

Appendix I

Plymouth and South West Devon Joint Local Plan Integrated Assessment: Non-Technical Summary

JULY 2017

Introduction

- I.1 This is the non-technical summary report of the Integrated Assessment (IA) report for the Plymouth and South West Devon Joint Local Plan pre-submission plan (regulation 19), covering Plymouth City, South Hams and West Devon Councils outside of the Dartmoor National Park. It describes how the Appraisal process was used to assist in planning for the development and use of land as required by planning legislation and Government guidance.

Plymouth and South West Devon Joint Local Plan

- I.2 The Plymouth and South West Devon Joint Local Plan (JLP) 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.
- I.3 The Integrated Assessment provides an appraisal of the social, economic and environmental impact of the Joint Local Plan and provides details of:
- Appraisal of the vision and objectives of the Joint Local Plan against the SA Framework;
 - 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;
 - An assessment of policy alternatives
 - An assessment of growth options
 - An assessment of the different options for distributing the development in the Joint Local Plan
 - An assessment of the process for identifying sites for allocation
 - An assessment of sites that could meet development needs in Plymouth Policy Area
 - An assessment of sites that could meet development needs in the Thriving Towns and Villages of South Hams and West Devon.
 - An assessment of the vision, objectives and the policies of the Joint Local Plan;
 - An assessment of growth options;
- I.4 The main 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 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

I.5 The Integrated Assessment is supported by a number of appendices, including this 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 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)

Integrated Appraisal incorporating Sustainability Appraisal, Strategic Environmental Assessment and Equality Impact Assessment

I.6 Planning legislation requires that the Local Plan is subject to a Sustainability Appraisal (SA). SA is a systematic process designed to evaluate the predicted social, economic and environmental effects of development planning. European and UK legislation require that the Local Plan is also subject to Strategic Environmental Assessment (SEA), a process that considers the effects of development planning on the environment. Government guidance advises that these two processes should be carried out together and outlines a number of stages of SA work that need to be carried out as the Local Plan is being prepared:

- Stage A: Setting Context and Scope
- Stage B: Preparing and Developing Options
- Stage C: preparing the SA Report
- Stage D: Consulting on the Plan and the SA
- Stage E: Monitoring the Implementation of the Plan

I.7 The Integrated Assessment incorporates the Environmental Report which is required by the SEA legislation. Appendix II identifies which parts of the Integrated Assessment, including the Appendices, comprise the Environmental Report.

I.8 Stage A of the process involves setting the context and scope of the process. In order to do this the JLP Councils prepared a Scoping Report which it sent to the Natural England, Heritage England and the Environment Agency for consultation. The Councils had previously carried out a process of identifying

relevant plans and proposals before they agreed to prepare a Joint Local Plan and much of the information included in these document was still relevant. The scoping report published alongside the Main Report as Appendix II sets brought the previous scoping exercises together into a new document.

- I.10 This process allows a sustainability framework to be developed, which comprises a series of sustainability objectives which cover the key social, economic and environmental issues within the plan area. These sustainability objectives are later used to assess the environmental performance of the plan.

Links to other plans, programmes and objectives

- I.11 The purpose of reviewing the policy context of the Local Plan is to identify the relevant objectives and targets of other plans and programmes, so they can be reflected in the sustainability framework. This will ensure that there is no conflict between the Local Plan and other documents, and ensure that any common objectives between the Local Plan and the other documents are utilised.
- I.12 In addition to the SA/SEA requirement, the appraisal of the JLP has also incorporated health and Equalities Impact Assessment (EIA). The latter enables the councils to demonstrate that they have met their single public sector equality duty when plan-making.

The character of the JLP area

- I.13 The JLP area covers approximately 2127km² and has a population of 399,914 (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 plan area, making an important contribution to the character of the area.
- I.14 The city is the main regional centre in the JLP area, home to approximately 70% of the population across the plan area. The city provides a number of key services and facilities including Derriford Hospital, the education establishments of Plymouth University, Marjon and Plymouth College of Art and Design alongside an extensive range of shopping and leisure facilities which meet the needs of the JLP area. The remainder of the population live in West Devon and South Hams, with its towns and villages providing services and facilities to meet the needs of the wider rural population. Combined with the city, this results in a hierarchy of settlements which help serve the whole of the JLP area from the smallest hamlets to those who live in the city.
- I.15 The JLP area is well connected to the rest of the country via the A30 and A38 and onwards from Exeter on the M5. There are also rail links to Cornwall, Exeter and beyond and there are plans within parts of the plan area to improve rail links, such as the reopening of the railway from Tavistock to Bere Alston.
- I.16 There are a number of landscape designations across the JLP area which contributes to its character, including the Dartmoor National Park and South Hams and Tamar Valley Areas of Outstanding Natural Beauty. There are also a number of European protected wildlife sites which are sites of exceptional importance in respect of rare, endangered or vulnerable 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

- South Dartmoor Woods SAC
- South Devon Shore Dock SAC
- South Hams SA
- Start Point to Plymouth Sound and Eddystone SAC

- I.17 There are also a range of other important national designations across the plan area including 68 Sites of Special Scientific Interest, 4 National Nature Reserves, 13 Local Nature Reserves and 489 County Wildlife Sites.
- I.18 In addition to the natural environment, the JLP is home to a rich and diverse historic environment which provides important cultural, economic and environmental benefits for the whole plan area. This includes 1137 Scheduled Ancient Monuments, 86 Conservation Areas, 5900 Listed Buildings, 14 Registered Park and Gardens and 2 Protected Wrecks.
- I.19 Plymouth is a regional centre for employment and retailing, where the current focus is on the maritime economy, dockyard, manufacturing and the public sector, which has substantial employers include the University, the Science Park and the Hospital. There are opportunities to tap into to transform economic growth. Economic issues in South Hams and West Devon include 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. This suggests the need to focus on raising productivity and wage levels and not just creating jobs.
- I.20 Generic issues about ageing population, access to services and facilities and fuel poverty. Extent of health inequalities, higher unemployment and lower economic activity rates are issues in Plymouth. There are issues about isolation, and affordable housing in rural areas, and the extent of smaller rural communities' reliance on Plymouth and the market towns, together with commuting to work and high private car use.

Sustainability Framework

- I.21 A framework has been prepared which includes a number of objectives against which the vision, objectives and policies of the plan will be assessed. This framework has been developed with Statutory Consultees as part of the consultation on the Scoping Report in 2016. The SA objective headings are as follows:
- Air Quality
 - Biodiversity and Green Infrastructure
 - Climate Change
 - Community Wellbeing including health and equality
 - Economy
 - Environmental Quality
 - Historic Environment
 - Housing
 - Landscape
 - Transport
 - Waste
 - Water

Assessment of the JLP

- I.22 The assessment of the JLP has systematically appraised each step of the preparation of the JLP using the Framework objectives. Given the iterative nature of the plan preparation process, many of the potential negative effects that were identified earlier had already been identified and suitable mitigation measures identified in the Plan and the assessment which is contained as part of this final report is an assessment of the final policies in the JLP. The appraisal used the following scoring matrix:

Score	Significance
++	Major positive effects to achievement of the IA objective
+	Minor positive effects to achievement of the IA objective
0	No effect (either positive or negative) to achievement of the IA objective
-	Minor negative effect to achievement of the IA objective
--	Major negative effect to achievement of the IA objective
?	Impact on the IA objective is uncertain

- I.23 Earlier work has looked at the reasonable alternatives when preparing the plan, the approach to distribution of growth across the plan area and the reasonable policy alternatives. These can be viewed at appendix IV - V.
- I.24 The assessment of the vision, objective, policies, reasonable alternatives and the approach to site allocations are available to view at appendix VII - X.

Monitoring requirements

- I.25 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. This will be reported each year through the Authority Monitoring Reports of the LPAs.

Summary and next steps

- I.26 The integrated 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 integrated assessment process has been undertaken by officers of the Councils who have an in-depth understanding of the JLP area. The Plan has been the subject of on-going drafting and refinement and some minor changes have not been documented. 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.
- I.27 The Integrated Assessment scoping process in 2016 included consultation to help ensure that the characteristics and sustainability issues for the JLP area were identified and incorporated into the SA (IA) 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 and this formal regulation 19 stage represents the ongoing opportunity to engage and comment.

- I.28 Where appropriate the 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.
- I.29 Wherever possible, plan-making has incorporated the recommendations and suggestions from the SA (IA). Key enhancements for sustainability arising from the SA (IA) 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 (IA) has made to the Plan.
- I.30 The SA (IA) 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
- I.31 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 (eg 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.
- I.32 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 (IA) 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

- I.33 The IA report is being published alongside the submission Joint Local Plan to demonstrate the significant sustainability effects of the plan and the reasonable alternatives considered in developing the plan.
- I.34 This report may be subject to further changes and amendments as the JLP makes its way through the examination process and will be finalised in the publication of a final report on the adoption of the Joint Local Plan.

