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Please ask for: Richard Grant

Date 06/10/2017

My Ref: EXC3

Dear Mrs Burden and Mrs Wright

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

- 1.1. Thank you for your letter dated 4th September, which set out initial indications of the arrangements for the Examination into the soundness of the Plymouth and South West Devon Joint Local Plan, and also asked for clarification from the Councils on a number of matters. This letter sets out the Councils' replies to the matters you set out.

Evolution of the Plymouth and South West Devon Joint Local Plan 2014 -2034

Can the Councils please provide a timeline which identifies the different stages in the preparation of the JLP, together with a list of references to those documents in the examination library which are linked to each of those stages. If there are documents which are not currently in the examination library but which formed an important part of the evidence base to a stage in the process, can those documents please be identified and added to the examination library.

- 1.2. We are attaching to this letter a timeline which sets out each stage the Plan has passed through, the documents which were drawn on at that time to support the development of the Plan, and which of those documents are included in the Examination Library, and hope that this timeline will clarify the position regarding references made in certain representations. The timeline has been given the following reference in the Examination Library (EXC3A). We have indicated one further document which we think should be added to the Examination Library. The document has therefore been added to the library with the following reference:

HO17 - Joint Local Plan - Plymouth, South Hams, West Devon: Establishing the Objectively Assessed Need, PBA, June 2016

- 1.3. As part of the work to produce the timeline, we have also identified a small number of additional documents that we think should be added to the Examination Library. We have

therefore added these to the library with the following references:

O12 - Minerals Topic Paper 1 Spatial Strategy Version 2, Dartmoor National Park, Devon County Council, Plymouth City Council and Torbay Council, January 2016

O13 - Minerals Topic Paper 2 Safeguarding Mineral Resources & Infrastructure Version 2, Dartmoor National Park, Devon County Council, Plymouth City Council and Torbay Council, January 2016

O14 - 5th Devon Local Aggregate Assessment 2006-2015 Version 2, Devon County Council, August 2016

O15 - 6th Devon Local Aggregate Assessment 2007-2016, Devon County Council, July 2017

EC12 - Tavistock Town Benchmarking Report 2013, Mike King, 2013

EC13 - Okehampton 2014 Town Benchmarking Report, People and Places, May 2015

EC14 - Tavistock 2014 Town Benchmarking Report, People and Places, May 2015

EC15 - Okehampton 2016 Town Benchmarking Report, People and Places, December 2016

EC16 - Tavistock Town Benchmarking Report, People and Places, January 2017

We have also discovered that the Examination Library document EN8 - Shoreline Management Plan Review (SMP2) Durlston Head to Rame Head, was incomplete. We have replaced this document with the complete version.

It would be helpful for the Councils to clarify whether an earlier draft version of the JLP has been produced prior to the submission JLP, and provide the evidence base for any earlier calculation of OAN.

- 1.4. I can confirm that no full draft of the Joint Local Plan was produced preceding the Regulation 19 Pre Submission Plymouth and South Devon Joint Local Plan in March 2017. You will see from the timeline referenced above that a consultation was carried out in July 2016 under Regulation 18, which included an early indication of the Objectively Assessed Need for new homes in the Plymouth HMA, including an evidence base note which has been added to the Examination Library (see above). The OAN was subsequently revised in the light of more up to date Sub National Population Projections which were released by ONS later in 2016.

In addition, we note that the majority of the submission documents listed in the examination library are dated July 2017. Can the Councils please clarify whether all those which have this date were actually produced at that time? It appears that some of the documents may have been produced at an earlier date – for example SUB9C. Where documents were produced at an earlier date, can that date please be included in the title to the document and where appropriate, provided on the examination library list.

- 1.5. The documents in the evidence base which are dated as July 2017 are labelled with that date because they were published at that time. However, some of the appendices included in the documents include information from earlier documents as set out below
- a. SUB1-7 are the Submission versions of the JLP - correctly dated July 2017. This is an iteration of the Pre-Submission (Regulation 19) JLP of March 2017.

- b. SUB8 is the summary schedule of changes to the plan - correctly dated July 2017.
- c. SUB9 (and its sub-elements) is the Submission version of the Integrated Assessment / Sustainability Appraisal - correctly dated July 2017. This is a revision to the Pre-Submission document of Feb 2017. Only two of the Appendices remained completely unaltered to the version published in February 2017. These are Appendices VI and XI (SUB9F and K). Appendices I, II, III, IX (SUB9A, B, C and I) contain only minor revisions (eg formatting; cross referencing updates; clarifications). Appendix V (SUB9E) replaces the previous Appendix X 'Distribution Strategy SA Topic Paper – Nov 2016' by extracting the matrix from the Topic Paper. The matrix itself has not been altered. Appendix X (SUB9J) updates the assessment so that it relates to the policies set out in the plan rather than emerging policies, and confirms some of the original scoring. Appendices IV, VII and VIII (SUB9D,G and H) are new and provide more clarity and detail in support of the commentary set out in the main report.
- d. SUB10 is the Submission version of the Habitat Regulations Assessment - correctly dated July 2017. This is a revision to the Pre-Submission document (draft HRA) of February 2017.
- e. SUB11 is the Statement of Consultation - correctly dated July 2017. Its Appendices (SUB11A-P) are dated separately because they are documents which relate to earlier stages of the plan preparation process.
- f. SUB12 is the Duty to Co-operate Statement - correctly dated July 2017.
- g. SUB13-21 are not dated July 2017.
- h. SUB22 (including its sub elements) is the Reg 22 Statement (response report) - correctly dated July 2017.

Contents of the PSWDJLP

To assist in navigating the JLP, in particular in the search for policies, can the Councils produce a revised contents page. This should list under each Chapter heading each of the Policies which appear within that Chapter together with the policy title and page number.

In addition can the Councils please provide the title to each of the annexes to the JLP on the contents page.

- 1.6. An amended contents page for the JLP is attached to this letter, and is available on the Examination webpage with the reference SUB1B

The Housing Topic Paper (TP3) makes reference to "Annex X" of the JLP. To which annex in the JLP does this refer?

- 1.7. This reference was mistakenly included in the Housing Topic Paper, and does not refer to the annexes of the submitted JLP.

Delivery of housing

We welcome the submission of the trajectories, but would invite the Councils to reproduce these documents in a format which will be easy for the Inspectors and all participants to deal with during the preparation for and at the hearings. They are currently very difficult to work with electronically, and the paper copies which have been produced are too large to be user friendly. We suggest that the Councils use the format for trajectories produced by other Councils to support their development plans, such as those at Annex A to the North

Northants Joint Core Strategy, or at Appendix B to the North Devon and Torrridge Local Plan Examination document ECO6.

- 1.8. We have reproduced the housing trajectories which were originally supplied with the Housing Topic Paper in the format which you have suggested. The reformatted trajectories are attached to this letter with the reference EXC3A. For convenience we have also added these reformatted trajectories to the relevant part of the Examination Library with the references TP3Ai, TP3Bi, and TP3Ci.

In TP3, it is stated (para 8.7) that the trajectories are based on the March 2016 housing monitoring point. The trajectories have the date of 13 March 2017 in the heading, with housing completions to 2015-16. Can the Councils please confirm that although the trajectories in the appendices to TP3 are dated March 2017, they are based on March 2016 data. In addition can the Councils consider whether it would be possible to provide an update of the trajectories to March 2017 which can be submitted as part of the Councils' evidence to the hearings.

- 1.9. We can confirm that the trajectories are based on March 2016 data, which was the most up to date position available at the time of the Regulation 19 Pre Submission consultation on the Joint Local Plan, and also at the point of submission of the Joint Local Plan. The Councils are able to produce an update of the housing trajectories and all of the housing supply information to the 2017 monitoring point and commit to producing this update and placing it into the Examination Library by 29th November 2017 in order that the revised information is available for those writing hearing statements dealing with housing land supply and delivery. As indicated below, the Council will seek the views of the main developers of each site on the updated trajectories, and this timescale will allow sufficient time for developers/promoters to respond with their latest assumptions, for the Council to then consider the responses from those developers/promoters, and to revise the housing trajectories and the housing topic paper accordingly.

In producing the trajectories, the Councils should consider as part of their evidence for the hearings, the extent to which the lead in times and delivery rates have been agreed with the main developers for each site, and if not, what assumptions are being made in relation to lead in times and delivery rates for each of the sites.

- 1.10. In updating the housing trajectories to March 2017, the Councils will also update and set out the assumptions that have been made in relation to lead in times and delivery rates for each of the sites and the extent to which these have been agreed with the main developers for each site. The Councils will liaise with relevant developers/promoters with regard to assumptions and delivery forecasts as part of their work updating the trajectories to the March 2017 position.

In addition, can the Councils please consider and respond to the following:

Should a trajectory be included in the JLP to demonstrate how residential development is expected to be delivered in accordance with the requirement in Policy STP3?

- 1.11. The Councils would be happy to include a trajectory or trajectories in the Joint Local Plan.

How will the 5 year housing land supply for each Council area be calculated in order to demonstrate that the provision in the JLP for the 5 year supply within each of the 2 policy areas is being delivered?

- 1.12. The following points explain how the Joint Local Plan considers this matter:

- i. The JLP sets out housing requirements in Policy SPT3 for the whole plan area, and for the 2 Policy Areas. Additionally, it sets out in Annex 2 to the plan, monitoring targets setting out the number of homes to be delivered in each of the three Local Planning Authority areas.
- j. The JLP sets out five year land supplies from the point of adoption of the plan (2018) for the whole plan area and for the 2 Policy Areas. Paragraph 6.25 of the Joint Local Plan additionally states that “for monitoring purposes the five year land supply will be assessed at local planning authority level.”
- k. Therefore, in order to continually understand the supply of sites available to meet the needs set out in the Joint Local Plan, we would expect to set out 5 year land supply positions at three levels:

Firstly at the whole plan level, to demonstrate that the strategy set out for the whole area is being delivered,

Secondly at the Policy Area level, to demonstrate that the plan requirements set out in SPT3 are being met and that the distribution of development between the two policy areas is being delivered,

Finally, there is a need to understand how housing is being delivered within each policy area, and in particular in the Thriving Towns and Villages Policy area given that it is a large rural area where there is a clear drive to ensure growth takes place in a sustainable manner, meeting the needs of market towns and the surrounding rural communities for homes, jobs and facilities. The JLP sets out a clear strategy for the distribution of new homes in the plan area, including an objective to focus growth in the TTV policy area in the six main towns, and in the towns and larger villages. In order to monitor how each local planning authority is playing its part in delivering this distribution of growth, the Joint Local Plan sets out housing monitoring targets in Annex 2 of the plan, and these can be used to set out a 5 year land supply for each LPA. These targets enable:

- i. Each LPA to set out a 5 year land supply for monitoring purposes,
 - ii. Each LPA to understand how each LPA is delivering the number of new homes envisaged by the Joint Local Plan,
 - iii. All the LPAs to have a thorough understanding of how new homes and affordable homes are being delivered across the whole plan area in accordance with the strategy and to individually and collectively take responsibility for any shortfalls in delivery of new homes, and/or the implementation of the JLP spatial distribution.
- l. The Councils are currently reviewing their existing Collaboration Agreement in order to put in place a new governance framework for the delivery of the JLP requirements and its ongoing monitoring and subsequent review. A high level governance framework diagram and principles have been discussed between the three Councils (see document attached) and are guiding the preparation of the formal Agreement. The governance framework will evolve and take into account the government’s direction of travel with regard to emerging changes to the National Planning Policy Framework including for example the provisions of a ‘Housing Delivery’ test and

standardised housing needs assessments.

Flood Risk Assessment

We note that a number of studies have been carried out in relation to flood risk within the JLP area. Can the Councils please confirm that the Environment Agency (EA) has been consulted at each stage of flood risk assessment, and is satisfied that the JLP strategy would not contribute to any unacceptable increase in flood risk?

Other issues, such as the effects of the housing provision in Plymouth upon water quality are raised in representations from the EA and we note that the Councils consider that other policies in the Plan are sufficient to deal with the EA's concerns. Has there been any further liaison with EA to ensure that those concerns can be fully met through the provisions of those policies?

- 1.13. The Council can confirm that the Environment Agency has been consulted at each stage of the flood risk assessment and is satisfied that the strategy proposed in the plan would not contribute to an unacceptable increase in flood risk. The Environment Agency have supplied the following comments in relation to the Inspectors' questions:

"Flood Risk

We can confirm that the Councils' Strategic Flood Risk Assessments (SFRA) are considered appropriate. Both South Hams and West Devon benefit from SFRA's that have been prepared or updated in the last 3 years. Whilst Plymouth's SFRA dates from 2006 it is still considered to be a robust document and is supplemented by a recent Local Flood Risk Management Strategy and Drainage Strategy which bring matters in the SFRA up to date.

We are happy that the SFRA's (and other flood risk management related evidence) have been used appropriately to apply the Sequential Test to the site allocations. The only sites within flood zones 3 and 2 which have been allocated are previously developed sites and their allocation appears to be consistent with wider sustainability objectives (see NPPF paragraph 102).

The councils have prepared SFRA level 2 documents to help inform some of the site allocations. Our formal response to the JLP consultation in April did specifically recommend the need for SFRA level 2 for the proposed allocation at Newnham Road/Colebrook. However, we note the 2010 Plympton SFRA Level 2 which covers the Tory Brook at this location and, importantly, the flood risks to/from the site have now been assessed through a site specific Flood Risk Assessment to support the current planning application. This FRA has indicated how the site can be developed so as to satisfy the second part of the Exception Test, Policy DEV37 and the policy supporting the allocation.

Water Quality

We are satisfied that the policies set out in the JLP, especially DEV37 will help ensure that the Local Planning Authorities and developers 'do their bit' in helping to ensure no deterioration in the status of the JLP area's water bodies and, where necessary, to help improve their status. However, it is important the level and distribution of growth is fully accounted for in South West Water's (SWW) next 5 year plan/PR19, which is currently being developed."

- 1.14. The Council is working with the Environment Agency through a Statement of Common Ground to address the concerns around the impact of the housing strategy in Plymouth on the water quality and it is anticipated that this can be satisfactorily addressed through minor modifications to the plan.

Sustainability Appraisal/SEA

Appendix X of the Integrated Assessment (IA) contains the sustainability appraisal/SEA assessment for the JLP (SUB9J). It lists 17 SA/SEA topics and objectives and sets out the assessment matrix. However we note that a separate site selection methodology has been used for the assessment of housing sites (SUB9F). How does this fit in with the SA/SEA assessment matrix? Can the Councils confirm which documents specifically compare the merits of individual sites and set out the reasons why particular sites have been allocated when compared with others?

- 1.15. SUB9F sets out the methodology the Councils used to undertake a thorough assessment of sites for inclusion in the Joint Local Plan. This methodology indicates the process that was followed to bring together information on sites from the SHLAA, and from other evidence base documents as explained below, in order to assemble the sites that we felt were reasonable alternatives, and eventually the sites that we felt should go forward into the Joint Local Plan. The SA/SEA process played two roles in this respect. Firstly, the methodology set out in SUB9F was tested through the SA/SEA process, as is stated in paragraph 1.3 of SUB9F. Secondly, the methodology generated the sites which the Councils considered to be reasonable alternatives for the purpose of SA/SEA. These sites could then be tested in the SA/SEA to ensure that the sustainability characteristics of the sites we considered were fully understood.
- 1.16. In response to your question regarding the comparison of the relative merits of sites considered for allocation, no single document has been published which sets this information out. However, the information used by the Councils can be found in a number of different documents. These include:
- The SHLAA and Employment Land Reviews for the Plan area
 - Other evidence base documents relating to greenspace and the natural environment, landscape impact, the historic environment, flood risk, sports and leisure, hotel sites, retail sites and topic papers explaining the overall JLP strategy and the approach to the distribution of development.
 - The Reg 18 consultation documents and their response reports (particularly July 2016, November 2016 and January 2017).
 - The Reg 19 consultation response report, which responds to representations in relation to allocated sites and omission sites.
 - The Integrated Assessment itself which includes sustainability analysis both of the sites that were considered as reasonable alternatives as well as revised analysis of the sites put forward in the Reg 19 plan once mitigation measures were built into the policies. In this respect, it can be noted that the site selection process is set within the context of a strategy for the sustainable distribution of development across the plan area, which itself was subject to sustainability appraisal.

1.17. Having said the above, in order to help the Examination process the Councils have now put together a summary document which identifies the sites considered at three stages of the JLP preparation process, namely: prior to the Reg 18 consultation; the Reg 18 consultation; and the Reg 19 plan. The document is structured around 7 tables:

- Tables 1 and 2 include only sites which were allocated in the Reg 19 plan (one table for the Plymouth Policy Area (PPA) sites and one for the Thriving Towns and Villages Policy Area sites (TTV). These tables do the following:
 - Identify some basic information about the site from the ‘reasonable alternatives’ stage of the sustainability appraisal process.
 - Provide a summary reason for the allocation of the site.
 - Signpost to other evidence base documents where information on the site can be found, in addition to the SHLAAs and Employment Land Reviews.
- Tables 3 and 4 include only sites which were considered at JLP Reg 18 stage. Sites are only shown which are not already included in Tables 1 and 2. These tables do the following:
 - Identify how the sites were put forward through the Reg 18 process (i.e. either in the July and November 2016 booklets, or sites that were identified through representations as omission sites).
 - Identify some basic information about the site from the ‘reasonable alternatives’ stage of sustainability appraisal process.
 - Provide a summary reason for the rejection of the site for inclusion in the Reg 19 plan.
 - Signpost to other evidence base documents where information on the site can be found, in addition to the SHLAAs and Employment Land Reviews.
- Tables 5 and 6 include sites which were considered but then rejected for inclusion in the Reg 18 consultation. Sites are only shown which are not already included in Tables 3 and 4. The reason for rejection is summarised.
- Table 7 identifies ‘omission sites’ put forward at Reg 19 stage including highlighting whether or not they were not previously identified through representations at the Reg 18 stage. The table includes an extract from the Reg 19 consultation response report.

Para 8.5 of the IA concludes that the majority of JLP policies are likely to have a significant positive effect (SUB9). Whilst some negative effects have been identified para 8.6 states that none give rise for concern. However para 8.7 identifies that the significance of potential negative effects is uncertain. Can the Councils summarise those areas of the plan where potential negative effects have been identified, and which of these are of uncertain significance? Are there any implications for specific policies and the JLP overall from the level of uncertainty demonstrated within the assessment?

1.18. The IA concludes that the Joint Local Plan strategy and policies will have an overall positive effect on the plan Area. Table 4 of the IA Main Report (SUB9) sets out the likely outcomes if there was no plan in place to tackle key issues identified – ie a ‘do nothing’ analysis of outcomes if the Joint Local Plan was not implemented. The likely effects of the implementation of the JLP are then expanded upon at paragraph 5.53 of the IA Main Report (SUB9) including a table explaining a number of issues where the Council cannot be completely certain of the likely effect of the plan or where there is ‘uncertain significance’.

- 1.19. The reason for this uncertainty is that it is often only at the planning application or project development stage that it is possible to understand exactly how the factors assessed in the IA have been dealt with. Clearly the policies of the JLP set out a framework for decision making, including policy tools to be applied to the detail which would only be expected to come forward through a planning application. For example a detailed application could show where energy efficient design has been included within the proposal, thus showing how an overall positive effect has been achieved. Given this complexity, the IA has taken a cautious approach of indicating an 'uncertain effect' that will only become certain at a later time.
- 1.20. Paragraph 8.7 attempts to highlight this uncertainty in some policy areas, but it must be emphasised that the paragraph is not concluding that there is a deficiency in the JLP, but rather that the effective application of JLP policies in relation to specific development proposals will be important in mitigating impacts. Comfort can also be taken from the spatial distribution strategy itself, which seeks to direct investment to the most inherently sustainable locations, meaning that the nature of sustainability issues identified for individual sites are often detailed rather than strategic matters that in many cases can be addressed through scheme mitigation and design.
- 1.21. Those broad topics where there is some uncertainty over the exact effects are identified as: Climate Change; Air Quality; the relationship between the city and its wider hinterland; fuel poverty and energy efficiency; waste production and the use of resources; economy and the creation of jobs; the natural environment and housing. Clearly, development proposed in the JLP will have an impact on these issues both in the short term whilst the strategy is developing and development is coming forward, and in the long term when the strategy is in place and fully implemented. The JLP spatial strategy, policies and proposals therefore include measures intended to address the likely known impacts of the planned growth, with provisions which will mitigate impacts as individual development proposals come forwards.
- 1.22. The Councils are therefore confident that the JLP provides the best and most sustainable strategy for the future growth of Plymouth, South Hams and West Devon. The Councils are confident that the JLP delivers the most sustainable strategy for their Development Plan Area and provides the greatest opportunity to measure, monitor and review the impacts of growth on the communities who live and work in the area. The Councils can confirm that there are no implications for specific policies, or for the JLP from the uncertainty demonstrated within the assessment.

Can the Councils please confirm that Natural England (NE) has been consulted at each stage of the SA/SEA process? SUB1 IE Appendix V of the Statement of Consultation contains three letters of consultation on the scoping report of the IA and it is unclear who these have been sent to. Can the Councils direct us to the list of statutory consultees that have been consulted on the SA/SEA process, and provide copies of the correspondence which has been received from those consultees.

- 1.23. The Council can confirm that Natural England were consulted at each stage of the SA/SEA process including the draft scoping report. As set out in paragraph 3.17 of SUB9 IA Main Report, the draft scoping report was sent for consultation to the three statutory consultation bodies (Environment Agency, Historic England and Natural England) for 5 weeks consultation between 17th August and 30th September 2016. It is also important to note that previously each of the individual scoping reports for each of the Councils had been subject to consultation. The Scoping Report for the draft JLP provided a way of amalgamating all of the previous work into one document. The correspondence from the statutory consultees is attached.

- 1.24. We note that in their representation, Natural England have stated that they had not seen the Scoping Report. We have discussed this with NE and they have indicated that this statement is incorrect. The Statement of Common Ground being prepared with NE will confirm this.

Statements of Common Ground

We note that the Councils propose to seek statements of common ground (SoCG) with Devon County Council and Historic England in relation to representations made to the JLP. We also request the Councils seek SoCG with NE and with the EA. We may request further SoCG at a later stage of the examination

- 1.25. We can confirm that the Councils are currently producing Statements of Common Ground with a number of third parties, including Natural England and the Environment Agency. The full list of organisations that we are currently preparing SoCG with is:

Historic England
Natural England
Environment Agency
Devon County Council
Dartmoor NPA
Landowner and developer consortium promoting the Woolwell allocation
Sutton Harbour Holdings
South West Strategic Developments (SWSD) in relation to Land at Coypool/Boringdon, Plymouth and Policies PLY53 and PLY60
Ministry of Defence in relation to PLY32 Stonehouse Barracks.

Plymouth Airport

Policies SPT8 and PLY42 seek to safeguard the Plymouth airport site for potential resumption of aviation use. Para 4.173 of the JLP refers to evidence prepared by Arup in this regard. Can the Councils clarify which document this refers to and if it is not an examination document, include it within the examination library.

- 1.26. The evidence base document referred to in paragraph 4.173 of the Joint Local Plan is T11, Plymouth Airport Study: Final Report (Arup, September 2014). This report sets out the evidence explaining that aviation activities could be reinstated at Plymouth Airport, with an explanation of the form such activities could take. In addition to this report, further evidence relating to Plymouth Airport is also included in the evidence base:
- a. T16 Plymouth Airport Safeguarding Consideration of Alternatives (Arup, November 2016) – this evidence explains what alternatives options for the Plymouth Airport site were considered.
 - b. T21 Plymouth Airport Site Condition Assessment and Capital Investment Update (Arup, February 2017) – this evidence examines the condition of the aviation infrastructure that is present on the site of Plymouth Airport, and presents some information on the costs of reinstating air operations at the site.
 - c. T17 A Study of Consultancy Reports' Conclusions on Reopening Plymouth City Airport for Commercial Passenger Services (Department for Transport, December 2016) – this study was produced by DfT as an analysis of the conclusions of all the studies produced by various parties relating to the potential for air services to be reinstated at Plymouth Airport. It includes a summary of the findings of T11.

1.24. I hope that these responses are sufficient for you to continue preparing for the Examination Hearings. If you require any further information of clarification please do not hesitate to contact me.

Yours sincerely

Richard Grant
Local Planning Manager, Plymouth City Council

