

Examination into the soundness of the Plymouth and South West Devon Joint Local Plan 2014 -2034**Inspectors' Note: Examination of alternative or omission sites**

We have received a number of queries concerning the consideration of alternative or omission sites which have been put forward in representations on the Joint Local Plan (JLP).

Our letter to the Councils of the 4 September states that we will not be considering the merits or otherwise of any proposals for development which have been omitted from the JLP. This includes sites which are proposed as alternatives to sites which have been allocated in the JLP. We will be considering the soundness of the JLP as a whole, including the basis on which the spatial strategy has been selected and the proposals for development which would deliver the spatial strategy for the JLP. The examination will consider whether the retention of any of the policies as drafted, including for the allocated sites, would cause the JLP to not be sound. For example, where a representor has an objection to a proposal for a residential or employment development site, evidence should be presented to demonstrate that the JLP would fail the tests of soundness if the site was to remain in the JLP.

It has been suggested that our approach to alternative or omission sites would prevent us from considering whether the JLP would be the most appropriate strategy, when considered against the reasonable alternatives. Clearly it is open to participants in the examination to argue that the strategy of the JLP as a whole or in relation to particular settlements is not justified and is therefore not sound. Participants may also argue that the allocation of a particular site proposed by the Council may cause the JLP to be not sound. However, the NPPF states that "the plan should be the most appropriate strategy, ---, based on proportionate evidence". At this stage of the examination and for the hearings we are examining the evidence to consider whether the Councils' proposals for the strategy of the JLP meets the tests of soundness, and whether proposals for the housing and employment sites which it considers would fulfil that strategy are sound. We are not therefore considering the relative merits of alternative or omission sites.

In the event that either the Councils' strategy as a whole is found to be not sound, the strategy in relation to particular settlements is found to cause the plan to be not sound, or that sites allocated in the JLP would cause the JLP to be not sound, we will consider whether the JLP could be made sound by changes, if necessary following further work by the Councils. In the event that alternative or additional housing or employment sites are required to make the JLP sound, we would look to the Councils to identify the sites which they would propose in order to make the JLP sound. This may include further consideration by the Council of alternative or omission sites which have been put forward in the process of consultation on the JLP.

Any main modifications put forward by the Councils following the hearings in order to secure a sound JLP would be subject to sustainability appraisal (as necessary) and public consultation. Once the responses and sustainability appraisal are available, we would consider whether it is necessary to hold a further hearing session to clarify or resolve any substantive outstanding issues, or whether we would be able to proceed to the finalisation of our report.

We expect to issue a draft list of matters, issues and questions together with a draft programme for the hearings by the end of October. If you are uncertain which hearing session you might most appropriately participate in, please contact the Programme Officer.

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Inspectors
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