Plymouth and South West Devon Joint Local Plan
Integrated Assessment incorporating Sustainability Appraisal/Strategic Environmental Assessment

**Feb 2018 July 2017**
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Section 1: Introduction

1.1 Plymouth City, South Hams and West Devon Councils have been working together to prepare a Joint Local Plan (JLP) for the area, excluding the Dartmoor National Park.

1.2 The Plymouth and South West Devon Joint Local Plan sets out the spatial strategy, long term spatial vision, strategic objectives and policies for development, and identifies sites for development within the plan area to cover the period up to 2034. It is based on social, economic and environmental objectives, together with other important strategic development needs such as housing, employment, retail, leisure and transport as well as mitigating and adapting to the effects of climate change.

1.3 The Planning and Compulsory Purchase Act 2004 (Section 19) requires local authorities to undertake a Sustainability Appraisal (SA) for local plans. SA is a systematic process which promotes sustainable development through the integration of social, economic and environmental considerations when preparing new planning documents.

1.4 European and UK legislation require that the JLP is also subject to Strategic Environmental Assessment (SEA). The SEA looks at the effects of the emerging plan on the environment. It must predict and evaluate the significant effects of the plan alternatives and suggest measures to help improve sustainability. Government guidance advocates that the SA and SEA processes are carried out together, during the stages of plan making and testing. SA/SEA also includes measures to monitor the sustainability impacts of the plan during its implementation.

1.5 This report and accompanying appendices comprises the Sustainability Appraisal for the JLP incorporating the requirements of SEA. It also includes the Equality Impact Assessment (EqIA). The consultation process undertaken through the SA/SEA process is especially relevant for equality issues. It seeks to ensure that issues of fairness, respect, equality and dignity are addressed.

1.6 Across the JLP area and on its borders, are a number of sites which have been designated as internationally important for wildlife and biodiversity. These designated sites consist of Special Areas of Conservation (SAC) designated for habitats and animal species and Special Protection Areas (SPA) designated for bird species. To meet the requirements of the Habitats Directive, a Habitats Regulation Assessment (HRA) has therefore also been prepared in order to ensure that the JLP does not contain any policies that will have or lead to an adverse effect on the integrity of designated sites. This is a separate process and the HRA is available as a standalone document.

1.7 This Assessment provides an appraisal of the social, economic and environmental impact of the Joint Local Plan and provides details of:

- an outline of the approach adopted to the development of the Sustainability Appraisal Framework, drawing on work previously undertaken for the Plymouth Plan, ‘Our Plan’
West Devon and ‘Our Plan’ South Hams where this is still relevant, developing the process further to provide a robust framework for site selection and policy development including:
- an assessment of the vision, objectives and policies of the JLP;
- an assessment of growth options;
- an assessment of how development could be distributed
- an assessment of the process for identifying sites for allocation
- an assessment of sites which are considered to be ‘reasonable alternatives’ for development in the Plymouth and Thriving Towns and Villages Policy Area.
- an assessment of the vision, objectives and policies within the Joint Local Plan.

1.8 This report is divided into a number of sections:

- **Section 2** provides context on the Joint Local Plan
- **Section 3** provides more detail on the methodology including the scoping process which has been undertaken.
- **Section 4** provides a description of the characteristics of the area and how the area might fare without the JLP in place
- **Section 5** considers the options and reasonable alternatives to the proposed approach within the JLP
- **Section 6** sets out the monitoring requirements
- **Section 7** sets out the approach to dealing with equalities and diversity
- **Section 8** sets out the high level conclusions

1.9 A Non-technical summary is available at Appendix I.

1.10 This assessment is supported by a number of appendices, including a non-technical summary, which are available separately.

- Appendix I: Non-technical summary
- Appendix II: SA compliance with the requirements of the SEA Directive
- Appendix III: Final Scoping Report
- **Appendix III(a): SA/SEA Criteria and Issues to Consider**
- Appendix IV – SA of Reasonable Alternatives for Growth
- Appendix V SA of Reasonable Alternatives for the Distribution Strategy
- Appendix VI: SA of site allocation methodology
- Appendix VII : SA of Reasonable Alternatives – Plymouth Policy Area
- Appendix VIII : SA of Reasonable Alternatives – Thriving Towns and Villages Area
- Appendix IX SA of JLP policy Alternatives
- Appendix X: SA of JLP Vision, Objectives and Policies
- Appendix XI : Equalities Impact Assessment (EqIA)
Section 2: The Plymouth and South West Devon Joint Local Plan

2.1 The JLP sets a shared direction of travel for the long term future of the area, building on and integrating the work previously undertaken on the separate Plymouth Plan, South Hams Our Plan and West Devon Our Plan. The key purpose is to establish an overarching strategic framework for sustainable growth and the management of change for Plymouth, South Hams and West Devon to 2034.

2.2 The JLP excludes policies for the Dartmoor National Park. This is because the Dartmoor National Park Authority is preparing a separate local plan. However all the planning authorities are working together through the 'Duty to Cooperate' and also sharing evidence.

2.3 The plan has been informed by a substantial local evidence base, national policy and guidance and working with neighbouring authorities and partners under the “Duty to Cooperate”. (see the separate paper on the Duty To Cooperate)

2.4 The Joint Local Plan is structured into 7 sections.
- Section 1 introduces the JLP
- Section 2 describes the vision for the plan area (see below)
- Section 3 sets out the high level spatial strategy for growth, including the overall housing and employment need that that plan needs to meet and how this will be addressed
- Section 4 sets out the strategy for the Plymouth Policy Area (which includes Plymouth’s administrative area and the urban fringe within South Hams), considering Plymouth’s strategic role, area-specific strategies for the city’s three growth areas, as well as site allocations
- Section 5 sets out the strategy for the Thriving Towns and Villages Policy Area (which includes all of South Hams and West Devon, excluding Plymouth’s urban fringe and Dartmoor National Park) explaining how the vision will be implemented, including identifying site allocations
- Section 6 sets out shared development policies that relate to the entire plan area
- Section 7 sets out how the plan will be delivered and how its implementation will be monitored and kept on track.

2.5 The JLP brings together the visions for Plymouth, South Hams and West Devon into one overarching vision. The objectives, policies and proposals within the JLP seek to bring this vision to life.
2.6 The Plan is also supported by a number of strategic objectives. These objectives are expanded upon within each of the chapters of the JLP. There are shown in summary below:

**Vision for Plymouth and South West Devon**

Plymouth and South West Devon will be a highly successful sub region, whose people and businesses benefit greatly from having both a major city and a network of high quality market towns and sustainable rural settlements, set within beautiful countryside and natural environment. It will have made the most of its economic, social, cultural, heritage and natural asset, and its settlements will play complementary and mutually beneficial roles for the urban and rural economy.

Development will be delivered proactively, meeting the needs of its people for new homes, jobs and services, and will recognise the diversity in characteristics between our urban, suburban and rural areas. We will be a good neighbour to neighbouring areas and play a key economic and social role both in the region and beyond. In particular:

1. Plymouth will be one of Europe’s most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone and where the following outcomes have been met:
   - Plymouth’s strategic role is fulfilled as a regional city and a major economic driver for the heart of the south west.
   - Plymouth as a healthy city, where our people live in happy, healthy, safe and aspiring communities.
   - Plymouth as a growing city, where we have used our economic, social, environmental and cultural strengths to deliver quality and sustainable growth.
   - Plymouth as an international city, renowned as the UK’s premier marine city and famous for its waterfront, maritime heritage and culture.

2. South West Devon’s Thriving Towns and Villages will be thriving rural communities where the following outcomes have been met:
   - Residents are empowered to create strong communities.
   - Places are created for enterprise to thrive and businesses to grow.
   - Homes have been built to meet local needs.
   - The services and facilities which meet the needs of our communities have been secured.
   - The built and natural environment has been protected, conserved and enhanced.
   - The past is celebrated and our heritage for the future is protected.
The Strategic Objectives of the plan

1. Delivering the spatial strategy: To meet the needs of Plymouth and South West Devon for new homes, jobs and services through an integrated approach to the strategic planning of the Plan Area as part of the wider region.

2. Strengthening Plymouth’s role in the region: To consolidate and strengthen Plymouth’s role as the major regional city in the south west peninsula of England, enhancing its contribution to the economic and social wellbeing of the south west and providing the major commercial, service and employment centre.

3. Delivering growth in Plymouth's City Centre and Waterfront Growth Area: To realise the potential of the City Centre and Waterfront Growth Area as a regionally significant growth hub.

4. Delivering growth in Plymouth’s Derriford and Northern Corridor Growth Area: To realise the potential of the Derriford and Northern Corridor Growth Area as a regionally significant growth hub.

5. Delivering growth in Plymouth’s Eastern Corridor Growth Area: To realise the potential of the Eastern Corridor Growth Area as a regionally significant growth hub.

6. Delivering a prosperous and sustainable South West Devon: To reinforce and protect the settlement pattern of South West Devon as the key driver of the prosperity and sustainability of the area, set within the diverse rural economy and an outstanding natural environment.

7. Maintaining a strong network of Main Towns: To promote locally distinctive and sustainable development in the main towns, with sufficient new homes, jobs, services and infrastructure provided to improve their level of self containment and to meet local needs.

8. Maintaining vitality and viability of the smaller towns and key villages: To promote the provision of homes, jobs, services and community infrastructure sufficient to enable the small towns and key villages to continue to play their important role as local service centres for their surrounding areas.

9. Maintaining the viability of the many sustainable villages in the rural area: To enable the development of new homes, jobs and community infrastructure sufficient to meet the local needs of the sustainable villages identified in the area.

10. Maintaining a beautiful and thriving countryside: To preserve and enhance the natural beauty of south west Devon’s countryside, and to avoid the creation of new homes in unsustainable locations.

11. Delivering high quality development: To deliver development in Plymouth and South West Devon which is sustainable and of the right type and quality.

12. Delivering infrastructure and investment: To take a proactive and co-ordinated approach to delivering the infrastructure and investment needed to realise the plan’s vision and deliver its strategic objectives and policies.
2.7 Once adopted, the JLP will form part of the development plan for Plymouth, South Hams and West Devon.

Section 3: What is a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)?

3.1 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves assessing the likely economic, environmental and social effects of the policies and proposals within the plan from the outset of its preparation. The purpose of the SA is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response.

3.2 Sustainability Appraisal (SA) is a continuous process used to assess the environmental, economic and social impacts of a proposal or policy within a plan. The SA ensures that plans are sustainable and that any negative effects identified can be appropriately overcome.

3.3 The purpose of the SA is to ‘test’ reasonable alternatives and potential policies to see whether they would have positive or negative effects when assessed against a set of objectives. These objectives include protecting and conserving the local environment, ensuring good access to local services (such as schools, or healthcare facilities), minimising flood risk, encouraging economic growth and improving the general health and wellbeing of people living in the area.

3.4 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive 1, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive is ‘to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans…. with a view to promoting sustainable development’.

3.5 A Strategic Environmental Assessment looks at the effects of the emerging plan on the environment. It must predict and evaluate the significant effects of the plan alternatives and suggest measures to help improve sustainability. It is common practice for SA/SEA to be carried out simultaneously given that the SA looks at the social, economic and environmental effects. SA/SEA also includes measures to monitor the sustainability impacts of the plan during its implementation.
3.6 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of the Joint Local Plan is being carried out in line with this integrated approach and throughout this report the abbreviation ‘SA’ should therefore be taken to refer to ‘SA incorporating the requirements of SEA’.

3.7 Appendix II sets out how this Assessment complies with the requirements of the SEA Directive.

3.8 Under the Equality Act 2010, there was a requirement to undertake formal Equality Impact Assessments. The requirement for an Equality Impact Assessment (EqIA) was removed in April 2011 when the “single equality duty” was introduced. This duty is a key measure of the Equality Act. Public bodies must give due regard to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions. They are also required to publish information showing how they are complying with the duty. They can do this without having to carry out lengthy and detailed assessments. Nevertheless, an EqIA provides a process to demonstrate that the Councils have complied with the duty.

3.9 As part of the integrated approach to assessments, the EqIA has been carried out alongside the preparation of the SA/SEA and each has informed the preparation of the other.

**What is the methodology for preparing a SA/SEA?**

3.10 This document draws on guidance set out by the now defunct Office of the Deputy Prime Minister (ODPM), National Planning Practice Guidance (NPPG) and the information on the Planning Advisory Service (PAS) website on how to carry out SA/SEA. This process is set out below (figure 1) and has incorporated the EqIA requirements.
Figure 1: Sustainability appraisal and local plan preparation process

**Sustainability appraisal process**

**Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope**
1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework
5. Consult the consultation bodies on the scope of the sustainability appraisal report

**Stage B: Developing and refining alternatives and assessing effects**
1. Test the Local Plan objectives against the sustainability appraisal framework
2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan

**Stage C: Prepare the sustainability appraisal report**

**Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public**

**Stage E: Post adoption reporting and monitoring**
1. Prepare and publish post-adoption statement
2. Monitor significant effects of implementing the Local Plan
3. Respond to adverse effects

**Local Plan preparation**

- **Evidence gathering and engagement**
- **Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).** Consultation may be undertaken more than once if the Local Planning Authority considers necessary.

**Stage C: Prepare the publication version of the Local Plan**

- **Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public**
- **Submit draft Local Plan and supporting documents for independent examination**

- **Outcome of examination**
  - Consider implications for SA/SEA compliance
- **Local Plan Adopted**

- **Monitoring**
  - Monitor and report on the implementation of the Local Plan
3.11 SA/SEA is an iterative process that has taken place alongside the evolution of the JLP. The 5 stages identified above in Figure 1 are expanded further in Table 1 below.

3.12 The process of writing the JLP has been iterative and as such the integrated assessment has been undertaken alongside the plan as it continued to evolve and develop. As such, the assessment of policies at appendix X represents an assessment of the JLP policies in the Joint Local Plan, during the preparation of the JLP, the SA process made some recommendations and where appropriate the policies were changed to take account of the SA. Consequently, the policies assessed already include appropriate measures to mitigate those matters where the SA process would otherwise have indicated potential adverse impacts.

Table 1: IA and JLP process

<table>
<thead>
<tr>
<th>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope (Scoping Report)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• A1 Identify other relevant policies, plans and programmes, and sustainability objectives</td>
</tr>
<tr>
<td>• A2 – Collect baseline information</td>
</tr>
<tr>
<td>• A3 – Identify sustainability issues and problems</td>
</tr>
<tr>
<td>• A4 – Develop the SA Framework</td>
</tr>
<tr>
<td>• A5 – Consult the consultation bodies on the scope of the IA process</td>
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<tr>
<td>JLP Process</td>
</tr>
<tr>
<td>Previous scoping reports</td>
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<tr>
<td>Plymouth Plan</td>
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<tr>
<td>South Hams</td>
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<tr>
<td>West Devon</td>
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</table>

<table>
<thead>
<tr>
<th>Stage B: Developing and refining options and assessing effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>• B1 – Test the Joint Local Plan objectives against the SA Framework</td>
</tr>
<tr>
<td>• B2 – Develop the JLP options including reasonable alternatives</td>
</tr>
<tr>
<td>• B3 – Evaluate the likely effects of the JLP and alternatives</td>
</tr>
<tr>
<td>• B4 – Consider ways of mitigating for adverse effects and maximising beneficial effects</td>
</tr>
<tr>
<td>• B5 – propose measures to monitor the significant effects of implementing the plan</td>
</tr>
<tr>
<td>JLP Process</td>
</tr>
<tr>
<td>Baseline data and trends set out in Final Scoping Report (Appendix III)</td>
</tr>
<tr>
<td>Ongoing informal engagement work with local communities, stakeholders and partners to explore the issues covered in the JLP (includes the Reg18 consultation for the JLP and also the work undertaken for the preparation of Plymouth Plan and ‘Our Plans’ for West Devon and South Hams).</td>
</tr>
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</table>

<table>
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<tr>
<th>Stage C – Developing and refining options and assessing effects</th>
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</thead>
<tbody>
<tr>
<td>• C1 – Preparing the SA Report</td>
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<table>
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<tr>
<th>Stage D- Consult on the draft IA report and Joint Local Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joint Local Plan</td>
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</table>
3.13 This integrated assessment is the result of work that each Council has already undertaken in relation to the early work on preparing individual plans for their areas, as set out in Table 2. These documents are available as within the evidence base and as appendices to the scoping report.

Table 2: Previous SA/SEA stages undertaken prior to agreement to prepare a Joint Local Plan 2014-2015

<table>
<thead>
<tr>
<th>Document</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sustainability Appraisal/Strategic Environmental Assessment of West Devon Our Plan Scoping Report</td>
<td>September 2014</td>
</tr>
<tr>
<td>Sustainability Appraisal/Strategic Environmental Assessment of West Devon Our Plan</td>
<td>February 2015</td>
</tr>
<tr>
<td>(draft) Health Impact Assessment of draft West Devon Our Plan</td>
<td>February 2015</td>
</tr>
<tr>
<td>Plymouth Plan Sustainability Appraisal Scoping Report</td>
<td>September 2014</td>
</tr>
<tr>
<td>The Plymouth Plan 2011 – 2031 (part one) Interim Sustainability Appraisal</td>
<td>Jan 2015</td>
</tr>
<tr>
<td>Sustainability Appraisal/Strategic Environmental Assessment of South Hams Our Plan Scoping Report</td>
<td>September 2014</td>
</tr>
</tbody>
</table>
Scoping Report

3.14 Table 1 illustrates that the first stage of preparing the SA is the preparation of the scoping report. The purpose of the scoping report is to review the baseline information and identify sustainability issues, challenges and opportunities within the JLP Area. This information is then used to create the sustainability framework that appraises emerging policies and proposals against a number of objectives. The scoping report was set out under the following topics:

- Air Quality
- Biodiversity and Green Infrastructure
- Climate Change
- Community Wellbeing including health and equality
- Economy
- Environmental Quality
- Historic Environment
- Housing
- Landscape
- Transport
- Waste
- Water
3.15 SEA topics are specifically referenced in each topic of the Scoping Report. This ensures that the report complies with the EU Directive. The Scoping Report sets out the following information for each topic:

- Key Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs): A list of relevant documents from international, European, national, regional and local level (Scoping stage A1)
- Relevant aims and objectives from the PPPSIs – Summary of the main objectives and sustainability issues and implication that are relevant locally (Scoping Stage A1)
- Baseline – sets out the quantitative and qualitative information for the local area (Scoping Report stage A2)
- Sustainability Issues and Problems – the main issues arising from the assessment that should be addressed through the plan making process (IA Scoping Stage A3)
- Monitoring indicators – to assess the effects of the plan once it is implemented

3.16 The assessment framework is comprised of 17 objectives that look to address the key issues for the JLP area identified under a review of each topic. To aid the assessment process the framework sets out a number of issues to consider when testing policies and proposals against the assessment criteria.

3.17 The draft scoping report (August 2016) including a suggested appraisal framework was produced by the three JLP Councils. It was sent for consultation to the three statutory consultation bodies (Environment Agency, Historic England and Natural England) for 5 weeks between 17th August and 30th September 2016. It is important to note that previously each of the individual scoping reports for each of the Councils had been subject to consultation and the topics had been broadly the same, the scoping report provided a way of amalgamating all previous work into one framework.

3.18 The Scoping Report has been updated for submission alongside the JLP. This has not made any changes to the SA/SEA Framework, it has been updated to include reference to the up to date evidence provided to support the Plan and also to ensure that the document references the correct content in terms of the Vision and Objectives of the JLP. The updated scoping report has also taken on board the representations made by the statutory consultees to the scoping report consultation.

3.19 The final Framework and scoring matrix is shown below at Table 3. The Final Scoping Report is included at Appendix III. The SA/SEA Criteria and Issues to consider are also set out in Appendix III (a)

Table 3: Final SA/SEA Framework

<table>
<thead>
<tr>
<th>SEA Topic</th>
<th>Objective</th>
<th>Issues to consider</th>
</tr>
</thead>
</table>
| Population | To promote community vitality and resilience by improving health and reducing inequalities. | Does it:  
  - Promote a sustainable mix of uses which are compatible to their surroundings? |
<table>
<thead>
<tr>
<th>Population and Human Health</th>
<th>2</th>
<th>To improve the health and wellbeing of communities including reducing crime and fear of crime.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>For any health impacts identified during the assessment…</td>
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<tr>
<td></td>
<td></td>
<td>Will the health impacts affect the whole population or will there be differential impacts within the population?</td>
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<td></td>
<td></td>
<td>Will the health impacts be difficult to remedy or have an irreversible impact?</td>
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<td></td>
<td></td>
<td>Will the health impacts be medium to long term?</td>
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<tr>
<td></td>
<td></td>
<td>Are the health impacts likely to generate public concern?</td>
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<tr>
<td></td>
<td></td>
<td>Are the health impacts likely to generate cumulative and/or synergistic impacts?</td>
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<tr>
<td></td>
<td></td>
<td>Combining the answers, on balance will the health impacts</td>
</tr>
</tbody>
</table>

| Does it:                    |   | Improve the health of the community and encourage healthy lifestyles?                            |
|                             |   | Have direct impact on health, mental health and wellbeing?                                     |
|                             |   | Have an impact on social, economic and environmental living conditions that would indirectly affect health? |
|                             |   | Affect an individual’s ability to improve their own health and wellbeing?                      |
|                             |   | Lead to a change in demand for or access to health and social care services?                   |
|                             |   | Encourage social interaction in public spaces?                                                 |
|                             |   | Improve access to open space and sports, leisure and recreation facilities?                    |
|                             |   | Improve the walking and cycling provision?                                                     |
|                             |   | Help people remain                                                                             |

- Promote the retention and development of community services and facilities?
- Facilitate flexible working practices which enable people to live near their place of work?
- Provide opportunities for communities to respond to unforeseen events and circumstances?
- Promote social inclusion?
- Promote healthier lifestyles through access to leisure opportunities (e.g. walking/Cycling)?
- Promote access to health and social care facilities, and to green and open space?
- Ensure that land contamination or pollution do not pose unacceptable risks to human health?
- Meet the noise standards required by law for specific land uses?
<table>
<thead>
<tr>
<th>Population and Human Health</th>
<th>3</th>
<th>To help provide access to a suitable mix of good quality housing</th>
<th>Does it:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Improve the mix and quality of housing stock, including open market and affordable housing to meet a range of needs?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Increase needed provision for specific sectors of the community e.g. elderly, disadvantaged, gypsies and travellers?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Promote improvement to the existing and future housing stock?</td>
</tr>
<tr>
<td>Population and Human Health</td>
<td>4</td>
<td>To improve access to a range of basic services and amenities</td>
<td>Does it:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Improve the access to key services (education, shops, employment, recreation, health, community services and cultural assets)?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Provide physical access for those with disabilities?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Improve and/or sustain public transport or other sustainable transport modes?</td>
</tr>
<tr>
<td>Population and Human Health</td>
<td>5</td>
<td>To provide access to opportunities for education and skills development.</td>
<td>Does it:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Ensure the provision of education and training facilities that meet local needs and that are accessible to all?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Support skills and training development in the local community and will it contribute to meeting identified skills shortages?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Will it support collaboration between educational establishments, businesses and industry?</td>
</tr>
<tr>
<td>Population and Material Assets</td>
<td>6</td>
<td>To support the growth potential of business sectors to provide jobs and encourage sustainable economic growth and prosperity.</td>
<td>Does it:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Provide for the needs of the economy, particularly local businesses (such as choice of</td>
</tr>
</tbody>
</table>
| Material Assets and Climatic Factors | 7 | To help develop a low carbon economy which will help to prepare the area for climate change for example by reducing energy demand and promoting energy generation for renewable sources. | Does it:  
• help to protect the community from changing weather patterns and environmental conditions and adapt to climate change?  
• Will it minimise the demand for energy?  
• Will it encourage efficiency in the use of energy?  
• increase the ability of the community to be more self-sufficient?  
• reduce the need for energy use and/or reduce fuel poverty?  
• support decentralised low carbon and renewable energy generation?  
• facilitate the generation and |
<table>
<thead>
<tr>
<th>Category</th>
<th>Objective</th>
<th>Does it:</th>
</tr>
</thead>
</table>
| Population and Human Health    | To reduce the need to travel, encourage alternatives to the car, and make best use of existing transport infrastructure | • Improve transport of goods/people by more sustainable means?  
• Encourage walking, cycling and use of public transport?  
• Help to reduce traffic congestion and improve road safety?  
• Reduce the need to travel, especially by car?  
• Help provide walking/cycling/public transport infrastructure?  
• Integrate well or improve the existing public transport infrastructure? |
| Biodiversity, Fauna and Flora   | To protect, conserve and enhance biological and geological diversity.       | • Protect and enhance species, habitats, soils and geologically important sites?  
• Enhance and improve connectivity of green infrastructure and the natural environment?  
• Provide opportunities for habitat creation or restoration and link existing habitats as part of the development process?  
• Ensure the sustainable management of natural habitats?  
• Help address any identified recreational impacts on biological and geological diversity? |
| Landscape                      | To conserve and enhance the distinctive character and special qualities and features of green and blue spaces | • Conserve and where possible enhance landscape character?  
• Conserve and enhance the natural beauty and special |
qualities of protected landscapes and their settings in particular the AONB and Dartmoor National Park?
• Maintain the character of the undeveloped coast?
• Protect and enhance natural networks, the living networks of green spaces (including parks, nature reserves, woodlands and allotments) and blue spaces (including rivers, streams, the coast and sea) throughout the area?
• Will it improve access to public open space?

| Cultural Heritage | 11 | To protect and enhance the cultural and historic environment | Does it:
| Cultural Heritage |  |  | • Continue to protect and or enhance historical, archaeological and cultural assets and their settings?
| Cultural Heritage |  |  | • Make a positive contribution to existing landscape, townscape and villages and their settings?
| Cultural Heritage |  |  | • Promote or enhance local culture?
| Cultural Heritage |  |  | • Protect or enhance designated or non-designated heritage assets (including landscapes) and their settings including the World Heritage Site?
| Cultural Heritage |  |  | • Does it harm the significance of the asset?

| Population and Human Health | 12 | To respect, maintain and strengthen local distinctiveness and sense of place by providing high standards of design. | Does it:
| Population and Human Health |  |  | • Enhance the quality and character of places?
| Population and Human Health |  |  | • Promote good design including density and site layout appropriate to the character of the location?
| Population and Human Health |  |  | • Encourage the use of local materials?
| Population and Human Health |  |  | • Minimise pollution from light and noise?

| Water and Climatic Factors | 13 | To avoid development in areas of high flood risk and reduce vulnerability to flooding | Does it:
| Water and Climatic Factors |  |  | • Help to manage and minimise the risk of flooding and coastal erosion to existing and new
<table>
<thead>
<tr>
<th>Soil and Water</th>
<th>14</th>
<th>To minimise resource use including greenfield land, minerals and water and to maintain and improve land quality</th>
<th>Does it:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>development and infrastructure?</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Help to discourage inappropriate development in areas at risk from flooding and coastal erosion?</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Reduce the risk of flooding to the development and surrounding areas?</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Help reduce the rate of run off?</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Promote sustainable flood risk management?</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Encourage sustainable drainage?</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Material assets, water, soil, Human Health and Population</th>
<th>15</th>
<th>To minimise the production of waste and encourage the sustainable use of resources</th>
<th>Does it:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Reduce the use of primary resources and promote the use of recycled materials?</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Encourage the use if local products and services?</td>
<td></td>
</tr>
</tbody>
</table>
To protect and improve air quality

Does it:
- Help improve air quality
- Support specific actions in designated AQMAs?
- Help reduce pollution from traffic?
- Minimise atmospheric pollution and enhance air quality?

To promote equality of opportunities and eliminate discrimination

Does it
- Ensure equality of opportunity and equal access to facilities and infrastructure for all?
- Ensure no discrimination based on the ‘protected characteristics’ defined in the Equality Act 2010?

Prediction of Effects

3.20 Using the baseline data and supporting information, the effects of the policies have been predicted for each of the SA objectives. The six point scale set out above was used to characterise the magnitude of predicted effects in terms of the change to the current baseline, combined with effects considered in terms of their duration (short, medium or long term), whether they are likely to be temporary or permanent, and the degree of certainty with which the prediction was made. Predictions were made using the evidence of the baseline data wherever possible. The predicted effects of alternatives can be compared with each other.

3.21 Definitions of Duration of Effects

<table>
<thead>
<tr>
<th>Timescale</th>
<th>Impact</th>
<th>Policy framework</th>
<th>Site allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short term</td>
<td>These effects are those that will typically occur for specific</td>
<td>Up to 5 years from the time of</td>
<td>Site preparation (e.g demolition)</td>
</tr>
<tr>
<td>Lengths of time</td>
<td>Medium term</td>
<td>Long term</td>
<td></td>
</tr>
<tr>
<td>----------------</td>
<td>-------------</td>
<td>-----------</td>
<td></td>
</tr>
<tr>
<td>During certain phases of a development or project</td>
<td>This relates to effects that may last for several years. It could include visual effects of development, which will be screened as landscaping and planting measures become more established. This may also include the economic effects of establishing new small business centres.</td>
<td>These effects are those extending beyond the lifetime of the plan, which are persistent and are likely to continue for several years, decades or could even be regarded as permanent.</td>
<td></td>
</tr>
<tr>
<td>Writing (2023)</td>
<td>At the end of the Local Plan’s duration (2034)</td>
<td>In 50 years time (2067)</td>
<td></td>
</tr>
<tr>
<td>and site works (e.g. construction)</td>
<td>Residents begin occupying the site.</td>
<td>Site in 50 years time (2067)</td>
<td></td>
</tr>
</tbody>
</table>

3.22 The permanent or temporary nature of the impacts was also assessed, in accordance with the SEA Directive (Annex 1(f)). The permanent impacts are those that are considered reasonably irreversible. Temporary impacts are those that are short term, and may possibly be reversed.

3.23 Where appropriate the secondary, cumulative and synergistic effects of the policies and allocations are also identified, in compliance with the SEA Directive (Annex 1(f)).

3.24 **Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of the complex pathway e.g. a development that changes a water table and thus affects the ecology of a nearby wetland. These effects are not cumulative and have been identified and assessed primarily through the examination of the relationship between various objectives during the Assessment of Environmental Effects.

3.25 **Cumulative effects** arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Cumulative effects can be:

- **Additive** - the simple sum of all the effects;
- **Neutralising** - where effects counteract each other to reduce the overall effect;
- **Synergistic** - is the effect of two or more effects acting together which is greater than the simple sum of the effects when acting alone. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
3.26 Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.

3.27 Cumulative effects assessment is a systematic way of identifying and evaluating the significance of effects from multiple activities. Cumulative (including additive, neutralising and synergistic) effects have been considered throughout the entire SA process, as described below:

- As part of the review of relevant strategies, plans and programmes and the derivation of draft SA objectives, key receptors have been identified which may be subject to cumulative effects.
- In the process of collecting baseline information cumulative effects have been considered by identifying key receptors (e.g. specific wildlife habitats) and information on how these have changed with time, and how they are likely to change without the implementation of the Joint Local Plan. Targets have been identified (where possible), that identify how close to capacity the key receptor is, which is a key determining factor in assessing the likelihood of cumulative and synergistic effects occurring, and their degree of significance.
- Through the analysis of environmental issues and problems, receptors have been identified that are particularly sensitive, in decline or near to their threshold (where such information is available).
- The development of SA objectives, indicators and targets has been influenced by cumulative effects identified through the process above.
- Cumulative effects of the policies have been predicted and assessed through the identification of key receptors and SA objectives that consider cumulative effects assessment.

3.28 Magnitude of effect

3.29 Magnitude of effects was defined in terms of progress towards achieving the relevant SA objective:

- Major Positive - likely to result in substantial progress towards the objective
- Minor Positive - likely to result in limited progress towards the objective
- Major Negative - likely to be substantially detrimental to achieving the objective
- Minor Negative - likely to be to the limited detriment of achieving the objective
- The magnitude may also be uncertain or neutral where the latter means no or negligible effects.

3.30 Assessment of the Significance of Effects

3.31 For the purposes of analysing the results of the assessment, significant effects are those that result in strongly negative (-) or positive (++) effects and are recorded as ‘major’.
3.32 The effects predicted for each SA objective for the plan policies were assessed for significance using a simple, systematic process. An assessment was derived for each objective based on the effect characteristics (taking account of magnitude, duration, scale, permanence and certainty) for short, medium and long term effects, using the assessment scale shown in the table below.

<table>
<thead>
<tr>
<th>Score</th>
<th>Significance</th>
<th>Explanation of Scoring Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>++</td>
<td>Major positive effects to achievement of the SA objective</td>
<td>The option or policy is likely to lead to a <strong>significant improvement</strong>, and to large scale and permanent benefits in the sustainability objective being appraised</td>
</tr>
<tr>
<td>+</td>
<td>Minor positive effects to achievement of the SA objective</td>
<td>The option or policy is likely to lead to <strong>moderate improvement</strong> and to large scale temporary or medium scale permanent benefits to the sustainability objective being appraised. Beneficial effects should not be easily reversible in the long-term. A minor positive effect is likely to halt or reverse historic negative trends.</td>
</tr>
<tr>
<td>0</td>
<td>No effect (either positive or negative) to achievement of the SA objective</td>
<td>A neutral scoring indicates that there are <strong>no or negligible effects</strong> upon the sustainability objective being appraised. This may include the continuation of a current trend. The condition of any issues may continue to decline/improve, however the appraiser's judgement is that the policy or option is having no effect on the current trend.</td>
</tr>
<tr>
<td>-</td>
<td>Minor negative effect to achievement of the SA objective</td>
<td>The option or policy is likely to lead to <strong>moderate damage</strong> or loss, leading to large scale temporary or medium scale permanent negative effects on the sustainability objective being appraised.</td>
</tr>
<tr>
<td>--</td>
<td>Major negative effect to achievement of the SA objective</td>
<td>The option or policy is likely to lead to <strong>significant or severe damage</strong> or loss. Major negative effects should only be recorded where effects are irreversible and difficult to mitigate.</td>
</tr>
<tr>
<td>?</td>
<td>Impact on the SA objective is uncertain</td>
<td>The effect of the option or policy is <strong>not known</strong> or is too unpredictable to assign a conclusive score. Where the option or policy is vague and require assumptions to assess, these should be clearly stated.</td>
</tr>
</tbody>
</table>

3.33 Mitigation measures

3.34 Mitigation measures have been identified during the evaluation process to reduce the scale/importance of significant negative effects and, where possible, enhance positive effects.
Review of relevant plans and programmes

3.35 In order to establish a clear scope for the SA of the JLP it is necessary (and a requirement of Strategic Environmental Assessment) to review and develop an understanding of the wider range of “policies, plans, programmes and sustainability objectives” that are relevant to the Plan. This includes International, European, National, Regional and local level policies, plans and strategies and initiatives. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes the systematic identification of the ways in which the JLP could help to fulfil them.

3.36 The three JLP councils conducted a thorough review of the relevant policies, plans, programmes, strategies and initiatives for the 3 JLP councils, covering international, national, regional, Devon wide and district levels. This review is detailed in Section 6 of the SA Scoping Report (July 2017) included in Appendix III. It is important to note that all three Councils had undertaken comprehensive scoping reports to support their DPD preparation prior to the decision to undertake a JLP. These previous scoping reports are available as part of the evidence base to support the JLP as they contain a significant amount of detail about the individual Local Authority Areas.

Limitations

3.37 The SA/SEA process has been informed by the most up to date information and data available and professional judgement. However, deficiencies in information do exist and it is not always possible to have sufficient knowledge available to identify and predict all of the effects of implementing the plan. For example, the precise implications of a specific site on environmental assets or traffic levels will not be known until the appropriate site-specific survey work has been carried out, usually during the planning application stage. Furthermore, climate change impacts are difficult to predict as they are most likely to result from cumulative impacts at a local, regional and national level. The SA/SEA process is therefore not a substitute for a proper project by project environmental assessment, it is a tool to enable the most appropriate strategies to be tested and advanced through the Joint Local Plan

3.38 The Joint Local Plan makes provision for a full review after 5 years from the point of adoption. This review and subsequent stages of plan making will require further appraisal and assessment and updated evidence.

Section 4: Sustainability characteristics of the Joint Local Plan area.

4.1 The Joint Local Plan area covers the administrative boundaries of Plymouth City Council, South Hams District Council and West Devon Borough Council, excluding the Dartmoor National Park Planning Authority area (map 1).
4.2 It comprises 2127.45 km\(^2\) (WD 1161.1, SH 886.51 and PCC 79.84) and has a population of 399,914 people (ONS 2014) living within the City and a network of market and coastal towns, villages and hamlets. The sea defines some of the limits of the plan area and the Dartmoor National Park sits in the middle of the area and provides an important part of the character of the area.
4.3 About 70% (261,546) of the current population live within the city of Plymouth and this provides the main regional centre for the Joint Local Plan Area. The City provides a number of key services and facilities such as Derriford hospital, further and higher education opportunities through Plymouth and Marjon universities and Plymouth College of Art and Design and provides an extensive range of shopping and leisure activities which meet the needs of the Joint Local Plan Area.

4.4 The rest of the population live in the Thriving Towns and Villages of West Devon (54,260) and South Hams (84,108). The market and coastal towns of Tavistock, Okehampton, Ivybridge, Totnes, Kingsbridge and Dartmouth provide a range of facilities and services that serve the wider rural populations. In addition to this several smaller towns and larger villages provide services for clusters of rural communities including Bere Alston, Hatherleigh, Lifton, Modbury, North Tawton, Salcombe, Stoneham and Chillington, Yealmpton and Dartington. These combine to provide a hierarchy of settlements which help serve the communities of the JLP area from the smallest hamlet to those who live within the district centres of the City.

4.5 It should be noted that West Devon is one of the most sparsely populated Local Authority Areas ranking 316\textsuperscript{th} out of 326 which a population density of 47 people per km\textsuperscript{2} compared to a density of 95/ km\textsuperscript{2} in South Hams and 3,300 km\textsuperscript{2} in the city. In direct contrast to the sparsely populated nature of West Devon, Plymouth is the 30\textsuperscript{th} most populous built up area in the United Kingdom and the second largest City within the South West after Bristol. This shows the diversity of communities living within the Joint Local Plan area and helps the JLP authorities understand the range of issues which the Plan will need to tackle.

4.6 The JLP area is well connected to the rest of the country via the A30 and A38 and both these roads join the M5 close to Exeter. There are also rail links to Cornwall, Exeter and beyond and there are plans within parts of the plan area to improve rail links, for example the reopening of the Tavistock to Bere Alston Railway line and passenger services between Okehampton and Exeter.

4.7 The JLP area is characterised by a number of important landscape designations which lie within or adjacent to its area. These include the Dartmoor National Park, the Tamar Valley, South Devon and Cornwall Areas of Outstanding Natural Beauty. It is important that the impact of any development proposals is carefully considered and the landscape assessment evidence prepared by each Council will help support the plan making process.

4.8 The three Devon authorities have a number of European protected wildlife sites, designated and protected under the Conservation of Habitats and Species Regulations 2010 (as amended). The sites of Plymouth, South Devon and West Devon form part of a wider European network of sites know as Natura 2000 sites, these sites are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. Sites of international significance include:
• Blackstone Point SAC
• Culm Grasslands SAC
• Dartmoor SAC
• Lyme Bay and Torbay SAC
• Plymouth Sound and Tamar Estuaries SAC
• Tamar Estuaries Complex SPA
• South Dartmoor Woods SAC
• South Devon Shore Dock SAC
• South Hams SAC
• Start Point to Plymouth Sound and EddyStone SAC

4.9 The Plan Area includes a wide variety of important national designations including:

<table>
<thead>
<tr>
<th>Designation</th>
<th>West Devon</th>
<th>South Hams</th>
<th>Plymouth</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites of Special Scientific Interest</td>
<td>36</td>
<td>23</td>
<td>9</td>
<td>68</td>
</tr>
<tr>
<td>National Nature Reserve</td>
<td>2</td>
<td>2</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Local Nature Reserves</td>
<td>4</td>
<td>1</td>
<td>8</td>
<td>13</td>
</tr>
<tr>
<td>County Wildlife Sites</td>
<td>203</td>
<td>262</td>
<td>24</td>
<td>489</td>
</tr>
</tbody>
</table>

4.10 There are also numerous protected species and priority habitats with the Joint Local Plan area including a natural network of green infrastructure and ensuring that development and recreational impacts are carefully managed to ensure that the integrity of sites and identified species is maintained is an important issue.

4.11 The JLP area is home to a rich and diverse historic environment which provides important cultural, economic and environmental benefits for the whole plan area. A key role of the plan is establishing and maintaining the character and distinctiveness of the area, as this plays an important role in regeneration, leisure, recreation and tourism. Within the JLP area there are a great number of heritage assets:

<table>
<thead>
<tr>
<th>Heritage Asset</th>
<th>West Devon</th>
<th>South Hams</th>
<th>Plymouth</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scheduled Monuments</td>
<td>700+</td>
<td>400+</td>
<td>37</td>
<td>1137</td>
</tr>
<tr>
<td>Conservation Areas</td>
<td>25</td>
<td>47</td>
<td>14</td>
<td>86</td>
</tr>
<tr>
<td>Listed Buildings</td>
<td>2,200+</td>
<td>2900+</td>
<td>800</td>
<td>5900</td>
</tr>
<tr>
<td>Registered Parks and Gardens</td>
<td>8</td>
<td>6</td>
<td>14</td>
<td>14</td>
</tr>
<tr>
<td>Protected Wreck</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
</tbody>
</table>
4.12 At the heart of the JLP area the City of Plymouth grew up out of a maritime economy and has developed the defence sector through the Devonport Dockyard which currently provides significant employment within the city. The maritime industry supports a large number of other firms and businesses which have chosen to locate within the city and this has been highlighted through the work of the Local Economic Partnership (LEP). The Heart of the South West Local Economic Partnership Strategic Economic Plan (SEP) has identified an approach to growth which addresses productivity barriers, creates job opportunities and ensures economic growth benefits for both rural and urban businesses. The SEP has identified some ‘transformational opportunities’ that could help to transform economic growth within the local area and this includes Marine sector growth. It is important that Plymouth and the JLP area tap into these opportunities to ensure economic stability and viability. Other substantial employers within the City include the University, the Science Park and the Hospital.

4.13 Within South Hams and West Devon, the economy is less concentrated within key industries. In 2012, top employment sectors in both authorities were retailing, public sector services, tourism, construction and manufacturing. There are a number of key issues which impact on the economy of West Devon and South Hams including low wage rates of those who work within the area, yet higher resident wage rates, significant levels of out-commuting to work, high skills levels amongst residents in work and below national average employment levels – therefore the Joint Local Plan needs to look for opportunities to raise productivity and wage levels and not just create jobs.

4.14 The latest ONS national projections predict that the population would grow by 8% over the plan period from 399,914 (2014) to 434,900 (2034). The latest Strategic Housing Market Needs Assessment (SHMNA) part 1 (February 2017) predicts that the population will grow to 442,700 which is an increase of 11% over the plan period. This population growth will be met by each of the Councils providing suitable land for housing and employment growth within the Councils areas.

4.15 Further baseline information is set out in the Scoping Reports, including social and health statistics. Since baseline information was collated, additional evidence has been added to the JLP evidence base which has informed plan making and the SA/SEA process.

4.16 The SEA regulations require that consideration is given to the likely evolution of the environment if the JLP were not to be implemented.

4.17 The Table shows that there are a number of key issues which the policies and proposals of the JLP need to address.
<table>
<thead>
<tr>
<th>Characteristics of the Area and Sustainability Issues Identified</th>
<th>Likely Evolution without the Local Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sustainable Development</strong></td>
<td></td>
</tr>
<tr>
<td>Climate change will continue to have impacts such as sea level rise, increased precipitation, rising surface temperatures etc</td>
<td>Increasing impacts on development situated within existing and future flood prone areas and associated social and economic effects, including resilience.</td>
</tr>
<tr>
<td>Incidences of flooding and more frequent extreme weather events are expected to increase as a result of climate change.</td>
<td></td>
</tr>
<tr>
<td>Generally good levels of air quality – but there are designated Air Quality Management Areas, and water quality areas which need careful monitoring. The water catchment of Plymouth city drains into a sensitive estuary;</td>
<td>Increasing effects of climate change and unsustainable development patterns, and low take up of sustainable transport modes likely to impact on all elements of the natural environment, and consequences eg for biodiversity, tourism and businesses dependent on water quality/availability. Unmitigated impacts on international sites would preclude significant city growth and undermine its strategic role</td>
</tr>
<tr>
<td><strong>Synergy between Plymouth and the rural areas in the plan area – notably with commuting to work and travel to access higher order services and facilities such as retail, leisure and tertiary education</strong></td>
<td>Uncontrolled development increases growth outside the city leading to increased traffic throughout the area, with potential impact on climate change as well as traffic congestion, journey time reliability and economic competitiveness</td>
</tr>
<tr>
<td><strong>High levels of fuel poverty in across the plan area, particularly in rural areas</strong></td>
<td>No increase in quality of design or improvement in construction standards that respond to the characteristics of the area, with fuel poverty remaining high</td>
</tr>
<tr>
<td><strong>Resource within the plan area to generate renewable energy, and provide opportunities to improve energy security</strong></td>
<td>Low take-up of renewable energy sources, increasing reliance on carbon-based fuels and adding to carbon emissions, likely to further increase the incidence of fuel poverty, and potentially contributing to climate change</td>
</tr>
<tr>
<td><strong>Opportunities to reduce waste and the need for landfill within the plan area</strong></td>
<td>Low reuse and recycling increases pressure on landfill Uncontrolled development results in loss of natural resources</td>
</tr>
<tr>
<td>Opportunities for the protection of soils and viable minerals</td>
<td></td>
</tr>
<tr>
<td><strong>Extensive areas of previously developed land, particularly in Plymouth</strong></td>
<td>Lack of focus on redevelopment of previously developed land increases pressure on greenfield sites, and reduces opportunities to regenerate and enhanced underused sites,</td>
</tr>
<tr>
<td><strong>Economy</strong></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
</tr>
<tr>
<td><strong>Strategic role of Plymouth and the wider economy</strong></td>
<td>Uncontrolled development in locations that are not consistent with supporting the focus on Plymouth undermines the ability to support its strategic role</td>
</tr>
<tr>
<td>Employment in Plymouth generally dominated by the maritime/defence, higher education, manufacturing/R&amp;D (eg the Science Park) and health sectors. High levels of unemployment and lower economic activity rates in Plymouth. Fragile economy, with need to diversify. In South Hams and West Devon, the focus is on retailing, public sector services, tourism, construction and manufacturing sectors with low paid jobs but higher resident wage rates, significant levels of out-commuting to work, high skills levels amongst residents in work and below national average employment levels. Rural economy is largely SMEs. Importance of main towns as retail destinations and employment areas. GVA levels are far below the national average across plan area.</td>
<td>Low economic growth in Plymouth reducing transformational opportunities for the economy, failing to support the flagship interventions of the Strategic Economic Plan. Economic productivity does not rise and economic reliance on public sector in Plymouth continues. City does not build on its key assets such as the City Centre, education infrastructure/knowledge economy, or its established and growing specialisms. Little or no increase in employment opportunities or diversification of sustainable skill levels. Continued reliance on low paid sectors in rural area, and skill shortages continue. Uncontrolled development leads to loss of viable employment sites to higher value uses</td>
</tr>
<tr>
<td>The environment is a valuable asset and the impact of growth and regeneration must be appropriately managed if this resource is to be sustained.</td>
<td>No support to provide modernisation of existing employment sites and more sustainable working practices and improved skills. Opportunities for regeneration of existing brownfield sites may be reduced. Uncontrolled development in countryside will potentially erode environmental assets.</td>
</tr>
<tr>
<td>Tourism is an integral part of the economy of Plymouth and South West Devon. The area has a wealth of tourism facilities and attractions, the majority of which are based on the value provided by the area’s environmental assets including the undeveloped coast.</td>
<td>Tourism results in a diverse and wide-ranging set of economic, social and environmental impacts. Potentially increasing impacts on communities and pressure on environmental assets, including protected landscapes and the countryside.</td>
</tr>
<tr>
<td><strong>Environment</strong></td>
<td></td>
</tr>
</tbody>
</table>
Levels of private car use are high. Higher use of sustainable transport modes in Plymouth but levels of public transport are low in rural areas. Increasing reliance on private vehicles likely to impact on carbon emissions and air quality. Under provision and utilisation of public transport likely to maintain existing levels of isolation in rural areas.

Plymouth and South West Devon has a high quality natural environment including the 2 AONBs, 9 SACs, numerous SSSIs and an extensive heritage coast, as well as the setting of Dartmoor National Park. Growth in population and related increase in traffic and tourism likely to have incremental impacts on the most sensitive landscapes and habitats in the plan area and the adjoining National Park. Uncontrolled development in countryside will potentially erode environmental assets.

Plymouth and South West Devon has a significant number of landscape, wildlife and heritage designations and more general green infrastructure which is important to local residents and the tourism sector, and to the biodiversity of the plan area. Potential degradation of designated sites with lack of support for key sustainability targets and objectives. Limited opportunities to enhance and expand green infrastructure network with implications for economy and health of population. Potential loss of strategic landscapes around Plymouth and protected landscapes through uncontrolled development, reducing the qualities of the area that are attractive to in-migrants including the workforce. Loss of opportunity to secure or retain integrated networks of green infrastructure, lowering biodiversity resilience to climate change. Uncontrolled development will potentially erode the historic environment including degrading the significance of heritage assets with loss of landscape/townscape, character and distinctiveness in the plan area.

Social

House prices are high in proportion to wages and there is a lack of affordable housing, particularly in the South Hams. Changing community needs regarding eg mix of housing, type, tenure, housing for older people and people with special needs, travellers A continuing trend of a shortfall in affordable housing supply and employment opportunities may lead to first time buyers and low income families being increasingly priced out of the market. Subsequent effects on the demographics of the plan area, particularly in the rural areas with increases in elderly population and a lower proportion of key workers. Shortage of housing in total or mix leads to objectively assessed needs not being met

High incidence of health inequalities, deprivation and unemployment in Plymouth. Health inequalities are exacerbated by non-delivery of health facilities/services, or by
| Population in South Hams and West Devon is relatively healthy but with a high proportion of elderly population | lower accessibility as a result of not having mixed uses or low availability of public transport. Increased travel as distances between homes and facilities are high, potential impact on work life balance and mental well being. Increasing elderly population put a greater demand on health services and facilities into the future. |
| Higher than average accessible greenspace in Plymouth. Reasonable public space provision in South Hams and West Devon but deficiencies in outdoor sports in some locations | Uncontrolled development on greenspace and loss of sports pitches and facilities reduces access to public space and opportunities for people to be physically active, reducing individuals' ability to improve their own health. |
| People in more rural parts of the plan area are geographically more isolated and employment opportunities are limited | Continued high levels of commuting to the Plymouth and to main towns may lead to smaller towns and villages becoming less viable with high levels of road traffic and potential effects on air quality. |
| Historic levels of in-migration to the rural areas, and an increasing number of second home ownership particularly in the South Hams. | Continuing current trends would see increase pressure on housing sector, community facilities and infrastructure, particularly in settlements with lower levels of services and facilities. |
| Rural communities rely on facilities within the main towns with many rural areas having experienced the loss of important local services. | Communities may struggle to maintain self-sufficiency with limited access to key services and facilities particularly amongst some vulnerable and disadvantaged groups. Lack of support for appropriate areas and levels of regeneration and growth through Neighbourhood Plans. |

Note: further assessment of not having policies is set out in Appendix IX (SA of JLP policy alternative) in this topic paper

4.17 The Table shows that there are a number of key issues which the policies and proposals of the JLP need to address. The Councils had previously undertaken work to identify key issues and these issues have been brought together through the ‘Duty to Cooperate’ and into the preparation of the Joint Local Plan. The Councils have worked together to develop a strategy for the JLP area which seeks to address these sustainability issues and to ensure that appropriate levels of development are implemented in the right locations. In order to develop the policies and proposals within the plan the Councils have worked together to identify ‘reasonable alternatives’. Section 5 of this document sets out the different alternatives which have been identified and assesses the different stages of plan preparation.
Section 5: Consideration of reasonable alternatives

5.1 There is a requirement for the SA/SEA to consider all reasonable alternatives, including the preferred approach and assess these against the baseline environmental, social and economic characteristics of the area. This can be achieved by assessing reasonable alternatives with the SA Framework.

5.2 This section of the document looks at the reasonable alternatives which have been considered during the preparation of the plan and tests them against the assessment criteria. It is important to recognise that when the three authorities made the decision to prepare a JLP there had been a considerable amount of work already undertaken through the duty to cooperate. The Councils had already recognised through cross boundary working that supporting Plymouth’s growth agenda and enabling sustainable levels of growth within the towns and villages of South Hams and West Devon would be the most sustainable strategy for the JLP area and of mutual benefit to all three Councils. It provided a real opportunity for the Councils within the Housing Market Area (HMA) and Functional Economic Market Area (FEMA) to work together to provide the best strategy for growth within their areas. Growth which would help support the city and the key towns and villages within South Hams and West Devon whilst also recognising the sensitive character of the area and those areas which have special designations such as the Dartmoor National Park, the Areas of Outstanding Natural Beauty and the World Heritage Site.

5.3 It is important to recognise that there were a limited number of reasonable alternatives which could deliver a strategy which recognised the key issues that had been identified through the Duty to Cooperate. The Councils have worked together to bring all the previous work undertaken individually into a single strategy which seeks to achieve a sustainable future for the JLP area.

Reasonable Alternatives for Growth

5.4 One of the key areas which the JLP must provide is a strategy to enable the Councils to provide for the identified housing and employment needs within the three Local Planning Authority Areas for the plan period to 2034. In order to identify this need the Councils commissioned consultant’s PBA to undertake some work on calculating the ‘Objectively Assessed Need’ for housing within the identified Housing Market Area (HMA) and also to identify the requirement for jobs within the Functional Economic Market Area (FEMA).

5.5 The HMA and FEMA have been identified through a robust testing of how different parts of Devon and Cornwall work and the evidence to support this is set out in the SHMA
Part 1. There are no reasonable alternatives to test in terms of the definition of the HMA and FEMA and therefore this SA does not test this evidence.

5.6 During the summer of 2016 the JLP Councils consulted on a potential growth figures which had begun to be calculated using the mid-year estimate and household projections available at that time. The initial figure of 30300 was consulted on through the Regulation 18 consultation documents. Firstly, in the Summer Reg 18 Consultation, which set out why the Councils were preparing a JLP and started the discussion about the number of homes which might be required in the area. It was made clear in the document that this was a very early figure and it that it would be subject to further refinement following the publication of more up to date demographics which were due to be published later in the year. The Councils felt it was useful to give an indicative figure so that the local communities could understand what the JLP was seeking to achieve.

5.7 The figure of 30300 was referenced again in the November 2016 consultation document ‘Deciding upon the distribution of development ‘Topic Paper. In this document, it was made clear that following the publication of the DCLG 2014 Household Projections there will be a need to update the figures. At that time Devon County Council (DCC) were updating their POPGROUP model to include both the 2014 Mid-Year Estimate and also the 2014 based household projections. The Council made it clear that they would use this more robust data to provide more up to date figures which could then be sense checked against the indicative figure of 30300.

5.8 The further work was subsequently undertaken by DCC and has informed the SHMA Part 1 which formed part of the evidence released in March 2017 alongside the PreSubmission Version of the Plan.

5.9 The SHMA Part 1 sets out how the overall housing need has been calculated and the assumptions which have been made. The starting point in estimating overall housing need is the official household projections and then these are adjusted to take different factors into consideration and to ensure that a longer-term view is taken and that more local data can be tested to ensure that the OAN is correct. Therefore, a number of longer term trends were tested as follows

- 10-year migration trend
- 20-year migration trend
- 30-year migration trend

5.10 When looking for reasonable alternatives to test the Councils looked at these three migration trends however both the 20 and 30-year migration trend both showed smaller overall population and dwelling growth than the official household projections and it was considered that these two trends were not reasonable alternatives on which to base the OAN as they were showing smaller levels of growth to those required in the officially recognised figures.
5.11 It was considered that the 10-year migration period gave a more accurate picture of demographic trends as it ensured that periods of boom, recession and several years of recover were included in the time period and therefore it enabled the most accurate picture of population change within the HMA.

5.12 The Councils felt that the 10-year migration trend projection provided the most robust baseline information and predicted a level of growth which could be seen as balanced and sustainable in the long term. To help inform the decision to use the 10-year migration figure as the baseline, the Councils tested three scenarios of demographic change. This process helped to identify key issues which would need to be considered as the plan developed and also helped clarify which demographic model was considered to be the most robust.

5.13 Appendix V sets out an assessment of the three scenarios

- Scenario 1 – DCLG Based
- Scenario 2 – 10 Migration
- Scenario 3 Reg 18 consultation fig

5.14 The Councils recognised that the DCLG based figures were commonly seen as the standard starting point for calculating the objectively assessed need for housing, however they felt that the figures only factored in a relatively short period (5 years) of migration and it is considered more robust to look to longer term trends to set a more locally informed baseline. The 10-year migration trend projection also demonstrates a higher need across the whole HMA and this is reflective of the Council’s desire to significantly boost the supply of housing, therefore it was considered that this was the preferred option for growth.

5.15 The Councils took the 10-year migration figures and used them to work through and prepare the housing targets. This work is set out in the Housing Topic Paper published alongside the pre-submission plan in March 2017

5.16 In terms of testing the alternatives through the SA, the 10-year migration model would ensure that the JLP was meeting its housing and employment needs in full and would also be boosting the supply above the level of growth identified in the DCLG based figures. This was seen as providing opportunities to deliver a sustainable level of growth for the HMA/FEMA. Whilst this figure is below the 30300 identified in the Regulation 18 document, the Councils are confident that this figure is robustly founded on a credible evidence base and provides a level of growth above the DCLG identified levels, therefore the Councils are confident that this provides the best and most sustainable level of growth for the HMA/FEMA.
Reasonable Alternatives for Distribution Strategy

5.17 Whilst the Councils were refining the figures to determine the levels of growth required for homes and jobs within the HMA and FEMA, the JLP Authorities were also beginning to think how this level of growth could be distributed throughout the JLP area.

5.18 In preparing the JLP, the Local Authorities were not starting with a blank sheet of paper. It is important to recognise that the distribution strategy should reflect previous work undertaken through the preparation of numerous plans and strategies. It was broadly accepted that the JLP should reflect this previous work as there was a substantial amount of evidence to support that this would provide the most sustainable form of development for the JLP area. Therefore, the overarching strategy needed to carefully consider the distribution strategy expressed in the Devon Structure Plan 2001-2016 and the draft Regional Spatial Strategy as these were commonly recognised through partnership working to provide the best strategy and hierarchy for growth. The Councils have been working together with other Councils in the SW for many years to devise a strategy which mirrored the functional character and needs of the area and the contemporary evidence which supports the JLP still recognises the historic strategic approach of Plymouth as a ‘growing city’ and of sustainable levels of growth in the South Hams and West Devon as being a robust strategy.

5.19 Much work has been done within each of the Authorities on how best to distribute the growth. Prior to the JLP, each of the three Local Planning Authorities considered independently how growth could be distributed within their Local Authority area and had worked together through the Duty to Cooperate to discuss cross boundary issues in connection with this. It became clear that the most effective and sustainable strategy to plan for and accommodate the sustainable growth of the area was to work jointly to prepare one local plan for the three authority areas, excluding the Dartmoor National Park area who are working on producing their own plan. The preparation of the JLP provided a real opportunity to think about growth at a sub-regional level and to develop a strategy which met the needs of the wider Housing Market Area and Functional Economic Market Area as well as the individual local authority areas. The preparation of a single plan would also provide Plymouth and South West Devon a single stronger voice in the wider region and would also meet the Government objectives of working together to develop a coherent comprehensive strategy for appropriate Housing Market Areas.

5.20 The Councils agreed that in developing the strategy the JLP should facilitate and promote economic growth and regeneration within the HMA/FEMA. The strategy should aim to guide development to locations which will contribute to the creation of sustainable settlements and that development should be located where it will avoid inappropriate harm to the AONB, the high-quality environment of the JLP area, and the historic environment, consistent with legislation and national policy.
5.21 To inform the strategy, the Councils identified a number of shared objectives which have become articulated as a vision within the Joint Local Plan. It is important to point out that the vision for the wider area has been developed from previous visions relating to each council area. The strategic objectives have been tested and have subsequently been further refined as the JLP has been prepared. An assessment of these objectives can be seen, along with the assessment of the vision and policies in Appendix X.

5.22 During November 2016, the JLP authorities consulted on a topic paper ‘Plymouth and South West Devon Joint Local Plan – deciding upon the distribution of development topic paper November 2016’. This set out to answer a number of key questions in relation to the preparation of the JLP. This also included consulting on the options for distributing development across the area.

These included:
- Why and how the LPAs decided to prepare a JLP
- What the JLP is seeking to achieve
- The historic context of the distribution strategy
- How the councils are working to prepare strategic objectives
- How the councils intend to distribute growth across the JLP
- The alternative approaches tested for the development strategy
- How work was progressing towards a preferred option

5.23 The preparation and consultation on this document was an important key stage in the preparation of the plan and enabled the councils to test work on options for the spatial distribution of the development within the plan area and to also set out some information to support the progress in preparing the JLP.

5.24 The paper set out a number of reasonable alternatives for the distribution of development within the Joint Local Plan area. These alternatives were appraised and consulted upon in the November 2016 Topic Paper as part of the iterative process of undertaking an appraisal and ensuring that sustainability is taken into consideration when looking at ways of distributing development within the plan area.

5.25 In addition, in thinking through the distribution of the growth throughout the plan area, the Councils had to have regard to the significant proportion of JLP allocations that were allocated in previous development plan documents, many of which are in current pre-application discussions or have recently received consent since the base date of the plan. The Council have also had regard to the Strategic Housing and Employment Land Availability Assessment (SHELAA) process which has assessed sites available for future development. Clearly, the availability of sites should not solely dictate the strategy being used, but clearly the Councils must consider only reasonable alternatives, i.e. those that are likely to be delivered in the timescale of the plan.
The Councils’ work on developing the strategy resulted in a number of options for distributing the growth. These are:

- **Urban Intensification**
  - A - Urban intensification only within Plymouth City Boundaries
  - B - Urban intensification including urban extensions

- **Concentration of development**
  - A - Concentration on Plymouth and adjoining settlements
  - B – Concentration on Plymouth and key transport corridors
  - C – Concentration on Plymouth and new settlements
  - D – Concentration on Plymouth and the area settlements
  - E - Concentration on Plymouth, Area Centres and Local Centres
  - F – Concentration on Plymouth, Area Centres, Local centres and Sustainable villages outside the AONB
  - G – Concentration on Plymouth, Area centres, local centres and all sustainable villages including within the AONB.

- **Dispersal of development**
  - A - Dispersal – City of Plymouth delivers what it can
  - B - Complete dispersal - development is shared out evenly across the whole HMA

Each of the alternative options for distributing the growth were consulted on during November/December 2016 and were the subject of the assessment included in the consultation document. Appendix VI sets out the appraisal and through this a preferred option began to emerge.

**Preferred Strategy**

This November 2016 consultation identified that the preferred option for the distribution of development within the JLP area was a concentration of growth cascading down through a defined settlement hierarchy, from the City to main towns and key villages down to sustainable villages. This strategy included an expectation that growth in settlements within the protected landscapes or their setting, including the AONB would be at an appropriate level which should not harm their special qualities of the protected landscapes. As a result of managing and articulating the strategy, two sub areas were confirmed; the ‘Plymouth Policy Area’ (PPA) and the ‘Thriving Towns and Villages Policy Area’ (TTV). This refined the broad approach that had been outlined during earlier consultations in 2016 and the Councils began to articulate how the JLP and its strategy would work to deliver appropriate levels of growth to the distinctive parts of the Plan Area.

These two policy areas are tools to manage the overall distribution of growth and to help demonstrate housing delivery and five-year supply throughout the plan period whilst ensuring that sustainable development is at the heart of decision making. They have two key roles. Firstly, to ensure that the growth required to drive the ambitious growth
agendas of Plymouth is delivered in locations which will deliver the aspirations of the city. Secondly, to ensure that the housing and development needs of the rest of the plan area are carefully balanced against the sensitive environments, towns and villages of South Hams and West Devon. The Policy Areas are therefore a clear expression of the preferred development strategy which arose out of the assessment set out in the November report. Combined, the approach represents a sustainable strategy. This provides the context for the translation of the Objectively Assessed Need (OAN) for housing into the JLP housing provision targets. The Housing Topic Paper provides the evidence for that translation and demonstrates that the OAN is met through the policies and proposals of the JLP.

5.30 This approach has been formally agreed in principle through the approval from all three authorities to submit the Joint Local Plan for examination. Nevertheless, it should also be noted that the three authorities set up a Joint Local Plan Member Steering Group as part of the Collaboration Agreement setting out how they would produce the Joint Local Plan. This steering group was tasked with providing guidance and a steer to officers on all key decisions regarding the formulation of the JLP. Throughout the development of the JLP, the Member Steering Group have considered and discussed every element of the JLP, and have agreed key policy recommendations such as the creation of 2 policy areas.

5.31 The Plymouth Policy Area comprises an area of the city and its immediate urban fringe, where growth will be driven by the economic growth agenda and initiatives being delivered to drive and increase the pace of transformation and regeneration.

5.32 The Thriving Towns and Villages is made up of 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 villages with thriving hinterlands.

5.33 This strategy is considered to most closely reflect the strategies previously deployed by each Council, albeit an approach that requires policy intervention to ensure that growth expectations within the AONB are limited to minor development, or major development only where the requirements of NPPF para 116 can be satisfactorily addressed.

5.34 The feedback from the November consultation has been taken into account whilst preparing the plan ready for submission of the plan and further work was undertaken on developing the two distinctive policy areas.

5.35 The Strategy Topic Paper published alongside the Submission Version of the Plan provides more detail in relation to the Strategy outlined in the Joint Local Plan.

Strategy for the Plymouth Policy Area

5.36 Within the Plymouth Policy Area, the approach has been to plan for sustainable development with a focus on the three growth areas, previously identified and tested as a policy approach through the Plymouth Plan. Other smaller sites around the City were also identified to ensure sustainable growth of the city as a whole. The site selection
Strategy for the Thriving Towns and Villages

5.37 In the Thriving Towns and Villages Policy Area, the strategy is based on the main towns of Dartmouth, Ivybridge, Kingsbridge, Okehampton, Tavistock and Totnes where the focus of growth reflects the role these towns in supporting their rural hinterlands, offering a range of services and facilities, public transport links and access to local jobs. However, it is recognised that Kingsbridge and Dartmouth are more constrained than the other settlements through their proximity and relationship to the South Devon AONB which has been taken into account and reflected when looking at the levels of growth that could be accommodated in each area.

5.38 The amount of new development that is being accommodated across the TTV in each town/village is informed by various evidence, including the Strategic Housing and Employment Land Availability Assessment (SHELAA).

5.39 The next level of settlements are the key towns and villages which form part of the important network of rural communities, acting as a focal point for the wider rural areas and providing access to some services and facilities. These locations are able to accommodate an appropriate and proportionate level of growth over the plan period which supports these communities over the JLP period.

5.40 Across South Hams and West Devon are also a number of smaller villages. Establishing a strategy for growth at this level has required some further work to establish those which are the more sustainable and may be able to accommodate some small scale development and which also takes into consideration those settlements within the AONB and their suitability for development. (see Strategy Topic Paper)

5.41 The Councils have sought to ensure that a consistent approach to identifying settlements has been established whilst accepting that in rural areas, it is rare that villages meet all of the criteria being used to assess them. However, many of these rural communities have adapted to make the best of the physical infrastructure and digital and transport connectivity to live as sustainably as possible. It is also important to recognise that many rural communities have functional relationships with other villages, sharing services, facilities and maximising the best of what each community has to offer whilst retaining their own identity and character.

5.42 An approach was devised which identified those settlements with access to services and facilities capable of supporting a sustainable rural community. This acknowledges that the focus should not be simply be on the physical infrastructure but also take into consideration how well connected the settlement is, in terms of both transport and
technology as well as looking more broadly at the three strands of sustainability in terms of the social, economic and environmental credentials of each community.

5.43 A number of these smaller settlements are within the designated landscapes of the South Devon and Tamar Valley Areas of Outstanding Natural Beauty. The NPPF does not preclude development in the AONB, but requires that ‘major development’ must be justified in exceptional circumstances and where it can be demonstrated that it is in the public interest. The strategy for these smaller villages has resulted in an approach where no development is being allocated by the JLP. Instead, the assessment of housing supply incorporates an allowance for potential housing growth delivered through the neighbourhood planning process. Indicative levels of growth of between 10 and 30 homes have been developed to guide that process. That assessment is based on factors such as services and facilities, accessibility of larger settlement, digital communications and site availability. All of the villages within the AONB which are considered to be sustainable villages have therefore been identified as potentially having capacity for small scale development of 10 homes which would not result in major development in the AONB and therefore in conformity with national policy but recognising that some limited growth will continue to support services and facilities of these settlements into the future.

5.44 The Housing Topic Paper which has been prepared to support the JLP has considered the matter of the AONB in more detail in relation to the neighbourhood plan allowance. It uses a site assessment approach based on SHELAA sites to forecast a potential allowance of housing supply from the neighbourhood plan process. That allowance is included in the TTV housing trajectory. The site assessment method has been used in preference to the theoretical village sustainability method which underpins figure 5.8 in the JLP.

5.45 The JLP responds through a policy which specifically protects the AONB (DEV27) when combined with the distribution strategy that minimises the development in the AONB, ensuring that designated landscapes are given appropriate consideration in planning for new development.

5.46 JLP policy SPT3 sets out the distribution of the housing provision within the JLP area with the Plymouth Policy Area expected to accommodate at least 19,000 new homes and the Thriving Towns and Villages 7,700 new homes. The Housing Topic Paper has tested reasonable alternatives; first for the total scale of housing provision and its distribution between the two policy areas; second for the distribution of affordable housing between policy areas.

5.47 The site selection process and appraisal for allocating sites is briefly outlined at paragraph 5.48 of this report with an assessment available to view at Appendix VI.
Site Assessment Process – Testing Reasonable Alternatives

5.48 The JLP goes on to make a number of site allocations across the plan area which sets out the strategy for meeting the level of growth planned across the area.

5.49 Throughout the development of the JLP, alternatives have been considered and where identified as ‘reasonable alternatives’ they have been appraised through the Sustainability Appraisal process. The Councils have worked quickly to bring the JLP together and SA has been an iterative and ongoing input into the process of developing the JLP. The JLP has identified a development strategy including the allocation of sites to meet the needs for housing, employment and other development needs. Alternatives for potential site allocations have been considered and the process included several public calls for sites. This built on previous work which each of the Councils had undertaken to support their emerging development plan documents prior to the preparation of the JLP.

5.50 The methodology for assessing sites for allocation is set out at Appendix VII. The site assessment process has been used to assess sites at various stages of the plan preparation process with the aim of narrowing down the number of sites to those that are considered to be reasonable alternatives for development. These reasonable alternatives for development have then been put through an assessment process, the tables showing the assessment of sites are shown at Appendix VII for Plymouth Policy Area and Appendix VIII for the Thriving Towns and Villages Policy Area. This process has enabled the Councils to identify the most suitable sites for development, not only in terms of the sites complying with the strategic aims of the plan but also a process which identifies the sites which have the least constraints, can maximise any identified benefits and also where appropriate have taken into consideration the views of the local community.

Reasonable Alternatives for Policy Options

5.51 In developing policy options for the JLP, an assessment was taken of the reasonable alternatives available to support the identification of suitable policies within the plan. It should be noted that many of the preferred policies are based on existing policies in use at the three authorities. Where appropriate the Councils have merged existing policies into an agreed common policy wording to ensure a consistency of approach across the plan area. The assessment of reasonable alternatives is available at Appendix IX but it is important to note that each of the Councils felt that the scope for alternative policies in many instances was relatively narrow as the JLP was bringing together a great deal of work which had been subject to various stages of consultation.

5.52 The Vision, Objectives and policies in the Joint Local Plan have all been assessed through the integrated assessment. This is shown in Appendix X.
Likely effects of the JLP

5.53 The assessment of the strategy, policies and proposals of the plan as set out in this assessment document has identified the following likely effects of the JLP. It is recognised that the JLP will have impacts on the sustainability characteristic of the area. Table 4 Evolution with out a Plan shown earlier in the document is shown here with an extra column showing the likely effects of implementing the JLP.
### Characteristics of the Area and Sustainability Issues Identified

<table>
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<th>Sustainable Development</th>
<th>Likely Evolution without the Local Plan</th>
<th>Effects of Implementing the Plan</th>
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<tr>
<td>Climate change will continue to have impacts such as sea level rise, increased precipitation, rising surface temperatures etc</td>
<td>Increasing impacts of development situated within existing and future flood prone areas and associated social and economic effects, including resilience.</td>
<td>The JLP includes policies which seek to address the long term impact of development on the environment, through both climate change mitigation and adaptation. The policies seek to minimise impacts on the road network, promote sustainable locations for development as well as encouraging mixed use /sustainable neighbourhood developments which could help contain travel by car. Many of the housing developments will be required to deliver appropriate levels of open space which provide carbon sinks; this can be further enhanced by the requirements for trees and strategic landscaping on some of the sites. Trees provide cooling through shade and can help reduce the heat in built up areas. Development in the JLP is generally directed away from areas at high risk of flooding unless the development proposals can be made acceptable in planning terms, for example by placing less vulnerable uses such as open space on those areas at risk of flooding. The JLP is supported by a Flood risk sequential and exceptions test document and policies exist in the plan to support this approach when dealing with specific applications. The JLP could have some potential for minor negative effects on the water environment as a result of the levels of growth in some areas and the loss of</td>
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Incidences of flooding and more frequent extreme weather events are expected to increase as a result of climate change.
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<td>Generally good levels of air quality – but there are designated Air Quality Management Areas, and water quality areas which need careful monitoring. The water catchment of Plymouth city drains into a sensitive estuary;</td>
<td>Increasing effects of climate change and unsustainable development patterns, and low take up of sustainable transport modes likely to impact on all elements of the natural environment, and consequences eg for biodiversity, tourism and businesses dependent on water quality/availability. Unmitigated impacts on international sites would preclude significant city growth and undermine its strategic role</td>
<td>Overall it is considered that major negative effect on air quality is unlikely as a result of the JLP. Policies within the plan seek to address the impacts of proposed development on the road network and encourage the use of more sustainable modes of transport. This includes measures for new and improved pedestrian and cycle links, better public transport to reduce car use and an aspiration to increase rail use including improved passenger services between Okehampton and Exeter and the reopening of the railway line between Tavistock and Plymouth (via Bere Alston). Whilst there could be some localised impacts in the short term as development starts to come forward, the mitigation measures included alongside the site allocations will seek to ensure that development does not exacerbate existing problems.</td>
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<td>Synergy between Plymouth and the rural areas in the plan area – notably with commuting to work and travel to</td>
<td>Uncontrolled development increases growth outside the city leading to increased traffic throughout the area, with potential impact on climate change as well as</td>
<td>Overall the JLP seeks to address the impacts of development on the road network and ensure that appropriate infrastructure is provided in the right places at the right time. The Plan includes mitigation measures for identified travel and transport impacts.</td>
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<td>access higher order facilities and services such as retail, leisure and tertiary education</td>
<td>traffic congestion, journey time reliability and economic competitiveness</td>
<td>The JLP seeks to encourage increased use of sustainable modes of transport and sets out appropriate requirements for financial contributions to critical infrastructure required to support the development. Policies which support the development of mixed use sites where homes and jobs are alongside each other will also help improve accessibility and reduce the need to travel. In the rural areas travel by car is more prominent however the strategy has looked to place development in those locations where there are essential services and facilities to help reduce the need to travel where possible. There are also policies within the JLP which seek to increase the use of rail travel particularly in the main towns of Tavistock and Okehampton in the TTV area. These measure alongside the growth in the housing stock, economy and community facilities has the potential to have some positive benefits in terms of travel and transport.</td>
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<td>High levels of fuel poverty in across the plan area, particularly in rural areas</td>
<td>No increase in quality of design or improvement in construction standards that respond to the characteristics of the area, with fuel poverty remaining high</td>
<td>The JLP includes policies which will seek to improve energy efficiency through design of buildings and will also look for opportunities to use renewables where possible. Unfortunately, this will not help those dwellings which already have poor energy efficiency and it is hoped that other initiatives will continue to tackle this issue.</td>
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<td>Resource within the plan area to generate renewable energy, and provide opportunities to</td>
<td>Low take-up of renewable energy sources, increasing reliance on carbon-based fuels and adding to carbon emissions, likely to further increase the</td>
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<td>improve energy security</td>
<td>incidence of fuel poverty, and potentially contributing to climate change</td>
<td>Overall the JLP is considered to have the potential for some minor effect due to the increase in waste production and the need for recycling. However, within the PPA there is a waste to energy plant which should help significantly reduce any impacts of increased waste production. The policies within the plan provide sufficient provision for refuse and recycling, as a unitary authority Plymouth is also responsible for the preparation of the waste plan, this combined with a strategic approach to waste management set out within the TTV area through the DCC Waste Plan will ensure that there are no major long term negative effects on waste and recycling.</td>
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<tr>
<td>Opportunities to reduce waste and the need for landfill within the plan area Opportunities for the protection of soils and viable minerals</td>
<td>Low reuse and recycling increases pressure on landfill Uncontrolled development results in loss of natural resources</td>
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<tr>
<td>Extensive areas of previously developed land, particularly in Plymouth</td>
<td>Lack of focus on redevelopment of previously developed land increases pressure on greenfield sites, and reduces opportunities to regenerate and enhanced underused sites, leading to likely further degeneration of the built environment. Would reduce the opportunities to develop deliverable schemes contribution to supply of housing and other land uses, but needs to be mindful of the need to maintain eg the housing land supply</td>
<td>The JLP seeks to identify the most sustainable locations for development. Where appropriate this includes bringing forward land which has been previously developed, where viable, through regeneration schemes. In the City, the JLP clearly sets out a vision for the future of each of the growth areas and this includes identification of areas of the city which would benefit from regeneration. The JLP also includes policies which seek to protect important greenspaces from development and clearly identify the countryside within the JLP area</td>
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Economy
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<tr>
<th>Characteristics of the Area and Sustainability Issues Identified</th>
<th>Likely Evolution without the Local Plan</th>
<th>Effects of Implementing the Plan</th>
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<tr>
<td>Strategic role of Plymouth and the wider economy</td>
<td>Uncontrolled development in locations that are not consistent with supporting the and focus on Plymouth undermines the ability to support its strategic role</td>
<td>Overall the JLP is considered to have a potential for short to long term positive cumulative effects on the economy and employment through the provision of new employment land across the JLP and through policies which identify strategic employment areas. Major allocations for employment have been made within the Plymouth Policy Area and appropriate levels have been identified in the TTV at an appropriate scale. The JLP protects important employment sites and supports economic growth through both the regeneration of previously developed land and the development of suitable greenfield sites. The JLP also seeks to protect the shopping function of the City Centre, Neighbourhood Centre and the towns of the TTV area.</td>
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<tr>
<td>Employment in Plymouth generally dominated by the maritime/defence, higher education, manufacturing/R&amp;D (eg the Science Park) and health sectors. High levels of unemployment and lower economic activity rates in Plymouth. Fragile economy, with need to diversify. In South Hams and West Devon, the focus is on retailing, public sector services, tourism, construction and manufacturing sectors with low paid jobs but higher resident wage rates, significant levels of out-commuting to work, high skills levels amongst residents in work and below national average</td>
<td>Low economic growth in Plymouth reducing transformational opportunities for the economy, failing to support the flagship interventions of the Strategic Economic Plan. Economic productivity does not rise and economic reliance on public sector in Plymouth continues. City does not build on its key assets such as the City Centre, education infrastructure/knowledge economy, or its established and growing specialisms. Little or no increase in employment opportunities or diversification of sustainable skill levels. Continued reliance on low paid sectors in rural area, and skill shortages continue. Uncontrolled development leads to loss of viable employment sites to higher value uses</td>
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<td>Characteristics of the Area and Sustainability Issues Identified</td>
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<td>employment levels. Rural economy is largely SMEs. Importance of main towns as retail destinations and employment areas. GVA levels are far below the national average across plan area.</td>
<td>No support to provide modernisation of existing employment sites and more sustainable working practices and improved skills. Opportunities for regeneration of existing brownfield sites may be reduced. Uncontrolled development in countryside will potentially erode environmental assets.</td>
<td>The JLP includes many policies which seek to protect and enhance the local character of the area, protect heritage assets and also ensure that the special qualities of designated landscapes such as the Dartmoor National Park and the AONB are not harmed. It has been identified that there could be some impact on some of the European Sites within the plan area particularly through recreational use of the Plymouth Sound and Tamar Estuary. Policies have been added to the plan to ensure that within an identified zone of influence that development will support the actions within the management plan by contributing a fixed sum to support access to and</td>
</tr>
<tr>
<td>The environment is a valuable asset and the impact of growth and regeneration must be appropriately managed if this resource is to be sustained.</td>
<td>Tourism results in a diverse and wide ranging set of economic, social and environmental impacts. Potentially increasing impacts on communities and pressure on environmental assets, including protected landscapes and the countryside.</td>
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<tr>
<td>Tourism is an integral part of the economy of Plymouth and South West Devon. The area has a wealth of tourism facilities and attractions, the majority of which are based on the value provided by the area’s environmental assets including the undeveloped coast.</td>
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<td>Environment</td>
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<td>management of the designated areas.</td>
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<td>Levels of private car use are high. Higher use of sustainable transport modes in Plymouth but levels of public transport are low in rural areas.</td>
<td>Increasing reliance on private vehicles likely to impact on carbon emissions and air quality. Under provision and utilisation of public transport likely to maintain existing levels of isolation in rural areas.</td>
<td>Overall the JLP seeks to address the impacts of development on the road network and ensure that appropriate infrastructure is provided in the right places at the right time. The Plan includes mitigation measures for identified travel and transport impacts. The JLP seeks to encourage increased use of sustainable modes of transport and sets out appropriate requirements for financial contributions to critical infrastructure required to support the development. Policies which support the development of mixed use sites where homes and jobs are alongside each other will also help improve accessibility and reduce the need to travel. In the rural areas travel by car is more prominent however the strategy has looked to place development in those locations where there are essential services and facilities to help reduce the need to travel where possible. There are also policies within the JLP which seek to increase the use of rail travel particularly in the main towns of Tavistock and Okehampton in the TTV area. These measure alongside the growth in the housing stock, economy and community facilities has the potential to have some positive benefits in terms of travel and transport.</td>
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</table>
### Characteristics of the Area and Sustainability Issues Identified

| Devon has a high quality natural environment including the 2 AONBs, 9 SACs, numerous SSSIs and an extensive heritage coast, as well as the setting of Dartmoor National Park. |
| ——— |
| Likely Evolution without the Local Plan |
| Increase in traffic and tourism likely to have incremental impacts on the most sensitive landscapes and habitats in the plan area and the adjoining National Park. Uncontrolled development in countryside will potentially erode environmental assets. |
| Effects of Implementing the Plan |
| Term negative effect on the natural environment. To address this issue the JLP seeks to direct development away from the most sensitive areas where appropriate and include policies to protect, enhance and restore the natural environment, including the remediation of contaminated land. The policies in the plan are considered to be robust enough to ensure that and negative impacts which are identified within development proposals can be mitigated for through design but it is accepted that development on greenfield sites on the edges of settlements and some of the development identified within the AONB will have some impacts. This needs to be carefully considered to ensure that any identified impacts are carefully mitigated for. On the positive side, the JLP identifies a significant amount of green space within the PPA and also recognises the importance of green infrastructure right across the JLP. Development levels within the TTV are considered to be appropriate to the scale of the settlement and have appropriate levels of mitigation in place to ensure that the development proposals have minimum impact, the success of this strategy will rely on the policies being implemented robustly and development proposals carefully considering the potential impacts properly |

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<p>| Plymouth and South West Devon has a significant number of landscape, |
| ——— |
| Potential degradation of designated sites with lack of support for key sustainability targets and objectives. |
| The JLP seeks to protect and enhance heritage and avoid development that could lead to negative effects on heritage assets. Whilst growth has the potential |</p>
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<td>wildlife and heritage designations and more general green infrastructure which is important to local residents and the tourism sector, and to the biodiversity of the plan area.</td>
<td>Limited opportunities to enhance and expand green infrastructure network with implications for economy and health of population. Potential loss of strategic landscapes around Plymouth and protected landscapes through uncontrolled development, reducing the qualities of the area that are attractive to in-migrants including the workforce. Loss of opportunity to secure or retain integrated networks of green infrastructure, lowering biodiversity resilience to climate change. Uncontrolled development will potentially erode the historic environment including degrading the significance of heritage assets with loss of landscape/townscape, character and distinctiveness in the plan area.</td>
<td>to negatively affect a heritage asset, it also provides an opportunity to enhance or contribute to the setting of the heritage asset. The significance of any effects will be dependent on the implementation of the policies; however there are adequate policies in the JLP to protect assets and to resist negative effects on heritage.</td>
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<tr>
<td>Social</td>
<td>A continuing trend of a shortfall in affordable housing supply and employment opportunities may lead to first time buyers and low income families being increasingly priced out of the market. Subsequent effects on the demographics of the plan area, particularly in the rural areas with increases in elderly population and a</td>
<td>Overall the JLP is considered to have the potential for short to long term positive cumulative effects on housing through the provision of 26700 new homes to meet the OAN for the HMA during the life of the plan. Housing will be distributed across the JLP Area between the Plymouth Policy Area and the Thriving Towns and Villages and the JLP policies will ensure that a suitable mix of homes are provided to meet the needs of all people in the future. Mixed use</td>
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<td>housing for older people and people with special needs, travellers</td>
<td>lower proportion of key workers. Shortage of housing in total or mix leads to objectively assessed needs not being met</td>
<td>development sites and larger scale neighbourhood areas have the additional potential for further positive effects on other SA objectives including transport and accessibility by providing a range of uses which enable people to live, work and play in one location. The JLP also seeks to achieve 30% affordable housing in new development or equivalent contributions for proposals of less than 5 dwellings. This is likely to result in a positive long term effect on the amount of people in affordable housing need but as the SHMA Part 2 sets out there is still likely to be an affordable housing shortfall.. The positive effects of this policy could be enhanced if the level of affordable housing provision were increased or if the overall housing numbers were increased but this is likely to have impacts on viability for some schemes and also over provision of housing would also have implications for the delicate balance between the provision of homes and jobs. The JLP seek to protect the existing built environment where it is considered to be of value, direct inappropriate levels of development away from special designated areas and will require new development to be well designed and of high quality, using sustainable construction and design methods where appropriate</td>
</tr>
<tr>
<td>High incidence of health inequalities, deprivation and unemployment in Plymouth.</td>
<td>Health inequalities are exacerbated by non-delivery of health facilities/services, or by lower accessibility as a result of not having mixed uses or low availability</td>
<td>Overall the JLP seeks to protect and enhance the accessibility to community facilities and services, which includes the provision of open space for recreation and health facilities. Where appropriate</td>
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### Characteristics of the Area and Sustainability Issues Identified

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<tr>
<td>Population in South Hams and West Devon is relatively healthy but with a high proportion of elderly population</td>
<td>Increased travel as distances between homes and facilities are high, potential impact on work life balance and mental well being. Increasing elderly population put a greater demand on health services and facilities into the future</td>
<td>Provision is made for new community facilities and in the PPA of the JLP there is a strategy to create sustainable linked communities and sustainable rural communities in the TTV. Measures have been included to promote more sustainable modes of transport including rail and this should help increase accessibility for the JLP area. The policies in the plan support development which is of the highest quality and ensure that new development will be well integrated with existing communities and the existing urban fabric to increase accessibility and permeability. The provision of housing and employment will help meet the future needs of the community in the JLP area and there are also policies which seek to protect the amenity of residents.</td>
</tr>
<tr>
<td>Higher than average accessible greenspace in Plymouth. Reasonable public space provision in South Hams and West Devon but deficiencies in outdoor sports in some locations</td>
<td>Uncontrolled development on greenspace and loss of sports pitches and facilities reduces access to public space and opportunities for people to be physically active, reducing individuals’ ability to improve their own health</td>
<td>The JLP has policies to protect and create protected greenspaces within the City. Policies also exist to ensure that important public space and sports pitches are protected from inappropriate development. New developments are required to meet standards in terms of the provision of open space and to help provide sports pitches where appropriate.</td>
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<tr>
<td>People in more rural parts of the plan area are geographically more isolated and employment opportunities are limited</td>
<td>Continued high levels of commuting to the Plymouth and to main towns may lead to smaller towns and villages becoming less viable with high levels of road traffic and potential effects on air quality.</td>
<td>The JLP includes policies which encourage rural diversification and to support employment opportunities in rural areas, Within the hierarchy of settlements employment land has been allocated to help meet local needs</td>
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</table>
### Characteristics of the Area and Sustainability Issues Identified

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<tr>
<th>Historic levels of immigration to the rural areas, and an increasing number of second home ownership particularly in the South Hams.</th>
<th>Likely Evolution without the Local Plan</th>
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<tr>
<td>Continuing current trends would see increase pressure on housing sector, community facilities and infrastructure, particularly in settlements with lower levels of services and facilities.</td>
<td>The JLP provides opportunities to deliver affordable housing for local people in the TTV area. It is important that affordable homes are delivered alongside market housing to bridge the gap in the housing market and ensure that the local community have access to housing in the area. The JLP also encourages the preparation of neighbourhood plans and within these there are opportunities for local communities to develop more bespoke policies for their community.</td>
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<tr>
<td>Rural communities rely on facilities within the main towns with many rural areas having experienced the loss of important local services.</td>
<td>Communities may struggle to maintain self-sufficiency with limited access to key services and facilities particularly amongst some vulnerable and disadvantaged groups. Lack of support for appropriate areas and levels of regeneration and growth through Neighbourhood Plans.</td>
<td>The JLP provides a settlement hierarchy which will support the development and creation of sustainable rural communities. This in turn will help support rural services and facilities. There are also policies in the plan which support the provision of services and facilities and seek to protect important community facilities from change of use unless there is no significant harm to the service locally.</td>
</tr>
</tbody>
</table>
Section 6: Monitoring Requirements

6.1 To ensure that the JLP delivers its vision and objectives the implementation of its policies will be monitored. This also serves the purpose of measuring how sustainable development is being monitored within the JLP area. The process for monitoring the Joint Local Plan including the Protected Characteristics of the Equality Act 2010 and any effects identified through the Sustainability Assessment and Habitats Regulations Assessment is set out in section 7 of the Joint Local Plan. The results of the monitoring will be reported annually through the Councils Monitoring Report. There will be a full review of the JLP every 5 years from adoption which will provide an opportunity to assess how the plan is progressing and look and the effects the plan is having on the sustainability criteria.

Section 7: Equalities Impact Assessment

7.1 The Equality Act 2010 provides the legislative framework and places an ‘equality duty’ on public authorities who, in exercising their duty should have regard to the need to:

- Eliminate discrimination, harassment and victimisation or any other conduct prohibited by the act
- Advance equality of opportunity between persons who share a ‘protected characteristic’ and those who do not
- Foster good relations between people who share a ‘protected characteristic’ and those who do not.

7.2 The Equality Act 2010 brings together all of the different equality strands and refers to them as ‘protected characteristics’:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

7.3 An Equality Impact Assessment (EqIA) is a tool that helps public authorities make sure their policies and the way they carry out their function, do what they are intended to do for everybody. Undertaking an EqIA allows local authorities to identify any potential discrimination that may result from policies, plans or the way they work and identify opportunities to promote equality.

7.4 As part of the integrated approach to assessments, a specific framework objective was added specifically added to cover equality and diversity (see Section 3 table 3 above). This results in equality being embedded within the assessment process and negates the
need for a separate policy analysis. This process has allowed us to ensure that any potential risks to protected characteristics are identified and that policies can be adjusted to ensure that the policy promotes equality. To supplement this however, a short EqIA report has also been prepared which is available at appendix XI.

Section 8: Summary, conclusions and next steps

8.1 The appraisal process has considered the strategic environmental and wider sustainability effects that are likely, or that have the potential to occur, as a result of the implementation of the JLP. The assessment process has been undertaken by officers of the Councils who have an in-depth understanding of the JLP area. This has resulted in an iterative process which has evolved through the plan-making stages. The appraisal report focuses on key recommendations and changes. The report demonstrates that sustainable development is at the heart of the decision making process, the fact that the assessment of policies does not highlight any significant negative effect that give rise to concern reflects how the SA has helped inform and influence policy development.

8.2 The Assessment scoping process in 2016 helped ensure that the characteristics and sustainability issues for the JLP area were identified and incorporated into the SA framework for assessments. This builds on the earlier work of each authority in preparing their own plans alongside previous SA work. Statutory consultees have therefore had the opportunity to engage throughout the process. This document has been updated to reflect those comments made to the formal regulation 19 pre-submission stage which was consulted on during Dec – January 2017.

8.3 Where appropriate the SA process has made recommendations to enhance the positive effects identified and mitigate negative effects. These recommendations have been in addition to the mitigation and enhancement measures contained within the Plan that reflect the evolution of the plan and appraisal recommendations arising from the on-going assessment process.

8.4 Wherever possible, plan-making has incorporated the recommendations and suggestions from the SA. Key enhancements for sustainability arising from the SA include strengthening and clarifying policies with regard to sustainable transport, Green Infrastructure, energy efficiency and renewables, and design requirements for high standards and to address needs of all users. This demonstrates the difference that the SA has made to the Plan.

8.5 The SA found that the majority of the JLP policies are likely to have significant positive effects, particularly with regard to;

- meeting housing needs with long term positive effects
- strengthening communities and reducing inequalities
- prioritising economic growth in the most sustainable settlements:
- protecting the distinctive landscape and open/green space
- protecting the distinctive historic environment
- strong focus on sustainable design, including construction, transport and energy
- seeking to ensure that infrastructure delivery matches the pace and level of growth

8.6 Alongside the positive effects, some negative effects were also identified - largely as a result of the overall cumulative effects of increased housing, employment and associated infrastructure in the plan area. Increased contributions to greenhouse gases are likely, particularly urban extension sites and will arise from transport and also the embodied energy inherent in construction. Potential negative effects (e.g., noise, air pollution, congestion, loss of tranquillity and wider health/well-being objectives) may arise from increased road traffic. There are also potential negative effects from significant physical changes to local areas with impacts on biodiversity, landscape/townscape and the historic environment. The process of appraisal has ensured that appropriate mitigation is included in the JLP policies, both site allocations and general development management policies.

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

**Next Steps**

8.8 The SA report is being published alongside the submission Joint Local Plan to demonstrate the significant sustainability effects of the plan and the alternatives considered in developing the plan. The Inspector will examine this evidence alongside the submission version of the JLP to see if it possible to find the Plan sound and to enable it to be adopted and subsequently implemented.
Glossary

Air Quality Management Area (AQMA) - An area where the Air Quality Objectives are not likely to be achieved.

Affordable housing - Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing.

Ancient Woodlands - Any wooded area that has been wooded continuously since at least 1600 AD. It includes: 'ancient semi-natural woodland' mainly made up of trees and shrubs native to the site, usually arising from natural regeneration. Area of Outstanding Natural Beauty (AONB) - An area of countryside designated by a government agency as having natural features of exceptional beauty and therefore given a protected status.

Article 4 Direction - A special planning regulation adopted by a Local Planning Authority in all or part of their borough which removes whichever permitted development rights specified in the direction.

Authorities Monitoring Report - The Authorities Monitoring Report will assess the implementation of the Local Development Scheme and the extent to which policies in the local plan are being successfully implemented.

Building Regulations Categories M4(2) & M4(3) - Building regulations which ensure that people are able to access and use buildings and their facilities. M4(2) relates to accessible and adaptable dwellings. M4(3) relates to wheelchair user dwellings.

City Deal - City deals are bespoke packages of funding and decision-making powers negotiated between central government and local authorities and/or Local Enterprise Partnerships and other local bodies.

Community Infrastructure Levy (CIL) - A planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area.

Community Right to Build Order (CRtBO) - A type of Neighbourhood Development Order and one of the neighbourhood planning tools introduced in the Localism Act 2011. It can be used to grant outline or full planning permission for specific development which complies with the order.

Connectivity / Strategic connectivity - A term use to refer to the physical connections between different areas, usually by transport modes but also by digital means such as broadband connections. Strategic connectivity is a reference to connections to a wider spatial area, particularly regional, national and international.

Conservation Area - An area of special architectural and/or historic interest where the character or appearance should be preserved or enhanced. County Wildlife Sites - Areas of
land recognised as being at least county, sometimes national, importance for their nature conservation value; this is defined by the presence of important, distinctive and threatened habitats and species. CWS are designated by a panel of experts assembled by the Devon Biodiversity Records Centre.

**Development plan** - The statutory planning document each Local authority prepares, setting out planning policies which will be used to determine planning applications and to set out long term development goals. This joint local plan is a development plan.

**Development Plan Documents** - Spatial planning documents that are subject to independent examination and which form the development plan for a local authority area. Since the introduction of the National Planning Policy Framework, development plan documents are referred to as the Local Plan. Each authority must set out its programme for preparing its Development Plan Documents in the Local Development Scheme.

**European Marine Site (EMS)** - A marine area which is both a Special Area of Conservation (SAC) and a Special Protection Area (SPA), protected under the European Communities Habitats and Birds Directives.

**European Union (EU)** - An economic and political association of certain European countries with internal free trade and common external tariffs.

**Flood Zones 2 and 3** - If an area is in flood zone 2 or 3 it is at the potential risk of flooding. The higher the number, the greater the risk.

**Functional Economic Market Area (FEMA)** - The functional area over which the local economy and its key markets operate irrespective of administrative boundaries.

**Gross Value Added (GVA)** - The measure of the value of goods and services produced in an area, industry or sector of an economy.

**Habitat Regulation Assessment (HRA)** - An assessment undertaken which determines whether a plan (or project) has a significant effect on natural habitats. High Quality Public Transport (HQPT) - This defines the aspiration in relation to the provision of attractive and realistic sustainable transport alternatives/or choices to the private car. It relates specifically to bus / coach, rail and water based forms of transport, but could in future include cycle hire schemes. The term ‘High Quality Public Transport Bus Network’ refers to all routes which carry bus services, whilst the term ‘High Quality Public Transport Bus Corridors’ (which is part of the wider HQPT Bus Network’) refers specifically to those routes which carry multiple bus services. The reason behind this terminology, and the need to differentiate between it, is firstly to explain the concept, and secondly to establish a hierarchy in terms of our approach to interventions on the HQPT Bus Network. Our intention is to focus on delivering HQPT on our HQPT Bus Corridors as a priority whilst maintaining the wider aspiration to achieve this on our entire HQPT Bus Network in the longer term.
**High Value Areas** - High Value Areas (Policy DEV8.4) include value area 3 and value area 4 as defined in the South Hams Strategic Viability Assessment (Levvel February 2015). The relevant postcodes are PL8 1, TQ6 0, TQ6 9, TQ7 2, TQ7 3, TQ7 4, TQ 8 8, TQ9 6 and TQ9 7.

**House in Multiple Occupation (HMO)** - A house where at least three tenants live there forming more than one household.

**Housing Market Area (HMA)** - A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. International Union for Conservation of Nature (IUCN) - The global authority on the status of the natural world and the measures needed to safeguard it. Listed Building - A building mentioned in statutory lists as being of special architectural or historic interest under the Listed Buildings and Conservation Areas Act. There are different grades of listing to indicate relative interest.

**Local Development Scheme** - A document which sets out the scope and timetable of local plans the local planning authorities are preparing.

**Local Enterprise Partnership** - Voluntary partnerships between local authorities and businesses set up in 2011 by the Department for Business, Innovation and Skills to help determine local economic priorities and lead economic growth and job creation within the local area.

**Local Green Spaces** - A series of greenspace have been identified by using the criteria set out in NPPF paragraphs 76 and 77 and by consulting local communities to arrive at a list of sites that are demonstrably of local significance. Local Nature Reserves (LNR) - A place with wildlife or geological features that are of special interest locally. It is a statutory designation made under Section 21 – "Establishment of nature reserves by local authorities" – of the National Parks and Access to the Countryside Act 1949.

**Local Plan** - The Localism Act 2011 and the National Planning Policy Framework reintroduced the concept of a single Local Plan setting out planning policies relating to a Local Authority area, instead of a suite of documents called a Local Development Framework.

**Local Planning Authority (LPA)** - This term describes the particular statutory role each council has to administer the planning function. Within the JLP, where the term ‘LPAs’ is used to, this is a reference to two or three of the councils operating in their role as local planning authorities together to implement a policy. Where a specific LPA is mentioned (eg. ‘Plymouth LPA’) this highlights the particular LPA which will be responsible for implementing that policy. Where the term ‘the City’ is used (capitalised), this is in the context of policies where the City Council and/or other partners in Plymouth are working together to deliver the wider objectives.

**Major developments** - A generic term which describes the scale of a development proposal and which needs to be interpreted in the context of the policy and the location of the development. In some cases, for a particular policy, major development may be specifically
defined in a supplementary planning document to mean a development of over a certain number of units or amount of floorspace. Where the term is used, it is not intended for it to mean ‘major’ in the context of the classification of a planning application as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

**Marine Conservation Zones** - Sites which have been designated under the Marine and Coastal Access Act 2009 in order to protect a range of nationally important, rare or threatened habitats and species.

**Ministry of Defence (MoD)** - The British government department responsible for implementing the defence policy set by Her Majesty's Government and the headquarters of the British Armed Forces.

**National Nature Reserves (NNRs)** - NNRs were established to protect some of our most important habitats, species and geology, and to provide ‘outdoor laboratories’ for research. NNRs are declared by the statutory country conservation agencies under the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981.

**National Planning Policy Framework (NPPF)** - National planning policy is set out in the NPPF, which was published in 2012 and gained full weight in March 2013. The NPPF replaces all of the previous Planning Policy Statements. Neighbourhood Plans - The Localism Act 2011 introduced powers to enable local communities to produce Neighbourhood Plans. These plans have the ability to set out policies dealing with the use and development of land, and upon formal adoption, following an examination and referendum, form part of the development plan.

**Objectively Assessed Need (OAN)** - The NPPF requires that local planning authorities identify the 'objectively assessed need' for housing in their areas, and that Local Plans translate those needs into land provision targets. The overall need (demand) is assessed on the basis of standard methodology and used to inform the setting of targets. OAN is also relevant in respect of determining the need for new employment land.

**Office for National Statistics (ONS)** - The UK’s largest independent producer of official statistics and the recognised national statistical institute of the UK. Office of Rail Regulation (ORR) - The independent safety and economic regulator for Britain’s railways.

**Personalised Travel Planning (PTP)** - An established approach that enables people to think about the way they currently travel and provides them with the information, advice and motivation to walk, cycle and use public transport more often.

**Policies Map** - The adopted policies map illustrates on a base map (reproduced for, or based upon a map base to a registered scale) all the policies contained in the Local Plan which have a spatial dimension – for example, site allocations or greenspace designations.
Primary Shopping Area (PSA) - An area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage). Regionally Important Geological and Geomorphological Sites (RIGS) - Places that are considered to be especially important for the geology they exhibit. They are mostly old quarries, pits, roadside cuttings and other excavations which expose rocks normally covered by soil and vegetation. Some sites are natural exposures of interesting rocks in river banks and cliffs, and others are fine views which demonstrate how the underlying geology and forces of erosion have shaped the landscape. These sites are identified by the Devon RIGS Group. Royal National Lifeboat Institution (RNLI) - A charity that saves lives at sea across the UK.

Rural Exception Sites - These are sites adjoining or very near to rural settlements where development which meets the essential local needs of the settlement might be permitted.

Scheduled Ancient Monument - A nationally important and protected historic building or site that is included in the Schedule of Monuments kept by the Secretary of State for Culture, Media and Sport.

Section 106 - A legally binding contract, between a developer and the local planning authority that constitutes a planning obligation.

Sites of Special Site of Scientific Interest (SSSI) - SSSIs are a suite of sites providing statutory protection for the best examples of the UK’s flora, fauna, or geological or physiographical features. These sites are also used to underpin other national and international nature conservation designations. Most SSSIs are privately-owned or managed; others are owned or managed by public bodies or non-government organisations.

Special Areas of Conservation (SACs) - SACs are defined as those given special protection under the European Union’s Habitats Directive as transposed into UK law by the Habitat and Conservation of Species Regulations 2010.

Special Protection Areas (SPAs) - SPAs are defined in the NPPF as ‘Areas which have been identified as being of international importance for the breeding, feeding, wintering or migration of rare and vulnerable species of birds found within European Union countries’. The NPPF goes onto to describe them as ‘European designated sites, classified under the Birds Directive’.

Strategic Cycle Network - The Strategic Cycle Network (SCN) is a plan of proposed cycle routes that are suitable for cyclists of all levels. The network includes routes for experienced cyclists (which involve dealing with traffic); routes for less experienced cyclists and children (including leisure routes); and those which are suitable for all. The SCN routes also provide benefits for pedestrians including those with mobility and other impairments.

Strategic Economic Plan (SEP) - A plan written by LEPs to help guide government negotiations when driving forward economic growth in their areas. Strategic Housing Land Availability Assessment (SHLAA) - A piece of evidence which identifies land and assesses the availability, suitability and deliverability of that land as a potential housing site.
Strategic Housing Market Needs Assessment (SHMNA) - A piece of evidence that provides information about an area’s future housing requirements. Strategic Landscape Areas - A designation in the plan based on landscape character areas that have an increased sensitivity to development due to proximity to a protected landscape. These areas have been identified as needing to be protected from inappropriate development to protect the setting of the adjacent designated landscapes. These areas are only identified within the Plymouth Policy Area.

Sub National Population Projections (SNPP) - Provides an indication of the future size and age structure of the population.

Supplementary Planning Documents - Provide supplementary information in respect of the policies in Local Plans. They do not form part of the Development Plan and are not subject to independent examination.

Sustainability Appraisal (SA) - A tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors) and required to be undertaken for all local development documents.

Sustainable Development / Sustainability - The United Nations General Assembly has defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

Undeveloped Coast - Defined in the Plymouth Policy Area based on landscape character areas that have strong coastal characteristics and meet the definition of Undeveloped Coast identified by the Devon Landscape Policy Group. In the Thriving Towns and Villages Policy Area the Undeveloped Coast is predominantly based on the existing Heritage Coast designation.

Use Classes - The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. This Order is periodically amended.

Part A

A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes. A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies. It does not include betting offices or pay day loan shops - these are now classed as “sui generis” uses (see below).

A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.
A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs).

A5 Hot food takeaways - For the sale of hot food for consumption off the premises.

Part B
B1 Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

B2 General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).

B8 Storage or distribution - This class includes open air storage.

Part C
C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).

C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres. C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.

C3 Dwellinghouses - this class is formed of 3 parts:

C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.

C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.

C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

C4 Houses in multiple occupation - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

Part D
D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non-residential education and training centres.

D2 Assembly and leisure - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).

Sui Generis - Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses, amusement centres and casinos.

Village Housing initiatives - A community-led planning project within the South Hams, enabling small scale affordable housing projects for local people in rural areas. The aim of the Village Housing Initiative is to increase the supply of affordable housing sites and reduce the reliance on public funding for affordable housing.

World Heritage Site - A place listed by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as of special cultural or physical significance.