Plymouth and South West Devon Joint Local Plan Examination

Response to Inspectors’ Matters Issues and Questions for the Examination Hearings

JLP Councils

Matter 4 Transport and infrastructure
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Matter 4 Transport and infrastructure

Main Issue - Does the JLP set out policies for transport, infrastructure and planning obligations which have been positively prepared and are justified, effective and consistent with national policy? Are the requirements set out within the plan viable?

Evidence Base and Submission documents referenced in this Matter Statement

- TP1 Housing Distribution Topic Paper
- O7 Plymouth Plan
- O9 Infrastructure Needs Assessment (INA)
- O9A Infrastructure Needs Assessment: Appendix 3
- O9B Infrastructure Needs Assessment: Appendix 4
- O10 Plan for Infrastructure and Investment (P4I&I)
- EXC10A Plymouth and South West Devon Joint Local Plan: Schedule of potential modifications
- SUB8 Plymouth and South West Devon Joint Local Plan Summary Schedule Of Changes To The Plan, July 2017
- SUB12 Duty to Co-operate Statement
- T6 Local Transport Plan 2011 to 2026
- T7 Devon and Torbay Local Transport Plan 3 2011 to 2026
- T11 Plymouth Airport Study: Final Report
- T16 Plymouth Airport Safeguarding: Consideration of Alternatives
- T17 A Study of Consultancy Reports’ Conclusions on Reopening Plymouth City Airport for Commercial Passenger Services
- T18 (T18A – T18E) Plymouth and South West Devon Joint Local Plan – Baseline Transport Conditions Report
- T19 Plymouth and South West Devon Joint Local Plan – Strategic Modelling Methodology Note
- T20i Plymouth and South West Devon Joint Local Plan – 2034 Forecast SATURN model results summary (updated T20)
- T21 Plymouth Airport Site Condition Assessment and Capital Investment Update
- T23 Strategic Cycle Network
- T25 Position Statement Two: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group
- T27 Position Statement Four: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group
- T28 Transport Strategy Working Group Memorandum of Understanding
- EN12 Analysis of Carbon Targets for Plymouth City Council: 2014
**Issue 4.1: Establishing and delivering transport and infrastructure needs (Policies SPT8-10, DEV31-33)**

**Question 4.1(i)**
Have all essential transport and infrastructure elements been established and does the plan adequately address these needs in its identification of the scale and location of proposed development?

4.1 Yes. A robust infrastructure planning process, which includes a comprehensive Infrastructure Needs Assessment (INA) (O9), has identified all the infrastructure measures required to deliver the JLP. Many of these have been identified as essential, or to use the terminology of the INA, they are ‘critical’ or ‘necessary’ to deliver the Plan rather than being ‘desirable’. These essential or key infrastructure schemes are also specifically identified in the JLP itself, within the policies and within Annex 1.

4.2 The NPPF states that: "Local Planning Authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands." It also states that LPAs should also: “take account of the need for strategic infrastructure including nationally significant infrastructure within their areas”. (NPPF para 162)

4.3 The NPPF sets out that Local Plans should: "Plan positively for the development and infrastructure required" (para 157). Infrastructure planning and delivery is therefore a key element of the ‘core planning principles’ which see the planning system as a creative exercise in finding ways to enhance and improve places, and to "...proactively ... deliver the homes, business and industrial units, infrastructure and thriving places ...". (NPPF para 17).

4.4 The JLP Councils’ infrastructure approach is based on three key principles:
   a. A thorough understanding of the infrastructure needed to support delivery of the JLP and of the interrelationships between infrastructure needs and each of the Plan’s objectives (this is reflected in the INA (O9)).
b. A willingness and commitment from all key stakeholders (Appendix One) to work together to achieve delivery and to prioritise the delivery and funding of critical infrastructure projects, using the JLP, the Plan for Infrastructure and Investment (P4I&I) (O10) and the INA (O9) as evidence to inform their investment programmes.

c. Having the tools to support the coordination of delivery to ensure that Plan objectives can be achieved on time, ensuring that growth is achieved and communities have the infrastructure and facilities they need.

4.5 The INA (O9) identifies the infrastructure needs to support future growth identified in the JLP. It also supports the Plymouth Plan\(^1\) (O7) and sits alongside the Our Plan corporate policy documents for South Hams\(^2\) and West Devon\(^3\). The INA (O9) is an evidence based document, not a policy document or a strategy in its own right. It focuses on the capital infrastructure needed to meet the policies of the JLP, with details of existing provision and capacity contained within a series of supporting documents. The extensive evidence base for the INA (O9) includes technical studies from each of the local authorities, and external sources, transport modelling work, detailed infrastructure plans, business plans and strategies from council departments and other agencies.

4.6 The INA (O9) is informed by a thorough analysis of the JLP and the infrastructure needs associated with its objectives and each of its policies. This ensures that future infrastructure provision is central to the delivery of the JLP outcomes. Appendix 2 of the INA (O9 pgs. 75-95) contains an analysis of all the JLP policies, identifying the infrastructure need associated with each policy.

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\(^1\) The Plymouth Plan is the City of Plymouth’s single, integrated and holistic strategic plan owned by the City Council and its partners. It’s an interactive web-based plan. Once the Plymouth and South West Devon Joint Local Plan is adopted, its policies that relate to Plymouth will be joined to the rest of the Plymouth Plan so that all policies (spatial and otherwise) that relate to the city can be read in one place. The Plymouth Plan Part One Refresh (O7) is the current approved document.

\(^2\) This report is available on the ‘past consultations’ page of the Joint Local Plan webpage [https://www.plymouth.gov.uk/plymouthandsouthwestdevonjlppastconsultation](https://www.plymouth.gov.uk/plymouthandsouthwestdevonjlppastconsultation). The reference for the document is SH12.

\(^3\) This report is available on the ‘past consultations’ page of the Joint Local Plan webpage [https://www.plymouth.gov.uk/plymouthandsouthwestdevonjlppastconsultation](https://www.plymouth.gov.uk/plymouthandsouthwestdevonjlppastconsultation). The reference for the document is WD13.
4.7 The preparation of the INA (O9) has been a collaborative process, developed through engagement with a wide range of key stakeholders involved in the provision of infrastructure and those with enabling or regulatory responsibilities. This includes meetings of the Plymouth and South West Devon Infrastructure Forum, and co-operation amongst neighbouring authorities through the Duty to Co-operate (SUB12). It also takes into account responses as part of the JLP consultations.

4.8 The INA (O9) identifies 471 infrastructure projects at a total value of over £1.6bn over the JLP period.

4.9 Infrastructure schedules for the Plymouth and Thriving Towns and Villages Policy Areas are provided at Appendix 3 (O9A) and 4 (O9B). The need for infrastructure has been classified according to whether it is considered to be Critical, Necessary or Desirable. Those that are ‘critical’ to the implementation of a policy of the JLP are those where a policy cannot be achieved without delivery of the infrastructure project (09 Pg. 10-11).

4.10 The identification of infrastructure needs is a continuous process and both the INA (O9) and Plan for Infrastructure and Investment (O10) are living documents that will be monitored and managed regularly in response to new and changing circumstances and information. In relation to transport some of the more up to date information is provided in the Position Statements (PoS) produced by the three Highway Authorities (HAs) within the JLP. The latest PoS, PoS Four (T27) incorporates ‘committed’, ‘pipeline’ (as described in T19: Appendix C) and ‘additional’ measures (T27 para 3.1.1-3.1.3) which the HAs have identified are required, by 2034, to support the JLP. It also identifies three locations where it is agreed by the Transport Strategy Working Group (TSWG) that an intervention is required, by 2034, but the detail of those interventions has not yet been determined (T27 pg. 16). The need for interventions at these locations is recorded in both the JLP (Annex 1) and INA (O9A).

4.11 In addition to physical transport interventions, in accordance with the principles set out in policy SPT9 and NPPG, the transport evidence base (Strategic Modelling Methodology Note (T19 para 3.3.18-3.3.28) and Baseline Transport Conditions Report (T18: para 11.1.3, 11.1.5, 11.1.10, 11.1.13)) also identifies the opportunities for encouraging a shift to more sustainable transport usage, based...
on current travel habits. This blended approach to the transport programme is set out in Figure One, which replicates Figure 3.2 of the Strategic Modelling Methodology Note (T19).

**Figure One: Approach taken to inform the transport programme of the JLP within the PPA**

4.12 Within Plymouth, sustainable transport promotion since 2011/12 has largely been brought forwards through the Plymotion (www.plymouth.gov.uk/plymotion) behavioural change campaign which is summarised in Appendix Two. This programme is ongoing, currently funded through the Department for Transport’s Access Fund for Sustainable Travel.

4.13 When the behavioural change programmes (modelled through a reduction in vehicular trips) and infrastructure schemes are tested in the strategic transport model the network, overall, in the latest iteration of the model (B4H) performs better in 2034 than in the ‘core (A1)’ scenario which tests the performance of the network in 2034 without the development set out in the JLP (T20i pg. 11 and T27 pg. 16). Therefore the Plan has established the essential transport elements.
...and does the Plan adequately address these needs in its identification of the scale and location of proposed development?

4.14 Yes, the JLP has been positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, in a manner which is consistent with achieving sustainable development.

4.15 As set out in the Housing Distribution Topic Paper (TP1), specifically page 50, when considering the spatial distribution of growth at the level of the Plymouth Housing Market Area (PHMA) development is predominantly located within the Plymouth Policy Area (PPA), and then the main towns within the Thriving Towns and Villages Policy Area (TTVPA) as these are the locations considered to be most accessible and where the greatest opportunity to maximise existing transport infrastructure and encourage behavioural change exists.

4.16 The strategic connectivity of Plymouth and South West Devon to the wider economy of the UK and indeed to global markets is vital to delivering a strong economy and concentrating growth principally within the PPA will help to protect and enhance the strategic connectivity assets set out in policy SPT8. The vision for Plymouth and South West Devon is for a highly successful sub region, whose people and businesses benefit greatly from having both a major city and access to a network of high quality market towns and sustainable rural settlements.

4.17 The INA (O9) informed the preparation of the Plan and the INA (O9) is largely derived from assessment of the infrastructure needs of the overall growth strategy together with the needs of individual development locations.

4.18 The approach taken for the identification and delivery of transport and infrastructure is therefore the most appropriate strategy, when considered against reasonable alternatives (and hence the approach is justified) because, as set out in Policy SPT9, major growth has been focussed on accessible locations, where use of sustainable transport can be maximised, thus reducing the need for new infrastructure and maximising the value of the infrastructure which is delivered.
4.19 In concentrating growth within the PPA where there is already a high level of self-containment (T18: para 4.4.4 and 4.4.8), suggesting that, as per NPPF paragraph 37, a balance of land uses which minimises journey lengths has been achieved. This affords the greatest opportunity for sustainable transport to be maximised.

4.20 The approach taken also means that the strategy fulfils the principles of Policy SPT9 by seeking to get the most out of existing transport networks (which are most extensive within the PPA and then, secondarily between the PPA and the main towns within the TTVPA), with major infrastructure projects only where there are no better alternatives, delivered only after opportunities to improve network efficiency and encourage behavioural change have been explored.

**Question 4.1(ii)**

ii (a) Is there clear evidence that infrastructure needs will be funded and delivered in a co-ordinated manner across the plan area?

4.21 Yes. The transport and infrastructure needs for the Plan have been identified (09) and are deliverable over its period because; a broad suite of funding and delivery opportunities have been identified (O10; section 3), the delivery of the infrastructure can be phased, alongside the development set out within the Plan (O10: pages 24-29 for the PPA) and the JLP Councils are building on a strong track record of delivery. In Plymouth £33m has been invested in improving transport infrastructure over the last three years and in excess of £65m will be invested in further improvements to transport infrastructure over the next five years. Within the TTVPA, Devon County Council, Highway Authority for the TTVPA, have also been successful in securing grant funding for a wide range of transport projects across the County with £11m being invested in Plymouth’s urban fringe (of which £7.1m is grant funding) as part of a £225.7m programme county wide, in the last five years. Furthermore, Policy SPT9 provides scope to generate independent resources to transform transport investment, thus providing a mechanism to secure funding for the programmes required to support sustainable development. The JLP is therefore effective and accords with the requirements of the National Planning Policy Framework (NPPF para.162)) to:-

- "Assess the quality and capacity of infrastructure for transport, water supply, wastewater ..... and its ability to meet forecast demands"; and

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• “Take account of the need for strategic infrastructure including nationally significant infrastructure within their areas”.

4.22 The JLP Council’s recent successful history of funding and delivering infrastructure projects is evidenced by the transport infrastructure set out in Figure Two and Table Two.

**Figure Two: Transport Infrastructure Investment 2014-2020 onwards**

![Transport Infrastructure Investment Map](image)

**Table Two: Transport Infrastructure Investment 2014-2020 onwards**

<table>
<thead>
<tr>
<th>Scheme</th>
<th>Location</th>
<th>Funding / Scheme Stage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth Coach Station</td>
<td>City Centre and Waterfront Growth Area</td>
<td>Constructed Scheme</td>
</tr>
<tr>
<td>Laira Rail Bridge Walking and Cycling</td>
<td>Eastern Corridor Growth Area</td>
<td>Constructed Scheme</td>
</tr>
<tr>
<td>Scheme</td>
<td>Location</td>
<td>Funding / Scheme Stage</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>-----------------------------------</td>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>Link</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northern Corridor Junction Improvements (Phase 1 and 2)</td>
<td>Northern Corridor Growth Area</td>
<td>Constructed Scheme</td>
</tr>
<tr>
<td>Stanborough Cross</td>
<td>Eastern Corridor Growth Area</td>
<td>Constructed Scheme</td>
</tr>
<tr>
<td>Marjon Link Road</td>
<td>Northern Corridor Growth Area</td>
<td>Constructed Scheme</td>
</tr>
<tr>
<td>Derriford Hospital Interchange</td>
<td>Northern Corridor Growth Area</td>
<td>Constructed Scheme</td>
</tr>
<tr>
<td>Eastern Corridor SCN Improvements</td>
<td>Eastern Corridor Growth Area</td>
<td>Schemes currently in delivery (2017-2018)</td>
</tr>
<tr>
<td>Northern Corridor SCN Improvements</td>
<td>Northern Corridor Growth Area</td>
<td>Schemes currently in delivery (2017-2018)</td>
</tr>
<tr>
<td>Derriford Transport Scheme</td>
<td>Northern Corridor Growth Area</td>
<td>Schemes currently in delivery (2017-2018)</td>
</tr>
<tr>
<td>Forder Valley Interchange</td>
<td>Northern Corridor Growth Area</td>
<td>Funding approved (2018 - 2020)</td>
</tr>
<tr>
<td>Charles Cross</td>
<td>City Centre and Waterfront</td>
<td>Funding approved (2018 - 2020)</td>
</tr>
<tr>
<td>Eastern Corridor Junction Upgrades</td>
<td>Eastern Corridor Growth Area</td>
<td>Funding approved (2018 - 2020)</td>
</tr>
<tr>
<td>Northern Corridor SCN Improvements</td>
<td>Northern Corridor Growth Area</td>
<td>Funding approved (2018 - 2020)</td>
</tr>
<tr>
<td>Eastern Corridor SCN Improvements</td>
<td>Eastern Corridor Growth Area</td>
<td>Funding approved (2018 - 2020)</td>
</tr>
<tr>
<td>Scheme</td>
<td>Location</td>
<td>Funding / Scheme Stage</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>-----------------------------------------</td>
<td>-----------------------------------------------------</td>
</tr>
<tr>
<td>Northern Corridor Junction Improvements (Phase 3 to 5)</td>
<td>Northern Corridor Growth Area</td>
<td>Funding approved (2018 - 2020)</td>
</tr>
<tr>
<td>Morlaix Drive</td>
<td>Northern Corridor Growth Area</td>
<td>Funded subject to Final Business Case (2018-2020)</td>
</tr>
<tr>
<td>Forder Valley Link Road</td>
<td>Northern Corridor Growth Area</td>
<td>Funded subject to Final Business Case (2018-2020)</td>
</tr>
<tr>
<td>Plymouth Station</td>
<td>City Centre and Waterfront Growth Area</td>
<td>Funded subject to Final Business Case (2018-2020)</td>
</tr>
<tr>
<td>Woolwell to The George</td>
<td>Northern Corridor Growth Area</td>
<td>On PCC Capital Programme - Early design stage (2019 - 2021)</td>
</tr>
<tr>
<td>A38 St. Budeaux</td>
<td>Western Corridor</td>
<td>Pipeline scheme (2020 onwards)</td>
</tr>
<tr>
<td>A38 Weston Mill</td>
<td>Western Corridor</td>
<td>Pipeline scheme (2020 onwards)</td>
</tr>
<tr>
<td>A38 Manadon</td>
<td>Northern Corridor Growth Area</td>
<td>Pipeline scheme (2020 onwards)</td>
</tr>
<tr>
<td>A38 Marsh Mills</td>
<td>Eastern Corridor Growth Area</td>
<td>Pipeline scheme (2020 onwards)</td>
</tr>
<tr>
<td>A38 Deep Lane</td>
<td>Eastern Corridor Growth Area</td>
<td>Pipeline scheme (2020 onwards)</td>
</tr>
<tr>
<td>Pomphelett to The Ride</td>
<td>Eastern Corridor Growth Area</td>
<td>Pipeline scheme (2020 onwards)</td>
</tr>
<tr>
<td>Scheme</td>
<td>Location</td>
<td>Funding / Scheme Stage</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>---------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>Cattedown Junction</td>
<td>Eastern Corridor Growth Area</td>
<td>Pipeline scheme (2020 onwards)</td>
</tr>
<tr>
<td>Rail Station east of Plymouth</td>
<td>Eastern Corridor Growth Area</td>
<td>Feasibility - Pipeline scheme (2020 onwards)</td>
</tr>
</tbody>
</table>

4.23 The INA (O9) and Plan for Infrastructure and Investment (O10) demonstrate that funding is available to deliver all key infrastructure requirements particularly over the first five years of the Plan.

4.24 The NPPF states that: “It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.” (NPPF para 177) NPPG states that LPA’s should pay careful attention to: “…identifying … how it (infrastructure) can be funded and brought on stream at the appropriate time…” It also states they “…should involve the LEP at an early stage in considering the strategic issues facing the area, including the prospects for investment in infrastructure”. NPPG\(^4\) goes on to say that “the local plan should make clear, for at least the first five years, … who is going to fund and provide it (the infrastructure), and how it relates to the anticipated rate and phasing of development. … For the later stages of the plan period less detail may be provided”

4.25 The INA (O9) contains details of the cost of each infrastructure project, as well as the method of delivery and lead agency. For projects which are expected to be delivered in the first five years i.e. 2017-22, there is more certainty around the costs as schemes are at advanced stages of design and development, or already in delivery. For later periods of the JLP the costs are estimates. As further development work is undertaken on these later projects then the INA (O9) will be revised to reflect the updated figures.

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\(^4\) Paragraph: 018 Reference ID: 12-018-20140306. Revision date: 06 03 2014
4.26 In relation to funding, most projects are anticipated to be fully funded from a range of different funding sources.

4.27 It is recognised nationally, and particularly in Plymouth where development viability is more of an issue than it is in say, the south east, that developer contributions either through Community Infrastructure Levy (CIL) or S106 play only a small, albeit significant, role in funding infrastructure. Commonly it is less than 10% of the overall total infrastructure cost. The starting point, therefore, has to be that major pieces of infrastructure will not be fully funded by developer contributions. Nevertheless in Plymouth there is a CIL, and across the JLP area there is the ability to negotiate contributions to infrastructure from relevant developments, subject to the three policy tests (NPPF para 204).

4.28 Policy DEL1 of the Plan identifies the JLP Councils overall approach to developer contributions, stating that a positive and strategic approach will be taken to planning obligations, and CIL (in Plymouth), in order to secure contributions to meet infrastructure needs. This includes contributions which are needed to: “mitigate the impact of development on infrastructure, including its cumulative impact, through direct provision, or a financial infrastructure contribution…” In addition Policy SPT12 states: “...where (infrastructure) schemes need to be delivered in advance of development, financial contributions will be sought retrospectively through the S106 process where appropriate”.

4.29 Where infrastructure needs relating to specific sites are known, these are included in the relevant policies of the JLP. For example, Policy PLY44 (Woolwell Sustainable Urban Extension) states that “development should provide for…” and then lists the known infrastructure needs of the site. The Plan area’s key infrastructure projects are also identified in other policies of the JLP such as PLY37 and TTV3, and in Annex 1 of the Plan.

4.30 Having identified the known relationships between development sites and infrastructure needs in the JLP, the process of seeking contributions then continues through the delivery stages, for example through master-planning and pre application discussions, to ensure that further granularity can be applied to the scale of contribution that may be relevant to the particular development. The closer to a planning application the process gets, the more detail there will be in relation to any site specific requirements.
which may only come to light as further work on site feasibility is undertaken) as well as more certainty around the scale of the contributions towards more strategic infrastructure that might be appropriate. Clearly during this process, as time goes by, more certainty as to the cost of the infrastructure projects will emerge, and there will be discussions around viability if appropriate.

4.31 Given that developer contributions are only part of the funding jigsaw, an integral part of the INA (O9) is an investment model which seeks to identify all the sources of funding that can be applied to each of the key infrastructure projects, particularly over the first five years of the Plan Period. This enables the INA (O9) to identify how much of the programme is funded and whether there is a gap. It also means that all key infrastructure projects can be closely tracked, and all funding sources aligned and utilised in the most efficient way.

4.32 In relation to the LA’s own funds, in Plymouth, the Plymouth City Council (PCC) Capital Programme has been aligned with the Plymouth Plan (O7) and the JLP to demonstrate the importance placed by the Council on delivering the JLP. The Council’s capital programme currently runs to approx. £100m per year of which 80% is on city infrastructure, and a further 10% is on infrastructure maintenance.

4.33 In addition, PCC has made a commitment to provide capital for key priority projects in the first five years, accepting that in many cases the infrastructure needs to be provided up front, in advance of any S106 and CIL contributions and before any New Homes Bonus (NHB) is received. This means that essential contributions can be made towards the costs of key projects, or funding underwritten, to demonstrate delivery to other potential funders.

4.34 There is also a commitment to commence early development of projects up to business case stage so that they are ‘oven ready’ and hence able to take best advantage of funding opportunities when they arise.

4.35 There is a close relationship between the JLP Councils and the Local Enterprise Partnership (LEP), and the JLP Councils have been very successful in securing funding for infrastructure projects through this funding route.

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4.36 The INA identifies 471 infrastructure projects at a total value of £1.6 billion over the 20 years of the Joint Local Plan period (O9: Pg2). For the Plymouth Policy Area, 314 projects have been identified at a value of over £1.39 billion. Transport is the largest infrastructure sector in terms of number of projects and value with 106 projects identified valued at over £441 million, 32% of the total. Education is the next largest infrastructure sector measured by number of projects with 47 valued at over £109 million. The Utilities sector totals over £317 million but this includes the completed £200 million Energy from Waste Plant and the near complete £60 million SWW treatment works. The Medical and health sector totals over £199 million including the Derriford Hospital Strategic Plan valued at £183 million. The vast majority of infrastructure provision is focused around the three Growth Areas, at close to £1.055 billion (76% of the total). The Derriford and Northern Corridor total is £467 million; the City Centre and Waterfront Growth Area £415 million; and, the Eastern Corridor Growth Area close to £174 million. The Rest of the City totals £331 million.

4.37 For the Thriving Towns and Villages Policy Area, 157 projects have been identified at over £188 million. Transport is the largest infrastructure sector in terms of number of projects and value with 32 projects valued at close to £75 million (39% of the total), of which £55 million is identified for the reinstatement of the railway between Tavistock and Bere Alston. Education is the next largest infrastructure sector with 36 projects valued at over £29.5 million.

4.38 Within the Plymouth Policy Area a total of £369m of infrastructure schemes have been completed or have commenced since 2014. Of these £350m are key infrastructure schemes. A further £659m of schemes are identified for delivery in the short term i.e. between 2017 and 2022, of which £370m are key infrastructure projects.

4.39 Within the Thriving Towns and Villages a total of £4m of infrastructure schemes have been completed or have commenced since 2014. A further £52m of schemes are identified for delivery in the short term, between 2017 and 2022, of which £32m are key infrastructure projects.

4.40 Analysis of Plymouth City Council’s capital programme since 2014 shows how the infrastructure projects have been funded. This shows that approximately 4% of the cost of these schemes has been...
provided through S106 and CIL, with the remainder split evenly (48% each) between the Council’s own resources, and external grants and contributions. Going forward, this trend is likely to continue, albeit with a higher proportion expected from developer contributions.

4.41 Table Three is taken from the P4I&I and shows the key infrastructure projects across the JLP area, for delivery over the 2017-22 period, and also includes those that are already under construction but not yet completed. The table also shows that there is a funding gap of just £4.7m (1% of total cost). Of the funding that has been identified some of it as yet unconfirmed. However only 9% of the total cost is considered to be high risk, e.g. funding that’s at a very early stage in the bidding process and we have no indication yet of likely success. When added to the 1% funding gap the resulting total of 10% is considered well within acceptable limits at this stage of a five year cycle.

**Table Three: Funding of key infrastructure projects 2017-22 (£m)**

<table>
<thead>
<tr>
<th>Project Description</th>
<th>cost</th>
<th>fwd fund</th>
<th>high risk</th>
<th>gap</th>
<th>% of cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Centre and waterfront</td>
<td>201.5</td>
<td>0.6</td>
<td>5.0</td>
<td>0.0</td>
<td>40%</td>
</tr>
<tr>
<td>Derriford and NC</td>
<td>167.8</td>
<td>5.9</td>
<td>24.7</td>
<td>0.0</td>
<td>33%</td>
</tr>
<tr>
<td>Eastern Corridor</td>
<td>86.1</td>
<td>1.2</td>
<td>9.6</td>
<td>0.4</td>
<td>17%</td>
</tr>
<tr>
<td>rest of Plymouth</td>
<td>21.0</td>
<td>0.0</td>
<td>6.6</td>
<td>0.2</td>
<td>4%</td>
</tr>
<tr>
<td>TTV</td>
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<td>12.2</td>
<td>1.1</td>
<td>4.2</td>
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**Total**

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>508.0</td>
</tr>
<tr>
<td>19.9</td>
</tr>
<tr>
<td>47.0</td>
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<tr>
<td>4.7</td>
</tr>
<tr>
<td>9%</td>
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<tr>
<td>1%</td>
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</tbody>
</table>

4.42 As well as the Councils own funds and developer contributions, funding has already been secured from, and further bids have been made to, the following:

- Growth Deal / Local Transport Board
- Housing Infrastructure Fund
- Growth and Housing Fund
- National Productivity Improvement Fund
- Coastal Communities Fund
- Other HCA and CLG grants
- Grants from other Government departments and agencies
- EU funding
4.43 Finally, with regards to revenue funding, the principles of the strategy set out in the JLP (i.e. delivering infrastructure interventions alongside complementary behavioural change programmes, providing travel choice etc.) has already secured external funding; most recently from the Department for Transport’s (DfT) Access Fund for Sustainable Travel, where £1.497m has been secured as part of a £2m programme (T19: Table 3.7 and Appendix Two), and DfT technical support for the development of a Local Cycling and Walking Infrastructure Plan (LCWIP) focussed on the site allocations within the PPA of the JLP. As per the funding for the infrastructure schemes, a range of funding sources are available to support the necessary sustainable transport programmes including: LA resources (with Policy SPT9 establishing the principle of generating independent resources for transport investment), developer contributions and grant funding, both of which the JLP Councils have a good track record of securing. This is illustrated by Plymouth City Council’s recent successful funding bid to the Department for Transport’s (DfT) Access Fund for Sustainable Travel.5

4.44 One of the ‘soundness’ tests of the NPPF is that: "...the plan should be deliverable over its period..." (NPPF para 182). NPPF also states that Plans should: "...ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion" (NPPF para 177). It also states that: "...infrastructure and development policies should be planned at the same time, in the Local Plan" (NPPF para 177).

4.45 National Planning Policy Guidance (NPPG) on Local Plans states that plans should demonstrate: "...how it (infrastructure) can ... be brought on stream at the right time..." It also states that: "early discussion with infrastructure and service providers is particularly

5 The bid is available to read online at https://www.plymouth.gov.uk/sites/default/files/AccessFundForSustainableTravelBid.pdf - Extract in Appendix Three
important to help understand their investment and critical dependencies”. NPPG also states: "The Local Plan should make clear, for at least the first five years ... how it (infrastructure) relates to the anticipated rate and phasing of development”. It goes on to say: "where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies to ensure their timely delivery…” (NPPG Local Plans para 018).

4.46 The JLP itself contains policies which outline the approach to delivery. SO1 talks about: "...an integrated approach to the strategic planning of the Plan area...”. Policy SPT7 states that: "...infrastructure needs are planned for collaboratively and effectively...". PLY2 includes: "...a co-ordinated approach to economic development, spatial planning and infrastructure planning”. Policy SPT12 states that: "The LPAs will work in partnership with key funding partners and investors in order to ensure that the infrastructure needed to deliver the spatial strategy is prioritised...Investment will be guided towards these priorities”. SO7 for the thriving towns and villages seeks to ensure: "...appropriate infrastructure needs are identified and met to enable new growth”.

4.47 SO12 specifically promotes: "...a proactive and coordinated approach to delivering the infrastructure and investment needed to realise the Plan’s vision and deliver its strategic objectives and policies”. This will be achieved by: "... removing barriers to investment ... coordinating infrastructure and investment ... planning the delivery of infrastructure as growth takes place”. Within the JLP, key infrastructure needs are integrated into the policy areas rather than being an add-on at the end of the Plan – e.g. PLY37, PLY47, PLY57, PLY61 and TTV3.

4.48 Within PCC, planning and transport functions have been brought together into the same department to ensure that the two activities are better integrated. A focus on the growth areas means that policy, delivery and development management are now brought together into the same team. In addition an Urban Fringe Delivery Team has been created by the JLP Councils to secure effective delivery of the larger projects in the JLP area, namely Sherford and Woolwell. This proactive approach to delivery ensures a joined up ‘project management’ approach to development from start to finish, ensuring that all issues are dealt with at appropriate times such as
the provision of necessary infrastructure. The Joint Local Planning team and Partnership Board will also have a key role in ensuring that infrastructure is delivered on time and co-ordinated with relevant development.

4.49 An Infrastructure and Investment Forum has also been created to give all the major infrastructure providers and utility companies the opportunity to work more closely together to plan their investment programmes and support delivery of the JLP. The Forum meets at least twice a year and is supported with detailed information on the development trajectories for the key parts of the Plan area, to help utilities and other providers to keep ahead of, or in pace with, development. Full details of current membership are set out in Appendix One. In addition to the Forum a Transport Strategy Working Group (TSWG) has been established to support the development of the transport programme underpinning the JLP. It is the intention of this group to continue post-adoption of the JLP with membership/scope expanded to include other regional stakeholders, thus ensuring the local and strategic connectivity requirements are considered throughout the Plan Period (T28: Section 4.3).

4.50 The Plan for Infrastructure and Investment (P4I&I) (O10) concentrates on the key infrastructure required across the JLP area over the first five years. These are broadly those identified as ‘strategic critical’, ‘critical’ or ‘strategic necessary’ in the INA (O9), and include relevant projects highlighted in the JLP itself (Annex 1). As the P4I&I (O10) will be reviewed on an annual basis, this gives the opportunity to incorporate further medium and long term projects at a later date, as further detail emerges.

4.51 Overall transport infrastructure programming, with the exception of the SRN, will be the responsibility of PCC in partnership with Devon County Council (DCC). They will be responsible for ensuring the INA (O9) and the P4I&I (O10) are kept up to date and for monitoring delivery progress. Whilst this approach will be sufficient across most of the JLP area, a more detailed approach is necessary within the three growth areas in the PPA where most of the growth is being concentrated and where the dependencies between development and infrastructure are more critical.

4.52 The P4I&I (O10) contains diagrams that show the delivery timescales for the main developments and the key infrastructure projects for each of the growth areas. It enables the key
dependencies to be identified. This enables the JLP Councils to prioritise the delivery of infrastructure projects that are specifically required in order to support and enable the timely delivery of development sites, helping to meet the JLP homes and jobs targets. It also enables an understanding of the implications of any slippage in the timescales of any of the development or infrastructure projects. A Plan for Transport (PfT) is also currently being developed and will form one of the delivery plans for the Plymouth Plan (O7). The PfT is the transport delivery plan for Plymouth. However, it has relevance for the urban fringe where the transport delivery programme is set out in the Devon and Torbay Local Transport Plan 3, 2011-2026 (T7). This document (T7) also covers the TTVPAP.

4.53 In accordance with the timetable for the Plymouth and South West Devon JLP it is proposed that an updated PfT is produced every five years, at the same time as the JLP is refreshed. This will ensure that the PfT supports the growth aspirations of the City and is aligned to the associated changing travel needs.

**Figure Three: City Centre and Waterfront diagram – Taken from O10**
**Question 4.1(iii)**
Do the measures set out in Policy SPT8 provide a positively prepared strategy for the protection and enhancement of the plan area’s transport routes and digital connectivity?

4.54 Yes. The JLP has been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements in a manner which is consistent with achieving sustainable development, in accordance with the following policies within the NPPF, through Policy SPT9, and by identifying and protecting sites and routes critical in developing infrastructure in order to widen transport choice (Policy SPT8), and hence is consistent with national policy, in particular:-

- **NPPF (17)** Core Planning Principles: ‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable’

- **NPPF (29)** ‘... The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel…’

- **NPPF (30)** ‘Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport’

- **NPPF (34)** ‘Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised’.

- **NPPF (37)** ‘Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities’.

- **NPPF (41)** ‘Local Planning Authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice’.

- **NPPF (58)** (planning policies should) ‘...optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks ...’.
4.55 Policy SPT8 considers the quality and resilience of the plan area’s regional and international transport links and digital connectivity, through the consideration of the: "needs and aspirations" (NPF para 154) for air, road, rail, water and digital links, reflecting the role these transport modes have at different spatial scales – as illustrated by Figure 3.12 of the JLP. In doing so, the policy accords with the principles of Policy SPT9 (and paragraphs 29 and 30 of the NPPF) through providing modal choice, getting the most out of existing transport networks and promoting sustainable transport. For each mode, consideration is given to the requirements to protect and enhance the facilities / services to support the sustainable development of the Plan Area, and these needs are set out in Policy SPT8.

4.56 **For rail:**- The strategic elements of long distance rail connectivity are framed within the Peninsula Rail Task Force (PRTF) 20 year plan (T18 para 7.6.1). This document forms the basis for regional lobbying to improve resilience, reduce journey times and increase capacity of the rail network, including reliable Wi-Fi and mobile connectivity and also provides the context of the Council’s response to the DfT setting out the new franchise requirements for both the Great Western and Cross Country Trains franchises as part of a longer term plan. Local rail connectivity is being developed and driven through the Plymouth Metro, as part of the wider Devon Metro Strategy.

4.57 **For the Strategic Road Network (SRN):** - The JLP’s goal is simple; to bring about the modernisation of the A38 to ensure the route reflects its status as a major trunk road on the SRN, addressing the challenges faced in Plymouth, and the wider JLP area, of low productivity caused in part by poor connectivity within the region and beyond to London and the rest of the UK.

4.58 To deliver this plan and support regional growth, the city and the South West region need a modern A38, built to a motorway standard, accommodating planned growth and supporting the South West region’s economy in the years to come. To achieve this objective we meet with Highways England at the TSWG to agree and test improvements to the SRN as part of the JLP.

4.59 In 2014 as part of the creation of Highways England the Government announced the Road Investment Strategy (RIS) – a
long-term improvements programme for our motorways and major roads with the stable funding needed to plan ahead.

4.60 This change is underpinned by a step-change in investment in our strategic roads, with £15bn capital spending provided through the RIS from 2015 to 2020. This scale of investment facilitates a dramatic increase in our ambitions for the SRN.

4.61 Highways England is currently collating their evidence base for RIS2 (2020 -2025). Our A38 priorities, which are underpinned by the work in the JLP include:
- A38 widening between A386 Manadon and B3413 Forder Valley;
- A38 widening on the approaches to Weston Mill Junction;
- B3416 Deep Lane Junction Improvements and Park & Ride;
- Improvements to A38/Manadon Roundabout; and
- Undertaking a route based study of the A38 from Exeter to Bodmin so that the costs and timescales of upgrading this route to a modern, motorway standard can be clearly understood.

4.62 For digital connectivity: - Plymouth currently has c. 99% superfast broadband coverage (both for min 24 Mbps and min 30 Mbps definitions) as at 2017 ([https://labs.thinkbroadband.com/local/uk](https://labs.thinkbroadband.com/local/uk)). The figures for South Hams and West Devon are 82%/80% and 78%/77% for 24Mbps and 30Mbps coverage respectively.6

4.63 Government policy is to deliver superfast broadband (min 24 Mbps) to 95% of premises by the end of 2017 ([www.gov.uk/guidance/broadband-delivery-uk](http://www.gov.uk/guidance/broadband-delivery-uk))8.

4.64 Connecting Devon and Somerset’s ambition is to achieve 100% superfast coverage (min 24 Mbps) by 2020 ([https://www.connectingdevonandsomerset.co.uk/about-us/](https://www.connectingdevonandsomerset.co.uk/about-us/))10.

4.65 The policies within the JLP will ensure that the number of premises that receive less than 25 Mbps speeds is not added to. This is to be achieved via a requirement that all development that creates residential or business premises provides for access from each

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6 Please see Appendix Four
7 Please see Appendix Four
8 Please see Appendix Four
9 Please see Appendix Four
10 Please see Appendix Four
premise to broadband with a minimum speed of 25 Mbps (Figure 3.2).

4.66 The importance of strategic connectivity to the wider region is recognised by the JLP Councils and by both the Heart of the South West LEP and the Cornwall and Isles of Scilly LEP, with the former setting out the aims for improving the resilience of the regions’ road and rail infrastructure, alongside enhancing digital connectivity, in its Strategic Economic Plan\(^\text{11}\), and this shared regional aspiration is reflected in Policy SPT8 of the JLP.

**Question 4.1(iv)**

*Policy SPT9 provides a list of principles for transport planning and strategy: is it an effective planning policy? Do the principles provide clear measures by which development proposals will be assessed?*

4.67 Yes, Policy SPT9 is considered an effective planning policy. The principles of Policy SPT9, such as supporting sustainable growth through locating development in accessible locations, is embedded within the Plan (SO1) and consolidated through detailed policies, such as Policy PLY44 which reinforces Policy SPT9:7 ‘...major transport infrastructure projects where there are proven benefits, so that transport links are not a barrier to planned developed and pinch points on the network are alleviated’, through reference to the delivery of the Woolwell to the George Junction Transport Scheme. Policy SPT9 is therefore deliverable over the life of the Plan and the delivery will involve effective join working on cross-boundary priorities. Effective partnerships, in the form of the TSWG, have already been formed (T28) and are proposed to continue throughout the Plan period.

4.68 Policy SPT9 is part of the JLP Spatial Strategy where we are setting out our overall approach to sustainable development, needs and the spatial distribution of development – which is then amplified in the delivery context through the Area and Site Specific Policies for the PPA and TTVP A sections and the Development Management Policies.

4.69 We consider this approach to be consistent with the NPPF. We are aware that paragraph 154 says: ‘Only policies that provide a clear indication of how a decision maker should react to a development


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proposal should be included in the plan’. However, we also believe that this has to be interpreted in a wider context, and in this respect the NPPF also says that:

- “Local Plans are key to delivering sustainable development that reflects the vision and aspiration of local communities” (para 150)
- “Local Plans should include strategic policies for the area in relation to meeting needs and delivering sustainable development” (para 156)

4.70 Additionally, NPPG states: ‘Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required. They should focus on the key issues that need to be addressed and be aspirational but realistic in what they propose’ (our emphasis). It also says: ‘They should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability.’ This suggests a degree of local determination as to what a policy can include. With this wider context in mind, we think it correct to interpret NPPF para 154 as relating to how policies work in combination with each other.

4.71 The following illustrations show how Policy SPT9 can ultimately be tracked through to informing a planning decision:

- SPT9.1 & 2 links to a strategy for Plymouth Policy Area which proposes, through PLY38, 39 and 44 for example, significant growth on the northern corridor – linked by PLY47 which identifies the key transport infrastructure needed.
- SPT9.3 links to TTV1, for example, in relating to a spatial distribution across the TTV area, which in itself leads to a series of site allocations in the Main Towns.
- SPT9.4 & 5 establishes sustainability principles which are then further amplified into a development context in DEV31 – and will be subject to further amplification in the Supplementary Planning Documents (SPDs).

4.72 Policy SPT9 is therefore a strategic policy promoting sustainable development and which, when viewed in combination with other

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12 NPPG: Paragraph: 002 Reference ID: 12-002-20140306. Revision date: 06 03 2014
policies, is an effective planning policy providing clarity about how development proposals will be assessed.

**Question 4.1(v)**

Policy SPT9 refers to a hierarchy of transport modes which is illustrated in Figure 3.12 within the supporting text and set out in Policy SPT10. Is the purpose of both policies clear in this regard?

4.73 Yes. Policy SPT9 sets out the overarching, strategic, principles for the transport strategy within the JLP. It describes the transport philosophy running throughout the Plan thus ensuring that sustainable development (with regard to: 'A transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel...' (NPPF para 29)) is embedded at both the strategic and site specific level. However, at different spatial settings what is ‘a realistic transport choice’ differs and this is what is sought to be articulated in Figure 3.12. The purpose of Policy SPT10 is to amplify the approach set out in Policy SPT9 (8) and guide decision makers on what needs to be considered for a balanced transport strategy at different spatial scales. For example, at the town / city level, the needs of motorists, public transport users (bus and rail) and cyclists should all be considered.

4.74 The NPPF, para 32, sets out that "All developments that generate significant amounts of movement should be supported by a Transport Statement of Transport Assessment. Plans and decisions should take account of whether (1) the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure (2) safe and suitable access to the site can be achieved for all the people; and (3) improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". Policy SPT9 (and 10) help to clarify which modes need to be considered for which trips by decision makers.
**Question 4.1(vi)**

Is Policy SPT10 an effective planning policy and does it provide a clear indication of how a decision-maker should react to a development proposal?

4.75 Yes. Policy SPT10 is an amplification of the principles established by Policy SPT9, particularly SPT9:4, 5 and 8. It is also part of the JLP Spatial Strategy where we are setting out our overall approach to sustainable development, needs and the spatial distribution of development – which is then amplified into delivery context through the Area and Site Specific Policies for the PPA and TTVP sections and the Development Management Policies.

4.76 We consider this approach to be consistent with the Framework. We are aware that NPPF para 154 says: 'Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan'. However, we also believe that this has to be interpreted in a wider context, and in this respect the NPPF also says that:

- "Local Plans are key to delivering sustainable development that reflects the vision and aspiration of local communities" (para 150);
- "Local Plans should include strategic policies for the area in relation to meeting needs and delivering sustainable development” (para 156).

4.77 Additionally NPPG says: 'Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required. They should focus on the key issues that need to be addressed and be aspirational but realistic in what they propose'\(^{13}\) (our emphasis). It also says: 'They should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability’. This suggests a degree of local determination as to what a policy can include.

4.78 With this wider context in mind, we think it correct to interpret NPPF para 154 as relating to how policies work in combination with each other; because we believe that the development policies of the plan are only understood properly in the context of the strategic policies

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\(^{13}\) NPPG: Paragraph: 002 Reference ID: 12-002-20140306. Revision date: 06 03 2014
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in the spatial strategy section - which set out key principles for sustainable development.

4.79 The following illustrates how Policy SPT10 can ultimately be tracked through to informing a planning decision:

- SPT10, building on the principles established by SPT9 (and amplifying the hierarchy of modes in Figure 3.12, which does not depict an exhaustive list of transport options), identifies the need for a balanced transport strategy supporting growth and the need for healthy and sustainable communities, and
- is amplified into a development context in DEV31. For example, a decision maker considering public transport access to local services and amenities (DEV31:10), from referring to SPT10 is guided to consider bus and coach services, ferry services, rail services and community transport), dependent on the spatial setting of the development, to ensure that ‘the provision of realistic sustainable transport choices’ (SPT9:5) (our emphasis) is achieved.

4.80 Policy SPT10 is therefore a strategic policy promoting sustainable development and which, when viewed in combination with other policies, is an effective planning policy providing clarity about how development proposals will be assessed.

Question 4.1(vii)

vii What evidence is there that the measures set out in Policy DEV31 will ’contribute positively to the achievement of a high quality, effective and safe transport system in the Plan Area which promotes sustainable transport choices and facilitates sustainable growth’?

4.90 The JLP Councils have a strong track record of requiring development to contribute positively to the achievement of a high quality, effective and safe transport system and the Councils are confident that this would continue throughout the Plan Period for the reasons set out below.

DEV31 (1) ‘Consider the impact of development on the wider transport network’ and DEV31 (2) ‘Provide safe and satisfactory traffic movement and vehicular access to and within the site’

4.91 To inform the JLP, strategic transport modelling has been undertaken to consider the traffic implications of the growth set out
in the Plan (T19). The results of the latest iteration of the model report that, in 2034, when a suite of measures are applied (both physical infrastructure interventions and complementary Smarter Choices programmes – in accordance with the principles set out in Policy SPT9 and expanded upon in Policy SPT10) then the performance of the network in 2034, overall, is better than in the scenario where background growth (supported by committed schemes) is applied (T27 pg16 and T20i pg. 11). However, there are still a number of locations where congestion is forecast to occur (T20i). Understanding where on the network these ‘pinch points’ are means that all parties can proactively plan for where mitigation is required, and consider appropriate interventions, mindful of the principles set out in Policy SPT9, Policy SPT10 and Policy DEV31, as part of the planning process. This approach is endorsed by the three JLP HAs as evidenced by PoSs Two (T25 pg3), Three\(^\text{14}\) and Four (T27 pg3) which all state that: “exclusion of a particular node / junction from the position statement does not mean that transport interventions will not be deemed necessary when development proposals are brought forwards through the planning process. The strategic model does not substitute the need for development of specific transport assessments or mitigation”.

DEV31 (3) ‘Ensure sufficient provision and management of car parking in order to protect the amenity of surrounding residential areas and ensure safety of the highway network’ and DEV31 (4) ‘Limit/control the overall level of car parking provision at employment, retail and other destination locations’.

4.92 Managing car parking at trip destinations is a recognised demand management tool and is currently effectively used in the Plan Area, in conjunction with complementary measures such as destination travel plans. For example, the main campus for Plymouth University is in the heart of the City Centre. In recent years the University has expanded and on-site car parking provision has reduced. This has not resulted in the degradation of the surrounding area and instead has enhanced the urban realm and amenity space. This is because the campus is in a highly accessible location for a range of transport modes including bus, rail and active travel, alongside appropriate parking management tools which stop car parking spreading into

\(^{14}\) Position Statement Three is available at: https://www.plymouth.gov.uk/parkingandtravel/transportplansandprojects/localtransportplan An extract is included in Appendix Six

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the local area. The University has an exemplary travel plan, supported by the City Council, and modal shift is being achieved (Figure Four).

**Figure Four: Staff Travel Plan Survey Data - Plymouth University**

![Plymouth University](image-url)

4.93 The effectiveness of managing on-site parking, alongside the implementation of a travel plan, is not limited to the city centre. Figure Five reports the travel plan survey data for Plymouth Science Park, located in the Derriford and Northern Corridor Growth Area, where recent expansion has also been successfully achieved without the provision of extensive additional car parking.
DEV31 (5) ‘Provide for high quality, safe and convenient facilities for walking, cycling, public transport and zero emission vehicles’, DEV31(8) ‘Ensure that access and infrastructure delivered as part of the development meets the need for walking, cycling and public transport connectivity both within the development and in the wider area alongside supporting place-shaping objectives’ and DEV31 (10) ‘Locate new homes in locations that can enable safe, secure walking, cycling and public transport access to local services and amenities’.

4.94 Plymouth City Council will be working with the DfT in 2018 on the development of a Local Cycling and Walking Infrastructure Plan (LCWIP) focussed on walking zones around development sites identified in the PPA of the JLP. Developing the LCWIP will involve identifying core walking zones around the development sites and, through the accompanying report, providing the narrative supporting the investment in the identified zones. This will ensure that as the development sites are brought forwards opportunities for walking, and cycling, can be understood by all parties (planners, transport planners and developers) and
maximised from the outset. This in turn, alongside the developments’ travel plans, will enable new residents and employees to consider walking and cycling as the natural choice for shorter journeys or as part of a longer journey, thus echoing the ambition of the national Cycling and Walking Investment Strategy (CWIS). PCC, through the TSWG, will share the lessons learnt and best practice with the local planning and highway authorities within the JLP area so that the approach can be applied throughout the Plan Area.

4.95 In Plymouth more than 67% of the workforce work in the city and of these more than 50% currently work in the strategic growth areas (T18 para 4.4.4 and 4.4.11), which is where the majority of development sites are located. As additional employment and housing is added to these areas, their importance will increase, as will travel demand.

4.96 At present the majority of regular commuting trips within the City are made by car, many only for short distances (T6: 2.21) There is therefore a real opportunity for walking and cycling to become the natural choice for some of these journeys, in accordance with the CWIS.

4.97 Continued growth in walking and cycling as an alternative to many car journeys supports the sustainable development of the communities of Plymouth, South Hams and West Devon, alongside improving the populations’ health. This is important because physical inactivity directly contributes to 1 in 6 deaths in the UK and costs £7.4bn a year to business and wider society.

4.98 For most people, the easiest and most acceptable forms of physical activity are those that can be built into everyday life. This is why active travel has such potential in terms of achieving health benefits. Due to the compact nature of Plymouth’s urban form this means there is significant potential to boost walking

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16 Working Together to Promote Active Travel, Public Health England, 2016 – Page 4 (Extract included in Appendix Eight)
and cycling levels in the City and results from programmes such as the Plymotion Personalised Travel Planning (PTP) scheme, where walking and cycling schemes are delivered, suggests this is being achieved (Table Four).

Table Four: Results from the 2015/16 PTP programme (T19: Figure 3.5)

<table>
<thead>
<tr>
<th>Delivery phase</th>
<th>Feedback from Quality Assurance participants saying PTP had changed how they travel</th>
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<tr>
<td></td>
<td>Increased reported level of bus use</td>
</tr>
<tr>
<td>2015</td>
<td>40% (women) 52% (men)</td>
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</tbody>
</table>

4.99 The focus of this work is on walking zones, rather than cycling and public transport networks because the latter already exist for both the PPA and TTVP and can already be drawn upon by decision makers (T18D, T18E, T18F, T18H and T23).

4.100 Policy DEV31 will also positively contribute to facilitating the introduction and expansion of zero emission vehicles. Within Plymouth there are currently 20 publically accessible vehicle charging points (T18 para 5.9.9) with one additional location in the TTVP (T18 5.9.10). In recent years additional sites have been secured through the planning process, with more sites in the pipeline and this approach is set to continue with the commitment to providing for zero emission vehicles proposed to be amplified within the SPD for the Plan.

DEV31 (6) ‘Mitigate the environmental impacts of transport including air quality and noise pollution’

4.101 Transport represents 27% of the city’s carbon emissions (EN12 page 2)\(^{17}\) and the strategy identifies the promotion of smarter

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\(^{17}\) Transport emitted 327kt CO\(_2\) in 2011, 27% of the [city's total](http://example.com)
choices as the primary opportunity in Plymouth to reduce transport based carbon emissions, whilst also helping to address air quality concerns. In 2010 a review of 16 behaviour change measures concluded that ‘all measures achieve genuine carbon reductions,’\(^{18}\) with the reductions ranging from between five and 1500kgs per person per year. Walking and cycling also achieves a number of other co-benefits including, air quality improvements, conservation of land and a reduction in noise, as well as a reduction in traffic congestion, through the associated reduction in car trips. The report ‘Benefits of Investing in Cycling’ suggests that achieving a 10% mode shift from cars to bikes would reduce air pollution and ‘save 400 productive life years.’\(^{19}\) Cycling and walking therefore have a key role to play in achieving environmental benefits. Locally, British Cycling has calculated that the SkyRide programme in Plymouth has saved 460 tonnes of carbon emissions, had a £837k health impact and contributed £460k to the local economy since 2012.\(^{20}\)

4.102 The promotion of sustainable transport, and providing realistic travel choice, is embedded within the Joint Local Plan (Policies SPT8, 9 and 10) and the transport evidence base demonstrates that there is a need (T18 sections 3.2, 3.3 and 3.4) to improve the environmental impacts of transport including air quality and noise. The evidence base also identified that there is a real opportunity to do so, through encouraging smarter choices, which builds on a track record of success (T19: Para 3.3.22-3.3.28). This will contribute positively to mitigating the environmental impacts of transport, alongside complementary measures such as supporting the investment of public transport operators in efficient vehicles,\(^{21}\) which development can contribute towards and which the JLP Councils have experience of.

\(^{18}\) Soft measures – hard facts. The value for money of transport measures which change travel behaviour – DoH, Highways Agency, NHS South West, Travelwise, South West RDA, January 2011 (Appendix Nine)


\(^{20}\) British Cycling Infographic for Plymouth City Council, 2016 (Appendix Eleven)

\(^{21}\) http://plymouthnewsroom.co.uk/cleaner-greener-technology-plymouth-buses/ (Appendix Twelve)
DEV31 (7) ‘Incorporate travel planning, including Personalised Travel Planning (PTP), which helps to maximise the use of sustainable transport in relation to travel demands generated by the development and limit the impact of the development on the road network’.

4.103 Travel planning is an established tool across the JLP area and, as illustrated in Figures Four and Five, is an effective method of encouraging modal shift, as is Personalised Travel Planning (PTP). Both PCC and DCC have experience of delivering successful PTP campaigns with both authorities securing funding from the Department for Transport’s Local Sustainable Transport Fund and, most recently for Plymouth, through the DfT’s Access Fund for Sustainable Travel (T19: Table 3.7).

4.104 PCC’s PTP programme is proven to be successful at achieving sustained modal shift (Table Five) and reducing traffic levels. Data shows that car travel across the city, using traffic data provided by all 33 of Plymouth’s continuous counting points, has reduced with 2015 car traffic showing a 2% reduction over 2011 levels. This outcome goes against national statistics which show that car traffic levels between 2010 and 2013 remained stable but then grew by 1.9% between 2013 and 2014 suggesting that Plymouth is currently succeeding in limiting traffic growth. (T19 para 3.3.27).
Table Five: Modal shift achieved through the LSTF PTP campaign (T19: Table 3.4)

<table>
<thead>
<tr>
<th>Delivery Phase</th>
<th>Respondents that stated PTP had influenced how they travelled</th>
<th>Respondents that had tried a different mode following PTP</th>
<th>2016 Longitudinal study – respondents that have changed how they travel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 1 (2012)</td>
<td>Data not available</td>
<td>25%</td>
<td>29%</td>
</tr>
<tr>
<td>Phase 2 (2013)</td>
<td>13%</td>
<td>18%</td>
<td>31%</td>
</tr>
<tr>
<td>Phase 3 (2014)</td>
<td>14%</td>
<td>9%</td>
<td>14%</td>
</tr>
<tr>
<td>Phase 4 (2015)*</td>
<td>15%</td>
<td>10%</td>
<td>-</td>
</tr>
</tbody>
</table>

* Phase 4 was delivered in the Northern Corridor Strategic Growth Area

4.105 The programme therefore delivers decongestion, environmental, road safety and physical activity benefits, increased public transport revenue, and better connected communities. The latest phase of Plymotion incorporates new developments across the PPA (Appendix Two).

**DEV31 (9) 'Contribute to meeting the wider strategic transport infrastructure needs generated by the cumulative impact of development in the area’.

4.106 Policy DEL1 of the JLP amplifies Policy DEV31 (9) and identifies the JLP Councils overall approach to developer contributions, stating that a positive and strategic approach will be taken to planning obligations, and CIL (in Plymouth), in order to secure contributions to meet infrastructure needs. This includes contributions which are needed to: "mitigate the impact of development on infrastructure, including its cumulative impact, through direct provision, or a financial infrastructure contribution…” (DEL1 3iv). In addition Policy SPT12 states "...where (infrastructure) schemes need to be delivered in advance of development, financial contributions will be
sought retrospectively through the S106 process where appropriate”.

**Question 2.1(viii)**

*Is the inclusion of measures in Policy DEV31 on matters including mitigation, landscape, local distinctiveness and rural and historic environments, as suggested by representors, justified by the evidence?*

4.107 The JLP Councils consider the JLP to be sound as submitted. Development policies for the natural environment are set out in Policies DEV24-DEV30 and explain the need to respect the natural and historic environment and mitigate any adverse impacts. These policies in turn are an amplification of the principles set out in Strategic Policy SPT11. However, the Councils acknowledge the impact that transport can have on the environment, both positive (through ‘solutions which support reductions in greenhouse gas emissions and reduce congestion’ (NPPF para 30)) and negative (T18; Chapter 3) which is why reference to the environment is also included in Policy DEV31.

4.108 The JLP Councils consider that Policy DEV31, as written, is justified and appropriately sets out the requirements of developers in terms of the potential impacts and opportunities transport has on the environment. The NPPF defines sustainability (pg. i) as ‘ensuring that better lives for ourselves don’t mean worse lives for future generations.’ The Councils therefore feel that the points raised by representations on landscape, local distinctiveness and rural and historic environments, are captured within the reference to sustainable growth mentioned at the start of the policy and amplified within the policy particularly in DEV31(3), DEV31(6) and DEV31(8) and the requirement to provide modal choice, through high quality facilities and complementary behavioural change programmes, thus according with the environmental remit of the planning system as set out in NPPF para 7.

4.109 However, we are mindful that a number of representations have been made which in our view do not raise soundness issues but which we felt at the time of our Response Report (SUB8) could potentially be addressed through MMs (EXC10A). The inclusion of measures in Policy DEV31 on matters including mitigation, landscape, local distinctiveness and rural and historic environments, we feel is one such MM where additional text can be added to the JLP Councils PSWDJLP Examination Hearing Statement – Matter 4.
policy to provide additional clarification to developers which corroborates the environmental policies of the Plan.
**Issue 4.2: Plymouth Airport (Policies SPT8 [point 1] and PLY42)**

**Question 4.2(i)**
Are Policies SPT8 and PLY42 safeguarding the potential future re-use of Plymouth airport as a general aviation airport, until the 5 year review of the JLP, appropriate and justified by robust evidence?

4.110 The Councils consider that safeguarding the potential future re-use of the former Plymouth airport site for general aviation use is appropriate and justified by robust evidence at both the national and local level. Despite not being operational since 2011 the site remains one of the city’s most strategic assets for which a clear policy position needs to be taken. Whilst the site has potential to accommodate alternative uses, the opportunity for the city (and the wider area) to have air connectivity again, with its associated wider economic and social benefits, would be forever lost, if the asset is not safeguarded within the Joint Local Plan (JLP).

4.111 **Policy SPT8 (Strategic Connectivity)** seeks to protect and enhance the resilience of Plymouth and South West Devon's strategic connectivity to the rest of the UK and to global markets in a multifaceted approach at all levels including air. SPT8 safeguards the opportunity for the re-opening of former airport site for general aviation until the next plan review. **Policy PLY42 (Plymouth Airport)** sets out the specific considerations that will be applied in relation to planning applications that may come forward in the meantime, including airport infrastructure that should be safeguarded.

4.112 The JLP will be reviewed on a five-year cycle, providing an early opportunity to consider progress with the reintroduction of a sustainable commercial general aviation operation. This is considered a reasonable approach to such a significant strategic infrastructure asset for Plymouth and the region in the context of the rapidly changing policy and commercial environment for general aviation in the UK.

**The National Planning & Aviation Policy Context**

4.113 Planning for infrastructure is a critical element of strategic planning and plan making. Paragraph 162 of the National Planning Policy
Framework (NPPF) clearly states that local planning authorities should assess the quality and capacity of a range of infrastructure types including transport to ensure it is properly planned. Paragraph 33 of NPPF and Planning Policy Guidance (PPG) provide guidance that local planning authorities should take account of the ‘business, leisure, training and emergency service’ roles of airports and airfields in plan making.

4.114 NPPF makes reference to the need for plans to have regard to the Government Framework for Aviation. The 2013 Aviation Policy Framework prepared and adopted by the Coalition Government remains the current aviation policy framework although DfT in 2017 have initiated consultation to inform preparation of a new UK Aviation Strategy.

4.115 Both the 2013 Aviation Policy Framework and PPG emphasise the importance of maintaining a viable network of aerodromes of varying sizes and that access to a national network is vital for the continued success of the general aviation sector. The enabling role that local planning authorities should take to ‘identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice’ is reinforced within the 2013 Aviation Policy Framework and NPPF.

4.116 The national aviation policy context has recently picked up momentum with DfT calling for evidence during 2017 as the first stage of an overhaul of aviation policy. The consultation document

22 NPPF Para 162 - "Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport ...... and its ability to meet forecast demands”.

23 NPPF Para 33 - ‘When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.’


25 DfT (March 2013) – Aviation Policy Framework

26 Beyond the horizon – the future of UK aviation: a call for evidence on a new aviation strategy’ (July – October 2017). The outcomes of this call have yet to be published.

27 DfT (March 2013) Aviation Policy Framework - Paragraphs 186-190


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sets out the Secretary of State’s overall aim ‘to achieve a safe, secure and sustainable aviation sector that meets the needs of consumers and of a global, outward-looking Britain’. The consultation sets out the long-term direction for aviation policy making for 2050 and beyond around six strategic objectives. A series of themed papers are anticipated to follow the call for evidence with a final aviation strategy planned for publication by the end of 2018. Although the consultation focuses on commercial airports and aviation the importance of making the most of the UK’s general aviation network as a feeder into commercial aviation remains a central theme of Government thinking, as in the 2013 Aviation Policy Framework. Essentially government’s call for evidence seeks to identify what the future needs of the UK’s general aviation network are, and how these can be met whilst balancing other market based factors. ‘Beyond the Horizon’ specifically states that:

‘there are specific issues that the government is keen to better understand. These include...the closure of some smaller airports, airfields and airstrips. The government is interested in gaining a better understanding of the benefits and requirements of the sector, and whether it is possible to identify a strategic network or level of infrastructure to enable the sector to continue its valuable role’

4.117 In anticipation of the potential changes at the national aviation policy level over the course of the next 1-2 years the Council consider it appropriate to pursue a safeguarding policy for the former airport site until the 5 year review of the JLP. Consistent with current national guidance the Councils have sought, in the preparation of the JLP, to build an appropriate and justified evidence base to support the safeguarding and development of Plymouth’s strategic transport connectivity options. Specifically taking into account the ‘business, leisure, training and emergency service role that the former airport site could perform if the reintroduction of general aviation use were encouraged through the JLP.

29 ‘Beyond the Horizon’ Strategy objectives: (1) help the aviation industry work for its customers, (2) ensure a safe and secure way to travel, (3) build a global and connected Britain, (4) encourage competitive markets, (5) support growth while tackling environmental impacts & (6) develop innovation, technology and skills.
The Local Evidence Base for Safeguarding

4.118 Both the evidence base prepared to support Policies SPT8 and PLY42 (Refer to EiP library Doc’s - T11,T16,T21,T17,T18\(^{32}\)) and Fly Plymouth’s representations to the JLP (as a potential operator) provides the Council’s with the assurance that general aviation has the reasonable prospect of returning to the site, but the time limit will guard against any long term risk that the site remains unused for the entirety of the plan period.

4.119 The 2014 Arup Plymouth Airport Study\(^{33}\) forms the principal evidence for Policies SPT8 and PLY42 (EiP Library Reference T11). The 2014 study examined the viability of the reintroduction of air services at the former airport site and consolidates information from studies previously undertaken to assess the future potential as an operational airport\(^{34}\). Alternative scenarios for the reintroduction of air services were developed and assessed in terms of financial viability and operational feasibility with consideration given to opportunities and constraints under specific criteria that would impact on aviation operations. Details of the options and option assessment are specified in Section 5 (Pages 26-45) of the study.

4.120 The assessment determined that re-opening as a licenced general aviation airfield, potentially building up to a Category 3 airport, was considered a feasible scenario should an in depth assessment and detailed business plan be presented that provides evidence that the level of demand for non-scheduled operations and the realization of suitable destinations for scheduled operations can provide sufficient income to support and sustain the required capital and operational investment. CAA re-licensing for general aviation was considered possible and would allow the site to continue operation in the future should an operator present a detailed viable business plan acceptable to Plymouth City Council. Safeguarding the site within the JLP would encourage aviation investor confidence and make


\(^{33}\) Local Plan EiP Library Reference T11 – Arup - Plymouth Airport Study – Final Report (September 2014).


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allowance for constructive modifications that may occur in planning and aviation policy and regulation in the medium term in the context of the national aviation policy review currently underway.\(^{35}\)

4.121 In 2016\(^{36}\) Arup were re-commissioned to supplement the evidence for the emerging policy position for the airport with an alternative use assessment of the site in accordance with the requirements of the NPPF. NPPF Paragraph 152 states that plan makers should assess reasonable alternatives in preparing the local plan and identify the likely significant effects of the available options\(^{37}\). In developing alternatives the NPPF identifies that options should deliver net gains across the economic, social and environmental dimensions of sustainable development. In addition to the safeguarding of the former airport site for the reintroduction of aviation use, residential and commercial led redevelopment options were considered as reasonable alternative prospects for the future and the basis of the alternative assessment. These options were evaluated in the context of five core themes derived from the strategic objectives of the Draft Plymouth Plan\(^{38}\).

4.122 The assessment suggests that whilst alternative redevelopment options could bring positive benefits to Plymouth, in balance, these would not outweigh the loss of a critical infrastructure asset and the long term future strategic connectivity of the city. Alternative redevelopment of the site would leave the city with no further opportunities for reconnection by air to the rest of the UK and Europe. It should also be noted that the JLP sets out a supply of land for housing and commercial uses (including employment) which meet the identified needs in full. The Housing Topic Paper (TP3(rev)) goes into great detail regarding the housing land supply,

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\(^{35}\) Beyond the horizon – the future of UK aviation: a call for evidence on a new aviation strategy’ (July – October 2017).

\(^{36}\) Arup (November 2016) - Plymouth Airport Safeguarding Consideration of Alternatives (Doc T16)

\(^{37}\) NPPF Paragraph 152 - ‘Local Planning Authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate’

\(^{38}\) Alternative assessment themes based on strategic objectives of Plymouth Plan: (1) The Plymouth Vision, (2) Commercial Growth, (3) Transport Connectivity, (4) Housing, and (5) Infrastructure.
and also shows that the JLP Authorities have ensured flexibility in the housing land supply by allocating more land than is required. The former Airport Site falls within the Plymouth Policy Area, which can demonstrate a 5 year land supply against the plan requirement set out in SPT3 at the point of adoption of the plan based on the 2017 monitoring point (see TP3(rev)). It is therefore clear that the JLP has identified sufficient housing land to meet needs over the plan period, and within the first five years of the plan, without needing to consider the redevelopment of the former airport site.

4.123 The aviation reintroduction option seeks to plan positively, safeguarding strategic connectivity facilitated by a policy that safeguards the retention of a strategic infrastructure asset. Future aviation use on the site contributes positively to the City Vision and a number of the accompanying objectives in relation to economic and commercial growth, transport connectivity, infrastructure investment and tourism. The NPPF and PPG outline that local plans should plan positively for infrastructure and take account of the need for strategic infrastructure. The importance of air connectivity to the city’s strategic connectivity and the regions transport strategy is further reinforced in the JLP Baseline Transport Conditions Report:

“Plymouth is one of only two UK cities with neither a motorway within ten miles nor an operational airport. As a consequence promoting excellent connectivity to the rest of the UK forms a key part of the region’s transport strategy”

4.124 PPG specifically states local authorities should have regard to the extent to which an aerodrome contributes to connectivity outside the authorities’ boundaries as part of a larger network. This is reinforced by the direction within the 2013 Aviation Policy Framework and NPPF that local planning authorities should seek to protect sites which could be considered critical to widening transport choice.

The Broader Context for General Aviation Safeguarding

4.125 The Councils have also been closely following the lobby and policy debate happening at the national level with regards to the protection of general aviation assets which has also gathered pace.
markedly during 2017 in parallel to the national aviation policy refresh.

4.126 In 1965 Beeching decimated the UK’s rail network with 2363 stations and over 5,000 miles of track closed. Protests were mounted but the majority closed. It was an example of the power of government albeit exercised negatively in hindsight. Government has learnt from these mistakes and is seeking to act positively particularly with regard to the network of general aviation airfields, as an essential part of the UK’s critical infrastructure framework. The Council has followed with interest the activities of the All Party Parliamentary Group for General Aviation (APPG) 40 and the General Aviation Awareness Council (GAAC) 41 who are at the forefront of the lobbying for greater protection and enhancement of general aviation airfields across the UK. Both organisations are active in their engagement with DfT and Local Planning Authorities to raise awareness of the co-ordinated action to safeguard Britain’s network of general aviation airfields.

4.127 The Council is seeking to reflect these commitments in the JLP and Policies SPT8 and PLY42 are consistent and aligned to this aspiration. The APPG and GAAC are promoting general aviation to be treated equitably as part of the wider economy, demanding that Government eliminates the disparities that general aviation faces in treatment compared to similar enterprises, from the presumption that “brownfield” airfields should be developed for other uses, to unfair taxation on aviation training and high duties on aviation fuels.

40 The General Aviation All Party Parliamentary Group (APPG) was formed in 2017 by Grant Shapps, MP for Welwyn Hatfield in 2017. The APPG promotes the objective – as set out by British Government – of making the UK the best country in the world for General Aviation, and to stimulate interest in the sector. The group seeks to ensure that General Aviation inspires both current and future generations to take up STEM subjects, thereby creating high-tech jobs. The APPG has a record 85 parliamentary members, including 12 Privy Councillors, 7 ex-Cabinet ministers and one current Party Leader, reflecting the importance attached to promoting jobs and growth through General Aviation.

41 The General Aviation Awareness Council (GAAC) was formed in 1991 in response to a growing concern that there was no one organisation responsible for protecting and promoting the interests of a wide range of General Aviation (GA) activities in the UK. It is a national body representing the general and light aviation and a registered company limited by guarantee, with full public accountability.
4.128 The Councils also wish to support the future of general aviation as the facilitator of hi tech job opportunities across the JLP area as well as the encouragement of STEM related career opportunities. The use of the safeguarding policy mechanism for the Plymouth Airport site provides opportunity for the reintroduction of general aviation activity to facilitate this economic future. The APPG make the compelling case that a lack of appreciation of the role that general aviation plays in our national economy has led to poor and misguided policy towards general aviation by successive governments which is putting the future of the UK aviation sector at risk; at a time when we need high-tech jobs and skills to compete globally post-Brexit.

4.129 The Councils have been scrutinising the loss of critical aviation infrastructure at the national level in recent years and this loss has become increasingly commonplace, particularly since 2014. The Councils have developed their own policy response with regards to the future of former airport site in the context of this national trend. Many of the remaining general aviation airfields around the UK are now under considerable threat of closure. The potential for airfields and aerodromes to be used for housing became more feasible following the deletion in 2003 of the footnote in PPG13, noting that airfields and hospital grounds should not be considered brownfield sites. The current definition of previously developed land included in the Glossary (Annex 2) of the NPPF makes no specific reference to airfields or flying sites resulting in an increasing tendency for airfields to be treated as brownfield sites. Both the NPPF and PPG encourage Local Planning Authorities to take account of its airfields role in serving business, leisure, training, emergency needs and connectivity, however in practice the brownfield categorisation for airfields places critical infrastructure assets under pressure for redevelopment. Many have closed, whilst others remain under persistent risk, thus reducing investment in airfield infrastructure and comprehensive network connectivity a result. The APPG is

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42 General aviation provides employment for nearly 40,000 people and directly contributes £3billion to the national economy – York Aviation (Feb 2015): The Economic Value of General Aviation in the UK.

43 Paragraph 33 Section 4 Promoting Sustainable Transport – NPPF (2012)

calling on government to make changes to the NPPF to give legislative protection to airfield land. The GAAC is currently working with DCLG to clarify the brownfield definition and gain confirmation from both the Lords and Commons that airfields will not automatically be classed as brownfield. It is understood that this could be incorporated into secondary legislation in support of the Housing Act 2016, however the timeframe remains unclear.

4.130 In order to understand how acute the loss of the general aviation network is becoming, it is worth noting that when the government commissioned and published its economic value study into general aviation in 2015 124 licensed airfields were quantified in the UK. The APPG has estimated that just two years later there are only 100 licensed airfields remaining (including those under imminent threat from re-development, such as Manston and Panshanger). This represents close to a 25% reduction in the UK’s general aviation capacity in just two years.

4.131 Both the APPG and GAAC make a rational case, and one which the Councils agree with, that airfields cannot survive in isolation, and therefore protection should be given similar to that appreciated by other critical network infrastructure such as railway stations.

The case for safeguarding a strategic General Aviation network.

4.132 There is a growing view, which the Councils support, that Government needs to ensure the survival of a minimum viable strategic network of general aviation airfields across the UK. The Councils consider that the former airport site should be safeguarded as an important part of that strategic network for the South West. It is the Councils’ view that airfields that form part of that strategic network should have assured protection from development or change of use giving stability and certainty to businesses and jobs that rely on the survival of the general aviation network. Airfields have a wider strategic connectivity role as recognised by government in the 2015 GA Strategy, in enhancing connectivity beyond the 50 airfields that have regular commercial air services.

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45 GAAC presentation to the Royal Aeronautical Society 24th October 2017: ‘The UK economy needs legislation to protect an essential network of airfields’
46 York Aviation (Feb 2015): The Economic Value of General Aviation in the UK.
47 Office or Rail Regulation (Dec 2013): ‘Land Disposal by Network Rail: the regulatory arrangements’
48 General Aviation Strategy (March 2015)
4.133 The GAAC regards the existing network of airfields as the minimum required for current levels of general aviation activity in the UK. The growth of our international airports will influence the commercial general aviation network stimulating growth in commercial general aviation and inward investment to the UK leading to an increase in demand for licensed airfields and general aviation in general.

4.134 Set against this upward trend has been the steady reduction in UK airfields generally and a substantial loss of licensed airfields in particular as they tend to be located closer to urban areas, face alternative use pressures and face significant challenges in replacing them or building in new locations. Licensed airfields are commercial ventures that rely on the full spectrum of business opportunities to survive. For Plymouth Airport this will mean optimising the airfields facilities and physical attributes including the offset of aviation income from indirect non-aviation income streams.

4.135 In addition to the loss of airfields, another outcome of the existing situation is the uncertainty the situation engenders on long term investment in general aviation airfields. The inability to engender investor confidence reduces capacity to attract substantial long term capital investment into airfields enabling them to become optimally profitable commercial operations. It also hinders investment in new aviation facilities and equipment such as runway lighting, satellite, radio, navigation and flight safety aids. To overcome this the Councils are eager to create an environment conducive to private investment in general aviation facilities, training and equipment. Policies SPT8 and PLY42 seek to encourage capital investment through the safeguarding of the future re-use of the former airport site until the 5 year review of the JLP.

Summary

4.136 Safeguarding the existing site to enable private sector investment in general aviation uses has the potential to facilitate the re-opening of the former airport site for commercial aviation in the longer term. The Councils consider that the permanent loss of this site, which has the potential to be re-regulated for commercial aviation by the CAA, would be short sighted, particularly if Plymouth is too maintain its strategic connectivity to the rest of the UK.

4.137 The evidence of emerging investment interest from the private sector has compelled the formation of the Council’s opinion that there is a real prospect that the former airport site could be reused
for aviation use and that a window of opportunity should be given through the safeguarding policy to enable and facilitate the development of that commercial prospect.

4.138 The permanent loss of the potential for the reintroduction of air connectivity would be an undesirable outcome for the city’s future competitiveness, both within the UK and internationally. The capital cost of a new airport would be extremely high even if a site could be identified. The only scenario under which this could even begin to be considered possible would be if the other local regional airports, Exeter and/or Newquay, were to close which is unlikely given the levels of investment happening at these sites. In this context, the local evidence base in relation to the potential reopening of the site, the state of flux with national aviation policy, the lobby for protection of the UK general aviation network and the fact that the OAN can be accommodated on other sites, all support the Council’s view that Policies SPT8 and PLY42 are appropriate and justified.
## APPENDIX ONE: PLYMOUTH & SOUTH WEST DEVON INFRASTRUCTURE FORUM – MEMBERS

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Organisation</th>
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<tbody>
<tr>
<td>Associated British Ports</td>
<td>PCC <em>(Flood/Drainage; Highway design)</em></td>
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<tr>
<td>BT / Open Reach</td>
<td>PCC <em>(Health)</em></td>
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<td>Community Health Partnerships</td>
<td>PCC <em>(Infrastructure &amp; Investment)</em></td>
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<td>Cornwall County Council</td>
<td>PCC <em>(Low Carbon, Flood/Drainage)</em></td>
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<td>Cross Country Trains</td>
<td>PCC <em>(Natural Infrastructure)</em></td>
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<td>PCC <em>(Public Health)</em></td>
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<td>Devon &amp; Somerset Fire &amp; Rescue Service</td>
<td>PCC <em>(Transport)</em></td>
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<td>Devon Chamber of Commerce</td>
<td>Plymouth City Centre Partnership</td>
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<td>Devon County Council</td>
<td>Plymouth Citybus</td>
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<td>South Devon &amp; Torbay CCG</td>
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<td>South West Ambulance Service</td>
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<td>South West Water</td>
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<td>Sport England</td>
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<td>Stagecoach South West</td>
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<td>Wales &amp; West</td>
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<td>PCC <em>(Commercial Enterprise)</em></td>
<td>Western Power</td>
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<td>PCC <em>(Economic Development, WiFi)</em></td>
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<tr>
<td>PCC <em>(Education)</em></td>
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APPENDIX TWO: SUMMARY OF THE PLYMOTION PROGRAMME AND ACCESS FUND FOR SUSTAINABLE TRAVEL BID.

1.0 Executive summary:

This appendix provides information on the 2017/18 to 2019/20 Access Fund for Sustainable Travel programme ‘Plymotion Three: Access to Employment, Education and Training on foot and by bike’ which is the current Plymotion behavioural change programme being delivered in Plymouth.

2.0 Background information:

In September 2016 Plymouth City Council (PCC) submitted a bid to the Department for Transport’s (DfT) Access Fund for Sustainable Travel (AFFST) revenue competition. The bidding opportunity was available to all English Local Authorities, outside London.

Local Authorities had the opportunity to apply for revenue funding up to a maximum of £1.5 million to support the cost of a range of sustainable travel measures. The DfT advised that the proposals should consider the importance of how to support the local economy by facilitating access to new and existing employment, education and training opportunities and increase levels of physical activity through the promotion of walking and cycling.

In January 2017 PCC were informed that our bid had been successful securing circa £1.5M from the DfT as part of a £2M behavioural change programme. The bid was commended as ‘a particularly strong bid, with [a] clear strategic narrative setting out how it will deliver against the fund’s primary objectives of supporting the local economy by supporting access to new and existing employment, education and training as well as active promotion of increased levels of physical activity through walking and / or cycling.’

The DfT also commented that the bid ‘demonstrated good understanding and consideration of air quality and / or carbon emissions, as well as the provision of solutions to the challenges faced by traffic congestion.’

49 Plymotion Three: Access to Employment, Education and Training on foot and by bike is referred to as ‘Plymotion Three’ throughout the rest of this note.

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3.0 Details of the programme

The objective of Plymotion Three is to increase the number of trips to work and school made by bike and on foot.

The programme consists of three smarter travel themes (Personalised Travel Planning (PTP), Walking and Cycling) and supports the redevelopment of Plymouth’s Central Railway Station, a scheme which provided match funding for the bid.

Plymotion Three is also designed to work in synergy with the capital investment in Plymouth’s transport infrastructure being delivered through the Local Growth Fund. In doing so the bid helps to address the barriers to walking and cycling set out in the national Cycling and Walking Investment Strategy (CWIS), and help to ‘Move Plymouth Ahead,’ strengthening the local economy by supporting access to new and existing employment, education and training and increasing active travel, thus achieving the objectives of the Access Fund for Sustainable Travel (AFFST).

Focussed on residential and business communities within Plymouth and its urban fringe Plymotion Three is designed to:-

- Support the local economy by supporting access to new and existing employment, education and training;
- Actively promote increased levels of physical activity through walking and cycling;
- Address transport’s contribution to carbon emissions and air quality levels, and;
- Reduce traffic congestion through providing people travel choices.

Plymotion Three builds on the success of the Local Sustainable Transport Fund projects Plymouth Connect and Plymotion. Through championing smarter travel, Plymotion Three supports access to new and existing employment, education and training opportunities and actively promotes increased levels of physical activity through walking and cycling, easing congestion and improving both health and air quality.

The programme focusses on Plymouth’s three growth areas; City Centre and the Waterfront, Derriford and the Northern Corridor and the Eastern Corridor. It supports people living, working and studying within the growth areas to make the best travel choices, adopt more active lifestyles.
and access employment and training opportunities, enabling modal shift and helping to liberate the network capacity required to allow the sustainable development of these locations.

Table One describes the programmes which are being delivered through *Plymotion Three* and the expected outcomes.

**Table One: Plymotion Three – Programme elements by Smarter Travel Theme**

<table>
<thead>
<tr>
<th>AFfST Objective</th>
<th>Scheme</th>
<th>Smarter Travel Theme</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support the local economy by supporting access to new and existing employment, education and training</td>
<td>Personalised Travel Planning(^50) to 45 businesses in Plymouth’s three strategic growth areas <strong>OUTPUTS:</strong> PTP delivered to 45 businesses engaging with 2,714 employees with detailed PTP conversations had with 759 employees. 45 staff active travel groups supported with their walking and cycling promotion activities</td>
<td>Y Walking Cycling</td>
</tr>
<tr>
<td></td>
<td><strong>PTP will also be provided at two employment agencies.</strong> <strong>OUTPUTS:</strong> 90 PTP drop-in sessions delivered at partner employment agencies supported by PTP training sessions for employment agency staff and travel information packs for job seekers.</td>
<td>Y Walking Cycling</td>
</tr>
<tr>
<td></td>
<td><strong>Free adult cycle training and “commuter tutor”.</strong> <strong>OUTPUTS:</strong> 228 cycle training sessions held providing 1368 hours of free adult cycle training</td>
<td>Y Walking Cycling</td>
</tr>
</tbody>
</table>

\(^{50}\) The business PTP programme will be delivered through the Plymotion at Your Workplace (PaYW) programme

JLP Councils PSWDJLP Examination Hearing Statement – Matter 4
<table>
<thead>
<tr>
<th>Bike Links Wheels to Work Scheme</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> 45 individuals for whom transport is identified as a barrier preventing them from getting to either work or training loaned a bike and equipment</td>
<td>Y</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>An intensive school engagement active travel programme (Bike It Plus), which increases the number of young people travelling to school actively and sustainably as well as engaging with the wider school community</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> 54 schools engaged in the programme</td>
<td>Y</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sustainable Travel Grants: Businesses and schools are able to apply for match funding to invest in targeted sustainable travel initiatives designed to overcome locally identified barriers to smarter travel.</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> A maximum of £150,000 invested in sustainable travel, securing between £200,000 and £600,000 match funding from partner businesses and schools.</td>
<td>Y</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Actively promote increased levels of physical activity through Led Cycle Rides; including two mass participation events:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> 4,000 individuals attending mass participation cycle events and 263 led ride participants across 35 rides per annum.</td>
<td>Y</td>
</tr>
</tbody>
</table>

---

51 The sustainable travel grants are expected to be awarded to 30 businesses / schools based on the Council’s maximum support per applicant being £5,000. This will secure between circa £200,000 (if the grant is 75% of the scheme cost) and £600,000 (if the grant is 25% of the scheme cost).

52 This is based on the 2015/16 Sky Ride local programme which involved 35 Rides organised with 525 registrations and 258 participants. There has been an annual 2% increase in participation since the programme started.

JLP Councils PSWDJLP Examination Hearing Statement – Matter 4
<table>
<thead>
<tr>
<th>walking and cycling</th>
<th>An adapted bike hire scheme</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> 400 adapted bike hires</td>
<td></td>
<td>Y</td>
</tr>
</tbody>
</table>

| Bike maintenance support. |  |  |
|---------------------------|  |  |
| **OUTPUTS:** Bike safety check sessions, covering 500 bikes supported by 36 open workshop sessions accessed by 300 people and a further 12 subsidised bike maintenance courses, training 84 people. |  | Y |

| Installation of 150 new cycle parking spaces and lockers at key locations within Plymouth’s growth areas and in particular at Plymouth Railway Station |  |  |
|---------------------------------------------------------------------------------------------------------------------------------|  | Y |
| **OUTPUTS:** 150 new cycle parking spaces including 70 cycle parking spaces at Plymouth Railway Station facilitating a cycle hire offer |  |  |

| Business focussed led walks |  |  |
|-----------------------------|  |  |
| **OUTPUTS:** 15-24 led walks per annum involving 225-360 individuals and delivering 180 physical activity hours. 45 trained walk leaders. |  | Y |

<p>| Enhancing access to Bircham Valley Local Nature Reserve and the creation of marked walking routes |  |  |
|---------------------------------------------------------------------------------------------------------------------------------|  | Y |
| <strong>OUTPUTS:</strong> Localised improvements to the three main access points to the Bircham Valley Local Nature Reserve |  |  |</p>
<table>
<thead>
<tr>
<th>Improved mapping of walking and cycling routes</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> Plymouth’s walking and cycling network data will be shared with Ordnance Survey for inclusion in all appropriate mapping and we will engage with other mapping and journey planning providers, such as Google.</td>
<td>Y</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Delivery of cycle awareness training to professional drivers</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> 17 cycle awareness training courses training a total of 408 professional drivers</td>
<td>Y</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Intensive walking focussed school engagement programme</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> 30 schools working towards the Modeshift STARS scheme supported by nine walking buses, involving an average of 12 pupils, and nine park and stride initiatives. Three schools delivering child pedestrian training sessions covering 270 children</td>
<td>Y</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address transport’s contributio n to carbon emissions and air quality levels</th>
<th>Cargo bike loan scheme and cycle logistics support</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OUTPUTS:</strong> 30, two month cargo bike loans.</td>
<td>Y</td>
</tr>
</tbody>
</table>
Reduce traffic congestion through providing people travel choices

Personalised Travel Planning (PTP).

**OUTPUTS:** PTP delivered to 6,000 households successfully engaging with 1,860 individuals\(^{53}\). Engagement with circa 15,000 people through the three PTP programmes (business, residential and events) with a corresponding carbon saving of 545 tonnes

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4.0 consultation and co-operative working

The Council has worked closely with a number of partners during the delivery of the *Plymotion* project and *Plymotion Three* provides an opportunity to continue and strengthen the co-operative delivery of an integrated, behavioural change programme in Plymouth.

Key partners in the delivery of the programme include: Office of the Director of Public Health, Plymouth’s cycling community, Plymouth Citybus and Stagecoach South West and local employment agencies. Letters of support were received from 37 organisations\(^{54}\) in support of the bid, including from the Heart of the South West Local Enterprise Partnership. The letter of support from the LEP identifies that ‘while the delivery of the [Plymotion Three] will principally be in the three Plymouth growth areas; Derriford and the Northern Corridor, City Centre and the Waterfront and the Eastern Corridor, this bid will span the wider ‘At Plymouth’ geographical area as set out in the emerging Joint Plan for Plymouth, South Hams and West Devon. This means that it directly supports the sustainable development of Plymouth and its wider Travel to Work Area. We welcome the fact that Plymouth’s use of Access Fund resources will be complementary to the Growth Deal 3 transport schemes which the Local Enterprise Partnership has prioritised for bringing forward

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\(^{53}\) This is assuming an engagement rate of 31% based on the engagement rate of 31% in 2015/16. This is a conservative estimate due to evidence that new residents (3,000 of the 6,000 PoYD households) are more inclined to engage in travel behaviour change than established residents.

\(^{54}\) Letters of support were received from Great Western Railway, Plymouth Citybus, Stagecoach South West, Plymouth University, AECOM, Devon Electric Bikes, Beechwood Primary School, Drake Primary School, St Andrews Primary School, DWP Job Centre Plus, Fleet Source, Livewell South West Wellbeing Team, Office of the Director of Public Health, English Communities Fund, Cavanna Homes, Mount Wise (Devon)Ltd, Cathedral School of St Mary, Holy Cross Catholic Primary School, Whitleigh Primary School, Heart of the South West Local Enterprise Partnership, Devon County Council, Derriford Hospital, Plymouth Science Park, Babcock International Group, Plymouth Community Homes, UTC Aerospace Systems, City College Plymouth, Centrica, Bikespace CIC, Access Plymouth, Working Links, iBASE Systems, Sustrans, Cycling UK, Plymouth Cycling Campaign, Livewell South West and South Hams District Council.
development around Plymouth station and at Sherford and Langage, and to the transport measures being funded through Growth Deals 1 and 2.’

5.0 Results to date

The delivery of Plymotion Three started this Summer and the results to date are encouraging. Feedback on the Plymotion programme is collected by an independent third party and includes:-

5.1 Feedback on the personalised travel planning service

- [with regards to whether travel behaviour has changed as a result of the PTP conversation]: "Yes, previously I would have used the car but now I have used the bus several times to get into town and it has allowed me to stretch my legs and be more healthy. Previously I hadn’t been to town for 5 or 6 years but I have been 3 times since receiving the information."

5.2 Feedback on the adult cycle training programme

- [with regards to the effectiveness of the Adult Cycle Training]: "I cycle to work, I started this after the first session, the course was perfectly timed for me.” & another person said ”I have since purchased my own bike & although I wouldn't say I'll be taking up the Tour de France, I am definitely building on my confidence by practising riding, turning & stopping safely.”

- “Just to say that Bikespace have done an amazing job with my bike – it felt like new when cycling home 😊 Maybe you could pass it on – thanks very much for organising”

- “I just wanted to pass on my thanks for the safety check on my bike. Being new to getting back on 2 wheels it gave me a lot of reassurance to have my bike given the once over. After a quick chat with the mechanic he advised I put my saddle height up. With immediate effect this revolutionized my ride home! Not only making it feel considerably more comfortable and less effort, it has also shaved several minutes off the time it takes me.

Whilst I can’t see myself completely ditching my running shoes for the bike it definitely now feels like a real viable alternative that I will be using on a very regular basis.

JLP Councils PSWDJLP Examination Hearing Statement – Matter 4
Thanks again for sorting out this great initiative and please pass on my appreciation to all concerned.”

5.3 Feedback on the sustainable travel grants

Eleven companies have applied for tranche one of the Plymotion at Your Workplace sustainable travel grants and will shortly be benefitting from the PaYW personalised travel planning service. Through the grant process £61,108 is being invested in sustainable travel initiatives of which £40,095 is grant funding and £21,013 is investment from the companies themselves. Measures being delivered through the grants include purchasing electric bikes, including cargo bikes, for business deliveries; the installation of secure cycle parking and lockers for staff, and the provision of an online journey planning tool for staff and visitors to a city science park to use. A school grant programme was launched this month providing a similar opportunity to local schools.

Early feedback from the programme suggests that Plymotion is changing people’s travel behaviour, directly supporting the delivery of the transport strategy in the Plymouth and South West Devon Joint Local Plan.
APPENDIX THREE: PLYMOUTH CITY COUNCIL APPLICATION FORM FOR THE DEPARTMENT FOR TRANSPORT’S ACCESS FUND FOR SUSTAINABLE TRAVEL REVENUE COMPETITION (EXTRACT)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>A4. Total package cost (£m):</td>
<td>£2.0m</td>
</tr>
<tr>
<td>A5. Total DIT revenue funding contribution sought (£m):</td>
<td>£1.5m</td>
</tr>
<tr>
<td>A6. Local contribution (£m):</td>
<td>£0.5m</td>
</tr>
</tbody>
</table>

Plymouth City Council has secured a significant contribution towards Pymotion Three both from internal and external sources (Table One).

Table One: Local contribution breakdown

<table>
<thead>
<tr>
<th>Local Authority Contribution</th>
<th>Amount</th>
<th>Letter of support confirming contribution and any conditions attached to it.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City Council (PCC)</td>
<td>£209,185</td>
<td>N/A</td>
</tr>
<tr>
<td>ODPH (PCC)</td>
<td>£1,309</td>
<td>Appendix 1 – 1.13</td>
</tr>
</tbody>
</table>

Third Party Contribution

1. For ease of reading Pymotion Three will be used in place of Pymotion: Access to Employment, Education and Training on foot and by bike throughout this document.
2. Physical Activity Needs Assessment for Plymouth 2015-2018

<table>
<thead>
<tr>
<th>Plymouth Railway Station redevelopment: Growth Deal 3 bid</th>
<th>£50,000</th>
<th>Appendix 1 – 1.1 Great Western Railways</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth Citybus</td>
<td>£30,000</td>
<td>Appendix 1 – 1.2</td>
</tr>
<tr>
<td>Stagecoach Southwest</td>
<td>£6,000</td>
<td>Appendix 1 – 1.3</td>
</tr>
<tr>
<td>Plymouth University</td>
<td>£3,840</td>
<td>Appendix 1 – 1.4</td>
</tr>
<tr>
<td>AECOM</td>
<td>£1,410</td>
<td>Appendix 1 – 1.5</td>
</tr>
<tr>
<td>Devon Electric Bikes</td>
<td>£1,798</td>
<td>Appendix 1 – 1.6</td>
</tr>
<tr>
<td>Beechwood Primary Academy</td>
<td>£1,500</td>
<td>Appendix 1 – 1.7</td>
</tr>
<tr>
<td>Drake Primary School</td>
<td>£2,775</td>
<td>Appendix 1 – 1.8</td>
</tr>
<tr>
<td>St Andrew’s Church of England Primary School</td>
<td>£4,380</td>
<td>Appendix 1 – 1.9</td>
</tr>
<tr>
<td>DWP Job Centre Plus</td>
<td>£2,538</td>
<td>Appendix 1 – 1.10</td>
</tr>
<tr>
<td>Fleet source</td>
<td>£7,125</td>
<td>Appendix 1 – 1.11</td>
</tr>
<tr>
<td>Livewell Southwest</td>
<td>£1,620</td>
<td>Appendix 1 – 1.12</td>
</tr>
<tr>
<td>Plot G Millbay S106 Funding</td>
<td>£60,000</td>
<td>Appendix 1 – 1.14</td>
</tr>
<tr>
<td>Boshone Boat Yard S106 Funding</td>
<td>£33,572</td>
<td>Appendix 1 – 1.15</td>
</tr>
<tr>
<td>Mt Wise S106 Funding</td>
<td>£99,661</td>
<td>Appendix 1 – 1.16</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>£506,713</strong></td>
<td></td>
</tr>
</tbody>
</table>
B4. The Financial Case – Project Costs

Please complete the following tables. **Figures should be entered in £000s** (i.e. £10,000 = 10).

**Table A: Funding profile (Nominal terms)**

<table>
<thead>
<tr>
<th></th>
<th>2017/18</th>
<th>2018/19</th>
<th>2019/20</th>
</tr>
</thead>
<tbody>
<tr>
<td>DfT funding sought</td>
<td>498.86</td>
<td>499.01</td>
<td>498.71</td>
</tr>
<tr>
<td>Local Authority contribution</td>
<td>88.58</td>
<td>72.39</td>
<td>49.52</td>
</tr>
<tr>
<td>Third Party contribution including LGF</td>
<td>179.44</td>
<td>17.80</td>
<td>98.98</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>766.88</td>
<td>589.20</td>
<td>647.21</td>
</tr>
</tbody>
</table>

*The local contribution represents 25% of the overall scheme cost and 34% of the amount of Department for Transport funding being asked for.*
APPENDIX FOUR: DIGITAL CONNECTIVITY

3.1 Superfast and Fibre coverage (https://labs.thinkbroadband.com/local/uk).

Summary for City of Plymouth

City of Plymouth Superfast and Fibre Coverage

Superfast 99%

City of Plymouth Speed Test Results (Mbps)

Estimated Maximum Mean Download Speed: 277.7 Mbps

This figure is based around everyone buying the fastest Virgin Media, KCOM or Openreach product available to them, based on current product availability. Distance limitations of ADSL2+ and VDSL2 are factored into the calculations.
JLP Councils PSWDJLP Examination Hearing Statement – Matter 4
3.2 Government policy ([www.gov.uk/guidance/broadband-delivery-uk](http://www.gov.uk/guidance/broadband-delivery-uk)).

<table>
<thead>
<tr>
<th>Guidance</th>
<th>Broadband Delivery UK</th>
</tr>
</thead>
<tbody>
<tr>
<td>From:</td>
<td>Department for Digital, Culture, Media &amp; Sport</td>
</tr>
<tr>
<td>Part of:</td>
<td>Broadband Investment, Communications and telecomms, European Union laws and regulation, and Government funding programmes</td>
</tr>
<tr>
<td>Published:</td>
<td>27 February 2013</td>
</tr>
<tr>
<td>Last updated:</td>
<td>19 December 2017, see all updates</td>
</tr>
</tbody>
</table>

Details of the plan to achieve a transformation in broadband in the UK

### Contents
- Overview
- Superfast Broadband Programme
- Local Full Fibre Networks Programme
- Benefits of broadband
- European funding for broadband
- Closed programmes

### Overview
Broadband Delivery UK (BDUK), part of the Department for Culture, Media and Sport, is delivering superfast broadband and local full fibre networks to the nation.

The Government is supporting investment to:

- provide superfast broadband coverage to 95% of the UK by December 2017
- provide access to basic broadband (2Mbps) for all
- stimulate private investment in full fibre connections by 2021

3.3 Connecting Devon and Somerset’s ambition ([https://www.connectingdevonandsomerset.co.uk/about-us/](https://www.connectingdevonandsomerset.co.uk/about-us/))
About Connecting Devon and Somerset

Who we are?

Connecting Devon and Somerset has been set up to deliver next generation broadband infrastructure to areas where the market has failed to invest. CDS is a local government-led partnership aimed at drawing on the strengths of each sector to implement a cost efficient plan to bring superfast broadband to Devon and Somerset.

The size and scope of the programme, and the time frames Central Government has allocated to the funding, has required more than one phase; the programme is nearing the completion of Phase 1 with all six Phase 2 contracts being signed and final coverage planning underway.

The programme governance is based on a collaborative approach led by the CDS Programme Board who meet quarterly ensuring that the programme is delivered in accordance with the Local Broadband Plan. The board includes cabinet members and chief executives from the Devon and Somerset Councils, CDS officers, representatives from the other authorities and central government’s Broadband Delivery UK (BDUK) team. To see Agendas and Actions relating to the boards decisions click here.

What are we going to do?

Our ambition is to provide superfast broadband speeds of over 24Mbps to all premises in the CDS area by 2020. Under phase one of our tax-payer subsidised programme, over 290,000 residents and businesses in Devon and Somerset have access to a superfast broadband connection, exceeding the government target of 277,000. The Government’s 90% target is heavily dependent on BT meeting its obligations under its own commercial programme.

By providing subsidies to homes and businesses for alternative solutions through our voucher scheme we also aim to ensure that every premise within the programme area has a broadband speed of at least 2Mbps. Phase two will be working to deliver superfast broadband services to the remaining hardest to reach premises. CDS has already begun delivering phase 2 in Dartmoor and Exmoor National Parks with the deployment of a fixed wireless superfast broadband network through partner supplier Airband. Gigaclear has recently been announced as the phase two supplier for four of six lots with the remaining two to be announced shortly.

CDS recognises that it is not simply about improving broadband speed, which is why we work closely with our support service, Get up to Speed. There are free workshops and talks to help both communities and businesses boost digital skills and make the most of faster internet speeds.
Foreword by Steve Hindley

Over the last year, the Heart of the South West Local Enterprise Partnership has been developing its strategy for economic development across our area. This plan sets out how we will maximise economic growth across our area to transform the prospects of the Heart of the South West and establish a legacy of prosperity for future generations.

We are one of 39 LEPs in England but we believe we have unique opportunities that set our area apart. The exceptional quality of our environment will provide a strong base for tourism and agricultural sectors, and attract new digital and technology companies to ‘Silicon’ South West. With the advent of Hinkley Point C, we will also be able to create a truly momentous shift in our approach, capitalising on construction, supply chain and skills opportunities.

Business is critical to achieving our ambitions. We will forge new connections and work with Government to secure greater inward investment, and harness our potential for export. Through our Growth Hub and working with other LEPs, we will enable business to reach new markets, innovate and expand, turning plans for growth into reality.

Our economy will be resilient, supported by investment into strategic and critical infrastructure to enable and protect our communities. Road, rail, air and maritime, alongside superfast broadband and 4G, will ensure that we can promote both real and virtual access for everyone, from urban spaces to rural landscapes.

Our City Deal will revitalise our marine sector, redirecting benefits across the entire Peninsula. It will boost our capacity for training and skills, motivating young people and mature workers alike, helping to build robust supply chains, and develop new solutions and sustainable jobs.

Through collaboration with our centres of academic excellence, we will nurture research and commercialisation, inspiring potential and rejuvenating our communities.

We acknowledge the challenges ahead. By working in partnership to create a dynamic and strong alliance, committed to securing the best for our people, we can overcome barriers, remove obstacles, and allow our communities to flourish as never before.

Steve Hindley
Chair
2.0 Transport Strategy Working Group (TSWG) – assessment of junctions which require further investigation/mitigation in response to the growth set out in the JLP

As part of Position Statement Two it was agreed that the results of the B3a scenario would be compared with the results of the B3 scenario and a revised list of junctions which need further investigation/mitigation would be prepared.

Appendix One lists the nodes/junctions within the Plymouth Policy Area (PPA) which the TSWG believe require further investigation and potentially mitigation. Appendix Two lists additional nodes on the Local Road Network which Plymouth City Council wishes to further investigate. Across both appendices there are 62 nodes spanning 37 junctions. This is a decrease of five nodes and an increase of three junctions when compared with Position Statement Two.

The data listed against the Nodes in Appendix One relates to the single worst performing turning movement at a particular node and not to the performance of the junction as a whole or of the performance of the route(s) of main interest to the Highway Authorities, as set out in section 3 below. The nodes in the appendices reflect these wider considerations and are a complete list of junctions the TSWG believe require further investigation/mitigation, at this stage.

Furthermore, it is important to emphasise that the exclusion of a particular node/junction from the list does not mean that transport interventions will not be deemed necessary when development proposals are brought forwards through the planning process. The strategic model does not substitute the need for development of specific transport assessments or mitigation.
The Government's ambition for cycling and walking in England

Our ambition for England
We want to make cycling and walking the natural choices for shorter journeys, or as part of a longer journey

1.6 The Government wants walking and cycling to be a normal part of everyday life, and the natural choices for shorter journeys such as going to school, college or work, travelling to the station, and for simple enjoyment. As part of our aim to build a society that works for all, we want more people to have access to safe, attractive routes for cycling and walking by 2040.
Summary

Walking and cycling are good for our physical and mental health. Switching more journeys to active travel will improve health, quality of life and the environment, and local productivity, while at the same time reducing costs to the public purse. These are substantial ‘win-wins’ that benefit individual people and the community as a whole.

This briefing has been written for transport planners, others concerned with the built environment, and public health practitioners. It looks at the impact of current transport systems and sets out the many benefits of increasing physical activity through active travel. It suggests that while motorised road transport has a role in supporting the economy, a rebalancing of our travel system is needed.

Some key messages when developing a healthy local transport strategy include:

- physical inactivity directly contributes to 1 in 6 deaths in the UK and costs £7.4 billion a year to business and wider society
- the growth in road transport has been a major factor in reducing levels of physical activity and increasing obesity
- building walking or cycling into daily routines are the most effective ways to increase physical activity
- short car trips (under 5 miles) are a prime area for switching to active travel and to public transport
- health-promoting transport systems are pro-business and support economic prosperity. They enable optimal travel to work with less congestion, collisions, pollution, and they support a healthier workforce

This guide suggests a range of practical action for local authorities, from overall policy to practical implementation. It highlights the importance of community involvement and sets out key steps for transport and public health practitioners.
APPENDIX NINE: SOFT MEASURES – HARD FACTS. THE VALUE FOR MONEY OF TRANSPORT MEASURES WHICH CHANGE TRAVEL BEHAVIOUR – DOH, HIGHWAYS AGENCY, NHS SOUTH WEST, TRAVELWISE, SOUTH WEST RDA, JANUARY 2011 (EXTRACT)

Key messages

- Travel behaviour change measures can provide very high benefits compared to costs, when measured by WebTAG, the Department for Transport’s method for evaluating transport investment.
- Changing how we travel can reduce the need for expensive infrastructure.
- Behaviour change measures can be implemented much more quickly than infrastructure projects.
- All measures achieve genuine carbon reductions (from 5kgs to 1500 kgs per person per year).
- Greater impact is achieved from careful targeting of people likely to change their behaviour combined with multi-measure programmes across age groups.
Our cycling vision

Our vision for cycling builds upon our overall aim which is to deliver a high performing strategic road network and the best possible service to road users.

In particular, we want to contribute to a connected, comfortable, attractive and high quality cycling network, suitable and safe for use by people of all ages and abilities.

Our guiding principles

To support the delivery of this vision, we have identified a number of key principles:

Planning for cycling – we will improve our capability to ensure the needs of cyclists are considered.

Improving cycling facilities – we will plan and deliver an investment programme to improve cycle facilities which are safe and separate from traffic. Over time we will improve the safety, convenience and environment for cycling.

Partnership working – we recognise the role of our partners and stakeholders in helping us to identify and support the delivery of cycling facilities and will work closely with them.

Impact – our cycling improvements will have a positive impact on communities, such as improving connections across roads that divide communities and providing an integrated and safe cycling network.

Direction of travel – we will play our part in delivering the Government’s ambition for cycling.

The benefits of increasing cycling investment

Cycling has many advantages over other types of transport, especially its environmental benefits; it causes negligible climate change, air pollution and noise. Increased levels of cycling can deliver a wide range of benefits to society, the economy and the environment.

Despite the benefits of cycling, many barriers, both real and perceived exist, including a lack of facilities, incoherent networks and a lack of information on where facilities do exist.

Cycling can play an important role in achieving our overall ambitions for the road network. Providing more attractive, safe, accessible and integrated cycling facilities will encourage cycling participation and remove some local motor vehicle journeys from our network. This will support the development of a more-travelled road network with fewer delays and better journey reliability, reduced environmental impacts, improved public health and greater sustainability.
APPENDIX ELEVEN: BRITISH CYCLING SKYRIDE INFOGRAPHIC, 2016
Buses on one of Plymouth’s busiest routes will be fitted with new technology designed to reduce pollution, thanks to a grant from the Department for Transport (DfT).

Plymouth City Council has been awarded almost £405,000 from the Clean Vehicle Technology Fund, which helps local authorities upgrade vehicles, reduce emissions and improve air quality.

The funding will be used to install ‘gyrodrive flywheel’ equipment on 16 RedFlash vehicles on the cross-city service 21/21A, run by Plymouth Citybus.

The flywheel gets electrically charged when the vehicle brakes and stores energy which the bus uses when it pulls away. The stored electricity can also be used to power heating and lighting on board.

This means greater fuel efficiency and fewer nitrogen dioxide (NO2) emissions – which is good news for air quality, especially on roads like Exeter Street and Royal Parade, where a significant proportion of vehicle emissions come from buses.

Exeter Street is one of the key routes in and out of the city and Royal Parade is the main bus interchange. The service 21/21A runs with high frequency along both roads, which is why it has been selected for the upgrade.

The £484,921 from the DfT will pay for 14 buses to be modified and Citybus is providing match funding for the additional two vehicles.

Councillor Mark Coker, Cabinet Member for Transport, said: “This is a practical measure that will help us reduce pollution and improve air quality along two of the city’s busiest bus routes and lower the risk of associated health problems. We hope it will also encourage operators to equip more vehicles with this sort of technology in the future.”

Richard Stevens, Managing Director Plymouth Citybus, said: “Citybus is delighted to partner the City Council on this exciting initiative. I am confident that once fitted there will be real benefits in terms of improved efficiency, reduced consumption and reduced emissions – a real win-win for residents, passengers and other road users.”

The flywheel equipment is expected to be in use on the buses by January 2016.