

## Examination into the soundness of the Plymouth and South West Devon Joint Local Plan (JLP) 2014 -2034

### Response to the Councils' letter of 23 August 2018

1. We refer to the Councils' recent response to our post-hearing advice note.
2. In relation to settlement boundaries we note that the JLP Councils propose to follow our Option b, and to commit to producing a subsequent DPD setting these out. On this basis we would like to see the consequential amendments to the JLP policies proposed by the Councils within the schedule of proposed main modifications (MMs). Whilst specific reference to settlement boundaries set out in 'made' neighbourhood plans could be included within the JLP this is not essential as neighbourhood plans statutorily form part of the development plan once they are 'made'. Furthermore, whether the boundaries carry full weight or not following adoption of the JLP, will be a matter to be determined by a decision-maker when considering a development and will be dependent on their level of consistency with the JLP as a whole, any other subsequent DPDs and national planning policy.
3. We acknowledge that the Councils propose to follow our Option 1 in relation to the local green space (LGS) designations. We recognise that this could result in a potential policy vacuum for these green spaces in the Plymouth Policy Area. We therefore invite the Councils to give further consideration to their suggestion of utilising the evidence set out within the Plymouth Open Space Assessment evidence (POSA) (EN34 and EN34a), to introduce a 'City Green Space' designation. The Councils' should set out the amendments they consider are necessary to Policies SPT11 and DEV29 in this regard as potential main modifications. As suggested we would also welcome this approach being set out in more detail in a revised EN31 document which should be consulted on at the same time as the proposed main modifications. We consider that the inclusion of criteria for LGS designation within Policy DEV29 would still be appropriate to assist any LGS designation within neighbourhood plans or other DPDs.
4. We look forward to receiving the Councils' amended versions of the schedule of proposed main modifications, SA and HRA which we will consider prior to the commencement of formal consultation.
5. As set out in our post-hearing note we have reached no final conclusions on these or any other matters raised at this time. The main modifications

will be subject to formal consultation and we will reach our final conclusions taking any representations into account. We note the Councils' provisional timetable for main modifications consultation.

6. If there are any queries or matters that require clarification please contact us through the Programme Officer.

Wendy Burden and Yvonne Wright  
Inspectors

11 September 2018