

## Appendix V

# Assessment of Reasonable for the Distribution Strategy (Nov 2016)

- 1.1 This appendix sets out an appraisal of the reasonable alternatives for the Distribution Strategy within the Joint Local Plan.
- 1.2 Each relevant option will be assessed against the IA criteria in the following format.. For more information about the sustainability appraisal process please look at the main report. For further information about the Distribution Strategy Topic Paper please look at the evidence submitted alongside the Joint Local Plan

Policy	Assessment Criteria																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
1																		
2																		
<b>Commentary</b>																		
<i>An overall description of the sustainability of each option, which will include consideration of any significant short , medium, long term, permanent, temporary, secondary, cumulative, synergistic positive or negative effect and any appropriate measures to improve the overall positive effects of the proposal.</i>																		

The matrix will record the findings of the assessment by using the following:

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

- 1.3 This Sustainability Report sets of Stage B: Developing and Refining alternatives and assessing effects of the 'Alternative Options for the Distribution of Growth Across the Plymouth and South West Devon Joint Local Plan.

I.4 This document will test the alternative options against the Integrated Assessment Framework to evaluate the likely effects of the Local Plan and its alternatives and offer appropriate ways of mitigating for its adverse effects and maximising beneficial effects.

#### Key Principles

I.5 As part of the work on the Joint local Plan a number of key principles have been defined which clearly set out the first step in identifying the most appropriate strategy for the distribution of growth across the Joint Local Plan area

Key Principles	Assessment Criteria																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Principle 1 The strategy should facilitate and promote social growth and regeneration in the sub region to meet the national agenda to boost growth	0	0	++	+	0	++	?	?	?	?	0	?	?	?	?	?	?
Principle 2 The Strategy should strive to guide development to locations which will contribute to the creation of sustainable settlements.	++	?	++	+	0	++	?	?	?	?	?	?	?	?	?	?	?
Principle 3 The Strategy should drive growth in locations that avoid harm to the AONB, the high quality natural environment of the sub region, and the historic environment.	?	0	?	?	0	-	0	?	++	++	++	?	?	?	?	?	?

#### Commentary

The principles could benefit from looking at some of the other elements of sustainability, although they pick up on the key themes of boosting growth , creating sustainable settlements and avoiding harm to distinctive landscape areas such as AONBs and other high quality natural areas they do not explicitly pick up on some of the basic elements of sustainable growth such as :

*Placing development in locations which reduce the need to travel and encourage alternatives to the car as a means of travel*

*Respecting, maintaining and strengthening local distinctiveness and a sense of place by providing high standards of design*

*Avoiding development in area of high flood risk and reducing the vulnerability to flooding*

*Minimising the protection of waste and encouraging the sustainable use of resources*

*Conserving and enhancing biological and geological diversity*

*Protecting and improving air quality*

*Promoting the equality of opportunities and eliminate discrimination.*

The principles could be seen as taking a very narrow view of sustainability and could be expanded or new principles added to include some of these other issues currently not set out in the principles, for example

Principle 1 - The strategy should facilitate and promote social growth and regeneration in the sub region to meet the national agenda to boost growth in terms of both the provision of homes and jobs, and also by promoting community vitality and resilience by improving health and reducing inequalities.

Principle 2 -The Strategy should strive to guide development to locations which will contribute to the creation of sustainable settlements, which reduce the need to travel by car and encourage the use of other modes of transport.

Principle 3- The Strategy should drive growth in locations that avoid harm to the AONB, the high quality natural environment of the sub region, and the historic environment. The strategy should respect, maintain and strengthen local distinctiveness and a sense of place by providing high standards of design and having regard to biological and geological diversity

Add in Principle 4- The strategy should drive growth in locations which avoid areas of high flood risk and reduce the vulnerability to flooding elsewhere, encourage the sustainable use of resources, protect and improve air quality and help develop a low carbon economy.

Add in Principle 5 -The strategy should help promote equality of opportunities and help to eliminate discrimination including improving the health and well being of communities and seeking to reduce crime and fear of crime in communities.

These overarching drivers have helped shaped the various alternatives to distribute growth across the joint local plan area. A number of approaches have been explored under three categories of Urban Intensification, Concentration of Development and Dispersal of Development. These alternatives are tested below.

## Urban Intensification

Focus exclusively on the **urban intensification** of Plymouth. This option implies that in principle, all of the need for new homes to meet the needs of the HMA is accommodated in the urban area of Plymouth. Clearly this alternative maximises the principle of focusing growth at Plymouth, removing the need for locations for new

development to be found in the surrounding rural areas. The following variations can be identified:

Policy Options	Assessment Criteria																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
A) Urban Intensification – only within Plymouth admin boundaries. This variation implies that all of the development needs of the HMA are accommodated within the administrative area of Plymouth, implying a very significant intensification of the built environment in the city.	?	-	-	-	?	?	0	?	-	?	?	?	-	-	?	?	?
B) Urban Intensification – including urban extensions in the city’s urban fringe. This variation recognises that the administrative boundaries of Plymouth are drawn very tightly to the urban area, meaning that there are limited opportunities to expand the urban area without extending into the neighbouring South Hams District. This option therefore implies that all the development needs of the HMA are met at Plymouth, but using urban extensions as well as intensification of the city within its administrative boundaries.	?	?	-	-	?	?	0	?	-	?	?	?	-	-	?	?	?

**Commentary**

Urban intensification will have a number of both positive and negative impacts on sustainability. Fundamentally urban intensification will not help to create balanced communities within the Joint Local Plan area and could have a number of negative social impacts in terms of health, access to services, encouraging growth and providing access to a suitable mix of good quality homes within the whole Joint Local Plan area. Whilst intensifying development within the city will provide communities within the city with optimum access to employment, facilities, healthcare and shopping it could also provide a greater imbalance in the communities of the Joint Local Plan area by increasing problems of access to affordable housing in the thriving towns and villages, this in turn could threaten the provision of essential services and facilities. In a nutshell focussing on urban intensification could be seen as ‘planning for decline’ in the rural areas.

Urban Intensification will be at odds with the requirement in the NPPF to ensure that the growth meets the wider needs of the Housing and Functional Economic Market Areas, and delivers growth in sustainable locations across the whole plan area. Development should be located so as to meet objectively assessed need but also to address changing community needs such as household sizes, types and tenures. The strategy should also provide opportunities for the local authorities to plan positively for innovative housing solutions within their areas such as self-build, live work units and other ways of delivering affordable housing,

The Urban intensification in Option A could also have impacts on the City’s aspiration to be a ‘quality city’. In order to deliver the required levels of growth the City would need to consider the delivery of housing, employment and other development on sites which are currently being considered as important green spaces or placing increasing levels of development on flood zones 2 and 3. This intensification of development could also have impacts in terms of air quality within the city as it could encourage travel in and around the city and also encourage commuting in and out of the thriving towns and villages into the city as the majority of jobs would be located within the city limits. Intensification could also have implications in terms of increasing light pollution and noise within the city as development is intensified and density is increased which again would have implications for the quality of the environment. It might also be difficult to ensure that the biodiversity and local wildlife are not impacted on by increased

density of development.

In Option B there may be more ability to create some quality development within the fringes of the city but this again in an attempt to deliver all of the required growth, this could lead to high levels of growth on the fringes of the city which could have serious implications in terms of landscape character and setting of the Dartmoor National Park and other important sensitive landscapes including the AONB . In particular, this approach could have impacts on settlements such as Wembury, Roborough, Brixton, Yealmpton and Yelverton by changing their character and causing a blurring of the edges of the city and could become urban sprawl.

In general terms urban intensification will have a number of other impacts including :

### **Environmental Impacts**

Both of these options could have negative impacts on the quality of the city environment leading to increased density of development and loss of greenspaces. This could have a knock on effect on the quality of life for those living in the city and have implications in terms of health and wellbeing. The lack of development within the TTV may not necessarily bring positive benefits to the towns and villages, although no development could be seen as a good way of preserving the status quo in terms of environmental quality, there could be long term effects as the Plan Area becomes more and more unbalanced. City dwellers may well travel further to meet their recreational needs and this could have implications for some of the recreational areas within the TTV and in particular Dartmoor.

Balancing the need for new housing and other development within the city with the conservation and enhancement of biodiversity designations could prove difficult if urban intensification were to be followed.

### **Social Impacts**

Both of these options will have implications for the delivery of services and facilities. Within the city there will be a concentration of development which could lead to better provision of services which might provide better options for city dwellers. However in rural areas the impacts are less tangible ...if there is little or no development this could place less strain on existing services but will also limit options for new services and facilities to grow. The lack of affordable housing in the TTV could also continue to exacerbate the trend of many of the young people moving to the city and leaving the TTV. This could have negative implications for the delivery of services as the population will be continuing the trend of becoming an older population.

Urban intensification will also have implications for the affordability of housing within the TTV. Market signals show that house prices within the rural areas are out of reach for many of the community in these areas. Housing waiting lists show that many are in need of affordable housing, if no development takes place within the TTV then there will be no opportunity at all to meet any of the housing needs of those in the local area. This will be contrary to the NPPF as the plan will be failing to meet the need for market and affordable housing within the Plan area.

There will be transport implications for the city which could exacerbate existing problems on the network and also have implications for air quality. In the Thriving Towns and Villages (TTV) the lack of development could have implications on the provision of bus services and the delivery of other modes of travel including cycling, walking and public transport. There are also plans within the TTV to deliver better rail services, if no development were to take place in this part of the plan area, this could have implications for the delivery of these proposed schemes such as the re-opening of the railway line in Tavistock or the provision of increased rail services between Okehampton and Exeter.

Urban Intensification will fail to address some of the identified health inequalities within the Joint Local Plan area. Within Plymouth there are less positive health outcomes for those living in deprived areas, it is unknown whether intensifying development within the city will improve deprivation or make it worse. The loss of green space to intensified development and an increased in density to accommodate housing need could have implications for the health of the city, there will be more people and less space. In the TTV the lack of development will not help address the current trend of an increasing elderly population which is placing greater demand on health services and facilities.

**Economic Impacts**

Both of these options provide the ability to concentrate the provision of jobs and the regeneration of the city which could in turn improve economic conditions within the city. However it will be more difficult to provide balanced communities as there may be a greater need to provide homes on land currently earmarked for employment uses in an attempt to ensure the provision of adequate housing. Developing in the City and the Urban Fringe (Option B) provides more opportunities to provide a range of employment land and locations but again whether this approach will meet the economic needs of the whole HMA has to be questioned. In the TTVs the lack of an employment strategy which includes the provision of land could lead to decline and increase the need for people to travel further for jobs. This approach could also lead to fewer opportunities for new businesses etc to form and improve the economy of the TTV. These options could also lead to out commuting from the city to the TTV to provide a workforce for jobs within the rest of the plan area. Within the TTV the opportunities to address the barriers to growth such as the supply of premises, skills and service shortages and the lack of adequate broadband and mobile provision in rural areas is unlikely to be addressed if there are no opportunities for growth in these areas.

**Conclusion**

It is felt the a development strategy based on urban intensification fails to meet the basic principles set out in the NPPF relating to sustainable development and will also fail to meet the needs of all communities within the local plan area. There needs to be a more balanced approach to development within the ‘Plan Area’ which seeks to address as many of the key issues identified. Whilst intensifying development in and around the fringes of the city might have some environmental benefits for the rural areas it will not address some of the social and economic problems which affect the area. Vice versa – urban intensification may improve access to homes, jobs and services for those in the City but could have negative impacts on the environment and could in turn impact on health and well being of communities.

**Concentration of Development**

**Concentration of development** in the Plymouth urban area, but with a proportion of development needs expected to be accommodated in the city’s hinterland. This alternative expects that the development needs of the HMA will be met in locations across the HMA, but with an emphasis of concentrating growth at Plymouth. Given that Plymouth is clearly the dominant urban area of not just the HMA, but also the wider Western Peninsula, this alternative most closely matches the existing pattern of development in the HMA, and also matches the development strategy that has been pursued over the past decade. The following variations can be identified

Policy Options	Assessment Criteria																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

Option I A) Concentration on Plymouth and adjoining settlements, creating a ‘necklace’ of settlements/garden villages. This variation suggests that the villages which are located closest to Plymouth are expanded as ‘garden villages’ to accommodate a significant proportion of the growth of the HMA along with Plymouth plus its urban extensions.	?	?	+	+	?	?	0	?	?	-	?	?	?	?	?	?	
b. Concentration on Plymouth and key transport corridors. This option suggests that the needs of the HMA are met in Plymouth, including urban extensions, and then at locations along the main transport corridors to the city. These corridors are chiefly the A386 to the north of the city as far as Tavistock and to the east of the city along the A38, and taking in Ivybridge.	?	?	+	+	?	?	0	?	?	?	?	?	?	?	?	-	?
c. Concentration on Plymouth and New Settlements. This option suggests that the needs of the HMA outside Plymouth should be met through the planning of one or more new settlements. The West Devon Our Plan suggested the possibility of a new settlement in West Devon, and at various times other locations for new settlements have been suggested in South Hams. Clearly, the Sherford new settlement has been planned as a way to meet the needs of Plymouth and South West Devon in the past, and will continue to be developed meeting the needs of the HMA through the Joint Local Plan. This option looks at whether further new settlements could be used to meet needs.	?	?	+	+	?	?	0	?	?	?	?	?	?	?	?	?	?
d. Concentration on Plymouth and the Area Settlements. This option suggests that the needs of the HMA are met through concentration of development in Plymouth and also in the six market towns or area centres of West Devon and South Hams – ie Okehampton, Tavistock, Ivybridge, Totnes, Dartmouth and Kingsbridge.	?	?	+	+	?	?	0	?	?	?	?	?	?	?	?	?	?
e. Concentration on Plymouth, Area Centres and Local Centres. This option is as option I d but also includes the Local Centres of West Devon and South Hams – ie those larger villages/small towns which have sufficient facilities and sustainability characteristics to support modest growth	?	?	+	+	?	?	0	?	?	?	?	?	?	?	?	?	?

**Commentary**

Concentration of development within the City with a proportion of development going to the TTV provides a good opportunity to balance growth across the wider area and set out a strategy which meets the needs of the Joint Local Plan Area and deliver a sustainable pattern of growth. Concentrating development within the City and allowing a level of growth within the rural areas makes sense in terms of delivering a sustainable strategy for the whole Joint Local Plan Area. This approach continues a strategy which has historically developed over time through previous iterations of the Regional Spatial Strategy and the Devon County Structure Plan. This approach will allow development within the TTV which will help meet needs for housing and employment development, the key question here is how should the growth be distributed within the TTV. For this approach to work it is important that key infrastructure is able to be delivered alongside the development to ensure that the strategy delivers sustainable development. A number of options have been set out here which have varying degrees of impact on the area as whole.

Option A sets out a 'necklace' approach. It is important that the settlements within the necklace are clearly defined preferably on a map. From an environmental perspective it is difficult to assess the option without understanding which locations are likely to be identified. The Councils have set out that this approach would 'protect the environmental character of the Urban Fringe', however depending on the location of the necklace this might not be the case. One settlement which could fall into the ring of settlements is Yelverton which is in the Dartmoor National Park Authority Area, development in this location will have numerous implications which need to be clearly identified. This approach could undermine the delivery of Sherford, the new settlement within South Hams by creating opportunities for other locations close to Sherford to come forward ahead of the new Settlement. Option A presents a focus of development in and around the city and could be considered to be similar to the urban intensification options as it does not provide opportunities for the rest of the Joint Local Plan Area to grow

Option b sets out an approach which focusses on key transport corridors. This approach will consider development options along key transport corridors such as the A38 and the A386 and would recognise the relationship between Tavistock and Ivybridge and the City. This approach could be expanded to look the relationship between the north of the JLP area and the main transport routes there in particular the A30 and the relationship between Okehampton and Exeter. As it stands it looks like the Councils have only considered this option in terms of the relationship with transport corridors which link with Plymouth rather than an identification of transport corridors in the whole JLP area. There are also a number of other roads which could be considered as important transport corridors including A374, A385, A380 these have also been identified here <http://www.futureroadsengland.org/>. It is felt that this option could benefit from a more strategic look across the whole area or be redefined to clearly set out which transport options it is considering. Concentrating development on transport corridors could have implications in terms of increased congestion and pressure on the strategic road network. This would need to be carefully considered alongside a package of mitigation measures to encourage the use of other modes of transport.

Option c sets out an option of looking for new settlements within the JLP area. The option does not set out a specific location for any new settlements but focusses on the basic principles which would be involved. The development of new settlements require significant work to identify land available and then work with all the parties involved to set out a package which is considered available, deliverable and viable. Due to the detailed work required to bring forward a new settlement this option is unlikely to deliver any development during the plan period to 2034. Depending on their locations new settlements can have significant impacts on the character of the local area which brings with it a large amount of challenges and issues to plan for and discuss with other stakeholders within the local plan area. The creation of new settlements would relieve pressure for development on existing TTVs but could also create a new set of problems depending on its location. There will be a need to do more work to understand what quantum of development would be required to make a new settlement viable. If we look at Sherford new settlement as an example of delivery of housing by this concept we can see that 5,550 new homes and other facilities is considered to be about the right level of growth. The key question that has to be considered relates to whether there is enough housing growth required within the JLP area to deliver a second new settlement within the JLP area and to also meet the need to support the growth of the city to ensure it maintains its key Strategic role.

Option d sets out an option which looks towards the area centres within the TTVs to deliver the development required within the TTVs. This includes Okehampton, Tavistock, Ivybridge, Totnes, Dartmouth and Kingsbridge. Interestingly these settlements feature on the important transport corridors set out <http://www.futureroadsengland.org/>. This option provides a good opportunity to balance development between the city and the TTVs. Understanding the level of growth expected to be placed within the key settlements would help understand what the main impacts of development in these locations could be. A number of the settlements listed here have a number of constraints which impact on the level of growth each Settlement could take Dartmouth and Kingsbridge are within the AONB and therefore any major development proposed in these locations will need to be justified in line with para 116 of the NPPF (Major development in AONBS). Parts of Tavistock fall within the WHS and this could have implications on the level and Scale of growth provided in particular locations.

Option e proposes to concentrate growth on the City, Area centres and local centres within the TTV, this is an expansion of option 4 which includes the local centres within South Hams and west Devon. This will include the settlements of Bere Alston, Hatherleigh, Lifton and North Tawton in West Devon and Modbury, Salcombe, Stokenham/Chillington and Yealmpton in South Hams. It should be noted that some of these settlements fall within the AONB and therefore any proposed major development would need to be justified in line with paragraph 116 of the NPPF. This option provides the greatest opportunity to strengthen the roles of area centres and also to recognise the important role which the second tier settlements play within the TTV. This option could be further strengthened by also allowing some modest levels of growth within the smaller villages within the Plan Area. Many groups are beginning to prepare Neighbourhood Plans and it would be good to have an approach to the level of growth expected to be delivered through Neighbourhood Plans and to enable an understanding of the scale of provision which other villages could deliver.

#### Environmental Impacts

Concentration of growth within the city with a range of development options within the TTVs will have a number of implications depending on the specific strategy chosen. It is important that the environmental constraints are dealt with effectively within the strategy chosen. It's not clear from the options if they are carefully considering the different designations within the HMA, for example there is no recognition of needing to ensure that development proposals do not have significant effect on the European designated sites such as the European Marine Site and also on protected landscapes such as the Dartmoor National Park and the Area of Outstanding Natural Beauty. There is a need to ensure that the option chosen does respect the different designations within the area.

#### Social Impacts

These options provide the greatest way of providing opportunities to deal with social issues within the HMA particularly around the provision of housing and providing opportunities to deal with affordability issues. Developing a Strategy which enables the Settlement hierarchy to meet the needs of the wider area provides the greatest opportunities to deal with some of the identified issues and objectives for the joint local plan.

#### Economic Impacts

These options provide the best way to enable a flexible approach to the delivery of the economic Strategy. This strategy should recognise the variation in the functional economic market area by providing opportunities to deliver jobs throughout the whole area and not just in the city

*An overall description of the sustainability of each option, which will include consideration of any significant effects and any appropriate measures to improve the overall positive effects of the proposal.*

## Dispersal of Development

**Dispersal of development** across the whole Joint Local Plan area – ie without an assumption that Plymouth should be the focus for meeting needs. This option has the following variations:

Policy Options	Assessment Criteria																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
a. Dispersal – City of Plymouth delivers what it can, and the unmet HMA need is dispersed across SHWD across all settlements with settlement boundaries. - ie not in Plymouth urban fringe	?	?	+	?	?	?	?	-	-	?	?	?	?	-	-	?	?
b. Complete dispersal – development is shared out evenly across all settlements of the HMA.	?	?	+	?	?	?	?	-	-	?	?	?	?	-	-	?	?

**Commentary**

Dispersal of the development across the whole of the HMA has a number of sustainability implications. It could be seen as the most sustainable way to distribute growth as it provides the best opportunity to disperse the growth evenly throughout the settlements. In some instances, this could increase the long term sustainability of a settlement by providing opportunities to provide a greater number of services and facilities within that community, however this could also be at the cost of the character of the community. The impact of the development would depend greatly on the scale and distribution of that development. One key aspect to carefully consider in this option is that any large ‘major’ scale development within the AONB would need to be carefully justified in terms of the tests within the NPPF, this would mean that large parts of the HMA would not be able to take the scale of development required as there would be other locations within the HMA that could take the level of growth required, this could mean that parts of the HMA take a disproportionate amount of the growth which could lead to unbalanced communities

Dispersing development too thinly across the area could also have serious implication in terms of the coordination and delivery of essential infrastructure, a more coordinated approach to delivering development could help ensure that key infrastructure to serve communities was in place alongside the development, whereas dispersing development too thinly might mean that service delivery does not happen to support communities and this could exacerbate rural deprivation in some locations.

Depending on the level of dispersal these options could help support the delivery of affordable housing in rural areas by enabling the smallest settlements to also deliver a level of housing needed to meet local need and in turn increase affordability within the rural parts of the HMA.

Not boosting the delivery of housing within the city and only enabling it to deliver ‘what it can’ could mean that the City would not be able to deliver its aspirations in terms of economic growth. This would have implications in terms of the long term sustainability of the HMA as it is recognised that the City needs to grow and change in order to ensure its long term viability as a vibrant and economically viable city. The development Strategy for the HMA needs to recognise the important role which the city plays in terms of delivering essential services, facilities and providing jobs to those that live in the surrounding area.

Two options for delivering a dispersed development Strategy have been suggested.

**Option A**

It is not clear from the description of option A how much development the City can take and this will have an impact on how the rest of the growth were to be distributed. For example, if the city were able to take 80% of the growth this would have a greater implication for the TTV than it only being able to take 50%. Putting that aside it is possible to identify the possible impacts of dispersing development across the whole of the HMA, it is just not possible to fully understand the scale of development at this Stage. The development will also be dispersed amongst the TTVs based on whether or not the Settlement has a development boundary or not, this could mean that Some settlements which could take small amounts of development would not be given the opportunity to expand. Many of the development boundaries which are currently in place have not been produced with any particular guidelines or Structure in place and therefore Some settlements which could benefit from Some Small Scale development are excluded and other settlements which are not considered to be sustainable locations for development are included, therefore this may not be a robust way of distributing the growth.

Option B sets out an approach which distributes the growth evenly across all settlements within the HMA, this option provides the greatest possible choice in terms of the delivery of development as it can maximise delivery by enabling available sites to come forward, however some of those development sites may not be located within the locations that would help deliver Sustainable development. This strategy would also have implication in terms of maximising the delivery of the growth within Plymouth. Dispersing development could also make it difficult to achieve required infrastructure to support development, particularly in the TTV where there is no CIL charging schedule and limited ability to pool section 106 contributions

#### Environmental Impacts

These options could have the greatest impacts in terms of the environment unless the options specifically direct development away from designated landscape and environmental areas. On the other hand this option could provide the greatest opportunity to re-use brownfield land for development rather than greenfield sites as it could provide opportunities to develop smaller pieces of underused land in all settlements across the HMA. However finding available land to deliver this strategy could prove difficult. Dispersing development may provide the greatest opportunity to avoid placing development on areas at risk of flooding as they could be more land available in areas which do not flood.

#### Social Impacts

These options could have impacts in terms of social exclusion and could increase rural poverty if homes were placed in locations that lacked services and facilities. People would need to rely on the car and for low income families this could prove difficult.

#### Economic Impacts

Dispersing development could provide the greatest opportunity to provide a flexible approach to the delivery of jobs and employment premises. However this could mean that jobs are located in places which are not accessible, other than by car, and this could prove difficult for businesses to remain viable.

*An overall description of the sustainability of each option, which will include consideration of any significant effects and any appropriate measures to improve the overall positive effects of the proposal.*

**Preferred Option**

**Plymouth** is identified as the location which will drive the economic growth of the HMA. The City's growth agenda has been in place for 10 years delivering new jobs and homes and transforming the city's role and function, and this will continue to be delivered in the future

Tavistock and Ivybridge are key Settlements within the Plymouth TTWA with close relationships with the city, and high quality public transport links to Plymouth. These towns are identified as locations for sustainable development which will contribute to the economic success of the city.

Okehampton, Totnes, Dartmouth and Kingsbridge are important market towns which service extensive hinterlands where some further sustainable development can be accommodated. Such development can be located in places served by facilities, public transport and access to local jobs. Okehampton and Totnes also benefit from close links to Exeter and Torbay respectively, while Kingsbridge and Dartmouth are more constrained by the AONB and other local constraints, and so are expected to see less development than the other area centres.

Local Centres and Villages. Across the sub region, there is a network of rural villages and larger local centres, associated with the market towns. These locations will clearly see limited levels of growth over the plan period. It is anticipated that development in these locations will come forward through allocations where appropriate. Neighbourhood Plans and criteria based policies

A limited amount of development will be brought forward in Dartmoor through the National Park Authority's Local Plan, in order to deliver its aims and priorities

Policy Options	Assessment Criteria																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
<p>The creation of two sub areas</p> <p>Plymouth – Britain's Ocean's City – comprising an area including the city of Plymouth 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.</p> <p>The Thriving Towns and Villages – comprising 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 thriving hinterlands</p>	?	?	+	+	+	+	?	?	?	?	?	?	?	?	?	?	?

**Commentary**

The preferred strategy for development within the HMA provides the greatest opportunity to deliver the different aspirations within the city and also enable TTVs to achieve moderate levels of growth which would enable them to counteract some of the issues surrounding affordability and also planning positively for the area by being able to provide some different forms of delivery such as self build and live work units. This will help the HMA to deliver the levels of housing which are needed to support

communities within the whole of Local Plan Area in terms of household size, tenure, types, this will provide more sustainable communities in the long term and help to counteract some of the demographic challenges that relate to the area.

This strategy will also help to deliver economic growth within the area in locations which will help create jobs for the communities making the best use of land and strategic locations. This strategy provides the greatest opportunity to maximise the strategic locations for employment and provide jobs where they can be accessed by many people living in the community.

The strategy will also provide opportunities to ensure that the character of the landscape and townscape is protected by providing opportunities for those special landscapes to be recognised and protected.

The option could benefit from highlighting that development will be located in those places which are less likely to suffer from flooding on the future impact of climate change, this is particularly important in areas where there is existing coastline which could be suffering from coastal erosion. This could be more explicit within the preferred option.

The strategy could also benefit from clearly setting out the approach to the AONBs within the HMA. The NPPF is quite clear that major development should only take place in the AONB where there is either an overriding community benefit or where the development proposals can not be met elsewhere. There will be a need within the AONB to provide housing for the communities which live within the AONB but this needs to be balanced against the need to ensure that the special environment of the AONB is protected from inappropriate development which could harm its character. This is also important when considering the levels of development required close to the Dartmoor National Park.

*An overall description of the sustainability of each option, which will include consideration of any significant effects and any appropriate measures to improve the overall positive effects of the proposal.*

