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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 Integrated Assessment for the JLP incorporating the requirements of SA/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. Health impacts are also considered and have been incorporated into the assessment framework.

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 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 the vision, objectives and policies of the JLP;
- an assessment of growth options;
- an assessment of the process for identifying sites for allocation

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 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 1.

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 IV: Scoping Report for Plymouth Plan (September 2014)
- Appendix V: Scoping Report for South Hams Our Plan (July 2014)
- Appendix VI: Scoping Report for West Devon Our Plan (September 2014)
- Appendix VII: Interim SA of Plymouth Plan part one (February 2015)
- Appendix VIII: SA of Our Plan West Devon (February 2015)
- Appendix IX: SA of JLP policy alternatives
- Appendix X: SA of draft distribution strategy (November 2016)
- Appendix XI: SA of site allocation methodology
- Appendix XII: SA of JLP Vision, Objectives and Policies
- Appendix XIII: 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 over-
arching strategic framework for sustainable growth and the management of change for Plymouth, South Hams and West Devon to 2034.

2.2 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 Co-operate”.

2.3 The 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.

2.4 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.
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.

2.5 The Plan is also supported by a number of strategic objectives:
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.

2.6 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 Directive1, 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 Integrated 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 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 XII represents an assessment of the JLP policies in the pre-submission version of the plan, where the majority of recommendations from the IA process had already been taken on board in the drafting of the plan. Consequently, the policies assessed already include appropriate measures to mitigate those matters where the SA process would otherwise have indicated potential significant 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>
<th>JLP Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>• A1 Identify other relevant policies, plans and programmes, and sustainability objectives</td>
<td>Previous scoping reports</td>
</tr>
<tr>
<td>• A2 – Collect baseline information</td>
<td>Plymouth Plan (Appendix IV)</td>
</tr>
<tr>
<td>• A3 – Identify sustainability issues and problems</td>
<td>South Hams (Appendix V)</td>
</tr>
<tr>
<td>• A4 – Develop the SA Framework</td>
<td>West Devon (Appendix VI)</td>
</tr>
<tr>
<td>• A5 – Consult the consultation bodies on the scope of the IA process</td>
<td>Previous SA/SEA</td>
</tr>
<tr>
<td></td>
<td>Plymouth Plan Interim SA Report (Appendix VII)</td>
</tr>
<tr>
<td></td>
<td>West Devon Our Plan SA/SEA (Appendix VIII)</td>
</tr>
<tr>
<td></td>
<td>Baseline data and trends set out in Final Scoping Report (Appendix III)</td>
</tr>
<tr>
<td></td>
<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>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Stage B : Developing and refining options and assessing effects</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• B1 – Test the Joint Local Plan objectives against the SA Framework</td>
<td></td>
</tr>
<tr>
<td>• B2 – Develop the JLP options including reasonable alternatives</td>
<td></td>
</tr>
<tr>
<td>• B3 – Evaluate the likely effects of the JLP and alternatives</td>
<td></td>
</tr>
<tr>
<td>• B4 – Consider ways of mitigating for adverse effects and maximising beneficial effects</td>
<td></td>
</tr>
<tr>
<td>• B5 – propose measures to monitor the significant effects of implementing the plan</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Stage C – Developing and refining options and assessing effects</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• C1 – Preparing the SA Report</td>
<td></td>
</tr>
</tbody>
</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 appendices to this report.

Table 2: Previous SA/SEA stages

<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>
<tr>
<td>Plymouth and South West Devon Joint Local Plan Integrated Assessment Scoping Report (including Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA))</td>
<td>August 2016</td>
</tr>
</tbody>
</table>

Scoping Report

3.14 Table 1 illustrates that the first stage of preparing the IA 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
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 (IA Scoping stage A1)
• Relevant aims and objectives from the PPPSIs – Summary of the main objectives and sustainability issues and implication that are relevant locally (IA Scoping Stage A1)
• Baseline – sets out the quantitative and qualitative information for the local area (IA 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.

3.18 The final Framework and scoring matrix is shown below at Table 3. The Final Scoping Report is included at Appendix III.

**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    | 1 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?  
• Promote the retention and development of community services and facilities? |
### Population and Human Health

<table>
<thead>
<tr>
<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>For any health impacts identified during the assessment…</td>
</tr>
<tr>
<td></td>
<td>Will the health impacts affect the whole population or will there be differential impacts within the population?</td>
</tr>
<tr>
<td></td>
<td>Will the health impacts be difficult to remedy or have an irreversible impact?</td>
</tr>
<tr>
<td></td>
<td>Will the health impacts be medium to long term?</td>
</tr>
<tr>
<td></td>
<td>Are the health impacts likely to generate public concern?</td>
</tr>
<tr>
<td></td>
<td>Are the health impacts likely to generate cumulative and/or synergistic impacts?</td>
</tr>
<tr>
<td></td>
<td>Combining the answers, on balance will the health impacts have an important positive or negative impact on health?</td>
</tr>
<tr>
<td></td>
<td>Can the policy be improved?</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 independent?
- Promote a safe environment through designing out crime and fear of crime?
| Population and Human Health | 3 | To help provide access to a suitable mix of good quality housing | Does it:  
• Improve the mix and quality of housing stock, including open market and affordable housing to meet a range of needs?  
• Increase needed provision for specific sectors of the community e.g. the elderly, disadvantaged, gypsies and travellers?  
• Promote improvement to the existing and future housing stock? |
| Population and Human Health | 4 | To improve access to a range of basic services and amenities | Does it:  
• Improve the access to key services (education, shops, employment, recreation, health, community services and cultural assets)?  
• Provide physical access for those with disabilities?  
• Improve and/or sustain public transport or other sustainable transport modes? |
| Population and Human Health | 5 | To provide access to opportunities for education and skills development. | Does it:  
• Ensure the provision of education and training facilities that meet local needs and that are accessible to all?  
• Support skills and training development in the local community and will it contribute to meeting identified skills shortages?  
• Will it support collaboration between educational establishments, businesses and industry? |
| Population and Material Assets | 6 | To support the growth potential of business sectors to provide jobs and encourage sustainable economic growth and prosperity. | Does it:  
• Provide for the needs of the economy, particularly local businesses (such as choice of premises, services, infrastructure and skilled workforce)?  
• Support the growth of existing businesses and business and |
<table>
<thead>
<tr>
<th>Material Assets and Climatic Factors</th>
<th>Does it:</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td>help to protect the community from changing weather patterns and environmental conditions and adapt to climate change?</td>
</tr>
<tr>
<td></td>
<td>Will it minimise the demand for energy?</td>
</tr>
<tr>
<td></td>
<td>Will it encourage efficiency in the use of energy?</td>
</tr>
<tr>
<td></td>
<td>increase the ability of the community to be more self-sufficient?</td>
</tr>
<tr>
<td></td>
<td>reduce the need for energy use and/or reduce fuel poverty?</td>
</tr>
<tr>
<td></td>
<td>support decentralised low carbon and renewable energy generation?</td>
</tr>
<tr>
<td></td>
<td>facilitate the generation and use of renewable energy?</td>
</tr>
<tr>
<td></td>
<td>support reductions in greenhouse gas emissions?</td>
</tr>
<tr>
<td></td>
<td>Promote the production of community owned energy?</td>
</tr>
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<td></td>
<td>Enable increased local...</td>
</tr>
</tbody>
</table>
| **Population and Human Health** | 8 | To reduce the need to travel, encourage alternatives to the car, and make best use of existing transport infrastructure | **Does it:**  
- 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** | 9 | To protect, conserve and enhance biological and geological diversity. | **Does it:**  
- 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** | 10 | To conserve and enhance the distinctive character and special qualities and features of green and blue spaces | **Does it:**  
- 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?

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

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

<table>
<thead>
<tr>
<th>Water and Climatic Factors</th>
<th>13</th>
<th>To avoid development in areas of high flood risk and reduce vulnerability to flooding</th>
<th>Does it:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Help to manage and minimise the risk of flooding and coastal erosion to existing and new development and infrastructure?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Help to discourage inappropriate development in areas at risk from flooding and coastal erosion?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Reduce the risk of flooding to the development and</td>
</tr>
<tr>
<td>Category</td>
<td>Objective</td>
<td>Does it:</td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
</tbody>
</table>
| Soil and Water                   | To minimise resource use including greenfield land, minerals and water and to maintain and improve land quality | • Help reduce the rate of run off?  
• Promote sustainable flood risk management?  
• Encourage sustainable drainage?  
• Make the most efficient use of land including previously developed land where appropriate?  
• Help remediate contaminated sites?  
• Minimise the loss of good quality agricultural land?  
• Safeguard mineral resources and encourage their efficient use?  
• Increase efficiency in the use of raw materials and promote recycling?  
• Conserve water resources and quality?  
• Improve the quality of rivers, the sea and groundwater?  
• Protect and improve freshwater and estuarine quality?  
• Provide adequate utilities infrastructure that does not adversely impact on the environment?  
• Protect soils of high environmental quality?  
• Provide appropriate soil management and storage? |
| Material assets, water, soil, Human Health and Population | To minimise the production of waste and encourage the sustainable use of resources | • Reduce the use of primary resources and promote the use of recycled materials?  
• Encourage the use if local products and services? |
| Air, Climatic Factors, Human Health | To protect and improve air quality | • Help improve air quality  
• Support specific actions in designated AQMAs?  
• Help reduce pollution from traffic?  
• Minimise atmospheric pollution and enhance air quality? |
| Equality and Diversity | 17 | 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? |

<table>
<thead>
<tr>
<th>Score</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>++</td>
<td>Major positive effects to achievement of the IA objective</td>
</tr>
<tr>
<td>+</td>
<td>Minor positive effects to achievement of the IA objective</td>
</tr>
<tr>
<td>0</td>
<td>No effect (either positive or negative) to achievement of the IA objective</td>
</tr>
<tr>
<td>-</td>
<td>Minor negative effect to achievement of the IA objective</td>
</tr>
<tr>
<td>--</td>
<td>Major negative effect to achievement of the IA objective</td>
</tr>
<tr>
<td>?</td>
<td>Impact on the IA objective is uncertain</td>
</tr>
</tbody>
</table>

### Review of relevant plans and programmes

3.19 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.

3.20 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 (March 2017) included in Appendix III.

3.21 The review highlighted key sustainability challenges for the JLP to address.

### Limitations

3.22 The IA 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.

3.23 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, Stokenham 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 316th out of 326 which a population density of 47 people per km$^2$ compared to a density of 95/ km$^2$ in South Hams and 3,300 km$^2$ in the city. In direct contrast to the sparsely populated nature of West Devon, Plymouth is the 30th 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.

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 known 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
• South Dartmoor Woods SAC
• South Devon Shore Dock SAC
• South Hams SA
• 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.

4.11 The JLP 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 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 Ancient 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></td>
<td>8</td>
<td>6</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. 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 Integrated Assessment.

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.

Table 4: Evolution without the Plan

<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>Incidences of flooding and more frequent extreme weather events are expected to increase as a result of climate change.</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>Generally good levels of air quality – but there are designated Air Quality Management Areas, and water quality. 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</td>
</tr>
<tr>
<td>Synergy between Plymouth and the rural areas in the plan area – notably with commuting to work and travel to access higher order functions such as retail, leisure and tertiary education</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>---</td>
<td>---</td>
</tr>
<tr>
<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>
</tr>
<tr>
<td>Resource within the plan area to generate renewable energy, and provide opportunities to improve energy security</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>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>
</tr>
<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>
</tr>
<tr>
<td><strong>Economy</strong></td>
<td></td>
</tr>
<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>
</tr>
</tbody>
</table>
| Employment in Plymouth generally dominated by the maritime/defence, higher education, manufacturing/R& 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 | 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,
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.

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.

The environment is a valuable asset and the impact of growth and regeneration must be appropriately managed if this resource is to be sustained.

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.

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.

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.

**Environment**

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

| Plymouth and South West Devon | JLP | Integrated Assessment Report | March 2017 |
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**

<table>
<thead>
<tr>
<th>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</th>
<th>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</th>
</tr>
</thead>
<tbody>
<tr>
<td>High incidence of health inequalities, deprivation and unemployment in Plymouth. Population in South Hams and West Devon is relatively healthy but with a high proportion of elderly population</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 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</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>
</tr>
<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>
</tr>
<tr>
<td>Historic levels of in-migration to the rural</td>
<td>Continuing current trends would see</td>
</tr>
</tbody>
</table>
areas, and an increasing number of second home ownership particularly in the South Hams.

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.

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.

5.2 In preparing the JLP, the Local Authorities are not starting with a blank sheet of paper. The distribution strategy that is set out in the JLP is largely a continuation of the distribution strategy expressed in the Devon Structure Plan 2001-2016 and the draft Regional Spatial Strategy. During the time that the Councils have been working together on the JLP, contemporary evidence still supports that historic strategic approach of Plymouth as a ‘growing city’ and of sustainable levels of growth in the South Hams and West Devon.

5.3 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 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.

5.4 The Councils agreed that in developing the strategy the JLP should facilitate and promote economic growth and regeneration within the HMA. 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 harm to the AONB, the high-
quality environment of the HMA, and the historic environment, consistent with legislation and national policy.

5.5 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 XII.

5.6 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. This assessment is available at Appendix IX.

Options for spatial distribution

5.7 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

5.8 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 distribution of the development within the plan area and to also set out some information in relation to the key topics outlined above.

5.9 In preparing the Joint Local Plan, alternatives for the distribution of development within the Joint Local Plan area have been identified and appraised 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.

5.10 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.

5.11 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

5.12 Each of the alternative options for distributing the growth were consulted on during November/December 2016 and were the subject of the IA included in the consultation document (appendix X) and through this a preferred option began to emerge.

**Preferred Strategy**

5.13 This November 2016 consultation identified the preferred option for the distribution of development was a concentration of growth cascading down the settlement hierarchy, from the City to main towns and key villages down to sustainable villages, with an expectation that growth in settlements within the protected landscapes or their setting, including the AONB should not harm their special qualities. 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.

5.14 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 agenda 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 the rest 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 in to 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.

5.15 This approach has been formally agreed in principle through the approval from all three authorities to consult on the pre-submission version of the plan. Nevertheless, it should also be noted 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.

5.16 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.

5.17 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.

5.18 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.

5.19 The feedback from the November consultation has been taken into account in the pre-submission version of the plan as the strategy for the distribution of growth has developed. Consequently, further work was required to develop the policy approach within the two policy areas. 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 process and appraisal for allocating sites is available to view at Appendix XI.

5.20 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.

5.21 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).

5.22 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 to thrive.

5.23 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.

5.24 Officers 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.

5.25 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.

5.26 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.

5.27 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.

5.28 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.

5.29 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 home 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.

5.30 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. The methodology for assessing sites for allocation is set out at Appendix X1.

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. This will be reported each year through the Authority Monitoring Reports of the LPAs.
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 XIII.

Section 8: Summary, conclusions and next steps

8.1 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 pre-submission document. The integrated 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 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.

8.2 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.

8.3 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.

8.4 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.

8.5 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

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 (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.

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 (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

8.8 The IA report is being published alongside the pre-submission draft Joint Local Plan to demonstrate the significant sustainability effects of the draft plan and the alternatives considered in developing the plan.

8.9 After the close of the consultation on the pre-submission version of the JLP any responses made in connection with the IA will be reviewed and consideration will be given to whether the document requires changes prior to it being submitted to the Inspector for examination.
Can I comment on this IA?

8.10 Comments are invited on the IA report for a six week period between 15th March and midnight on 26th April 2017.

8.11 To comment on the Plan and this integrated report, you are recommended to use the on-line consultation portal which can be accessed here http://plymouth.consult.limehouse.co.uk/portal/planning/jlp/

8.12 Alternatively, please send your comments to:

- Plymouthplan@plymouth.gov.uk
- Strategic.planning@swdevon.gov.uk
- Joint Local Plan Team, Floor 2, Ballard House, West Hoe Road, Plymouth, PL1 3BJ