1. Introduction

1.1 During the examinations hearings, and in the subsequent Post Hearing Advice (EXC15, paras 17-21), the inspectors expressed concerns about the effectiveness of and justification for Policy DEV26 and the Strategic Landscape Area (SLA) local landscape designation.

1.2 Following the discussions on this policy at the public hearings, the JLP Councils produced a ‘Note to inspectors on the matter of DEV26’ (EXD66). This note set out a potential alternative approach to a local landscape designation, which would involve use of a criteria based policy for Plymouth’s urban fringe within the Plymouth Policy Area (PPA).

1.3 The inspectors have invited the JLP Councils to give further consideration to this suggestion and advised that the area to be covered by such a policy should be clearly defined on the Policies Map.

1.4 This paper sets out that further consideration, and describes the context for a new urban fringe policy. The proposed policy will be consulted upon as a ‘main modification’; additionally we will also consult on amendments to the Policies Map, which will set out clearly the boundaries affected by the new policy.

2. The need for a policy relating to Plymouth’s urban fringe

2.1 The original proposal set out through DEV26 of a local landscape designation was in response to evidence that we considered justified a policy response to the urban fringe. However, we acknowledge the inspectors concerns expressed in EXC15 about the particular approach that we set out in the plan, in particular in relation to consistency across the JLP area and about areas which are not clearly shown on the Policies Map.

2.2 Nonetheless, we consider that the evidence continues to justify a particular policy response for the Plymouth urban fringe which is distinct to the policy approach set out elsewhere in the plan for the
management and protection of the countryside. This distinct situation includes the need to manage un-planned development in the open countryside around the edge of Plymouth whilst having particular regard to high landscape sensitivity on the edges of the city and provide appropriate consideration of natural environment constraints.

2.3 Our note to the inspectors (EXD66) outlines the evidence that demonstrates landscapes in the urban fringe are particularly sensitive to development. In particular we highlight the following:

- The significant contribution the landscape within the urban fringe makes to the character and visual setting of the city (EXD66, para 2.1)
- The valuable landscape assets that contribute to the character and identity of the city (EXD66, para 2.2).
- The high sensitivity to development and the vulnerability of landscapes surrounding the city (EXD66, para 2.3 – 2.5).

2.4 The evidence demonstrates that the landscapes surrounding Plymouth make a significant contribution to the setting of the city and the adjacent nationally protected landscapes. It highlights the valuable environmental assets in the urban fringe and their sensitivity to development pressures. The evidence shows us that there are particular environmental constraints, unique to the urban fringe, that need to be considered to ensure sustainable development at the edges of the city. The landscape and seascape assessment (EN22 and EN22A) also provides practical guidance for managing change in the urban fringe and a sound basis for considering the potential impacts of new development proposals.

3. The proposed policy approach

3.1 The proposed policy approach involves use of a traditional criteria based policy for the whole of Plymouth’s urban fringe as defined on the Policies Map, rather than a criteria based policy to deliver a bespoke suite of local landscape designations. This policy would be called ‘Development in Plymouth’s urban fringe’ and would be a PLY policy rather than a DEV one, comparable to the TTV ‘development in the countryside’ policy (Policy TTV31). The policy will therefore be more about management of change in the urban fringe rather than specifically safeguarding a landscape designation.

3.2 The new policy will operate in a similar manner to Policy TTV31, but with some different criteria reflecting the unique situation in Plymouth’s urban fringe.

3.3 As recommended by the Inspectors (EXC15 para 21), the JLP Councils have considered the potential to make TTV31 a DEV policy and therefore apply to the whole plan area including the PPA. However, we felt that this would break from the overall spatial strategy that sets the ‘countryside’ as a key part of the spatial hierarchy in the TTV. Furthermore, it is considered that separate policies in the TTV and PPA
areas will create greater clarity and aid the implementation of the different approaches in each.

3.4 Our proposed approach should help overcome the inspectors concerns regarding consistency across the JLP area. It will be noted that not all of the urban fringe land within the PPA was identified as SLA in the submission JLP; quite significant tracts of land remained as ‘white land’. The way we had intended to address this issue is explained in para 5.160 of the submitted JLP. The intention was for TTV31 to apply to this ‘white land’. However, the alternative approach provides the opportunity to address this ‘white land’ within a PLY rather than TTV policy of the plan. Our proposal would be to include all of this ‘white land’ and the SLAs, but to exclude land for which there are other positive allocations (i.e. the site allocations and Strategic Greenspaces).

3.5 In summary, our alternative approach involves:

a) Deleting reference to Strategic Landscape Areas in Policy SPT11, removing this local landscape designation from the natural environment hierarchy.

b) Replacing Policy DEV26 with a new policy called ‘Development in the Plymouth urban fringe’, as a purely criteria based policy.

c) Justifying the provisions of this new policy from the landscape character and sensitivity evidence base documents.

d) Including this new policy in the ‘Plymouth Policy Area’ section, giving the policy a PLY rather than DEV reference (thereby also mirroring the ‘Development in the countryside’ policy in the TTV Policy Area section).

e) Deleting all SLAs and defining the urban fringe on the policies map. This would be broader than the SLAs, and would include all countryside land within the Plymouth Policy Area currently shown as ‘white land’, excluding sites allocated for development or as Strategic Greenspaces, which have their own positive policy statements.

3.6 The proposed new policy is set out in Appendix 1.

4. How the area covered by the policy is defined

4.1 This policy applies to all predominantly undeveloped land beyond the built-up edge of the city. In certain places, it will include dwellings, settlements or buildings where these are separate from the city and surrounded by open land or countryside.

4.2 The policy excludes land that is positively allocated in the JLP for new land uses (such as housing or strategic greenspace).

4.3 The policy excludes nationally designated landscapes (AONBs) as separate policies exist in the proposed plan to manage development in these areas.

4.4 Appendix 2 shows the proposed policy boundary in the context of the exclusions outlined above.
APPENDIX 1

Policy PLY (NEW)

Development in Plymouth’s urban fringe
The LPAs will protect the special characteristics and role of the urban fringe countryside as identified on the Policies Map. The following provisions will apply to the consideration of development proposals in the urban fringe:

1. Development will only be permitted where:
   i. The form, scale and design is not visually intrusive and is well integrated into the landscape.
   ii. The development, either individually or cumulatively does not significantly harm the open character, key characteristics, valued attributes, or sensitive features of the area or important views.
   iii. The proposal does not result in significant intrusion into the open countryside or contribute to the coalescence of separate settlements.
   iv. The setting, individual character and identity of adjoining settlements is not significantly harmed.
   v. The proposed development is linked to an existing appropriate use and does not conflict with the above criteria.

2. Development proposals should, where appropriate:
   i. Protect and improve public rights of way and bridleways.
   ii. Re-use traditional buildings that are structurally sound enough for renovation without significant enhancement or alteration.
   iii. Be complementary to and not prejudice any viable agricultural operations on a farm and other existing viable uses.
   iv. Respond to a proven agricultural, forestry and other occupational need that requires a countryside location.
   v. Avoid the use of Best and Most Versatile Agricultural Land.

3. Development for the purposes of agriculture, forestry, public access and enjoyment of the countryside, or community facilities that meet the objectively assessed needs of the local community will be supported if it meets the above provisions.

NEW supporting text

The countryside within Plymouth’s urban fringe makes a vital contribution to the setting and character of the city and adjacent nationally protected landscapes and provides a valuable environmental resource. It is therefore of great importance that development pressure in the urban fringe is carefully managed in order to ensure prevent harm to the urban/rural interface and associated negative impacts on the natural environment. The city is bounded to the south and north by nationally protected landscapes; the South Devon Area of Outstanding Natural Beauty (AONB), the Tamar Valley AONB and Dartmoor National Park. Proximity to these designated landscapes creates areas of greater sensitivity where it is important to ensure that development
does not individually or cumulatively harm these protected landscapes. This policy seeks to protect these designated areas from the sprawl of the city and ensure that only development that is appropriate for these sensitive locations is permitted. Development proposals within the urban fringe will need to supported by Landscape Visual Impact Assessments and landscaping schemes, in accordance with the provisions of Policy DEV24.6.
APPENDIX 2

Map showing the proposed boundary of PLY XX ‘Development in Plymouth’s urban fringe’
Proposed boundary of 'Development in Plymouth's urban fringe' policy

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