How are the Local Authorities deciding upon the Distribution of Development in the Joint Local Plan and how does this relate to the Joint Local Plan’s objectives?

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Introduction

In early 2016 Plymouth City Council, West Devon Borough Council and South Hams District Council decided to combine their three separate, emerging Local Plans into a single Joint Local Plan. The Local Authorities considered that a single Local Plan was the best way to meet the needs of their local authority areas and to achieve their key objectives. How the three local authorities made decisions about why they chose to pursue a Joint Local Plan is explored further in the section in this topic paper on “Why and how we decided to produce a Joint Local Plan”.

The Joint Local Plan needs to have a strategy for distributing development in the plan area. This is a cornerstone of the plan that will support the plan’s objectives and guide its policies and proposals. It is a response to the question of how to address needs that have been identified, in particular the need for housing and employment. The section on “What are we trying to achieve with the Joint Local Plan?” signposts the emerging work on our Housing and Economic Development Needs Assessment, a key part of the plan’s evidence base.

When the authorities decided to produce a Joint Local Plan, they had already undertaken considerable amounts of work on their separate Local Plans. This work included looking at the objectives each local authority wanted to achieve through their Local Plans, and various levels of work looking at alternative ways to achieve those objectives through the Local Plans. The emerging Plymouth Plan and the West Devon-Our Plan fully considered development distribution. Initial work on the South Hams – Our Plan started the conversation about development and distribution. The Authorities were also mindful of the context provided by previous plans and the momentum for change in national policy. This is explored further the section on “The historic context for our distribution strategy”.

Now the Councils are taking the opportunity of moving from three plans to one Joint Local Plan, to revisit this matter and build on the earlier work. This is not a restart, but a refresh and update based on the latest evidence. The Councils emphasise that they are maintaining an open mind in revisiting this matter. The distribution of development is one of the crucial matters where we need to look at what are the reasonable alternatives throughout plan preparation.

The move opens up ways to address the needs of the plan area. It strengthens the focus on the effective distribution of development. The topic paper concentrates on how to distribute development across the Joint Plan area. It identifies the options we considered for the distribution of development across the Joint Local Plan area, and shows the assessment of the alternative options that we undertook.

This topic paper also looks at a second strand, which is the Joint Local Plan’s suite of strategic plan objectives. The choice of strategic objectives is important for plan-making. They set the framework for the Joint Local Plan’s policies and proposals. They also provide the context for assessing the different ways to achieve the long term vision for plan area.

Again, the Councils are taking the opportunity of moving from three plans to one Joint Local Plan, to build on that earlier work. They face the challenge of streamlining the objectives set out in the emerging plans for Plymouth and West Devon, and early discussions about South
The challenge is to weave the objectives seamlessly together so that the Joint Local Plan expresses strategic objectives for the plan area. Changing circumstances and issues raised in responses received through plan making consultation stages must also be considered. This is explored further in this topic paper in the section on “Towards the Joint Local Plan’s Strategic Objectives”.

As well as guiding the Plan’s policies and proposals, these strategic objectives are used to assess alternative approaches during plan-making. Government policy and guidance indicates that there will be few or no alternatives for some aspects of the plan. However, there are crucial matters where the Councils will need to consider alternatives. The distribution of development is one of those matters.

The Councils must consider whether potential alternatives would fulfil the strategic objectives of the plan and whether the alternatives can be delivered. Alternatives that meet these tests are “reasonable”. The Councils must test reasonable alternatives through the Sustainability Appraisal process, consistent with legislation.

A first assessment of the strategic distribution options is set out in Appendix 1 of this paper. The results are drawn together and analysed in the section on “Towards a Preferred Option”. It looks at the steps taken so far and the steps that the Councils still need to take before taking decisions for the next plan making stage.

At this stage, the Councils have not yet reached a decision on the preferred distribution strategy for the Joint Local Plan. Work has progressed but there are key evidence documents that are still in preparation which will inform that decision, notably:

- The viability assessment of the Joint Local Plan
- The Infrastructure Delivery Plan
- The transport assessment
- Evidence on deliverability including the land supply for development and housing trajectories
- The Integrated Assessment of the Joint Local Plan (including the Environment Report) to be published and consulted on alongside the Publication version of the Joint Local Plan

The Councils anticipate that this topic paper will be updated once that evidence is available. It will form part of the evidence base that informs the next stage of plan-making and justifies the emerging plan. The updated paper will identify which options are reasonable and which are not. It will also draw conclusions about the performance of the reasonable alternatives and justify the conclusion about which is the preferred option.
Why and how we decided to produce a Joint Local Plan

The Plymouth and South West Devon Joint Local Plan is being produced collaboratively by Plymouth City Council, South Hams District Council and West Devon Borough Council. The decision to produce a Joint Local Plan arose from work the three local authorities had been pursing through the Duty to Cooperate on their separate Local Plans – the Plymouth Plan, the West Devon Our Plan and the South Hams Our Plan.

Clearly, prior to that decision, each of the local authority’s Local Plan processes had reached different stages in the plan making process. The Plymouth Plan Part One (dealing with overarching strategy and policies) had been published as a draft and its approach had been subject to a draft Sustainability Appraisal. The West Devon Our Plan had actually reached a Regulation 19 Pre-Submission consultation stage, and had therefore been published with a draft Sustainability Appraisal. Both of these plans had therefore been subject to appraisal of the approach to development which was set out and any reasonable alternatives to that approach. The South Hams Our Plan, however, had only reached an early Regulation 18 ‘Issues and Options’ stage, and had not therefore been subject to a Sustainability Appraisal.

The three local authorities had been working together through the Duty to Cooperate, along with Dartmoor National Park Authority, Devon County Council and Cornwall Council, for several years before the decision to move to a Joint Local Plan. This cooperation resulted in joint evidence base documents being produced, and the identification of cross boundary issues that each local authority would need to pick up in their Local Plans. Some of these issues revolved around the emerging requirement for Plymouth City Council to work with its neighbours to explore whether some of its needs could be met in adjoining local authority areas. Further work had suggested that in particular, South Hams District Council and the City Council needed to work closely to find potential locations for urban extensions on the edge of Plymouth, but within South Hams’ area.

Much of this thinking was set out in the 2014 “Sub Regional Growth” Topic Paper (http://plymouth.objective.co.uk/portal/planning/lfd/plymouth_plan/ppto_sub_regional_growth). This paper was consulted on as part of the City Council’s Plymouth Plan Connections engagement process, but set out the position which had been reached in the Duty to Cooperate discussions between the local authorities. By 2015, the City Council had firmed up many of the themes set out in the Topic Paper, and had embedded these in its draft Plymouth Plan Part One, which was published for consultation in January 2015 along with a Sustainability Appraisal (http://web.plymouth.gov.uk/sustainability_appraisal-2.Pdf).

Given the outcomes of the ongoing Duty to Cooperate discussions, during 2015 Plymouth, South Hams and West Devon began to examine whether they should consider rolling their separate Local Plans into a single Joint Local Plan. The starting point for this consideration was a growing understanding of the need to consider the three Local Plans as together meeting the needs of the Plymouth Housing Market Area, and therefore needing to present a clear and consistent strategy and approach to the HMA. The question became, what is the most effective and efficient plan to meet those needs?

- It enabled the three local authorities to plan more effectively for the needs of the HMA in a single plan, setting out a single strategy and subject to one plan making process.
• It enabled the cross boundary issues which would have required close alignment of separate Local Plans, to be tackled more simply in one plan which was not constrained by local authority administrative boundaries.
• The three local authorities would be able to better handle development proposals and delivery through a single integrated set of policies.
• A single, Joint Local Plan would give Plymouth and South West Devon a single, stronger voice in the wider region.

More on this decision can be seen in the reports to the Councils (here) and in material set out during the engagement on the Joint Local Plan in July 2016. Further details about the actions undertaken through the Duty to Cooperate and the outcomes achieved will be set out in a separate topic paper on the Duty to Cooperate, that will be part of the Joint Local Plan’s evidence base when the Publication Joint Local Plan is published for consultation.

In addition, the Joint Local Plan will be subject to a single Habitats Regulations Assessment (HRA) as required under the Conservation of Habitats and Species Regulations 2010 which will be submitted as a single document building on the conclusions of the draft HRA as produced to support the ‘West Devon Our Plan’ document.

When the three local authorities moved to producing a single Joint Local Plan, it was necessary to look again at the cross boundary issues, to understand the objectives that could apply to a Joint Local Plan and how these may differ from three separate Local Plans, and to understand how those objectives could better be achieved using a Joint Local Plan. Although the work done on the separate local Plans is carried forward, the starting point for this paper is to look at these issues in the Joint Local Plan. This includes the strategic distribution of development and strategic objectives.
What are we trying to achieve with the Joint Local Plan?

One of the first elements of the Joint Local Plan we need to understand is what the Plymouth Housing Market Area (HMA) is, and what are the needs we must plan for – especially the need for new homes. These elements are part of the Housing and Economic Development Needs Assessment, which is being prepared as part of the evidence base for the Joint Local Plan. The HEDNA will set out:

1. The definition of the Plymouth Housing Market Area. The HMA is defined as the local authority areas of Plymouth, South Hams and West Devon, and the Joint Local Plan has been configured to cover those parts of the HMA not covered by Dartmoor National Park. It is accepted that the HMA definition has an element of pragmatism, given that the surrounding HMAs (Cornwall, North Devon, Torbay and Exeter) have already been defined either in evidence or adopted Local Plans along local authority boundaries. Nevertheless, the HEDNA also shows that there is objective evidence available to justify this definition of the HMA (http://web.plymouth.gov.uk/1_hma_note_on_migration_and_commuting_final.pdf).

2. The objectively assessed need for the housing relating to the Plymouth HMA. The HEDNA has used the methodology set out in the NPPG and national guidance to calculate the objective need for housing in the HMA. It has found that there is a need for 30,300 new homes in the Plymouth HMA between 2014 and 2034. As a result of the updated official DCLG 2014 based Household Projections which have been released since the last consultation, Devon County Council are updating their POPGROUP model to include the new 2014 household representation rates and latest mid year population estimate. This may have implications for the Objectively Assessed Need (OAN). Other evidence, including topic papers on housing and employment, and an updated Sustainability Appraisal that appraises the scale of development as well as its distribution, will inform the next stage of plan making. This will be published as part of the evidence base with the Publication version of the Joint Local Plan.

The HEDNA therefore provides the evidence of the area the Joint Local Plan should cover, and most crucially for the number of new homes the plan should accommodate.

A final related point concerns whether the Joint Local Plan should seek to accommodate all of the HMA’s needs. The NPPF states clearly that Local Plans should aim to meet housing needs in full. Our starting point is therefore to seek a strategy which enables us to meet these needs of the HMA in full, mindful of accommodating a modest part of that need within that Dartmoor National Park which lies within the HMA but outside the area of the Joint Local Plan.
The Historic Context for our Distribution Strategy

In developing these over-arching objectives, we were not starting with a ‘clean sheet of paper’. The Joint Local Plan, and the individual Local Plans that were being prepared previously, are reviews of existing plans and strategies. The city of Plymouth and its surrounding area has been recognised as having potential for significant growth for at least the last decade, and strategies for accommodating that growth have been put in place through the following plans and strategies. They provide the historical context for the Joint Local Plan, forming the springboard for the plan’s strategy. They can also be used as a reality check when considering whether the plan should continue or change strategy.

- **Devon Structure Plan 2001 – 2016 (adopted 2004; revoked 20 May 2013).** The Structure Plan set out several key principles which established the importance of Plymouth as a centre for economic growth in Devon and the wider region, and also as providing an important focus for residents of the surrounding areas. The Structure Plan set out the concept of a Plymouth Principal Urban Area which extended beyond the city’s boundaries, and established the principle of a new settlement at Sherford. Important principles were set out in Policy ST6, including that Plymouth should:
  - act as the primary focus for major economic investment and regeneration in the western part of Devon;
  - enhance its role as the main commercial centre within the Western Sub Region of the South West;
  - provide a wide range of regional services and specialist facilities necessary to meet the needs of the wider area.

- **The draft South West Regional Spatial Strategy (RSS) – published 2006, subject to examination in 2007.** The draft RSS was not adopted and the Regional Planning Guidance for the South West was revoked on 20 May 2013. Nevertheless, the draft strategy reiterated important principles regarding Plymouth and its surrounding area, which were considered by the Inspectors at the RSS examination in public and recommended for approval in the panel report. In particular the RSS reaffirmed the strategic importance of Plymouth to the Western Peninsula sub region, setting out in Policy SR32 “Specifically at Plymouth, measures will be taken to transform and revitalise the city for significant growth in economic activity and housing, in order for the city to realise its potential and enhance its sub-regional role.” The RSS set out a spatial strategy for Plymouth and the wider area, recognising the role of the city as a SSTC (Strategically Significant Town or City), and its importance as a focus for economic growth in this part of the South West (see Section 4.4 of the RSS, and policies SR32, SR33, SR34, SR35).

- **The Vision for Plymouth – (Mackay, Harradine and Zogolovich 2005).** The Vision for Plymouth set out the core principles of the growth agenda which has been pursued by public and private sector stakeholders in Plymouth for over a decade. The vision introduced the concept of Plymouth striving to become “One of Europe’s Finest Waterfront Cities”, and the principle that the city should grow to a critical mass of 300,000 people to support the facilities and attractions it should aspire to realise.
- **Plymouth Core Strategy and Local Development Framework (adopted 2007 – 2010).** Growing out of the Vision for Plymouth, the Plymouth Core Strategy was the first to be adopted by a major English city in 2007. It set out the principles advanced through the Devon Structure Plan and work on the South West RSS, alongside the aspirational approach of the Vision for Plymouth, into a set of locally distinct development plan strategies and proposals. The Core Strategy is the adopted development plan for Plymouth, and sets out the importance of the city’s growth to the wider area, and its role as the economic driver of a thriving sub region. Alongside the Sherford AAP (produced by South Hams District Council) it also established the planning framework for the Sherford New Settlement.

- **South Hams Core Strategy (adopted 2006) and Sherford AAP (adopted 2007).** The South Hams Core Strategy was one of the first Core Strategies to be adopted under the LDF system. It set out a strategy of sustainable growth focused on area and local centres, and established the specific role to be played by the Plymouth Principal Urban Area (the Plymouth Urban Fringe) and the Sherford new settlement. The Sherford AAP further set out the detailed planning framework for Sherford.

- **West Devon Core Strategy (adopted 2011).** The West Devon Core Strategy set out the principle of development in the Borough being concentrated on the two area centres of Tavistock and Okehampton. It drew out some of the linkages between Tavistock and Plymouth including the importance of the re-opening of the Tavistock to Plymouth rail link.

- **The Heart of the South West LEP Strategic Economic Plan (approved 2014).** The SEP sets out the strategy for boosting the economy of the Heart of the South West LEP area – which covers Devon and Somerset. It clearly sets out the economic growth at Plymouth as a key driver of the whole LEP area, and therefore expects the city to play its part in delivering that growth.

- **The West Devon Our Plan (Regulation 19 version published 2015) –** continued the approach set out in the West Devon Core Strategy of concentrating growth at Tavistock and Okehampton.

- **The Plymouth Plan Part One (approved by PCC Full Council 2015) –** continued the strategy of growth set out in the Core Strategy and Vision for Plymouth. The Plymouth Plan revisited the evidence for the growth of the city to ensure it was up to date and complied with the NPPF. As part of this exercise and in line with the Duty to Cooperate, the Plymouth Plan Part One also assessed the potential for some of Plymouth’s development needs to be accommodated within Cornwall, met entirely within the city’s boundaries, or whether further extensions into the urban fringe should be considered.

It is evident that a clear strategy for the growth and development of Plymouth and wider area has existed in adopted plans and strategies for a considerable amount of time. Key characteristics of this strategic approach have included recognition of the importance of the growth of Plymouth, both economically and demographically, to the success of the wider
region and sub-region, an emphasis on supporting and planning for the continuing growth of the city as a driver of the growth of the peninsula and LEP area, and a need to balance the growth of the city with the high quality environments surrounding it and the needs of the residents of the surrounding market towns to live in sustainable settlements and also be able to access facilities and functions in Plymouth.

In developing the Plymouth Plan and the West Devon Our Plan, and in early work on the South Hams Our Plan, the local authorities have not discovered any evidence to suggest that the above historic strategic approach and underlying principles should not continue to apply to Plymouth and South West Devon. Indeed, evidence developed as part of the HEDNA has shown that the city has continued to grow and attract investment at a faster pace over the last 10 years than at any previous time in the last 30 years, suggesting that the approach is working. In addition:

- Government policy is to promote sustainable economic growth and boost productivity, alongside driving a significant increase in the delivery of new homes by the end of the current Government’s term of office in 2020. Again, it would not therefore seem reasonable to pursue aims which did not seek to pursue economic growth in those parts of the Joint Plan area most able to support such aspirations.

- The NPPF clearly expects Local Plans to be positively prepared and promotes sustainable economic development. So a Local Plan which sets out a strategy including a major city such as Plymouth and sustainable market towns in surrounding rural areas would clearly be unsound if it did not attempt to promote a distribution of development which promoted sustainable economic growth.

Moreover, the Joint Plan Area contains a number of national landscape and environmental designations – such as the South Devon AONB, the Tamar Valley AONB, a World Heritage Site, Plymouth Sound & Estuaries Special Area of Conservation (SAC), South Dartmoor SAC, Tamar Estuaries Special Protection Area, seven further SACs and Sites of Community Interest and numerous Sites of Special Scientific Interest. The Plymouth HMA includes a large part of the Dartmoor National Park which the Joint Local Plan area therefore borders and forms the setting for, and there are many areas of historic interest – Scheduled Ancient Monuments, Historic Buildings and Estates and conservation areas. The national policy covering these assets require Local Plans to conserve them and to protect them from the impacts of development, so again the development strategy would not be following national legislation and guidance if it were to attempt to disregard such principles. It would not be reasonable to pursue an approach which did not aim to avoid harm to these places, consistent with legislation and national policy.

We can draw conclusions from this earlier work and the momentum of previous plans and strategies. These can be used to shape the over-arching strategic objectives for the Joint Local Plan. We conclude that:

1. The Joint Local Plan should facilitate and promote economic growth and regeneration in the HMA to meet the national agenda to boost growth, and should do so by focusing growth in those parts of the Joint Local Plan area most able to support these aims.
2. The Strategy should strive to guide development to locations which will contribute to the creation of sustainable settlements.

3. The Strategy should drive growth in locations that avoid harm to the AONB, the high quality natural environment of the HMA, and the historic environment, consistent with legislation and national policy.

These overarching drivers encompass the three facets of sustainable development set out in the National Planning Policy Framework – economic, social and environmental. We must use them to develop the strategic objectives that we will apply to test, at the highest level, development strategies which will inform where and how the growth needed in the HMA should be delivered.

The key aim is to deliver sustainable economic growth which respects the distinctiveness and high quality environment of Plymouth and South West Devon. Aspirations to grow and to transform the economy of the area continue to be a key element of the growth of the Heart of the South West LEP and for the south west region as a whole, acting as a counterbalance to Bristol and the West of England. The strategic objectives will need to balance those aspirations with the need to ensure that settlements develop as sustainable places with range of facilities and jobs to meet the needs of residents. Part of the recipe for success of the HMA is the superb quality environment which runs throughout the area – in terms of landscapes, the natural environment and the historic environment. Therefore, the drive for growth should not compromise or harm the quality of this environment, consistent with legislation and national policy.
Towards the Joint Local Plan’s strategic objectives

The second element of our thinking around the Joint Local Plan was to look at the over-arching objectives that the Councils were trying to achieve with the Joint Local Plan. These are the objectives that we will aim to deliver through the strategy, including the distribution of development, and policies in the Joint Local Plan. They form a useful set of yardsticks to use when assessing different ways in which the Joint Local Plan could meet needs.

The Joint Local Plan seeks to create places that respond positively to their surroundings, be that in the heart of the city, in the transitional environment of the urban fringe, or within the rural towns and villages. Regardless of location within the JLP area, the plan will enable people to turn these new places into thriving and resilient communities, how they will relate to and integrate with our existing communities, and provide positive and proactive responses to this.

The JLP will bring together the corporate objectives that direct the activity of each of the Councils involved. The essence of these complementary corporate objectives have been used to shape a set of Strategic Objectives that will apply across the JLP area, and provide a framework for meeting the varied needs and aspirations of all communities within the JLP area, and enable our communities to be resilient to change throughout the plan period.

Work on strategic objectives had already been in progress for preparing the following plans prior to the decision to move to the Joint Local Plan:

- The Plymouth Plan 2011-2031 Part One consultation draft (Jan 2015) consulted on a suite of strategic objectives guided by 5 principles, in the context of key themes
- West Devon – Our Plan (Regulation 19 Publication version February 2015) consulted on a suite of objectives focused on wellbeing, communities, homes, economy, infrastructure, environment, heritage and resources
- South Hams – Our Plan– early work in 2014 consulted on the scope of the plan.
Consultation responses provided information and views about themes on the vision, homes, economy, heritage, environment, resources, wellbeing and communities. These would help the Council in their work to develop plan objectives

Contained within the Plymouth Plan and the West Devon-Our Plan were the following suite of 10 over-arching objectives that have been consulted on previously:

1. Plymouth's strategic role is fulfilled as a regional city and a major economic driver for the heart of the south west.
2. Plymouth as a healthy city, where its people live in happy, healthy, safe and aspiring communities.
3. Plymouth as a growing city, which has used its economic, social, environmental and cultural strengths to deliver quality and sustainable growth.
4. Plymouth as an international city, renowned as the UK’s premier marine city and famous for its waterfront, maritime heritage and culture.

1. Empowering residents to create strong communities.
2. Creating places for enterprise to thrive and business to grow.
3. Enabling homes that meet the needs of all.
4. Securing the services and facilities which meet the needs of our communities.
5. Protecting, conserving and enhancing our built and natural environment.
6. Celebrating our past and protecting our heritage for the future.

These are a starting point, but our Joint Local Plan now needs to express the strategic objectives for the plan area. The challenge is to weave together the overarching objectives that emerged from the earlier plans for the three Authorities. The new suite of objectives need to form a coherent whole, and reflect the issues evidenced for the whole Joint Local Plan area.

As part of the plan making process, the three councils have taken the 10 over-arching objectives listed above and are using them to shape the Strategic Objectives for the Joint Local Plan. These are listed below.

**Economic**
- Create an environment for sustained economic growth that recognises the role of Plymouth as regional city and major economic driver for the Heart of the South West, and which supports a thriving rural economy;
- Provide and sustain Infrastructure, services and facilities that ensure our places function effectively and our communities are resilient to change;

**Social**
- Ensure that our residents live in happy, healthy, safe and aspiring communities;
- Deliver a range of new homes that meet the needs and aspirations of all sectors of the community, in sustainable locations across the Plymouth and South West Devon;

**Environment**
- Deliver high quality built environments that respond positively to the distinct characteristics of all settlements across Plymouth and South West Devon;
- Protect, conserve and enhance all aspects of our natural environment, including our nationally designated landscapes, our nationally recognised species and habitats, and all elements of our natural infrastructure that combine to make our area such an outstanding place to live;
- Protect, conserve and enhance the rich heritage that defines our high quality built and natural environments;
- Show responsible stewardship of our natural resources, and plan for the effective adaptation and mitigation of climate change.

These strategic objectives have been ‘bundled’ together under the headings of economic, social and environment, in order to assess the ability of the alternative distribution options to fulfil the objectives,
This focused set of Strategic Objectives can be clearly related back to those over-arching objectives which reflect the priorities and aspirations of each local authority, and also resonate with the core planning principles of the NPPF, and the requirement on Local Planning Authorities to enable and deliver sustainable development.

The Councils emphasise that these are emerging strategic objectives for the Joint Local Plan which will be refined, assessed for alignment with the Sustainability Appraisal’s sustainability objectives, and then set out in the Joint Local Plan at the next stage of plan-making.

The Joint Local Plan will also contain more spatially specific, ‘smart’ objectives in the chapters on themes and places. This creates a pyramid where the strategic objectives flow from the plan’s vision, supporting the Plan’s response to the issues being addressed through the spatial objectives which links clearly to the strategies and the related policies and proposals in the plan. The Joint Local Plan will need to make this structure clear by signposting this approach early in the plan, so that the reader knows that the plan is taking this approach and to aid understanding.

More detail on how we assessed these strategic objectives is set out in the appendix.
How to distribute development across the Joint Local Area?

Having thought through the emerging overall objectives that the Joint Local Plan is trying to achieve, our next step was to look at the ways in which development and growth could be distributed across the Joint Local Plan area.

Clearly, any approach which would be taken through to the final plan would need to be consistent with the strategic objectives discussed above, but we wanted to ensure that we had looked at several alternative approaches to distribution to ensure that we had explored any reasonable options.

The three local authorities had been discussing various options for the distribution of growth across the area through Duty to Cooperate meetings relating to their separate plan processes. These discussions had focused chiefly around the relationship to Cornwall and whether any of the HMA need should be accommodated in Saltash; along with other discussions around the role of Plymouth’s urban fringe and the potential for urban extensions. In terms of the West Devon Our Plan discussions had also covered the relationships between the settlements of West Devon and Callington and Launceston in Cornwall. Much of these discussions were summarised in Plymouth City Council’s 2014 topic paper titled “Sub Regional Growth” (http://plymouth.objective.co.uk/portal/planning/ldf/plymouth_plan/pptp_sub_regional_growth) and in the Sustainability Appraisals which accompanied the Plymouth Plan (http://web.plymouth.gov.uk/sustainability_appraisal-2.Pdf) and West Devon Our Plan in 2015, and were consulted upon alongside those plans.

Nevertheless, the advent of the Joint Local Plan meant that distribution options could be looked at more effectively for the whole plan area.

We began by looking at the very high level alternative approaches to where development could be located. The alternative approaches we looked at could be summarised as “Urban Intensification” implying all the needs of the HMA being met at Plymouth; “Urban Concentration”, implying that as much development as is feasible is focused at Plymouth; and dispersal of HMA needs across the whole plan area, which suggests that there is not a principle that as much development as possible is focused at Plymouth. It should be clear that these alternatives represent points on a scale of potential approaches. At one extreme is the potential approach of accommodating all the needs of the HMA within Plymouth’s administrative boundaries. At the other end of the scale is the potential approach of evenly distributing needs across all the settlements in the Joint Local Plan area. In between these two extremes are numerous variations of more or less development being focused at Plymouth. The options presented have attempted to choose clear points which enable the characteristics of the most reasonable alternatives to be tested.
Development Strategy Alternative Approaches

The "Urban Intensification" Alternative

We first looked at an alternative that was based on exclusively focusing the delivery of the needs of the HMA in the urban area of Plymouth. Clearly this alternative maximises the principle of growth at Plymouth, removing the need for locations for new development to be found in the surrounding rural areas. It would imply that the decision to undertake a Joint Local Plan has opened up the potential for Plymouth to ‘soak up’ all of the need for new homes and jobs in the whole HMA, thus removing the need for other locations to take any growth at all.

The opportunities and challenges of this approach can be summarised as follows:

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<tr>
<th>Alternative Options/variations</th>
<th>Opportunities</th>
<th>Challenges</th>
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<tbody>
<tr>
<td>1. Urban Intensification</td>
<td>Plymouth is the most sustainable location to accommodate the needs of the HMA.</td>
<td>Needs of Okehampton may not be fully served by accommodating all the needs at Plymouth.</td>
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<td></td>
<td>Optimum access to employment, facilities, healthcare, shopping, etc</td>
<td>Market Signals – will the housing market in the city support this level of growth?</td>
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<td></td>
<td>Concentration of population/labour force/jobs</td>
<td>Market signals – key social issues in South Hams/West Devon not resolved: meeting needs in SHWD, choice of accommodation in SHWD, increases in house prices in SHWD. Existing social problems are exacerbated</td>
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<td></td>
<td>Creates opportunities for greater physical and economic regeneration.</td>
<td>Impact on Tamar Valley SAC and and Plymouth Sound and Estuaries EMS.</td>
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<td></td>
<td>Infrastructure provision already planned/maximising use of existing investment.</td>
<td>Intensify need for support facilities – schools, healthcare, playing fields etc</td>
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<td></td>
<td>Maximise opportunities to provide infrastructure to promote city’s role.</td>
<td>Increases in commuting out of the city to provide labour force to fill SHWD jobs.</td>
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<td>Newly forming households in SHWD would have to move to Plymouth to find accommodation.</td>
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<td>Fewer people to work in jobs in SHWD.</td>
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<td>Alternative Options/variations</td>
<td>Opportunities</td>
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<td>Undermine the economy of the rural areas.</td>
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<td>Inability to deliver all the infrastructure needed to support sustainable development due to natural / physical constraints</td>
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<td>Environmental challenges - AQMA issues etc would be increased if all growth within Plymouth</td>
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<td>Increased severance within the City due to transport - ie wider / bigger roads etc</td>
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<td>Increased commuting out of the city places greater burden on regional transport links such as the A38</td>
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</tbody>
</table>

Our assessment of this alternative is set out in the Appendix. We felt that Urban Intensification would have a number of both positive and negative impacts on sustainability. Fundamentally urban intensification would not help to create balanced communities within the Joint Local Plan area and could have a number of negative social impacts in terms of health, access to services, encouraging growth and providing access to a suitable mix of good quality homes within the whole Joint Local Plan area. Whilst intensifying development within the city could provide communities within the city with optimum access to employment, facilities, healthcare and shopping it could also provide a greater imbalance in the communities of the Joint Local Plan area by increasing problems of access to affordable housing in the thriving towns and villages, this in turn could threaten the provision of essential services and facilities. In a nutshell focusing on urban intensification could be seen as ‘planning for decline’ in the rural areas.

Urban Intensification will be at odds with the requirement in the NPPF to ensure that the growth meets the wider needs of the Housing and Functional Economic Market Areas, and delivers growth in sustainable locations across the whole plan area. Development should be located so as to meet objectively assessed need but also to address changing community needs such as household sizes, types and tenures. The strategy should also provide opportunities for the local authorities to plan positively for innovative housing solutions within their areas such as self-build, live work units and other ways of delivering affordable housing.

When we looked at this option in some more detail, the following variations could be also be considered:
1. Urban Intensification – only within Plymouth City administrative boundaries. This variation implies that all of the development needs of the HMA are accommodated within the administrative area of Plymouth, implying a very significant intensification of the built environment in the city.

2. Urban Intensification – including urban extensions in the city’s urban fringe. This variation recognises that the administrative boundaries of Plymouth City are drawn very tightly to the urban area, meaning that there are limited opportunities to expand the urban area without extending into the neighbouring South Hams District. This option therefore implies that all the development needs of the HMA are met at Plymouth, but using urban extensions as well as intensification of the city within its administrative boundaries.

We looked at these variations to see whether they might mitigate some of the more challenging aspects of the Intensification option – the opportunities and challenges of each are set out below:

<table>
<thead>
<tr>
<th>Alternative Options/variations</th>
<th>Opportunities</th>
<th>Challenges</th>
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</thead>
</table>
| Urban Intensification – within Plymouth admin boundaries | Maximises opportunities to use brownfield land.  
Greater patronage of public transport in City improves its cost efficiency & viability  
More sustainable transport including walking and cycling benefitting health and well being  
Greater potential for cost effective low carbon energy distribution networks  
Increase Plymouth’s regional reputation.  
Minimises impact on high quality natural and built environments in South Hams/West Devon.  
Opportunities to link closely to urban networks/more opportunities to support public transport services etc. | Higher risks/costs from use of brownfield sites relating to land contamination/ ground conditions  
Availability of land – insufficient land available in Plymouth without building on sensitive green spaces and using employment sites etc.  
Impact on quality of the urban environment in Plymouth.  
Surface water drainage in the city  
Impact on health/well being from loss of green space; higher density use; impact on air quality dependent on car use;  
Infrastructure constraints – cost and ability to deliver infrastructure to cope with additional growth.  
Loss of Quality City agenda tested as part of Plymouth Plan SA.  
Challenge of integrating new and existing communities |
<table>
<thead>
<tr>
<th>Alternative Options/variations</th>
<th>Opportunities</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban Intensification – including urban extensions in the urban fringe</td>
<td>Bigger return on infrastructure investment/land values because of use of large greenfield sites.</td>
<td>Loss of greenfield land/agricultural land/food security</td>
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<td></td>
<td>Greater choice of sites</td>
<td>Complete change of identity for rural areas and communities in the urban fringe.</td>
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<tr>
<td></td>
<td>More straightforward sites to deliver.</td>
<td>Sacrifice the existing landscape and environmental setting of the city.</td>
</tr>
<tr>
<td></td>
<td>Lower density of development than Option 1a.</td>
<td>Impact on national designations (AONBs)/National Park and their settings.</td>
</tr>
<tr>
<td></td>
<td>Should leave more brownfield land for other uses/employment within Plymouth.</td>
<td>Impact for existing population – longer travel times due to increased congestion</td>
</tr>
<tr>
<td></td>
<td>Greater protection for employment land/open space etc within the city.</td>
<td>Greater flooding issues/surface water</td>
</tr>
<tr>
<td>Alternative Options/variants</td>
<td>Opportunities</td>
<td>Challenges</td>
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<tr>
<td></td>
<td>More scope to coordinate investment – possible to plan for the larger urban extensions more effectively than piecemeal developments. Evidence of developer interest. Less disruptive to residents of Plymouth than Option 1a, in terms of amenity and the quality of the urban environment. Opportunities to link closely to urban networks/more opportunities to support public transport services etc. Ability to create mixed use developments inc employment, support and facilities, adapt to people's live/work patterns, travel requirements etc.</td>
<td>drainage in the city. Utility and services challenges to provide infrastructure for significantly greater population. Impact on trunk road network/need for strategic infrastructure. Impact on air quality on roads across city, dependent on car use</td>
</tr>
</tbody>
</table>

The appendix sets out our assessment of these variations to the 'Intensification' option.

The analysis suggests that the first variation could have significant impacts on the City's aspiration to be a 'quality city' - which was an approach discussed in the City Council's Housing topic Paper in 2014 (http://plymouth.objective.co.uk/portal/planning/ldf/plymouth_plan/pptp_housing?pointId=3082741) and tested through the Sustainability Assessment which accompanied the Plymouth Plan in 2015 (http://web.plymouth.gov.uk/sustainability_appraisal-2.pdf). In order to deliver the required levels of growth the City would need to consider the delivery of housing, employment and other development on sites which are currently being considered as important green spaces, or placing increasing levels of development on flood zones 2 and 3. This intensification of development could also have impacts in terms of air quality within the city due to the travel implications including encouraging commuting in and out of the thriving towns and villages of South Hams and West Devon as the majority of jobs would be located within the city limits. Intensification could also have implications in terms of increasing light pollution and noise within the city as development is intensified and density is increased.
which again would have implications for the quality of the environment. It might also be
difficult to ensure that the biodiversity and local wildlife are not impacted on by increased
density of development.

In the second variation there may be more ability to create some quality development on the
edge of the city but there is the possibility that in an attempt to deliver all of the required
growth, 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,
Yealmstone and Yelverton by changing their character and causing a blurring of the edges of
the city and contributing to town cramming and urban sprawl.

In conclusion, our assessment found that a development strategy based on urban
intensification fails to meet the basic principles set out in the NPPF relating to sustainable
development and will also fail to meet the needs of all communities within the local plan area.
There needs to be a more balanced approach to development within the ‘Plan Area’ which
seeks to address as many of the key issues identified. Whilst intensifying development in
and around the fringes of the city might have some environmental benefits for the rural areas
it will not address some of the social and economic problems which affect the area. Urban
intensification may improve access to homes, jobs and services for those in the City but could
have negative impacts on the environment and could in turn impact on health and well being
of communities.

The "Urban Concentration" Alternative

We then looked at the alternative approach which we termed "Urban Concentration". This
alternative suggests that the majority of development to meet the needs of the HMA is
concentrated at Plymouth, but with a significant proportion of the needs of the HMA being
accommodated in the wider plan area. This alternative expects that the development needs
of the HMA will be met in locations across the HMA, but with an emphasis of concentrating
growth at Plymouth. Given that Plymouth is clearly the dominant urban area of not just the
HMA, but also the wider Western Peninsula, this alternative most closely matches the existing
pattern of development in the HMA, and also matches the development strategy that has
been pursued over the past decade.

The opportunities and challenges of this approach can be understood as follows:

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<thead>
<tr>
<th>Concentration at Plymouth</th>
<th>Opportunities</th>
<th>Challenges</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Plymouth is the most sustainable location to accommodate the needs of the HMA.</td>
<td>May mean that some of the needs of the rural areas are met at Plymouth.</td>
</tr>
<tr>
<td></td>
<td>Concentration of population/labour force/jobs</td>
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<tr>
<td>Opportunities</td>
<td>Challenges</td>
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<tr>
<td>Optimum access to employment, facilities, healthcare, shopping, etc</td>
<td>Need to maximise growth potential of Plymouth may place strain on infrastructure/services/land availability.</td>
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<td>Infrastructure provision already planned/maximising use of existing investment.</td>
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<tr>
<td>Takes pressure off the rest of South Hams/West Devon.</td>
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<tr>
<td>Maximises labour force availability to Plymouth employers.</td>
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<tr>
<td>Continues strategic approach of the last 10 years</td>
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Our assessment of this alternative is set out in the appendix. Concentration of development within the City with a proportion of development going to the wider area of South Hams and West Devon provides a good opportunity to balance growth across the wider area and set out a strategy which meets the needs of the Joint Local Plan Area and deliver a sustainable pattern of growth. Concentrating development within the City and allowing a level of growth within the rural areas makes sense in terms of delivering a sustainable strategy for the whole Joint Local Plan Area. This approach continues a strategy which has historically developed over time through previous iterations of the Regional Spatial Strategy and the Devon County Structure Plan. This approach will allow development within South Hams and West Devon which will help meet needs for housing and employment development.

Our analysis also showed, however, that in order to assess the sustainability of this approach we needed to think about how development meeting the needs of the HMA should be distributed within South Hams and West Devon. For this approach to work it is important that key infrastructure is able to be delivered alongside the development to ensure that the strategy delivers sustainable development. A number of variations have therefore been set out which have varying degrees of impact on the area as whole:

1. Concentration on Plymouth and adjoining settlements, creating a ‘necklace’ of settlements/garden villages. This variation suggests that the villages which are located closest to Plymouth are expanded as ‘garden villages’ to accommodate a significant proportion of the growth of the HMA along with Plymouth plus its urban extensions.

2. Concentration on Plymouth and key transport corridors. This option suggests that the needs of the HMA are met in Plymouth, including urban extensions, and then at locations along the main transport corridors to the city. These corridors are chiefly the A386 to the north of the city as far as Tavistock and to the east of the city along the A38 and A379, and taking in Ivybridge.
3. Concentration on Plymouth and New Settlements. This option suggests that the needs of the HMA outside Plymouth should be met through the planning of one or more new settlements. The West Devon Our Plan suggested the possibility of a new settlement in West Devon, and at various times other locations for new settlements have been suggested in South Hams. Clearly, the Sherford new settlement has been planned as a way to meet the needs of Plymouth and South West Devon in the past, and will continue to be developed meeting the needs of the HMA through the Joint Local Plan. This option looks at whether further new settlements could be used to meet needs.

4. Concentration on Plymouth and the Area Settlements. This option suggests that the needs of the HMA are met through concentration of development in Plymouth and also in the six market towns or area centres of West Devon and South Hams – ie Okehampton, Tavistock, Ivybridge, Totnes, Dartmouth and Kingsbridge.

5. Concentration on Plymouth, Area Centres and Local Centres. This option is as option 4 but also includes the Local Centres of West Devon and South Hams – ie those larger villages/small towns which have sufficient facilities and sustainability characteristics to support modest growth.

6. Concentration on Plymouth, Area Centres, Local Centres and villages that meet a minimum level of sustainability criteria (excluding villages in the AONB)

7. Concentration on Plymouth, Area Centres, Local Centres and all villages that meet a minimum level of sustainability criteria, including within the AONB

The opportunities and challenges of each of these options is set out below:

<table>
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<tr>
<th>Variation</th>
<th>Opportunities</th>
<th>Challenges</th>
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</thead>
</table>
| Concentration on Plymouth and adjoining settlements – necklace of settlements/garden villages | Settlements already ‘look towards’ Plymouth
Prevents coalescence of settlements with Plymouth.
Protects environmental character of the Urban Fringe.
Increases choice of sites, necklace locations attractive to market and to developers, and bring forward some housing at an early stage | Undermines the delivery of existing developments (Sherford) or more sustainable urban extensions.
Settlements to expand are not chosen on basis of infrastructure availability/sustainability – purely on proximity to Plymouth.
Affordability issues in settlements in rest of South Hams/West Devon still exist.
Not attempting to address social issues in wider rural areas. |
<table>
<thead>
<tr>
<th>Variation</th>
<th>Opportunities</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concentration on Plymouth and key transport corridors.</td>
<td>Recognises the relationship of Tavistock and Ivybridge to Plymouth for jobs and services. Greater patronage of public transport on corridors improves its cost efficiency &amp; viability Makes case for investment in key routes. Works with existing patterns of travel and commuting Increases choice of sites</td>
<td>Reinforces existing patterns of movement, placing greater stress on transport routes Increased cost of improving public transport links to Plymouth Places greater pressure for growth on Ivybridge and Tavistock leading to infrastructure pressures/stress on services. Could act to reinforce perception of Ivybridge as a commuter town, rather than encouraging its development as a sustainable settlement. Could act as a disincentive to town centre investment in Ivybridge/Tavistock given reliance on Plymouth Increase in demand for public transport requires extra investment / capacity in bus / train links Demand for bus and rail links overloads what's already there, thereby worsening the journey experience and making it less likely that people will use it.</td>
</tr>
<tr>
<td>Concentration on Plymouth and New Settlements</td>
<td>Relieves pressure on existing settlements Development needs can be met in specific locations minimising harm to sensitive high quality environments</td>
<td>Long lead in times until development starts Complex landownership/delivery arrangements. No sites for new settlements have been examined/.promoted.</td>
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<tr>
<td>Variation</td>
<td>Opportunities</td>
<td>Challenges</td>
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<tr>
<td>New settlements allow key infrastructure to be planned most efficiently.</td>
<td>Not as sustainable as looking at urban extensions first.</td>
<td>Cost/viability issues from need for significant investment in new infrastructure- and could lower the ability to deliver affordable housing</td>
</tr>
<tr>
<td>Opportunity for comprehensive master-planning of new settlement(s) to create sustainable place(s) including mixed use development; landscape scale Green Infrastructure; and full network of footpaths/cycleways and public transport.</td>
<td>Greater uncertainty over long term viability eg service provision delivery</td>
<td>Uncertainty over attractiveness of new settlement location for employers/businesses</td>
</tr>
<tr>
<td>Enable creation of a new town centre or higher order centre consistent with scale of new settlement - reduce need to travel.</td>
<td>New or higher order town centre could draw trade from town centres in South Hams / West Devon undermining their viability</td>
<td></td>
</tr>
<tr>
<td>Concentration on Plymouth and the Area Settlements.</td>
<td>Enables sustainable distribution of growth to main settlements across the Plan area</td>
<td>Implies a greater focus on market towns which may place pressure on services</td>
</tr>
<tr>
<td>. Continues broad approach as set out in plans over the last decade.</td>
<td>Parts of Dartmouth and Kingsbridge are in the AONB, and parts of Tavistock are in the World Heritage Site so there are constraints.</td>
<td>May lead to restraint in larger villages/local centres which have capacity to deliver some growth and a need for development to support services.</td>
</tr>
<tr>
<td>Sustains the Plymouth growth agenda and enables levels of growth to support the sustainable characteristics of market towns.</td>
<td>May lead to restraint in larger villages/local centres which have capacity to deliver some growth and a need for development to support services.</td>
<td>Could result in service rationalisation focused on area centres increasing the need to travel from Local Centres and villages</td>
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<tr>
<td>Provides a level of development to support growth of facilities/services in market towns.</td>
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<tr>
<td>Variation</td>
<td>Opportunities</td>
<td>Challenges</td>
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</table>
| Concentration on Plymouth, Area Centres and Local Centres | Enables sustainable distribution of growth to main settlements across the Plan area.  
Sustains the Plymouth growth agenda and enables levels of growth to support the sustainable characteristics of market towns.  
Enables most local need from South Hams/West Devon to be met locally and not displaced to edge of Plymouth or into Plymouth  
Provides a level of development to support growth of facilities/services in market towns.  
Enables a wider distribution of growth across the JLP area, enabling local centres to support services/meet affordable housing needs.  
Opportunity for greater public transport patronage in area and local centres and between these centre and Plymouth  
Delivers a balanced approach between providing as many sites for development as possible to maximise delivery, and using an approach which promotes sustainable economic development in the most appropriate locations | May limit choice of sites for developers across the JLP area.  
Affordable housing issues remain in the villages  
Parts of Dartmouth and Kingsbridge are in the AONB, and parts of Tavistock are in the World Heritage Site so there may be constraints.  
Effective mix and supply of housing issues remain in the villages - exacerbating affordability issues  
Possible decline of sustainable villages and loss of valuable services and amenities  
Need to reinforce retention/availability of public transport serving both area and local centres |
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<tr>
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<th>Opportunities</th>
<th>Challenges</th>
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<tbody>
<tr>
<td>Concentration on Plymouth, Area Centres, Local Centres and villages that meet a minimum level of sustainability criteria (excluding villages in the AONB)</td>
<td>Enables focused distribution of growth to main settlements across the Plan area but without impacting AONB&lt;br&gt;Allows considerable protection to designated landscapes&lt;br&gt;Sustains the Plymouth growth agenda and enables levels of growth to support the sustainable characteristics of market towns.&lt;br&gt;Enables most local need from South Hams/West Devon to be met locally and not displaced to edge of Plymouth or into Plymouth&lt;br&gt;Provides a level of development to support growth of facilities/services in market towns.&lt;br&gt;Enables a wider distribution of growth across the JLP area, enabling local centres to support services/meet affordable housing needs.&lt;br&gt;Opportunity for greater public transport patronage in area and local centres and between these centre and Plymouth.</td>
<td>Parts of Dartmouth and Kingsbridge are in the AONB, and parts of Tavistock are in the World Heritage Site so there may be constraints.&lt;br&gt;Effective mix and supply of housing issues remain in the villages - exacerbating affordability issues.&lt;br&gt;Restricting supply to outside the most expensive/desirable areas to live will further compound affordability issues, skewing the demographic profile even further towards older age groups&lt;br&gt;Possible decline of sustainable villages and loss of valuable services and amenities.&lt;br&gt;Displaces affordable housing need to areas outside the AONB, resulting is disconnect of rural families/communities.&lt;br&gt;Potential economic impact of not sustaining or expanding employment (other than tourism) in a large proportion of the JLP area - with a particularly acute impact on agricultural workers. &lt;br&gt;Need to reinforce retention/availability of public transport serving both area and local centres.</td>
</tr>
<tr>
<td>Concentration on Plymouth, Area Centres, Local Centres and all villages that meet a minimum level of</td>
<td>Enables sustainable and proportionate distribution of growth to settlements across the Plan area that are considered to be sustainable locations for new growth.</td>
<td>Parts of Dartmouth and Kingsbridge are in the AONB, and parts of Tavistock are in the World Heritage Site so there may be constraints.</td>
</tr>
<tr>
<td>Variation</td>
<td>Opportunities</td>
<td>Challenges</td>
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<tr>
<td>Sustainability criteria, including within the AONB</td>
<td>Continues the approach as set out in plans over the last decade. Sustains the Plymouth growth agenda and enables levels of growth to support the sustainable characteristics of all rural settlements with adequate services and facilities to support new growth. Enables most local need from South Hams/West Devon to be met locally and not displaced to edge of Plymouth or into Plymouth Provides a level of development to support growth of facilities/services in all sustainable settlements. Enables the widest distribution of growth across the JLP area whilst utilising the most sustainable locations in sustainable settlements. Ensures that proportionate delivery of affordable housing can benefit all rural communities Enables a more effective mix of new homes to meet identified local need - particularly acute in the AONB. Opportunity for greater public transport patronage connecting all rural settlements Provides opportunity to better integrate the AONB Management Plans into plan making and decision taking.</td>
<td>Potential environmental impacts on the AONB - requires an adequate policy framework to ensure appropriate levels and quality of development. Potential minor economic impact on tourism, although there will be tourism benefits too Need to reinforce retention/availability of public transport serving both area and local centres</td>
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</tbody>
</table>
The appendix sets out our assessment of these options, most of which are clearly concerned with alternative ways for the towns and villages of South Hams and West Devon to accommodate a proportion of the needs of the HMA. Our analysis made the following comments on these variations:

The first variation sets out a ‘necklace’ approach. Clearly, the settlements chosen to be within the ‘necklace’ would need to be set out in a strategy, and the choice of settlements would affect the sustainability of such an approach. Nevertheless, it should be clear that this variation implies 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. It would seem inevitable that some settlements would be close to Dartmoor or other areas of restraint and development in such locations would have numerous implications which need to be clearly identified. This variation could also undermine the delivery of Sherford, the new settlement within South Hams by creating opportunities for other locations close to Sherford to come forward ahead of the new Settlement. This variation presents a focus of development in and around the city and could be considered to be similar to the urban intensification options as it does not provide opportunities for the rest of the Joint Local Plan Area to grow.

The second variation sets out an approach which focuses on key transport corridors. This variation considers development options along key transport corridors such as the A38 and the A386 and would recognise the relationship between Tavistock and Ivybridge and the City. This variation could be expanded to look at transport corridors in the north of the HMA, particularly the A30 and the relationship between Okehampton and Exeter. There are also a number of other roads which could be considered as important transport corridors including A374, A385, A380. Concentrating development on transport corridors could have implications in terms of increased congestion and pressure on the strategic road network. This pressure would require this variation and any proposals for development to be accompanied by a package of mitigation measures to encourage the use of other modes of transport.

The third variation sets out an option of looking for new settlements within the HMA. The variation does not set out a specific location for any new settlements but focuses on the basic principles which would be involved. The development of new settlements require significant work to identify land available and then work with all the parties involved to set out a package which is considered available, deliverable and viable. Due to the detailed work required to bring forward a new settlement this option is unlikely to deliver any development during the plan period to 2034. Depending on their locations new settlements can have significant

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<th>Challenges</th>
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<td></td>
<td>Delivers a balanced approach between providing as many sites for development as possible to maximise delivery, and using an approach which promotes sustainable economic development in the most appropriate locations</td>
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</table>
impacts on the character of the local area which brings with it a large amount of challenges and issues to plan for and discuss with other stakeholders within the local plan area. The creation of new settlements could relieve pressure for development on existing settlements but could also create a new set of problems depending on locations. Given these challenges, it would seem that this variation 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.

The fourth variation sets out an option which looks towards the area centres within South Hams and West Devon to deliver the needs of this part of the HMA. This includes Okehampton, Tavistock, Ivybridge, Totnes, Dartmouth and Kingsbridge. It is notable that these settlements feature on important transport corridors. This variation seems to provide 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. A number of the settlements listed here have a number of constraints which impact on the level of growth each Settlement could accommodate. For example, Dartmouth and Kingsbridge are within the AONB and therefore any major development proposed in these locations would need to be avoided unless it could meet the tests set out in the NPPF. Parts of Tavistock fall within the World Heritage Site and this will have implications on the level and scale of growth provided in particular locations. Therefore, this variation would clearly need to look at appropriate levels of growth in each settlement, balancing needs and aspirations against the care needed to preserve the special character of the settlements and surrounding environment. This variation allows such a balance to be struck.

The fifth variation suggests concentrating growth in Plymouth, the area centres and local centres of South Hams and West Devon. In many respects this variation is a refinement of the fourth variation, recognising the role and range of facilities available in local centres, including Bere Alston, Hatherleigh, Lifton and North Tawton in West Devon and Modbury, Salcombe, Stokenham/Chillington and Yealmpton in South Hams. Again, 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. Given the three over-arching principles set out earlier, however, it would seem unlikely that these local centres would be expected to accommodate large amounts of development, over and above local needs, if they are subject to such environmental and landscape constraints. This option provides the greatest opportunity to strengthen the roles of area centres and also to recognise the important role as service centres which the local centres play within the wider area. This option would clearly not prevent some growth at villages within South Hams and West Devon, to meet local needs where appropriate sites could be identified. Many groups are beginning to prepare Neighbourhood Plans and it may be that these are the most appropriate vehicle for local communities to identify appropriate sites where there is a will to do so, and a need that the community can quantify. Clearly, the Joint Local Plan will also contain development management policies which will set out the circumstances when development proposals in these smallest settlements would be acceptable.

The sixth variation proposes a concentration of growth cascading down the settlement hierarchy to include ‘sustainable’ villages as well as the City, Area Centres and Local Centres, but without expecting settlements within the AONB to deliver any new growth. Many villages
within the rural areas sit within AONB landscapes, and this option would concentrate growth onto a ribbon of settlements between the A38 corridor and the AONB boundary. The potential social impacts of restricting growth to the areas outside the AONB are likely to be significant, as this option requires the plan to neglect to meet identified housing need within the AONB, the areas where the challenges of housing affordability, stock diversity and skewed demographic profiles are most keenly felt. Option 6 will undoubtedly bring with it a significant level of environmental protection, although that 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.

The final option 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.

The "Dispersal" Alternative

Finally, we looked at an alternative approach that would distribute the needs of the HMA across the whole Joint Local Plan area without an assumption that Plymouth should be the focus for meeting needs. The alternative starts from an assumption that development could be distributed evenly across the plan area, without the key principle underlying the previous alternatives, that Plymouth should be the focus for development in the HMA.

The opportunities and challenges of this alternative are set out below:

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<thead>
<tr>
<th>Opportunities</th>
<th>Challenges</th>
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<tbody>
<tr>
<td>Dispersal of Development</td>
<td>Impact on the rural road network and on main roads providing access to Plymouth, particularly for travel to work.</td>
</tr>
<tr>
<td>Supports the sustainability of the rural areas.</td>
<td>Greater pressure on facilities and services in lower order settlements.</td>
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<tr>
<td>Reduces the infrastructure burden/impacts on Plymouth.</td>
<td>Impact on character of settlements.</td>
</tr>
<tr>
<td>Meeting demands/desires of people to live in rural areas</td>
<td>Greater impact on smaller settlements.</td>
</tr>
<tr>
<td>Greater choice of sites and locations</td>
<td>Moving large parts of the Plymouth labour market away from Plymouth.</td>
</tr>
<tr>
<td>Assists in meeting affordable housing needs in rural areas.</td>
<td>Harder to provide infrastructure and services (critical mass) and cost which could create social inequalities.</td>
</tr>
</tbody>
</table>
## Development Strategy/Alternative Approaches

### Opportunities

| Protection of EMS, SAC, National Park |

### Challenges

| Weakens the principle of the growth of Plymouth – undermines Mackay Vision. |
| Unit cost of delivering services in a rural areas – ie higher capital and/or revenue costs to service providers. |

Our assessment of this alternative is set out in the appendix. Dispersal of the development across the whole of the HMA has a number of sustainability implications. It could be interpreted as the most sustainable way to distribute growth as it provides the best opportunity to disperse the growth evenly throughout the settlements. In some instances, this could increase the long term sustainability of a settlement by providing opportunities to provide a greater number of services and facilities within that community, however this could also be at the cost of the character of the community. The impact of the development would depend greatly on the scale and distribution of that development. One key aspect to carefully consider in this option is that it could potentially imply that development would take place within the AONB and in locations which would be close to or within other sensitive environments. Clearly such a strategy would not meet the principles set out earlier in this paper, and would require careful consideration of such development against the NPPF. As a point of principle, the distribution strategy of the Joint Local Plan is seeking to avoid locations which would harm the AONBs and other sensitive environments.

Dispersing development too thinly across the area could also have serious implications in terms of the coordination and delivery of essential infrastructure, a more coordinated approach to delivering development could help ensure that key infrastructure to serve communities was in place alongside the development, whereas dispersing development too thinly might mean that service delivery does not happen to support communities, thus exacerbating rural deprivation.

This alternative could help support the delivery of affordable housing in rural areas by enabling the smallest settlements to also deliver a level of housing needed to meet local need and in turn increase affordability within the rural parts of the HMA.

Not boosting the delivery of housing within the city and only enabling it to deliver ‘what it can’ could mean that the City would not be able to deliver its aspirations in terms of economic growth. This would have implications in terms of the long term sustainability of the HMA as it is recognised that the City needs to grow and change in order to ensure to meet its aspirations as set out in the Mackay Vision, and to strengthen its position as the commercial, cultural and economic centre of the wider region. The development Strategy for the HMA needs to recognise this important role of the city, delivering a range of attractive and transformative services, facilities and jobs to those that live in the surrounding area.

We also looked at the following variations to this alternative:
1. Limited dispersal – City of Plymouth delivers what it can, and the unmet HMA need is dispersed across South Hams and West Devon being met in all settlements with settlement boundaries. - ie without looking for extensions to the city in the urban fringe

2. Complete dispersal – development is shared out evenly across all settlements of the HMA.

The opportunities and challenges of these variations are set out below:

<table>
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<tr>
<th>Variation</th>
<th>Opportunities</th>
<th>Challenges</th>
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</table>
| **Dispersal – City of Plymouth delivers what it can, and the unmet HMA need is dispersed across SHWD across all settlements with settlement boundaries.** | Implies a degree of concentration at Plymouth
Implies a recognition that development should be directed to larger settlements | Implies a need to define how to assess what Plymouth can deliver – implies that development at Plymouth is not maximised and therefore growth of the city is held back.
Increases commuting to work in Plymouth and to access higher order retail/leisure opportunities, with implications for the Strategic Road Network
Distribution of development in rural areas is not decided on sustainability grounds.
Impact on existing community identity |
| **Complete dispersal - development is shared out evenly across all settlements of the HMA.** | Provides widest possible choice of sites encouraging greatest delivery rates
Viability of smallest settlements, ability to provide affordable housing is maximised.
Pressure for development is relieved in the larger settlements.
Attractiveness of rural settings for part of the market – providing choice of sites, and early delivery | Impact on the AONB and sensitive, high quality environments is not considered.
Plymouth’s growth is stopped and the city’s economic development potential is crippled.
Huge pressure placed on infrastructure/facilities in small settlements.
Unable to reach threshold to achieve economies of scale in provision of day to day services (eg to support school; local shop) |
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<th>Variation</th>
<th>Opportunities</th>
<th>Challenges</th>
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<td>Potential for use of small clusters that could accommodate ‘low impact’ living enabling alternative life-style choices, in conjunction with access to land in the countryside related to husbandry of the land and provision of a livelihood</td>
<td>High impact on existing community identity or in creating communities across a wide area and the social infrastructure to sustain them</td>
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<td></td>
<td>Impact of isolation on health and well being eg from dispersal of people including those on low incomes and vulnerable people, to locations without sufficient support and infrastructure</td>
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<td></td>
<td></td>
<td>Greater loss of greenfield and agricultural land; and implications for food security</td>
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The assessment of these options is set out in the appendix.

Clearly, much of the impact of the first variation will depend upon how much development can be accommodated within Plymouth, which is something which cannot be considered in this part of the assessment. It is possible, however, to identify the possible impacts of dispersing development across the whole of the HMA. Development will be dispersed amongst the settlements of South Hams and West Devon based on whether or not the Settlement has a settlement boundary or not. This approach could mean that some settlements which could take small amounts of development would not be given the opportunity to expand. Many of the settlement boundaries which are currently in place have not been produced with any particular guidelines or structure in place and therefore 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, therefore this may not be a robust way of distributing the growth.

There is little difference between the two variations in terms of the overall sustainability of the dispersal option. The first variation implies some emphasis on meeting needs at Plymouth but would still lead to substantial amounts of development being directed towards the settlements of South Hams and West Devon with effects on the character of those settlements, strain on infrastructure, impact on the AONBs and increased amounts of commuting. The second variation sets out an approach which distributes the growth evenly across all settlements within the HMA. Although this option would provide the greatest possible choice in terms of the sites to deliver development to meet the needs of the HMA, therefore maximising the pace of delivery of new homes, this variation would also 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. This variation would also have implications in terms of maximising the delivery of the growth within Plymouth. Overall, we considered that these options would lead to fundamentally unsustainable patterns of development which would work against the principle of promoting the growth and transformation of Plymouth, and would in fact lead to the stagnation and failure of the city.
Towards a Preferred Option

Each of the alternatives considered in this paper clearly has a range of associated opportunities and challenges, and some have clearer sustainable development characteristics than others. Our investigation of these options has been undertaken in order to suggest the most appropriate strategy to be used to distribute development across the HMA, but also to help move towards the decision about development strategy which meets the needs and aspirations which the stakeholders and communities of Plymouth and South West Devon, a process which we have been working towards for more than a decade.

From our analysis, some conclusions seem apparent:

- Neither of the ‘extreme’ options of either complete concentration in Plymouth or dispersal across the plan area is sustainable. Neither meets all three sets of bundled emerging strategic objectives, and both imply a shift from the strategy which has been pursued for over a decade and which has been reiterated in the SEP.

- A balanced approach which aims to concentrate development at Plymouth but which also aims to ensure that development takes place in the area and local centres of South Hams and West Devon is a much better fit with existing strategies and with the bundled emerging strategic objectives. This approach is also a more appropriate option with regards to the promotion of sustainable economic development and planning for a range of sites to be brought forward to meet needs.

- Elements of other options also have merit:
  
  - The need to minimise development in sensitive locations where the high quality natural environments could be harmed – eg the AONBs and Dartmoor National Park

  - The merits of recognising that Ivybridge and Tavistock have a slightly different relationship to Plymouth in terms of jobs and access to services

  - The principle of using urban extensions to Plymouth and other settlements is a more sustainable option than planning for new settlements to meet needs - particularly when there are no well advanced options for a new settlement which could lead to significant amounts of the HMA need being met within the plan period.

From this, the following ‘Emerging Preferred Option’ development distribution strategy can be described:

1. **Plymouth** is identified as the location which will drive the economic growth of the HMA. The City’s growth agenda has been in place for 10 years delivering new jobs and homes and transforming the city’s role and function, and this will continue to be delivered into the future, and indeed the assumption that the growth of the city that has been observed over the last 10 years will continue over the plan period has been a key element of the assessment of objectively assessed need for new homes. It would seem unreasonable to suggest that the
need for housing to support the continued growth of the city should not be met at Plymouth, including through the use of urban extensions in the city’s urban fringe, supported by other policy specific to the urban fringe.

2. **Tavistock and Ivybridge** are key settlements within the Plymouth TTWA, with close relationships with the city, and good quality public transport connections to Plymouth. These towns are identified as locations for sustainable development which will contribute to the economic success of the city.

3. **Okehampton, Totnes, Dartmouth and Kingsbridge** are important market towns which service extensive hinterlands where some further sustainable development can be accommodated. Such development can be located in places served by facilities, public transport and access to local jobs. Okehampton and Totnes also benefit from close links to Exeter and Torbay respectively, while Kingsbridge and Dartmouth are more constrained by AONB and other local constraints, and so are expected to see less development than the other area centres.

4. **Local Centres and Villages.** Across the plan area, there are a network of rural villages and larger local centres, associated with the market towns. These locations will clearly see limited levels of growth over the plan period. It is anticipated that development in these locations will come forward through allocations where appropriate, Neighbourhood Plans and criteria based policies.

5. **The Countryside** - outside Plymouth City and the designated fringe and those settlements with settlement boundaries it is anticipated that limited development will come forward through criteria based policies, including those specific to the countryside and Neighbourhood Plans where appropriate.

6. This paper has focused on the emerging high level strategic objectives and approaches to the distribution of development to meet the needs of the HMA, principally through looking at the Joint Local Plan area. Clearly **Dartmoor NPA** is also looking at the amount of development which can be accommodated in the Park, which will also contribute to the needs of the HMA. Plymouth, South Hams and West Devon have been discussing these issues with Dartmoor as part of the Duty to Cooperate, and the agreed position will be set out in a Memorandum of Understanding accompanying the draft Joint Local Plan when it is published for consultation. It will set out that a limited amount of development will be brought forward in Dartmoor through the National Park Authority’s Local Plan, in order to deliver on its aims and priorities and meet the needs of the HMA.

These six components will form the framework of the strategy for the spatial distribution of growth across the Joint Local Plan area.

In response to some of the issues raised in our assessment of the various approaches to distributing development, we are also suggesting that in order to focus growth in jobs and homes in Plymouth, and therefore maximise the city’s ability to deliver regeneration and a transformed economy, it is crucial to ensure that development is focused on the city and is not diluted by inappropriate levels of growth ‘leaking’ out to the rural areas and market towns.
We are therefore proposing to create two policy areas in the Joint Local Plan to create a climate for growth in the city to feed its ambitions for economic transformation and growth, and to ensure that growth in the rest of South Hams and West Devon reinforces the sustainability of its towns and larger villages and strengthens the high quality environments and landscapes across the Joint Local Plan area, to the benefit of communities and stakeholders across the HMA:

1. **‘Plymouth Policy Area’**, comprising an area including the city of Plymouth and its immediate urban fringe (see map below), where growth will be driven by the economic growth agenda and initiatives being delivered to drive and increase the pace of transformation and regeneration. The boundary of the Plymouth Policy Area has been drawn so that the policy area takes in environmental designations such as the Plym Valley in its entirety, and runs up to the AONB boundaries, enabling landscape designations to be developed which will offer protection to sensitive landscapes up to the city’s built limits.

2. **‘The Thriving Towns and Villages’**—comprising the rest of the HMA outside of Dartmoor where growth will be more modest and will lead to the consolidation of sustainable market towns and thriving hinterlands.

**Next Steps and Further Questions**
We have set out an initial assessment of this emerging Preferred Option in the appendix. Clearly there are still several tasks to be undertaken to set out the complete strategy in the draft Joint Local Plan:

- We must set out how many dwellings can be accommodated through the implementation of this strategy, and how much employment floorspace, and assess whether this will meet the needs of the HMA.
- We need to test the viability of the overall plan including the implications of the distribution strategy
- We need to complete the Sustainability Appraisal testing of the proposed distribution strategy together with the scale of development in the plan area and the policy areas
- We need to ensure that the proposed development does not have a likely significant effect on the designated sites and features of the Special Areas of Conservation and Special Protection Areas through the Habitat Regulations Assessment. As the preferred option is further refined to deliver the development of the Joint Local Plan Area, so, the Councils will look at ways to ensure that it does not result in a significant likely effect on any of the sites that are designated under the Habitats Directive. Avoidance and mitigation measures will be assessed against each factor in turn and applied to each of the designated sites and then further tested and refined working closely with Natural England. This information will be provided in the Habitat Regulations Assessment which will accompany the Joint Local Plan (for more information see the Appendix).
- We need to assess the deliverability of the plan including the implications of the distribution strategy regarding infrastructure development delivery, such as the housing trajectories
- We are continuing to refine this strategy as we develop the plan, looking at a number of questions which need to be answered as we investigate the delivery of the strategy. For example:
  - How to further understand those parts of the Joint Local Plan area which are most sensitive to development - the AONBs, the World Heritage Site, the undeveloped coast, and areas which are susceptible to coastal erosion and flooding.
  - How to balance these areas of restraint against the needs of communities in those areas for some development, for example for affordable housing.
  - How to accommodate the role of neighbourhood plans and the amount of development they could bring forward to contribute to meeting the needs of the HMA.

We are seeking views on the process we have used to arrive at this emerging development distribution strategy as clearly the strategy will form the backbone of the whole Joint Local Plan. We will use comments we receive on this paper, and the results of our own assessment and further questions, to set out the final version of the strategy, along with policies and site allocations to support delivery of the strategy, in the draft Plymouth and South West Devon Joint Local Plan which the Councils are anticipated to consider in February/March 2017. This draft plan, supported by its evidence base, plus a full draft Sustainability Appraisal of all elements of the plan, will then be consulted upon ahead of its submission to the Secretary of State for independent testing through an Examination.
Urban Intensification

Focus exclusively on the urban intensification of Plymouth. This option implies that in principle, all of the need for new homes to meet the needs of the HMA is accommodated in the urban area of Plymouth. Clearly this alternative maximises the principle of focusing growth at Plymouth, removing the need for locations for new development to be found in the surrounding rural areas. The following variations can be identified:

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<tr>
<th>Policy Options</th>
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<tbody>
<tr>
<td>A) Urban Intensification – only within Plymouth City administrative boundaries. This variation implies that all of the development needs of the HMA are accommodated within the administrative area of Plymouth, implying a very significant intensification of the built environment in the city.</td>
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<td>B) Urban Intensification – including urban extensions in the city’s urban fringe. This variation recognises that the administrative boundaries of Plymouth City are drawn very tightly to the urban area, meaning that there are limited opportunities to expand the urban area without extending into the neighbouring South Hams District. This option therefore implies that all the development needs of the HMA are met at Plymouth, but using urban extensions as well as intensification of the city within its administrative boundaries.</td>
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Commentary

Urban Intensification would have a number of both positive and negative impacts on sustainability. Fundamentally urban intensification would not help to create balanced communities within the Joint Local Plan area and could have a number of negative social impacts in terms of health, access to services, encouraging growth and providing access to a suitable mix of good quality homes within the whole Joint Local Plan area. Whilst intensifying development within the city could provide communities within
the city with optimum access to employment, facilities, healthcare and shopping it could also provide a greater imbalance in the communities of the Joint Local Plan area by increasing problems of access to affordable housing in the thriving towns and villages, this in turn could threaten the provision of essential services and facilities. In a nutshell focusing on urban intensification could be seen as ‘planning for decline’ in the rural areas.

Urban Intensification will be at odds with the requirement in the NPPF to ensure that the growth meets the wider needs of the Housing and Functional Economic Market Areas, and delivers growth in sustainable locations across the whole plan area. Development should be located so as to meet objectively assessed need but also to address changing community needs such as household sizes, types and tenures. The strategy should also provide opportunities for the local authorities to plan positively for innovative housing solutions within their areas such as self-build, live work units and other ways of delivering affordable housing.

The analysis suggests that the first variation could have significant impacts on the City’s aspiration to be a ‘quality city’ - which was an approach discussed in the City Council’s Housing topic Paper in 2014 (LINK) and tested through the Sustainability Assessment which accompanied the Plymouth Plan in 2015 (LINK). In order to deliver the required levels of growth the City would need to consider the delivery of housing, employment and other development on sites which are currently being considered as important green spaces, or placing increasing levels of development on flood zones 2 and 3. This intensification of development could also have impacts in terms of air quality within the city due to the travel implications including encouraging commuting in and out of the thriving towns and villages of South Hams and West Devon as the majority of jobs would be located within the city limits. Intensification could also have implications in terms of increasing light pollution and noise within the city as development is intensified and density is increased which again would have implications for the quality of the environment. It might also be difficult to ensure that the biodiversity and local wildlife are not impacted on by increased density of development.

In the second variation there may be more ability to create some quality development on the edge of the city but there is the possibility that in an attempt to deliver all of the required growth, 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, Yealmpton and Yelverton by changing their character and causing a blurring of the edges of the city and contributing to town cramming and urban sprawl.

In general terms urban intensification will have a number of other impacts including:

**Environmental Impacts**
Both of these options could have negative impacts on the quality of the city environment leading to increased density of development and loss of greenspaces. This could have a knock on effect on the quality of life for those living in the city and have implications in terms of health and wellbeing. The lack of development within the TTV may not necessarily bring positive benefits to the towns and villages, although no development could be seen as a good way of preserving the status quo in terms of environmental quality, there could be long term effects as the Plan Area becomes more and more unbalanced. City dwellers may well travel further to meet their recreational needs and this could have implications for some of the recreational areas within the TTV and in particular Dartmoor.

Balancing the need for new housing and other development within the city with the conservation and enhancement of biodiversity designations could prove difficult if urban intensification were to be followed.

Social Impacts

Both of these options will have implications for the delivery of services and facilities. Within the city there will be a concentration of development which could lead to better provision of services which might provide better options for city dwellers. However in rural areas the impacts are less tangible ...if there is little or no development this could place less strain on existing services but will also limit options for new services and facilities to grow. The lack of affordable housing in the TTV could also continue to exacerbate the trend of many of the young people moving to the city and leaving the TTV. This could have negative implications for the delivery of services as the population will be continuing the trend of becoming an older population.

Urban intensification will also have implications for the affordability of housing within the TTV. Market signals show that house prices within the rural areas are out of reach for many of the community in these areas. Housing waiting lists show that many are in need of affordable housing, if no development takes place within the TTV then there will be no opportunity at all to meet any of the housing needs of those in the local area. This will be contrary to the NPPF as the plan will be failing to meet the need for market and affordable housing within the Plan area.

There will be transport implications for the city which could exacerbate existing problems on the network and also have implications for air quality. In the Thriving Towns and Villages (TTV) the lack of development could have implications on the provision of bus services and the delivery of other modes of travel including cycling, walking and public transport. There are also plans within the TTV to deliver better rail services, if no development were to take place in this part of the plan area, this could have implications for the delivery of these proposed schemes such as the re-opening of the railway line in Tavistock or the provision of increased rail services between Okehampton and Exeter.
Urban Intensification will fail to address some of the identified health inequalities within the Joint Local Plan area. Within Plymouth there are less positive health outcomes for those living in deprived areas, it is unknown whether intensifying development within the city will improve deprivation or make it worse. The loss of green space to intensified development and an increased in density to accommodate housing need could have implications for the health of the city, there will be more people and less space. In the TTV the lack of development will not help address the current trend of an increasing elderly population which is placing greater demand on health services and facilities.

**Economic Impacts**

Both of these options provide the ability to concentrate the provision of jobs and the regeneration of the city which could in turn improve economic conditions within the city. However it will be more difficult to provide balanced communities as there may be a greater need to provide homes on land currently earmarked for employment uses in an attempt to ensure the provision of adequate housing. Developing in the City and the Urban Fringe (Option B) provides more opportunities to provide a range of employment land and locations but again whether this approach will meet the economic needs of the whole HMA has to be questioned. In the TTVs the lack of an employment strategy which includes the provision of land could lead to decline and increase the need for people to travel further for jobs. This approach could also lead to less opportunities for new businesses etc to form and improve the economy of the TTV. These options could also lead to out commuting from the city to the TTV to provide a workforce for jobs within the rest of the plan area. Within the TTV the opportunities to address the barriers to growth such as the supply of premises, skills and service shortages and the lack of adequate broadband and mobile provision in rural areas is unlikely to be addressed if there are no opportunities for growth in these areas.

**Conclusion**

In conclusion, our assessment found that a development strategy based on urban intensification fails to meet the basic principles set out in the NPPF relating to sustainable development and will also fail to meet the needs of all communities within the local plan area. There needs to be a more balanced approach to development within the ‘Plan Area’ which seeks to address as many of the key issues identified. Whilst intensifying development in and around the fringes of the city might have some environmental benefits for the rural areas it will not address some of the social and economic problems which affect the area. Urban intensification may improve access to homes, jobs and services for those in the City but could have negative impacts on the environment and could in turn impact on health and well being of communities.
Concentration of development

Concentration of development in the Plymouth urban area, but with a proportion of development needs expected to be accommodated in the city’s hinterland. This alternative expects that the development needs of the HMA will be met in locations across the HMA, but with an emphasis of concentrating growth at Plymouth. Given that Plymouth is clearly the dominant urban area of not just the HMA, but also the wider Western Peninsula, this alternative most closely matches the existing pattern of development in the HMA, and also matches the development strategy that has been pursued over the past decade. The following variations can be identified

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<tbody>
<tr>
<td>A) Concentration on Plymouth and adjoining settlements, creating a ‘necklace’ of settlements/garden villages. This variation suggests that the villages which are located closest to Plymouth are expanded as ‘garden villages’ to accommodate a significant proportion of the growth of the HMA along with Plymouth plus its urban extensions.</td>
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| B) Concentration on Plymouth and key transport corridors. This option suggests that the needs of the HMA are met in Plymouth, including urban extensions, and then at locations along the main transport corridors to the city. These corridors are chiefly the A386 to the north of the city as far as Tavistock and to the east of the city along the A38, and taking in Ivybridge. |

| C) Concentration on Plymouth and New Settlements. This option suggests that the needs of the HMA outside Plymouth should be met through the planning of one or more new settlements. The West Devon Our Plan suggested the possibility of a new settlement in West Devon, and at various times other locations for new settlements have been suggested in South Hams. Clearly, the Sherford new settlement has |
been planned as a way to meet the needs of Plymouth and South West Devon in the past, and will continue to be developed meeting the needs of the HMA through the Joint Local Plan. This option looks at whether further new settlements could be used to meet needs.

D) Concentration on Plymouth and the Area Settlements. This option suggests that the needs of the HMA are met through concentration of development in Plymouth and also in the six market towns or area centres of West Devon and South Hams – ie Okehampton, Tavistock, Ivybridge, Totnes, Dartmouth and Kingsbridge.

E) Concentration on Plymouth, Area Centres and Local Centres. This option is as option 1d but also includes the Local Centres of West Devon and South Hams

F) Concentration on Plymouth, Area Centres, Local Centres and sustainable villages OUTSIDE the AONB - villages are those that have been assessed as meeting a minimum provision of services and facilities

G) Concentration on Plymouth, Area Centres, Local Centres and all sustainable villages including WITHIN the AONB - villages are those that have been assessed as meeting a minimum provision of services and facilities

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**Commentary**

Our assessment of this alternative is set out in the appendix. Concentration of development within the City with a proportion of development going to the wider area of South Hams and West Devon provides a good opportunity to balance growth across the wider area and set out a strategy which meets the needs of the Joint Local Plan Area and deliver a sustainable pattern of growth. Concentrating development within the City and allowing a level of growth within the rural areas makes sense in terms of delivering a sustainable strategy for the whole Joint Local Plan Area. This approach continues a strategy which has historically developed over time through previous iterations of the Regional Spatial Strategy and the Devon County Structure Plan. This approach will allow development within South Hams and West Devon which will help meet needs for housing and employment development.
**Option A** sets out a ‘necklace’ approach. Clearly, the settlements chosen to be within the ‘necklace’ would need to be set out in a strategy, and the choice of settlements would affect the sustainability of such an approach. Nevertheless, it should be clear that this variation implies 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. It would seem inevitable that some settlements would be close to Dartmoor or other areas of restraint and development in such locations would have numerous implications which need to be clearly identified. This variation could also undermine the delivery of Sherford, the new settlement within South Hams by creating opportunities for other locations close to Sherford to come forward ahead of the new Settlement. This variation presents a focus of development in and around the city and could be considered to be similar to the urban intensification options as it does not provide opportunities for the rest of the Joint Local Plan Area to grow.

**Option B** sets out an approach which focuses on key transport corridors. This variation considers development options along key transport corridors such as the A38 and the A386 and would recognise the relationship between Tavistock and Ivybridge and the City. This variation could be expanded to look at transport corridors in the north of the HMA, particularly the A30 and the relationship between Okehampton and Exeter. There are also a number of other roads which could be considered as important transport corridors including A374, A385, A380. Concentrating development on transport corridors could have implications in terms of increased congestion and pressure on the strategic road network. This pressure would require this variation and any proposals for development to be accompanied by a package of mitigation measures to encourage the use of other modes of transport.

**Option C** sets out an option of looking for new settlements within the HMA. The variation does not set out a specific location for any new settlements but focuses on the basic principles which would be involved. The development of new settlements require significant work to identify land available and then work with all the parties involved to set out a package which is considered available, deliverable and viable. Due to the detailed work required to bring forward a new settlement this option is unlikely to deliver any development during the plan period to 2034. Depending on their locations new settlements can have significant impacts on the character of the local area which brings with it a large amount of challenges and issues to plan for and discuss with other stakeholders within the local plan area. The creation of new settlements could relieve pressure for development on existing settlements but could also create a new set of problems depending on locations. Given these challenges, it would seem that this variation 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.
**Option D** sets out an option which looks towards the area centres within South Hams and West Devon to deliver the needs of this part of the HMA. This includes Okehampton, Tavistock, Ivybridge, Totnes, Dartmouth and Kingsbridge. It is notable that these settlements feature on important transport corridors. This variation seems to provide 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. A number of the settlements listed here have a number of constraints which impact on the level of growth each Settlement could accommodate. For example, Dartmouth and Kingsbridge are within the AONB and therefore any major development proposed in these locations would need to be avoided unless it could meet the tests set out in the NPPF. Parts of Tavistock fall within the World Heritage Site and this may have implications on the level and scale of growth provided in particular locations. Therefore, this variation would clearly need to look at appropriate levels of growth in each settlement, balancing needs and aspirations against the care needed to preserve the special character of the settlements and surrounding environment. This variation allows such a balance to be struck.

**Option E** suggests concentrating growth in Plymouth, the area centres and local centres of South Hams and West Devon. In many respects this variation is a refinement the fourth variation, recognising the role and range of facilities available in local centres, including Bere Alston, Hatherleigh, Lifton and North Tawton in West Devon and Modbury, Salcombe, Stokenham/Chillington and Yealmpton in South Hams. Again, 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. Given the three over-arching principles set out earlier, however, it would seem unlikely that these local centres would be expected to accommodate large amounts of development, over and above local needs, if they are subject to such environmental and landscape constraints. This option provides the greatest opportunity to strengthen the roles of area centres and also to recognise the important role as service centres which the local centres play within the wider area. This option would clearly not prevent some growth at villages within South Hams and West Devon, to meet local needs where appropriate sites could be identified. Many groups are beginning to prepare Neighbourhood Plans and it may be that these are the most appropriate vehicle for local communities to identify appropriate sites where there is a will to do so, and a need that the community can quantify. Clearly, the Joint Local Plan will also contain development management policies which will set out the circumstances when development proposals in these smallest settlements would be acceptable.

**Option F** proposes to cascade option E down to another layer in settlement hierarchy, by placing a small level of expectation on sustainable rural villages in the TTV areas, but without seeping into the AONB. This will bring with it a high degree of environmental protection, but will be set against a significant impact on social wellbeing and resilience, felt most keenly in the coastal areas of the South Hams and the rural settlements of the Tamar valley.
**Option G** extends option E to its logical conclusion, which is to extend the delivery of new growth to all settlements, including the most sustainable villages throughout the TTV. This will need to be managed sensitively within the designated landscapes to ensure that environmental impacts are kept to a minimum, but this is allied to the additional social and economic benefits of allowing appropriate growth within the AONB to improve access to housing and services, and to ensure a more resilient demographic profile for all of our communities.

**Environmental Impacts**

Concentration of growth within the city with a range of development options within the TTVs will have a number of implications depending on the specific strategy chosen. It is important that the environmental constraints are dealt with effectively within the strategy chosen. It’s not clear from the options if they are carefully considering the different designations within the HMA, for example there is no recognition of needing to ensure that development proposals do not have significant effect on the European designated sites such as the European Marine Site and also on protected landscapes such as the Dartmoor National Park and the Area of Outstanding Natural Beauty. There is a need to ensure that the option chosen does respect the different designations within the area.

**Social Impacts**

These options provide the greatest way of providing opportunities to deal with social issues within the HMA particularly around the provision of housing and providing opportunities to deal with affordability issues. Developing a Strategy which enables the Settlement hierarchy to meet the needs of the wider area provides the greatest opportunities to deal with Some of the identified issues and objectives for the joint local plan.

**Economic Impacts**

These options provide the best way to enable a flexible approach to the delivery of the economic Strategy. This strategy Should recognise the variation in the functional economic market area by providing opportunities to deliver jobs throughout the whole area and not just in the city.
**Dispersal of development**

Dispersal of development across the whole Joint Local Plan area – ie without an assumption that Plymouth should be the focus for meeting needs. This option has the following variations:

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<th>Policy Options</th>
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**Commentary**

Our assessment of this alternative is set out in the appendix. Dispersal of the development across the whole of the HMA has a number of sustainability implications. It could be interpreted as the most sustainable way to distribute growth as it provides the best opportunity to disperse the growth evenly throughout the settlements. In some instances, this could increase the long term sustainability of a settlement by providing opportunities to provide a greater number of services and facilities within that community, however this could also be at the cost of the character of the community. The impact of the development would depend greatly on the scale and distribution of that development. One key aspect to carefully consider in this option is that it could potentially imply that development would take place within the AONB and in locations which would be close to or within other sensitive environments. Clearly such a strategy would not meet the principles set out earlier in this paper, and would require careful consideration of such development against the NPPF. As a point of principle, the distribution strategy of the Joint Local Plan is seeking to avoid locations which would harm the AONBs and other sensitive environments.

Dispersing development too thinly across the area could also have serious implications in terms of the coordination and delivery of essential infrastructure, a more coordinated approach to delivering development could help ensure that key infrastructure to serve communities was in place alongside the development, whereas dispersing development too thinly might mean that service delivery does not happen to support communities, thus exacerbating rural deprivation.

This alternative could help support the delivery of affordable housing in rural areas by enabling the smallest settlements to also deliver a level of housing needed to meet local need and in turn increase affordability within the rural parts of the HMA.
Not boosting the delivery of housing within the city and only enabling it to deliver ‘what it can’ could mean that the City would not be able to deliver its aspirations in terms of economic growth. This would have implications in terms of the long term sustainability of the HMA as it is recognised that the City needs to grow and change in order to ensure to meet its aspirations as set out in the Mackay Vision, and to strengthen its position as the commercial, cultural and economic centre of the wider region. The development Strategy for the HMA needs to recognise this important role of the city, delivering a range of attractive and transformative services, facilities and jobs to those that live in the surrounding area.

Two options for delivering a dispersed development Strategy have been suggested:

Clearly, much of the impact of the first variation will depend upon how much development can be accommodated within Plymouth, which is something which cannot be considered in this part of the assessment. It is possible, however, to identify the possible impacts of dispersing development across the whole of the HMA. Development will be dispersed amongst the settlements of South Hams and West Devon based on whether or not the Settlement has a settlement boundary or not. This approach could mean that some settlements which could take small amounts of development would not be given the opportunity to expand. Many of the settlement boundaries which are currently in place have not been produced with any particular guidelines or structure in place and therefore 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, therefore this may not be a robust way of distributing the growth.

There is little difference between the two variations in terms of the overall sustainability of the dispersal option. The first variation implies some emphasis on meeting needs at Plymouth but would still lead to substantial amounts of development being directed towards the settlements of South Hams and West Devon with effects on the character of those settlements, strain on infrastructure, impact on the AONBs and increased amounts of commuting. The second variation sets out an approach which distributes the growth evenly across all settlements within the HMA. Although this option would provide the greatest possible choice in terms of the sites to deliver development to meet the needs of the HMA, therefore maximising the pace of delivery of new homes, this variation would also 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. This variation would also have implications in terms of maximising the delivery of the growth within Plymouth. Overall, we considered that these options would lead to fundamentally unsustainable patterns of development which would work against the principle of promoting the growth and transformation of Plymouth, and would in fact lead to the stagnation and failure of the city.
Environmental Impacts

These options could have the greatest impacts in terms of the environment unless the options specifically direct development away from designated landscape and environmental areas. On the other hand this option could provide the greatest opportunity to re-use brownfield land for development rather than greenfield sites as it could provide opportunities to develop smaller pieces of underused land in all settlements across the HMA. However finding available land to deliver this strategy could prove difficult. Dispersing development may provide the greatest opportunity to avoid placing development on areas at risk of flooding as they could be more land available in areas which do not flood.

Social Impacts

These options could have impacts in terms of social exclusion and could increase rural poverty if homes were placed in locations that lacked services and facilities. People would need to rely on the car and for low income families this could prove difficult.

Economic Impacts

Dispersing development could provide the greatest opportunity to provide a flexible approach to the delivery of jobs and employment premises. However this could mean that jobs are located in places which are not accessible, other than by car, and this could prove difficult for businesses to remain viable.
Preferred Option

Plymouth is identified as the location which will drive the economic growth of the HMA. The City’s growth agenda has been in place for 10 years delivering new jobs and homes and transforming the city’s role and function, and this will continue to be delivered in the future.

Tavistock and Ivybridge are key Settlements within the Plymouth TTWA with close relationships with the city, and good quality public transport connections to Plymouth. These towns are identified as locations for sustainable development which will contribute to the economic success of the city.

Okehampton, Totnes, Dartmouth and Kingsbridge are important market towns which service extensive hinterlands where sustainable development can be accommodated. Such development can be located in places served by facilities, public transport and access to local jobs. Okehampton and Totnes also benefit from close links to Exeter and Torbay respectively, while Kingsbridge and Dartmouth are more constrained by proximity to the AONB and other local constraints, and so are expected to see less development that the other area centres.

Local Centres and Villages. Across the sub region, there is a network of rural villages and local centres, associated with the market towns that can be considered part of a network of sustainable rural settlements. These locations can support an appropriate and proportionate level of growth over the plan period. It is anticipated that development in these locations will come forward through strategic allocations within the JLP where appropriate, and through neighbourhood plans.

The Countryside - outside Plymouth City and the designated fringe and those settlements with settlement boundaries it is anticipated that limited development will come forward through criteria based policies, including those specific to the countryside and Neighbourhood Plans where appropriate.

A limited amount of development will be brought forward in Dartmoor through the National Park Authority’s Local Plan, in order to deliver its aims and priorities.

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‘Plymouth Policy Area’, comprising an area including the city of Plymouth and its immediate urban fringe (see map below), where growth will be driven by the economic growth agenda and initiatives being delivered to drive and increase the pace of transformation and regeneration.

‘The Thriving Towns and Villages’–comprising the rest of the HMA outside of Dartmoor where growth will be more modest and will lead to the consolidation of sustainable market towns and thriving hinterlands.

**Commentary**

The preferred strategy for development within the HMA provides the greatest opportunity to deliver the different aspirations within the city and also enable TTVs to achieve levels of growth which would enable them to counteract some of the issues surrounding affordability and also planning positively for the area by being able to provide some different forms of delivery such as self build and community-led housing. This will help the HMA to deliver the levels of housing which are needed to support communities within the whole of Local Plan Area in terms of household size, tenure, types, this will provide more sustainable communities in the long term and help to counteract some of the demographic challenges that relate to the area.

This strategy will also help to deliver economic growth within the area in locations which will help create jobs for the communities making the best use of land and strategic locations. This strategy provides the greatest opportunity to maximise the strategic locations for employment and provide jobs where they can be accessed by many people living in the community.

The strategy will also provide opportunities to ensure that the character of the landscape and townscape is protected by providing opportunities for those special landscapes to be recognised and protected.

The option could benefit from highlighting that development will be located in those places which are less likely to suffer from flooding on the future impact of climate change, this is particularly important in areas where there is existing coastline which could be suffering from coastal erosion. This could be more explicit within the preferred option.
The preferred strategy depends on a clearly identified policy approach to delivering housing within the AONBs and how this contributes to the wider HMA. The NPPF is quite clear that major development should only take place in the AONB where there are exceptional circumstances and where the development is in the public interest. There is a need within the AONB to provide housing for the communities which live within the AONB, and this needs to be balanced against the need to protect against inappropriate development which could harm the special qualities of the AONB. This is also important when considering the levels of development required close to the Dartmoor National Park.

**Habitats Regulations Assessment**

In addition to the Sustainability Appraisal, a ‘Habitat Regulations Assessment is also required to support the Joint Local Plan and part of this will include an assessment of the options put forward in this Topic Paper.

Within the Joint Plan area, there are a number of European protected wildlife sites, designated and protected under the Conservation of Habitats and Species Regulations 2010 (as amended). The UK regulations transpose the European Union’s Birds Directive (79/409/EEC) and Habitats Directive (92/43/EEC) into UK law.

The sites of Plymouth, South Hams and West Devon form part of a wider European network of sites known as Natura 2000 sites. Natura 2000 sites are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. These sites include:

- Special Protection Areas (SPAs) – wild bird habitats designated under the Wild Birds Directive.
- Special Areas of Conservation (SACs) – animal and plant habitats designated under the Habitats Directive.
- Sites in the process of becoming SACs or SPAs; and sites identified or required as compensatory measures for adverse effects on European sites.

The following sites have been identified as having the potential to be impacted by the Joint Local Plan:

- Plymouth Sound & Estuaries SAC
- Tamar Estuaries SPA
- Start Point to Plymouth Sound & Eddystone Site of Community Interest
- South Dartmoor Woods SAC
- Dartmoor SAC
- Blackstone Point SAC
- Lyme Bay and Torbay SAC
- South Hams Bat SAC
- Culm Grasslands SAC
- South Devon Shore Dock SAC

The UK Government’s National Planning Policy Framework requires that listed or proposed Ramsar sites should also be given the same protection as European sites. Ramsar sites are wetlands of international importance, designated under the Ramsar Convention 1979 although there are none within 20km of the Joint Plan area.

Plans and projects, such as the Joint Local Plan, can only be permitted having established that there will be no adverse effect on the integrity of the site(s) through a process known as the Habitat Regulations Assessment (HRA). This is an assessment tool required by law to determine whether plans or projects will impact upon site integrity or not as set out in Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended).

Land use plans such as the Joint Local Plan can affect Natura 2000 sites in a number of ways by affecting the environmental conditions and these are summarised in the following table:

<table>
<thead>
<tr>
<th>Factor</th>
<th>Potential effects of a Land Use Plan</th>
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<tbody>
<tr>
<td>Air Quality</td>
<td>Potential to contribute to atmospheric pollution through increased traffic linked to housing and employment, minerals working and waste management (i.e. dust generation, landfill gas or incinerator emissions) and renewable energy schemes such as biomass.</td>
</tr>
<tr>
<td>Water Quality</td>
<td>Increase in development results in more pressure on sewage and surface water drainage systems, which if not managed can result in pollution entering our rivers, lakes and seas.</td>
</tr>
<tr>
<td>Hydrology</td>
<td>Increasing housing and employment sites is likely to result in an increased demand for water abstraction, which can effect watercourses and groundwater.</td>
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<tr>
<td>Factor</td>
<td>Potential effects of a Land Use Plan</td>
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<tr>
<td>Habitat loss / fragmentation</td>
<td>Land take can lead directly to loss of designated and supporting habitats and fragmentation.</td>
</tr>
<tr>
<td>Noise, Vibration and Lighting</td>
<td>Increasing development can result in increased noise and light levels which can lead to increased disturbance at European designated sites.</td>
</tr>
<tr>
<td>Recreational Pressure and Disturbance</td>
<td>The Plan could contribute to increased levels of disturbance as a result of recreational activities from an increasing population.</td>
</tr>
<tr>
<td>Coastal Squeeze</td>
<td>Development has the potential to prevent the natural migration of coastal habitats landwards, as sea levels rise.</td>
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The matrix

The matrix will record the findings of the assessment by using the following:

<table>
<thead>
<tr>
<th>Score</th>
<th>Significance</th>
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<tbody>
<tr>
<td>++</td>
<td>Major positive effects to achievement of the IA objective</td>
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<tr>
<td>+</td>
<td>Minor positive effects to achievement of the IA objective</td>
</tr>
<tr>
<td>0</td>
<td>No effect (either positive or negative) to achievement of the IA objective</td>
</tr>
<tr>
<td>-</td>
<td>Minor negative effect to achievement of the IA objective</td>
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<tr>
<td>--</td>
<td>Major negative effect to achievement of the IA objective</td>
</tr>
<tr>
<td>?</td>
<td>Impact on the IA objective is uncertain</td>
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