Plymouth and South West Devon Joint Local Plan Examination

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

JLP Councils

Matter 7 Policy Area Strategies: Plymouth
Issue 7.5: Other areas and sites within the PPA (Policies PLY58-PLY61) ........61
  Question 7.5(i) ..............................................................................................................61
  Question 7.5(ii) ..............................................................................................................61
  Question 7.5(iii) .............................................................................................................62

Issue 7.6: Housing delivery within the PPA (Housing site allocations, the housing trajectory and Policies DEV7, DEV11 and DEV12) ..................................................64
  Question 7.6(i) ..............................................................................................................64
  Question 7.6(ii) ..............................................................................................................70
  Question 7.6(iii) ..............................................................................................................71
  Question 7.6(iv) ..............................................................................................................72
  Question 7.6(v) ..............................................................................................................79
  Question 7.6(vi) ..............................................................................................................85
  Question 7.6(vii) ..........................................................................................................88
  Question 7.6(viii) .........................................................................................................91
  Question 7.6(ix) ..........................................................................................................94

Appendix 1 Schedule of Commercial Sites (Qu 7.2iii, 7.3i, 7.4i & 7.5i)
Appendix 2 Extract from Derriford and Seaton Area Action Plan Sustainability Appraisal (December 2012)
Appendix 3 Extracts from Inspector’s Report into Derriford and Seaton AAP relating to district centre location (23 August 2013)
Appendix 4 Copy of email relating to PLY39, Glacis Park
Appendix 5 Matter 7.4(v) Extract from BGS Survey data showing extent of Limestone
Appendix 6 Schedule of housing sites (Qu 7.6)
Appendix 7 Plymouth City Council large (5+) windfall approval sites and their current status
Appendix 8 Snapshot of Plymouth housing needs data
Appendix 9 Plymouth Fishing Industry Analysis
Appendix 10 Fish Quay SWOT analysis and functionality assessment
Appendix 11 Fish Market sales tonnages and values for the last five years
Appendix 12 Evidence relating to Plymouth market for industrial premises
Matter 7 Policy Area Strategies: Plymouth

Main issue - Does the JLP provide a robust framework for the delivery and management of development across the Plymouth Policy Area (PPA) that is justified, effective and consistent with national policy?

Evidence Base and other documents referenced in this Matter Statement

- Statement of Common Ground - Barwood (SCG1)
- Statement of Common Ground – Devon County Council (SCG2)
- Statement of Common Ground – Environment Agency (SCG3)
- Statement of Common Ground – Historic England (SCG4)
- Statement of Common Ground – Ministry of Defence (SCG5)
- JLP Councils Response to EXC2 (EXC3)
- Summary of Allocated and Rejected Sites (EXC3D)
- Schedule of Potential Modifications (EXC10A)
- Plymouth Plan Strategic Overview Topic Paper (PCC3)
- Plymouth Plan Housing Need and Supply Topic Paper (PCC12)
- At Plymouth Area Visions (JLP5)
- Integrated Assessment Appendix V (SUB9E)
- S Hams, W Devon etc Employment Land Review (EC1)
- Plymouth District and Local Centres Study (EC2)
- Plymouth Retail Centres Study (EC3)
- Plymouth Hotel Market Study (EC5)
- Plymouth Employment Land Review (EC6)
- Plymouth Employment Land Review Schedule of Sites (EC6A)
- Plymouth Retail Study (EC9)
- Plan for Playing Pitches (EN20)
- Plan for Playing Pitches Appendices (EN20A)
- Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment (EN22A)
- Landscape Impact Assessment of Potential Allocation Sites in the Plymouth Policy Area (EN27)
- Plymouth Greenspace Policy Development Process (EN31)
- Plymouth Policy Area Tree Canopy Cover Assessment (EN36)
- Plymouth City Wide District Energy Strategy (EN39)
- Strategic Flood Risk Assessment (F1)
- Strategic Flood Risk Assessment Level 2 (F4)
- Plan for Managing Local Flood Risk (F9)
- Flood Risk Sequential Exceptions Test (F11)
- Local Flood Risk Management Strategy (F11A)
- Local Flood Risk Management Strategy Appendices (F11B)
- Plymouth Strategic Housing Land Availability Assessment (HO2)
• Plymouth Strategic Housing Land Availability Assessment Appendix 6 (HO2F)
• Plymouth Strategic Housing Land Availability Assessment Appendix 7 (HO2G)
• Plymouth Strategic Housing Land Availability Assessment Appendix 8 (HO2H)
• Plymouth Sustainable Growth Study (HO5)
• Sustainable Growth Distribution Study (HO6)
• Strategic Housing Market Needs Assessment Part 1 (HO13)
• Strategic Housing Market Needs Assessment Part 2 (HO13A)
• Plymouth Student Accommodation (HO16)
• Heritage Impact Assessment (HE4)
• Housing Distribution Topic Paper (TP1)
• Plymouth Policy Area Housing Trajectory (TP3B)
• Plymouth Policy Area Housing Trajectory Updated March 2017 (TP3F)
• Plymouth Policy Area Housing Trajectory Agreement (TP3H)
• Plymouth Policy Area Housing Trajectory Revised (TP3(rev))
• Plymouth Eastern Gateway Framework Study (T1)
• Plymouth Eastern Gateway Framework Study Appendix 1 (T1A)
• Strategy Topic Paper (TP5)
• Port of Plymouth Study (T5)
• Port of Plymouth Study Volume 2 (T5A)
• Baseline Transport Conditions Report 2017 (T18)
• JLP Strategic Modelling Methodology Note (T19)
• Forecast Saturn Model Results Summary (T20i)
• Strategic Cycle Network (T23)
• Position Statement Two: JLP Transport Strategy Working Group (T25)
• Position Statement Four: JLP Transport Strategy Working Group (T27)
• Derriford Development Framework Evidence Report (SGA1)
• Reports on Proposed New District Shopping Centre, 2007, 2009 and 2011 (SGA2)
• Plymouth City Centre Strategic Masterplan (SGA4)
• Plymouth Waterfront Strategic Masterplan (SGA5)
• A Vision for Plymouth (O1)
• Infrastructure Needs Assessment (O9)
• Infrastructure Needs Assessment Appendix 3 (O9A)
• Plymouth Policy Area Education Infrastructure Evidence Base (O11)
• Minerals Topic Paper 1 - Spatial Strategy (O12)
• Minerals Topic Paper 2 - Safeguarding Mineral Resources (O13)
• 5th Devon Local Aggregate Assessment (O14)
Issue 7.1: The PPA strategic role (Policies PLY1-PLY5)

Question 7.1(i)
Is it clear how development proposals in the PPA will be assessed against policies PLY1, PLY2 and PLY3? Is the focus of development within the City Centre and Waterford Growth Area, the Derriford and the Northern Corridor Growth Area and the Eastern Corridor Growth Area within the PPA (Policy PLY2) justified and consistent with the overall spatial strategy?

Is it clear how development proposals in the PPA will be assessed against policies PLY1, PLY2 and PLY3?

7.1 Policies PLY1, PLY2 and PLY3 provide a clear context for decision makers who are assessing development proposals in the PPA.

7.2 Paragraph 154 of the Framework sets out that ‘Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.’

7.3 The Framework also sets out that:
- Plans should provide a practical framework within which decisions on planning applications can be made (para 17, first bullet point)
- Plans should set out a clear strategy for allocating sufficient land (para 17, third bullet point).
- 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)

7.4 The NPPG provides further guidance, setting out that ‘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.’ The NPPG goes on to say that ‘They should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them ....’ This guidance suggests a degree of local determination as to what a policy can include.
7.5 Given this guidance, the JLP Councils believe that policies PLY1, PLY2 and PLY3 are consistent with guidance in the Framework and NPPG, and that they do, in combination with other policies in the JLP, provide a clear indication to decision makers of how they should react to development proposals. To explain this point in more detail it is necessary to set out how the JLP is structured and contains a consistent strategy and approach to development across the plan area.

7.6 The JLP is set out in a logical way which explains how the whole plan area should be planned over the plan period. Clearly, all the policies in the JLP should be read together to guide a decision maker with regard to how development is envisaged to come forwards.

7.7 The first chapters of the JLP set out the overarching vision of what the JLP Councils are trying to achieve in Plymouth and South West Devon (Chapter 2), the broad Spatial Strategy which sets out the key drivers of the strategy that the JLP Councils are putting in place (Chapter 3) and finally the strategic policies (SPT policies in Chapter 4) which are the critical ‘golden threads’ running through the whole plan, and if delivered will ensure that the vision and spatial strategy are achieved. These SPT policies therefore deal with sustainable development, needs and spatial distribution for the Plan Area as a whole. (See diagram in Appendix 1 to Matter 2 Statement for illustration of this plan structure).

7.8 The following chapters then deal with the specific policies for the Plymouth Policy Area (PPA) and the Thriving Towns and Villages Policy Area (TTVPA), which interpret and expand upon the strategic policies set out in the SPT policies. In the case of the PLY policies, this includes setting out the spatial strategy for the PPA, and the strategic drivers which a decision maker should be aware of which affect the city.

7.9 Policies PLY1, PLY2 and PLY3 specifically are in a sub section called “Our policies for Plymouth’s Strategic Role.” This is a section of strategic policies that interpret the Spatial Strategy down to the level of the PPA, from which the site specific policies flow.
7.10 These policies are crucial to explaining how the policies for the PPA should be interpreted and delivered:

- Policy PLY1 sets out those parts of the city which are key to strengthening and enhancing Plymouth’s role in the wider south west region, if not nationally, and therefore spells out the broad uses which it is expected should be located in the City Centre, Waterfront and Northern Corridor areas of the city. The policy therefore provides a clear context for the site specific policies in these locations, and assist decision makers to understand the priority that should be given to strategically significant proposals coming forward in these parts of Plymouth.

- PLY2 introduces the spatial strategy in Plymouth, which focuses development at the City Centre and Waterfront, the Northern Corridor and the Eastern Corridor, and sets out that these locations are where the JLP Councils expect to see most of the housing and employment development take place. The policy therefore sets an important context for decision makers, assisting them to understand that proposals in these locations are assisting to deliver the overarching objectives of the JLP and the PPA. The policy also gives a clear steer to decision makers that proposals which do not assist in delivering this strategy and would in fact put at risk the fulfilment of the approach should be resisted.

- PLY3 is a clear policy setting out how the PPA strategy will be aligned with and supported by key stakeholders such as the LEP and the South West Peninsula City Deal. This is an important policy giving decision makers reassurance that the PPA approach is supported by regional stakeholders and city stakeholders with a regional presence, and that proposals which are strategically significant are supported and their delivery will assist in also delivering regional objectives.

7.11 Given this, we believe that it is clear that these policies give a strong context for a decision maker to use the JLP as a whole to assess development proposals. With this wider context in mind,
we think it correct to interpret Framework paragraph 154 as relating to how policies work in combination with each other.

7.12 Additionally, the JLP Councils, and Plymouth City Council in particular have historically tried to produce spatial plans which set out a clear strategy not only for those making decisions on development proposals, but also for decision makers who are investors, funding partners, local and regional stakeholders and local communities using the JLP to deliver their aspirations (e.g. the Plymouth Core Strategy 2007). In setting out clearly the strategic context, the aspirations of those involved in the growth of the city, and the alignment with wider regional agendas, these JLP policies will help build confidence and clarity for people and organisations whose efforts will contribute to the transformation of the city and the implementation of the Vision for Plymouth.

7.13 The hypothetical case of a proposal for a major out of centre shopping development on Plymouth’s urban fringe is used below as an example as to how the policies can be used to help a decision maker react to a development proposal.

7.14 What policies inform a decision maker about the strategic elements of the policy framework?

- The starting point is the Spatial Strategy (particularly SPT5 and 6)
- This is amplified in a PPA context in PLY1 – which affirms the key strategic role of the City Centre; and given extra teeth by PLY2 in relation to its commitment to defend against proposals that put this strategic role at risk. The policies therefore emphasise to the decision maker that the primacy of the City Centre is a key consideration of the JLP.
- PLY3 indicates that the approach in the JLP has support of the LEP and other stakeholders, and that contrary proposals would damage the partnership working to deliver regional objectives.
- PLY6 then sets out a positive strategy for the enhancement of the City Centre – which is important to a planning decision given that simply resisting bad development is not enough to deliver the plan’s strategy, we also need to commit to moving forward on the good.
• DEV16 provides the detailed development management provisions to enable all of the above to be realised or supported.

7.15 So whereas the decision maker might finally turn to DEV16, all of the strategic policies have been part of the overall decision making framework and each provides a clear reason for the decision maker to use to resist the inappropriate development.

Is the focus of development within the City Centre and Waterford Growth Area, the Derriford and the Northern Corridor Growth Area and the Eastern Corridor Growth Area within the PPA (Policy PLY2) justified and consistent with the overall spatial strategy?

7.16 The approach to focus development at the growth areas of the City Centre and Waterfront, Derriford and Northern Corridor, and the Eastern Corridor is justified and consistent with the overall spatial strategy.

7.17 The spatial strategy of the JLP aims to focus development primarily at the PPA, to reinforce and continue to deliver the City’s growth agenda that has been in place since the Vision for Plymouth (O1) in 2005.

7.18 This approach was assessed and explained in the Distribution of Development Topic Paper (TP1) which was consulted upon in November 2016, and was also subject to SA assessment both in the Topic Paper and in Appendix V of the Integrated Assessment (SUB9E).

7.19 The approach is explained further in the Strategy Topic Paper (TP5) which sets out the detail of the spatial strategy, but also explains that the JLP is continuing a strategic approach to growth which was established in previous plans and has been the focus of efforts to deliver the city’s growth agenda for the past 10 years (see the Vision for Plymouth O1, and the Plymouth Core Strategy 2007). A key element of the spatial strategy being pursued in Plymouth has been the three growth areas.
7.20 The approach of the three growth areas setting out how the PPA will accommodate and drive delivery of that growth is therefore entirely consistent with the over-arching JLP strategy.

7.21 Focusing growth at the three growth areas is a justified strategy. The approach has been subject to sustainability appraisal both in the Integrated Assessment accompanying the JLP but also in earlier sustainability appraisals prepared for the adopted development plan documents in the city.

7.22 The three growth areas were first set out in the development plan in the Plymouth Core Strategy which was adopted in 2007, and was then carried forward to delivery through a series of Area Action Plans. The approach was based upon numerous pieces of evidence, including:

- The Vision for Plymouth (O1)
- Plymouth Sustainable Growth Distribution Study (HO5)
- Sustainable Growth Distribution Study (HO6)

7.23 These studies all confirmed that there were key strategic and sustainability drivers for focusing development in the three growth areas:

- The City Centre and Waterfront growth area represents the heart of the city. It is the location which contains the commercial centre of the city, and which also has substantial areas of brownfield regeneration sites which should be utilised for strategic projects driving the transformation of the city – a number of which are now delivered or underway.
- The Eastern Corridor represents the link between Plymouth City Centre and the new community and Sherford, and represents the opportunity to improve linkages between the new community and the jobs and facilities found in the City Centre and Waterfront area. There are also significant brownfield sites, such as Saltram Meadow, which were planned to be brought forward to take advantage of the improvements to the corridor and which are now being delivered.
• Derriford and the Northern Corridor represents a part of the city where some key institutions and employment sites are found, such as Derriford Hospital, the University of St Mark and St John, Plymouth Science Park, the Plymouth International Medical Technology Park, and the site of Plymouth Airport. There are also large sites which are available for development, for example at Seaton Valley and Glacis Park, as well as the Derriford Community Park Strategic Greenspace. The opportunity in this growth area is to use the existing institutions, plus the available sites, to create a new heart for the north of Plymouth, providing a focus for people living to the north of the A38 and including new homes, jobs and a commercial centre. Again, the approach was embedded in the Core Strategy and many elements of the strategy are being delivered (e.g. Seaton Neighbourhood and the Derriford Community Park). The Northern Corridor is also subject to many strategically important infrastructure schemes aimed at improving movements along the A386 (see paragraph 2.24 of Infrastructure Needs Assessment O9), many of which are either completed (e.g. Marjon Link Road), underway (Derriford Transport Scheme), or at an advanced stage of delivery with funding secured (Forder Valley Link Road, Woolwell to the George).

7.24 The concept of these growth areas and the vision and strategy for delivering them is therefore reiterated and set out in the Plymouth Visions in Chapter 5 of the JLP.

7.25 Given that the approach to the growth areas is well established and delivery is well progressed, it is considered that adopting a completely different approach in the JLP would not be a reasonable alternative, and that therefore the strategy of focusing growth in the three growth areas of Plymouth is the most appropriate strategy.
Question 7.1(ii)
Is Policy PLY4 (Devonport Naval Base and Dockyard’s strategic role) clear about the area it covers? In relation to where MoD land is surplus to requirements, is it reasonable for priority to be given to seeking uses ‘which help deliver the plan’s economic growth objectives….’ or does the evidence justify a more flexible approach by referring to the plan’s growth objectives overall rather than just economic objectives?

Is Policy PLY4 (Devonport Naval Base and Dockyard’s strategic role) clear about the area it covers?

7.26 Policy PLY4 does not set out a spatial area for the Naval Base and Dockyard. This is because the policy is a strategic policy which is about protecting a strategic function of the Naval Base and Dockyard rather than, for example, a safeguarding policy protecting the land from development. The JLP Councils do not therefore feel it requires a site boundary. It is a policy that gives a strategic context for decision makers making assessments of proposals that could promote or harm the importance of the role and function that Devonport Naval Base and Dockyard play in the city.

7.27 Clearly, the Naval Base and Dockyard are one of the defining characteristics of Plymouth, being a strategic asset of national importance as well as being a key economic and social driver for Plymouth and the south west region. The intent of the policy is to emphasise this importance and to ensure that the JLP strategy fully recognises the context of the Dockyard to any applications which may impact on its functioning. In this way, the policy plays a similar role to Policies PLY1 – 3 as discussed under the previous question.

In relation to where MoD land is surplus to requirements, is it reasonable for priority to be given to seeking uses ‘which help deliver the plan’s economic growth objectives….’ or does the evidence justify a more flexible approach by referring to the plan’s growth objectives overall rather than just economic objectives?

7.28 The intent of the policy is to set out an approach to be used by decision makers when and if the Ministry of Defence decides to release surplus land – in the understanding that MOD land
release decisions can often be sensitive and may occur with little notice. The policy provides some guidance as to how the City Council could react to future land releases.

7.29 The policy sets out that land releases will be used to deliver the plan’s economic growth objectives and also to meet neighbourhood needs for new community spaces. The intent is to flag up that the use of any future land releases should contribute to not only delivering the city’s growth agenda, but should also have regard to local community aspirations. The reference to economic growth objectives therefore refers to economic growth in the wider context – i.e. to assisting to deliver the growth agenda of the city, which has always been described as an economic-led growth agenda. Therefore, if the most appropriate use for a land release was to support the growth of the city by providing new homes, this policy would not rule that out.

7.30 It is accepted that the wording of the policy may not accurately capture that intention, so the JLP Councils would be happy to accept a change which re-worded the policy to read; “which help deliver the plan’s growth objectives....”

**Question 7.1(iii)**

_Devon County Council has suggested changes to the wording in policy PLY5 and the supporting text, including in relation to the policy’s relationship with the Devon Minerals Plan and the deletion of point 7 which refers to development outside the city boundary. Are these changes necessary for reasons of soundness?_

7.31 The JLP Councils, and particularly the City Council as Minerals Planning Authority responsible for the policy, consider that Policy PLY5 is sound as written and the changes requested by Devon County Council are not necessary for reasons of soundness. However, we are content to agree some modifications if this helps clarify elements of the policy, as set out in the Schedule of Potential Modifications (EXC10A, references M28-M35), and the Statement of Common Ground with Devon County Council (SCG2), including a further modification identified below.
7.32 PLY5 is positively prepared policy which acknowledges the role of minerals infrastructure in a wider regional context, and seeks to complement the adjoining Devon Minerals Plan.

7.33 The approach in the policy facilitates the sustainable use of minerals, which are essential to support sustainable economic growth both locally and regionally. There is a need for mineral extraction within Plymouth as defined within the Local Aggregate Area Assessment 2016 (O14).

7.34 The designation of Minerals Safeguarding Areas (MSA), which are fully justified by evidence (OS12 and OS13) and have been supported by Mineral Operators, ensure that mineral development will be recognised and supported within the plan and that reserves will not be needlessly sterilised. Section 4.1 of Minerals Topic Paper 1 (O12) identifies that the limestone in Plymouth is of strategic importance as makes a significant contribution to delivering the need of sub-regional aggregates. There is therefore clearly a need to ensure the supply of limestone aggregate is safeguarded. Section 5.1.2 of Minerals Topic Paper 2 (OS13) makes it clear that MSA will be required to be used to safeguard Hazeldene Quarry to ensure that the a reliable supply of limestone can be secured.

7.35 The use of safeguarding of infrastructure is also achieved through the policy to ensure that the regionally significant port and wharves are maintained so that facilities are maintained for the export and importation of mineral resources required locally, regionally and nationally. Thereby supporting the economy and consistent with paragraph 143 of the Framework.

7.36 Through outlining the expectations that Mineral Operators will need to adhere to restore the land and aftercare as well as the mechanisms that will secure the delivery, the plan is positive in its approach to restoration. This ensures that ecological considerations as well as long term stewardship of environment are frontloaded to ensure that a balance between the economy and the environment is achieved when permitting mineral development. This is consistent with paragraph 143 of the Framework.
7.37 The plan recognises that there are locally distinctive buildings within the region that are constructed from minerals. For example Plymouth Limestone is high quality material which is evident on many historic buildings in the City. The policy therefore responds to this through identifying flexibility for extraction in locations where there is an identifiable finite supply of certain minerals.

7.38 In terms of impact on local residents the plan recognises that particular sensitivity and potential conflict can arise between mineral development and other uses. This is because of the methods of extraction can result in significant off site impacts through the use of heavy plant and machinery as well as explosives and other techniques. As a result this can be a disturbance to both operator, who need to extract resources where they occur, and neighbouring uses including residential uses, that expect the quiet enjoyment of their personal lives. As a result the plan seeks to ensure that appropriate mitigation and assessment of environmental issues to be provided by the Minerals Operators and enforced through regular monitoring and planning conditions.

7.39 It is recognised that Plymouth is a functioning modern City which provides for a whole variety of uses for the businesses and communities that it serves. This sets a particular context for the scale and scope of minerals extraction to ensure that it is compatible with the character and form of the City. This is because the distances between land uses is less than can be achieved in more rural and remote settings. A Minerals Safeguarding Area set within this context is defined on the Policies Map. This area is defined by the known identification of the minerals as identified by the British Geological Survey as well as a buffer zone to ensure that particular consideration is given to non-minerals development that could conflict with other more sensitive land uses. The constrained nature of the City is also important context for point 6 of the policy which is relevant in relation to open cast mining and consistent with paragraph 143 of the Framework.
7.40 Devon County Council suggested changes to PLY5 and its supporting narrative. Their representations have resulted in a series of modifications being put forward in document EXC10A (references M28, M30, M33, M35).

7.41 Devon County Council’s most substantive concern related to point 7. This point was included in PLY5 because of the potential for significant cross border impacts affecting residential communities and the city’s transport infrastructure.

7.42 Although we agree that it relates to development outside of the jurisdiction of the City Council in its role as Minerals Planning Authority, our view is that a policy should be able to set out considerations that we would wish a neighbouring minerals planning authority to consider where their decision has significant cross border implications. However, we accept too that this provision does not need to be stated within the policy itself and could be moved to the narrative that follows the policy. We are therefore happy to put this forward as an additional minor modification, and this has been agreed in the Statement of Common Ground. This change will be included in a Schedule of Further Modifications to be submitted alongside the Matter Statements.

7.43 Having said this we consider that the inclusion of point 7 (either in policy or narrative) is consistent with national policy. Specifically paragraph 144 of the Framework requires ‘that there are no unacceptable adverse impacts... and take into account cumulative sites and multiple impacts from a number of sites in the locality.’ In this regard development within close proximity to the administrative boundary could have an impact on infrastructure within the City and it is therefore justified that Policy PLY5 sets the position that the City Council will take on responding to consultations.

7.44 The access to the Strategic Road Network from many of the minerals uses located to the north east of Plymouth are required to travel through the local network of Plympton in order to get access to either the Marsh Mills or Deep Lane Junctions of the A38. The existing permissions for minerals development allow for both the extraction of minerals as well as the supply of JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
secondary aggregate. The tonnages permitted require exportation via the highway network through pinch points on the network as well as residential developments of Plympton.

7.45 As the City develops and grows there will be increased pressure on existing infrastructure and there will be the need for new investment. In order to maximise and coordinate investment and maximise the use of existing assets and new assets the provision of point 7 (in policy or narrative) explains that the City Council as adjoining Minerals Planning Authority will seek a solution to reasonably mitigate the impacts of the development on the local community as well as targeting investment to maximise the opportunities of growth.

7.46 Furthermore this approach is consistent with Policy M22 of the adopted Devon Minerals Plan 2011-2031. As part 3 of Policy M22 requires mineral development to be mitigated appropriately through vehicle routing, travel plan and or implementation of funding of improvements to transportation infrastructure, this is consistent with the approach being sought through including point 7 in the policy or narrative.
**Issue 7.2: City Centre and Waterfront Growth Area (Policies PLY6-PLY37)**

**Question 7.2(i)**

Would the inclusion of references within Policy PLY6, to such factors as the City Centre Masterplan, the Armada Way, connectivity between the City Centre and neighbouring areas, design codes, weather protection measures and flood defences, as suggested by some representors, be justified and necessary for effectiveness?

7.47 The JLP Councils consider Policy PLY6 to be an effective policy for the City Centre of Plymouth without the inclusion of factors suggested by some respondents for the reasons as set out below:

7.48 **City Centre Strategic Masterplan (SGA4):** The City Centre Strategic Masterplan was commissioned to provide the evidence base for the City Centre policy and site allocations and is already explicitly referenced in the policy’s supporting text. Further reference to the masterplan in the policy is considered unnecessary but could be justified and we would be happy to agree some changes as minor mods (as set out in the Schedule of Potential Modifications, EXC10A, reference M36).

7.49 **Armada Way:** Point 2 of the policy makes explicit reference respecting and celebrating the centre’s mid-twentieth century built heritage, including preserving and enhancing the Beaux Arts grid of the 1943 Abercrombie Plan. Armada Way is at the heart of this Beaux Arts grid being the widest and longest street in the plan and as such is afforded protection and recognition as an integral part of the grid. Building heights along Armada Way are set out in relevant site specific policies in the City Centre (PLY9-13). Explicit reference to Armada Way in the policy text is considered unnecessary but could be justified and we would be happy to agree some changes as minor mods (as set out in the Schedule of Potential Modifications EXC10A, reference M37). Reference to Armada Way in the strategic policy could help to provide some amplification of the purpose behind the building heights provision.
7.50 Connectivity between the City Centre and neighbouring areas: Point 10 of the policy specifically mentions movement in and around the City Centre to emphasise connection between the City Centre and its neighbours. Further reference to connectivity is considered unnecessary but could be justified and we would be happy to agree some changes as minor mods (as set out in the Schedule of Potential Modifications, EXC10A, reference M38).

7.51 Design codes: The City Centre Strategic Masterplan includes design criteria on a street by street basis across the entire City Centre. It is considered that this, when read as a supporting document to PLY6 and the relevant site allocation policies PLY7-PLY18, contains an appropriate level of site specific guidance for considering proposals for new development in accordance with Framework paras 57-61. Further design guidance is provided in DEV20. However, it is recognised that the City Centre Strategic Masterplan at p56 makes explicit recommendation for a Design Code to be written focusing on the City Centres mid-century heritage, raising design quality and shaping an architectural language. We have considered the use of a Design Code in accordance with Framework para.59 but consider that on balance it would be unnecessary and unjustified but that relevant additional design guidance if required should be contained within the emerging SPD.

7.52 Weather protection measures: Point 11 provides for a coordinated programme of investment in the public realm that delivers structured environmental improvements, creating a safe accessible and attractive environment for the community and visitors alike. Weather protection is one of a wide range of measures that could be accommodated as part of public realm enhancements. Explicit reference to weather protection in the policy text is considered unnecessary but could be justified and we would be happy to agree some changes as minor mods (as set out in the Schedule of Potential Modifications, EXC10A, reference M39).

7.53 Flood defences: Point 12 requires proposals that are resilient and respond to the challenges of climate change which includes flooding. Explicit reference to flood defences within the policy is
considered unnecessary but could be justified and we would be happy to agree some changes as minor mods (as set out in the Schedule of Potential Modifications, EXC10A, reference M40).

**Question 7.2(ii)**

*Is the proviso in point 6v. of Policy PLY6 that student accommodation is delivered as part of mixed use development a reasonable approach that is justified by the evidence?*

7.54 The City has taken a positive and proactive approach to the provision of high quality purpose built student accommodation (PBSA) in the City Centre over the last decade. Plymouth Student Accommodation (HO16, Table 2 on page 6) clearly shows that a significant number (7,749) of new bed spaces have been consented by the Local Planning Authority. There are 5,420 bed spaces in existing PBSA, 1,281 under construction and a further 1,048 with planning consent but not yet started.

7.55 The City Centre Strategic Masterplan (SGA4, p71) recognises the benefits that high quality purpose built student accommodation (PBSA) can bring to the City Centre but advises that the unchecked proliferation of this use might be counterproductive to the long term aims of the City Centre by making it more difficult to attract other land uses such as residential and office.

7.56 Our monitoring of the provision of PBSA in the City Centre and our close working with the Higher Education providers in the City tells us that the provision and pipe-line provision of PBSA in the City Centre is now sufficient to meet the identified demand from first year students that have the greatest requirement of this accommodation offer. However, we also recognise that there remains a strong market demand for PBSA and understand that it continues to be a major value driver for property development in the City.

7.57 The purpose of 6v is to continue to support PBSA in the City Centre where it can meet the tests of DEV12 and to use this high value use to deliver other less viable uses including office and residential and commercial ground-floor uses. Increasing
the diversity of uses in the City Centre is recognised in the City Centre Strategic Masterplan as essential for the long-term health and sustainability of the City Centre. Single use PBSA schemes would not contribute to the diversity of uses in the City Centre given the proliferation of PBSA already completed, under construction or with planning consent but not yet started.

7.58 The promotion of mixed-use developments is identified as one of the 12 core planning principles in para 17 (bullet 9) of the Framework, is important to the vitality of Town Centres in para 23 and is one of the attributes of good design in para 58 (bullet 3). The NPPG (Design) goes further recognising that the vitality of neighborhoods is enhanced by a mix of uses to attract people to live, work and play in the same area and goes on to explain the benefits of mixed use buildings that allow for different uses at different times (Para014). Para 015 sets out seven qualities of ‘well designed places’ which includes ‘mixed uses and tenures’. Para 041 provides specific guidance for Town Centre buildings which includes ‘active frontages and entrances that support town centre activities...[and] where appropriate they may help to diversify town centre uses and the offers they provide’.

7.59 We therefore believe that 6v is reasonable and justified and is a positive strategy to support the continued regeneration of the City Centre in accordance with the City Centre Strategic Masterplan, the Framework and NPPG.

**Question 7.2(iii)**

*In relation to the site allocations proposed for employment, retail, leisure and other commercial development within this growth area (housing site allocation questions are in 6.6 below):*

  - a. *Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?*
  - b. *Is the development deliverable in the timescales envisaged?*
  - c. *Do relevant site allocation policies take appropriate account of issues including design and the historic environment?*

7.60 The JLP Councils consider that all of the site allocations put forward in the plan are both justified and deliverable over the plan period, JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
and that they have adequately taken account of appropriate issues, having regard also to the Development (DEV) policies of the plan which are equally applicable to allocated as well as non-allocated sites.

7.61 A summary schedule of the reasons for allocation of each site can be found in Table 1 of the Summary of Allocated and Rejected Sites (EXC3D). Additionally, a schedule of commercial site allocations which responds to the specific questions raised by the Inspectors (with key documents sign-posted) can be found in Appendix 1 of this Matter Statement. Our responses are to be understood within the context of the approach we have taken to the identification of site allocations as explained below.

7.62 The approach we have taken to the allocations is considered to be consistent with the requirements of the Framework. The key elements of this approach include:

1. Identifying sufficient sites to meet any objectively assessed need identified (consistent with para 17 of the Framework, third bullet point, and para 157, fifth bullet point). This is especially important for housing and employment, and this is considered more fully in Matter Statements 3 and 5. In order to demonstrate that the plan does make adequate provision in relation to housing and employment, an indication of the appropriate quantum of development is identified in the site allocation policy (see para. 1.18 of the Submission JLP, SUB1).

2. Identifying only sites that are considered to be suitable for the particular type of development, preferring land of lesser environmental value (consistent with para 17 of the Framework, third and seventh bullet points, and para 110). Each allocated site has been assessed through the Sustainability Appraisal and is considered to be suitable for the purposes set out in the plan.

3. Identifying sites that are considered to be deliverable over the plan period (consistent with para 182 of the Framework, third bullet point). Para. 47 of the Framework deals with the question of housing delivery. It distinguishes between identifying a ‘deliverable’ five year supply of sites, and a ‘developable’ set of sites outside of this five year period.
Footnote 12 says that a site is ‘developable’ where ‘there is a reasonable prospect that the site is available and could be viably developed at the point envisaged’.

The Framework is silent on the matter of a deliverability test for non-housing developments. Local authorities are expected to have a general understanding of possible obstacles to delivering commercial land uses, including viability. But, unlike housing, they are not under specific requirements to predict the timing of delivery, or demonstrate that sites are deliverable / developable according to precise criteria or within a given time frame. Instead, delivery of commercial uses relates to the plan period as a whole and there is no requirement that sites be viable now or in the next five years.

The JLP Councils consider it reasonable to assume that a test more akin to the ‘develop-ability’ test is therefore appropriate. This is not considered to conflict with para 173 of the Framework which is about the deliverability of the plan as a whole, and ensuring that there are not undue policy burdens in the plan to make its allocations unviable.

It is noteworthy that the commercial property market works differently to the residential market. Consequently, the achievability of commercial sites remains important but this requires a different method to the viability assessments which often suggest that speculative development for employment uses is not viable, because the open market value of the completed development would be below the cost of delivering it. The implication is that the development would not be worthwhile for an institutional investor. But for an owner-occupied or pre-let development, the same scheme may well be worthwhile. The upshot is that many sites may be successfully developed for commercial uses when a standard viability assessment would suggest that they are not viable for such development. This may be because the property is worth more to the business than its open market price, for example because its location or other features are an especially good match to the requirements of a particular business. Such considerations cannot be captured in a standard viability appraisal, because they are specific to individual occupier businesses and individual sites.
4. Using evidence about a site’s availability in considering whether to allocate the site (consistent with para 159 of the Framework, second bullet point; and para 161, second bullet point). This is particularly significant in relation to housing uses and the need to demonstrate a five year housing land supply.

5. Identifying a range of sites to meet the scale and type of retail, leisure, commercial, office and other uses; particularly to ensure that needs for these uses are not compromised by limited site availability (consistent with para 23 of the Framework, 6th bullet point). Although the Framework advocates this principle particularly in the context of town centre uses, the JLP Councils consider that this is a generally helpful principle, particularly in relation to employment uses generally (as considered in Matter Statement 5). The Councils consider it important to identify a range of suitable sites to provide flexibility for the market to meet the growth and sustainable community needs of the area, highlighting the investment opportunities that are available. In this respect the site allocation strategy is positive rather than restrictive.

6. Identifying sites as part of a positive planning strategy to promote development opportunities, to provide the market confidence about the investment opportunity (consistent with para 157 of the Framework, fifth bullet point).

7. Positively planning for flexible use of land where appropriate, e.g. through mixed use allocations which might be less prescriptive about a balance of uses where appropriate (consistent with para 157 of the Framework, fifth bullet point).

8. Providing guidance to the appropriate level on matters such as form, scale, access and quantum of development, without unnecessarily repeating provisions of other policies in the plan and being over-prescriptive (consistent with para 157 of the Framework, fifth bullet point). Our intended approach has been to only add points / criteria to site allocation policies where we feel it is helpful to identify something
specific which may already be covered generically in a DEV policy.

**Question 7.2(iv)**

*Is the inclusion of flood risk strategy/management provision within Policies PLY23-PLY26, PLY29 and PLY35 reasonable and justified or does Policy DEV37 adequately cover this issue?*

7.63 In each of these cases we consider that Policy DEV37 does adequately cover the issue. Policy DEV37.3ii makes clear reference to the Local Flood Risk Management Strategy (LFRMS) (F11A parts I and 2 and F11B Appendices) and the flood protection standards contained therein, in general and for these specific sites. Hence, the flood risk issues on each site are adequately covered by the DEV37 as it stands.

7.64 However, as these sites do have specific identifiable needs (see below) we have no objection to incorporating minor modifications to into these policies, and it may be helpful to do so. See Schedule of Potential Modifications (EXC10A, references M52-M55, M58 and M76) and the Statement of Common Ground with the Environment Agency (SCG3).

7.65 **PLY23-PLY26**: These sites are in Sutton Harbour area. The City Council has jointly with the Environment Agency identified a need to upgrade the existing flood defences to take account of the effects of climate change (sea level rise and increased storminess in this instance). To do so requires a common strategy (Sutton Harbour Development Guidance – Flood Risk Management For New Development, February 2016) which has been incorporated into the LFRMS (F11A, s4.4 and F11B, Appendix F).

7.66 **PLY29**: Millbay waterfront area is vulnerable to both surface water flooding, because parts are below high water level and drainage can become tide-locked, and to coastal flooding especially during storms when waves can overtop defences. These vulnerabilities are detailed in the LFRMS (F9 s2.4 page 15-16 ‘Millbay and City catchment’; and F1: s12.17-21 pp68-76; & F4: s9 p75 for underlying technical analysis).

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
7.67 **PLY35**: Coastal flooding can be caused by sea level rise and by wave action, to both of which Drakes Island is highly exposed. Climate change intensifies risks of both. These vulnerabilities are detailed in the LFRMS (F9 s2.4 page 18 'Sutton and Laira catchment'; and F1: s12.14 p62 & F4: s8 p63 for underlying technical analysis).

**Question 7.2(v)**

Policy PLY27 relates to a site allocation within the Hoe Conservation Area. Is it in accordance with national policy on conserving and enhancing the historic environment and legislation relating to conservation areas? Are amendments suggested by Historic England necessary for reasons of soundness?

**Is it in accordance with national policy on conserving and enhancing the historic environment and legislation relating to conservation areas?**

7.68 It is considered that Policy PLY27 is sound and in accordance with national policy on conserving and enhancing the historic environment and legislation relating to conservation areas.

7.69 Paragraph 131 of the Framework says that local planning authorities should take account of the desirability of development "sustaining and enhancing the significance of heritage assets“ and "making a positive contribution to local character and distinctiveness”.

7.70 Framework Paragraph 137 says that local planning authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance and that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

7.71 Paragraph 129 says that local planning authorities should identify and assess the significance of heritage assets and take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.
7.72 The Planning (Listed Buildings and Conservation Areas) Act 1990 defines a conservation area as “an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance” [Para 69].

7.73 The 1943 Abercrombie & Watson Plan for Plymouth suggested the idea of landmark buildings to mark the approach to the Hoe. The Plymouth Waterfront Strategic Masterplan (SGA5, Masterplan Opportunity 20, Page 27) identifies the opportunity for a landmark building on the site. A high quality, sensitively-designed tall building would be positive and assist with way-finding in terms of widely marking the strategic southern gateway to Plymouth's most important street. Not including a positive proposal for this strategic gateway site would be a missed opportunity to support the City Vision.

7.74 The Heritage Impact Assessment (HA4, PLY27 p31) says that “The current building ... has a negative impact on the street scene” and “proposals to replace the building with something that responds positively to the Hoe Conservation Area and other heritage assets is an appropriate strategy for the site and will ensure that any proposed development is in line with points 126, 128-136 and 140 of the Framework and the Local Plan policies.”

7.75 Point 1 in Policy PLY27 says that redevelopment must respond positively to the Hoe Conservation Area's historic character and requires a detailed heritage character assessment. The supporting text in 4.110 says any proposal must be sensitive to the historic context in terms of height, massing and orientation. Policy PLY27 is therefore considered compliant with the Framework – there is no heritage asset on the site itself and the policy requires a positive response the historic context (informed by a detailed heritage character assessment) and presents the opportunity to enhance the Hoe Conservation area (Framework Para 9 - seeking positive improvements in the quality of the historic environment by replacing poor design with better design, Framework Para 137 - LPAs should look for opportunities for new development with Conservation Areas [....] and within the setting of heritage assets to better reveal their significance).
Are amendments suggested by Historic England necessary for reasons of soundness?

7.76 The amendments suggested by Historic England – including the use of the words "preserve" and "enhance" are not considered necessary for reasons of soundness and we consider that Policy PLY27 achieves the objectives of national legislation and policy without (as NPPG advice suggests) reiterating policies that are already set out in the Framework.

7.77 However, we are content to agree some modifications if this helps clarify elements of the policy, as set out in the Schedule of Potential Modifications (EXC10A, references M56 & M57) and the Statement of Common Ground with Historic England (SCG4).

Question 7.2(vi)
Is the use of the term ‘respects’ in point 3 of Policy PLY30 and point 4 of Policy PLY31 consistent with national policy in relation to heritage assets? Should the policies be amended as suggested by representors?

7.78 We do not consider that this is a matter of soundness. The Framework says that in drafting policies local planning authorities should “avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.” For this reason we did not seek to copy the precise wording of the Framework. We felt that the word “respects” could be interpreted as being entirely consistent with the language the Framework uses – such as “preserve”, “conserve” and “enhance”. After all, a development would only respect its historic character if it did these things as appropriate to the scheme. We therefore consider that Policies PLY30 and PLY31 are sound.

7.79 However, we are content to agree some modifications if this helps clarify elements of the policy, as set out in the Schedule of Potential Modifications (EXC10A, references M59 & M62) and the Statement of Common Ground with Historic England (SCG4).
**Question 7.2(vii)**
Does Policy PLY32 take adequate account of the operation of Millbay port?

7.80 Policy PLY32 is considered sound as it stands and Points 8 and 12 are considered sufficient to safeguard the operation of the port. Point 8 says that development should provide for “Design and juxtaposition of uses that responds to the continued and expanded operation of the Millbay port, with appropriate noise mitigation measures provided in development.” Point 12 says that development should provide “Delivery of an access strategy to ensure that the transport impacts of the development are appropriately managed and mitigated, having regard also to the operation of the port.”

7.81 However, a minor but unnecessary change has been agreed as requested by Ministry of Defence (Defence Infrastructure Organisation) to replace the word “Millbay” from Point 8 with “ferry” as part of the Statement of Common Ground (SCG5) and is put forward as a minor modification (EXC10A, reference M70).

7.82 A further minor change has been agreed at the request of DIO to delete the words “having regard also to the operation of the port” from the end of Point 12. It is considered that this change can be accommodated without affecting the substance of the provision and this forms part of the Statement of Common Ground and is put forward as a minor modification (EXC10A, reference M73).

**Question 7.2(viii)**
Reference is made in Policy PLY36 to sites within conservation areas and the need for design to be in keeping with historic features. Is this approach consistent with national policy?

7.83 Specific reference to Conservation Areas is made in relation to PLY36.2 and 3, both of which are found in the Devonport Conservation Area.

7.84 These site allocations have been informed by the Heritage Impact Assessment (HE4).

- For PLY36.2, Site Selection Methodology Step 5, Page 48. PLY36.2 Points 1 and 2 have been added accordingly with...
regards to the need for development to be in keeping with historic features and to require archaeological recording of the Cold War bunker if it is to be removed.

- For PLY36.3, Site Selection Methodology Steps 1-5, Pages 49 and 50. PLY36.3 Points 1, 2, 3 and 4 have been added accordingly to require development to be in keeping with historic features, be carefully designed to avoid some harm to heritage assets, retain historic boundary walls and avoid with historic Devonport Dock Lines.

7.85 We are aware that the specific phrase ‘in keeping with’ is not used in the Framework. However, we believe the allocations are nonetheless consistent with the Framework which calls for a positive strategy for the conservation and enjoyment of the historic environment and the positive contributions they make to the character of a place (para 126). We have also been mindful of NPPG advice that ‘In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.’

7.86 However, we are content to agree some modifications if this helps clarify elements of the policy, as set out in the Schedule of Potential Modifications (EXC10A, references M78 & M79) and the Statement of Common Ground with Historic England (SGA4).

**Question 7.2(ix)**

*Does the evidence justify the infrastructure measures for the growth area as set out in Policy PLY37? Have any additional measures been identified?*

7.87 We believe that the evidence does justify the measures set out. All the infrastructure measures identified in Policy PLY37 are contained within the Infrastructure Needs Assessment (O9, Appendix 3) which in turn is a key element of the JLP Councils’ robust infrastructure planning process. Further details of the infrastructure planning process are contained within Hearing Statement Matter 4.

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
7.88 Other infrastructure measures relevant to this Growth Area are referred to in other JLP Policies and all are brought together for ease of reference in JLP Annex 1. These are:

- Modernised and accessible Port Infrastructure, safeguarding existing facilities (Policy SPT8)
- Major improvements to Plymouth Station (Policy SPT8, PLY16)
- History Centre (The Box) (Policy PLY18)
- Significant improvements to Central Park (Policy PLY19)
- Sutton Harbour trail (Policy PLY23, 24, 25, 26)
- Enhancement of Sutton Harbour Fish Quay and Market (Policy PLY26)
- Water Transport infrastructure (Policy PLY20, 29)
- Re-provision or refurbishment of Millbay Arena (Policy PLY31)
- South Yard (Oceansgate) (Policy PLY33)

**Question 7.2(x)**

Is it appropriate to identify and set out within the JLP ‘opportunity sites’ in this growth area (p109 of the JLP)?

7.89 The inclusion of Opportunity Sites is not necessary for the soundness of the plan, but it is considered helpful to identify potential longer term opportunities where there is no evidence to support their deliverability within the plan period but which, if circumstances allowed, could still come forward. This will help give potential investors and land owners confidence about pursuing actions that might help bring the sites forward either in the longer term or, potentially earlier, if delivery obstacles can be overcome.

7.90 The sites identified are only those which are high profile in nature, such as the Royal Citadel, which was announced for closure in 2024 as part of the ‘Better Defence Estate Review’, November 2016, and is considered briefly in the Waterfront Strategic Masterplan (SGA5-site 21 on page 27); or which could have a transformational impact supporting the city’s growth agenda (e.g. City Centre sites which are also considered through the City Centre Strategic Masterplan and sites in the Sutton JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
Harbour area which have previously been considered through the Sutton Harbour Area Action Plan).

7.91 We think having a longer term perspective in the plan, beyond the plan period, is appropriate and consistent with the Framework’s comment that Local Plans should reflect the vision and aspirations of local communities (para. 150) and should be aspirational but realistic (para 154). By including the sites as Opportunity Sites we are showing both aspiration and realism - in that we recognise that it would be unrealistic to allocate these sites as deliverable within the plan period but it is realistic to assume that over a longer time frame the site deliverable propositions could be achieved.

7.92 We also note that NPPG says that ‘Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required.’ The use of Opportunity Sites within the PPA fits well with the local context for Plymouth, which has for many years had a radical growth vision which the City Council and its partners are very active in promoting. In this respect it would be somewhat out of alignment with this positive approach if the plan was silent on significant longer term opportunities – especially when they relate to long standing aspirations that the City has had.
**Issue 7.3: The Derriford and Northern Corridor Growth Area (Policies PLY38-PLY41 and PLY43-PLY47)**

**Question 7.3(i)**
In relation to the site allocations proposed for employment, retail leisure and other commercial development within the Derriford and Northern Corridor Growth Area (housing site allocation questions are in 6.6 below):

a. Is the type and amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

b. Is the development deliverable in the timescales envisaged?

7.93 Our approach to the identification of site allocation policies in the context of the Framework is set out in response to Question 7.2iii and is not repeated here.

7.94 The responses to the Inspectors’ questions are identified in Appendix 1 at the end of this Matter Statement.

**Question 7.3(ii)**
Is the location of the new district centre – Derriford commercial centre – in Policy PLY38 justified? Is it necessary for the policy to include reference to retail impact assessment and sequential test thresholds set out in Policy DEV16?

**Is the location of the new district centre – Derriford commercial centre – in Policy PLY38 justified?**

7.95 The delivery of a new district centre in the Derriford area is a long standing aspiration for Plymouth and was first identified as a policy objective in the Plymouth Core Strategy, which was adopted in 2007.

7.96 The Core Strategy did not allocate sites, instead leaving that task to Area Action Plans (AAPs). However, it did at the time anticipate that the district centre would be ‘centred’ on the west side of the A386 – where there was a considerable area of underused land. The Area Vision diagram for the Derriford area showed that the centre might however also incorporate land on
the east side of the A386.

7.97 The Derriford and Seaton AAP was intended to be the vehicle for determining the precise site of the district centre. However, the AAP was being prepared in a rapidly changing context, with a challenging national economic situation affecting development viability and a reducing quantitative demand for retail development influenced also by a growing trend of internet shopping. This led the City Council at the time to undertake a series of studies in relation to the retail capacity, the need for and nature of the district centre and the consideration of the different site options. It also resulted in the need for two separate Regulation 19 consultations (in 2011 and 2012) before the AAP was submitted (in December 2012).

7.98 The question of which site to allocate was one of the most hotly contested issues for the AAP. In total, 4 different sites within Derriford itself were under consideration as reasonable alternatives, and Sutton Harbour Holdings put forward as a fifth alternative the Plymouth Airport site.

7.99 Appendix 2 to this Matter Statement includes a table taken from the Derriford and Seaton AAP Sustainability Appraisal. It provides a summary of these alternatives and what the evidence base documents said in relation to each. The alternatives were:

- The former Seaton Barracks parade ground (east of A386) – this became the LPA’s preferred site and was put forward in the Submission AAP.
- The South West Water site (west of A386) – now known as Glacis Park
- B&Q site / Crownhill retail park (west of A386).
- North West Quadrant site (east of A386).
- Plymouth Airport site.

Appendix E of the Plymouth Retail Study (EC9) includes a map to locate each of these sites.

7.100 Notwithstanding the Core Strategy’s provision for a district centre ‘centred’ on the west side of the A386, it is clear from the analysis set out in Appendix 2 that by the time of the AAP the evidence base was pointing to an alternative conclusion. The
Core Strategy Inspector was indeed clear in his report that the actual location could only be determined on the basis of further evidence that would come through the AAP process, and that his findings at the time were on the basis of the information he then had. In para 3.22 of the Examination Report he said: ‘The debate on the main location for the new centre at Derriford highlights the need for those with interests in the area to wait until the proper survey, analysis and plan work has been completed before commitments are made that might prejudice the long term development of Derriford.’ This point was accepted by the Derriford and Seaton AAP Inspector, in para 46 of his report. (See Appendix 3 to this Matter Statement, which includes the relevant extracts of the inspector’s report on the question of the location of the district centre).

7.101 Key factors determining the view taken in the Submitted AAP that the former Seaton Barracks parade ground was the preferred site included the better relationship of sites to the east of the A386 to the hub of activity at Derriford Hospital and Plymouth International and Medical Technology Park (PIMTP), a better location in relation to transport, and deliverability, which was a major stumbling block for the sites to the west in particular.

7.102 The Public Examination into the AAP was held between 21 and 28 March 2013. The AAP was ultimately found unsound. Key points to highlight in relation to the AAP Inspector’s consideration of the alternative locations for the district centre include:

- **Glacis Park**: The Inspector recognised concerns regarding the deliverability of the site within reasonable timescales (para 51).
- **North West Quadrant**: The Inspector concluded that there was insufficient evidence that transport issues that were of concern to the Council at the time could not be dealt with on a site specific basis (para. 56).
- **Plymouth Airport site**: The Inspector agreed with the LPA that the airport’s geographic position, away from the more central locations of Derriford, was a limiting factor as to its suitability to accommodate the district centre.
(para 59), and that the current evidence did not support a robust conclusion that it is a better reasonable alternative than the other sites (para. 60).

- **Former Seaton Barracks Parade Ground**: The Inspector acknowledged that this site had sufficient size and scope for expansion into the Derriford Business Park area (para. 63) and that it is a deliverable site (para. 64). However, in the absence of wider consideration of the need for the site for employment purposes (no city wide employment land review took place as part of the AAP process) he felt that there was a question mark which constrained its acceptability for district centre use at that time (para 64).

- **Conclusion**: The Inspector agreed with the qualitative need for the centre but felt that the issue of location was a finely balanced judgement (a view that the LPA also agreed with). The Inspector particularly drew attention to the North West Quadrant alternative in his concluding comments (para 65).

**7.103** Although at the time of the AAP there were potentially 5 sites under consideration, this is no longer the case:

- Sutton Harbour Holdings are now pursuing a residential-led mixed use development for the Airport site and have put forward their aspirations for this site in a representation ID1256.
- No landowner or developer is promoting the Crownhill retail park site for the west of the A386.
- Notwithstanding their representations at Regulation 19 stage of the JLP, Dawnan, South West Water and Stuart Partners are now also pursuing a residential-led mixed use development, which is what is supported by Policy PLY39 of the JLP. See Appendix 4.

**7.104** The North West Quadrant and former Seaton Barracks Parade Ground sites, which were formerly identified as separate options, are now considered to provide a combined opportunity to deliver the district centre as part of a wider concept of a Derriford commercial centre. Policy PLY38 covers both of these sites and links them with the longer term opportunity of incorporating Derriford Business Park into the centre.
7.105 The reason for this approach is summarised in ‘At Plymouth’ Area Visions (JLP5, pages 16-19) and is justified in the Plymouth Retail Study (EC9, particularly paras 4.49-4.65).

7.106 Furthermore, it is considered that the remaining uncertainties that the AAP Inspector had identified in relation to these two sites (uncertainty over transport infrastructure for North West Quadrant and over employment land need for the Parade Ground site) have been addressed. The Derriford Transport Scheme and its reconfiguration of Derriford roundabout is now nearing completion. An Objectively Assessed Need for employment land has been established through this JLP process with a more than adequate supply of sites to meet this need (see Matter 5 Statement).

Is it necessary for the policy to include reference to retail impact assessment and sequential test thresholds set out in Policy DEV16?

7.107 Policy PLY38 forms a key part of the strategy for Derriford and the Northern Corridor, the provision of the District Centre as part of the Commercial Centre is also an important part of the retail strategy set out in SPT5 and SPT6. The centre will help improve the spatial distribution of retail facilities to support local communities and provide increase access to food retail provision in the North of the City and Derriford in particular.

7.108 Given this approach there is a need to include provisions to control the scale of retail which might be located in the District Centre, particularly in relation to comparison goods and managing impacts on the City Centre and other centres. This is a continual theme running through the retail evidence base, including the Plymouth District and Local Centres Study 2011 (EC2, paras 7.6-7.9), the Retail and Centres Study (EC3, paras 6.42-6.60), and the Derriford and Seaton Area Action Plan Reports on Proposed New District Shopping Centre (SGA2, Section 7 and specifically paras. 7.28 and 7.46-56 of the 2011 study).
7.109 These evidence base documents were all considered in the Plymouth Retail Study 2017 (EC9) which provides a comprehensive up-to-date review of the proposed centre. Section 4 of EC9 considers the strategy for Derriford in detail providing an up to date assessment of the requirements for the centre. Paragraph 4.23 identifies the historical concern through the previous evidence base documents over the potential impact of the centre on the City Centre and other centres and considers this concern remains relevant particularly for comparison goods in relation to the implications on the City Centre. It is for this reason that the policy includes a requirement for both sequential test and impact test to ensure that the centre in coming forward does not cause unacceptable impacts. This approach set out in PLY38 is considered to be based on up-to-date and relevant evidence which accords with the approach set out in paragraph 158 of the Framework.

7.110 In terms of the requirement for an impact assessment, paras. 4.27-4.47 of EC9 advise that the amount of comparison goods and leisure floorspace within the new centre should be limited, in order that it is complementary to the role and function of the City Centre. The study also identifies the potential for unintended consequence from setting a floor space threshold in the policy. (para 4.38 and 4.47), justifying why it is appropriate to not define a specific floorspace figure for retail and leisure space. The study indicates the range of factors which should be taken into account when determining future planning applications including specifically the requirement for an impact assessment. This approach also ensure that where in the future changes of use or alterations to the ranges of goods sold (where controlled by condition) can also be considered to establish if these changes would alter the roll and impact of the centre. This allows a continued management of the centre to ensure the Hierarchy of Centres and the primary role of the City Centre is maintained.

7.111 The question of the need to include provisions for impact testing was also considered in the Derriford and Seaton AAP Public Examination. A relevant extract from para. 43 of the Inspector’s report is shown below:
'The 2012 Study has considered the impact of the Plan proposals upon the existing retail offer of the city. The greatest impacts, when considered in isolation or in conjunction with other city developments, are identified to be on the other nearby District Centres albeit of a scale that, in terms of the immediate time frame of the Plan, would not appear to be fundamentally harmful. The Council has suggested alterations to Proposal DS16 which would clarify the need for specific Retail Impact Assessments in association with planning applications for retail development at the District Centre and potential measures to control the unit sizes and their use. Such means would enable the Council to react appropriately to the details of specific proposals to ensure the wider impacts arising from the District Centre upon the retail hierarchy of the city are not unacceptably adverse. In particular, it will be imperative for the Council to ensure, through any Retail Impact Assessments, that the District Centre complements the primary retail function of the City Centre. The evidence does not justify a more prescriptive and potentially inflexible approach.'

7.112 The requirement for a sequential test is identified to ensure that the opportunity for retail development to be located in sequentially preferable locations has been considered. In most cases, given the site’s district centre designation, this will be a simple approach where the primary catchment areas for the proposal is limited to the Northern part of the city. However for proposals which are of a scale which could have a wider catchment and particularly city wide primary catchment area, it is important that City Centre and potential site within it are also considered. This provides another policy tool to ensure that while the proposed Derriford District Centres is supported in coming forward, that is managed in a way that maintains the City Centre being the regional centre for the JLP plan area as set out in Policy SPT6.

7.113 In conclusion we consider that there is a clear justification for including the impact and sequential test elements of DEV16 in PLY38 and for such considerations to be a requirement on the centre and proposals associated with it, and that this approach
accords with paragraph 161 of the framework. The approach is considered positive and promotes competitive town centres in a way which manages the growth and scale of the district centre in a way which maintains the City Centre in its primary role. This also accords with the guidance in paragraph 23 of the Framework. The approach is therefore considered justified as the most appropriate strategy to manage the proposed centre coming forward and is effective and consistent with national policy.

7.114 The location of the district centre in Policy PLY38 is therefore considered to be well justified by the evidence.

**Question 7.3(iii)**

*How has the boundary of the Derriford Community Park Strategic Greenspace (Policy PLY41) been determined and is it justified?*

7.115 The boundary of the Derriford Community Park Strategic Greenspace has been determined through evidence-based studies. The greenspace boundary has undergone extensive consultation as part of a masterplanning exercise and has been amended where it was deemed appropriate. This justifies the boundary as proposed.

7.116 The boundary of the Strategic Greenspace has been developed using many evidence-based studies that have refined and the boundary to ensure that it is appropriate and justifiable.

7.117 The Derriford Community Park and One Planet Masterplan Study 2012 (detailed as an evidence document in document EN31 Plymouth Greenspace Policy Development Process 2017 – Table 1 page 3) summarises how the master planning work for the Park, including defining the boundary was developed and evolved utilising information contained within previous evidence base studies.

7.118 The 2012 Masterplanning study used the previous studies and an extensive consultation process to define and justify the Park boundary that is now being proposed for the Derriford Community Park Strategic Greenspace Boundary.
7.119 This work included a review of all existing evidence and the development of six topic papers to bring together all evidence relating to the Park (a link to these topic papers can be found in table 1 on page 3 of document EN31).

7.120 These topic papers and the draft masterplan went through a 6 week consultation process where members of public, stakeholders and landowners were all encouraged to provide comments and suggested amendments. Nine community consultation events were held during this period and people were encouraged to submit comments online, by email and through completion of a paper consultation form.

7.121 The Park also formed part of the Derriford and Seaton AAP, which although not adopted did go through all of the consultation processes and was considered at public examination. The Inspector commented on the Park in his report and stated:

- para 92 ‘The Proposal aims to deliver around 770 homes, a new local centre, additional employment provision, additional educational capacity, the FVLR and the dedication of land for the commendable aims for the Community Park. The evidence sources support the principle and content of the allocation and have included consideration of the topography constraints and opportunities of the area.

- Para 126 - ‘Strategic Objective 6 relates to enhancement of the natural environment and complements the aims of the CS. The evidence base identifies that character and green space potential of the Plan area and, in conjunction with various bespoke studies, is supportive of Proposal DS20 as it relates to Derriford Community Park. The evidence indicates that the net effect of the proposed Community Park will have a positive effect upon the natural environment of the locality.’

7.122 The Masterplan consultation in 2012 resulted in amendments to the Masterplan. The most significant change, as a result of the consultation, was the re-definition of the boundary at the eastern edge of the Park. This was done to ensure a better relationship between the Park and the proposed new Seaton Community that will be developed adjacent to the Park.
7.123 The evolution of the Park boundary over many years, through numerous evidenced based studies, demonstrates that is has been defined, consulted upon and where appropriate amended. This justifies the Derriford Community Park Strategic Greenspace boundary as proposed.

**Question 7.3(iv)**

Policy PLY44 allocates land at Woolwell as a mixed use sustainable urban extension to deliver about 1,880 homes within the plan period and a community park.

a. *Is it clear within the policy what the range of services and facilities to be sought within the proposal will be? Should more specific reference be included for facilities required to be delivered on site as well as contributions to such services as a secondary school?*

b. *Is it appropriate for the policy to restrict occupation of any dwellings on the site until the A386 Woolwell to the George Junction Transport Scheme has been implemented?*

c. *It is suggested that the policy should include reference to Pick Pie Plantation to ensure its future management: is this appropriate?*

7.124 It should be noted that as a result of the 2017 monitoring update (TP3F). the total number of houses now projected to come forward in the plan period is 1,560.

*Is it clear within the policy what the range of services and facilities to be sought within the proposal will be? Should more specific reference be included for facilities required to be delivered on site as well as contributions to such services as a secondary school?*

7.125 The JLP Councils consider that the policy is sufficiently clear to be effective in the decision making process for future applications.

7.126 Policy SPT2 sets out the principles for sustainable linked neighbourhoods which supports the overall strategy for the plan area. This includes access to a vibrant mixed use centre to meet the daily needs of the community, including shops, health and wellbeing services and community facilities. The policies of the plan should be read alongside each other.
7.127 The land allocated at PLY44 is an extension to the existing community at Woolwell and therefore will connect and enhance the services and facilities for the wider community.

7.128 Where there is a specific need for a particular community facility, this is explicitly referenced in the policy, such as the requirement for the community park.

7.129 There is already an existing local centre at Woolwell, offering a range of services and facilities for the community. Any future provision of services and facilities should complement and enhance the existing offer and be appropriate to the locality in size and scale.

7.130 Where there is a specific need for a particular community facility, this is explicitly referenced in the policy, such as the requirement for the community park to reduce the landscape impact of the extension on Dartmoor and enhance opportunities for access and enjoyment. Landscape Impact Assessment (EN27)

7.131 As a result, it is felt that the policy is clear, and allows sufficient flexibility throughout the plan period for additional community services to be provided as the need and market allows.

7.132 Plymouth Policy Area Education Infrastructure Planning Evidence Base Report (O11, see Woolwell part of Section 4) identifies the need for new primary education provision as part of the Woolwell urban extension as a result of data on expected growth. It also sets out that some additional capacity will be required at Plymouth Secondary Schools to meet forecast demand, justifying the seeking of secondary school contributions. The Schedule of Potential Modifications (EXC10A, reference M87) proposes the incorporation of specific reference to this matter in response to Statement of Common Ground discussions with Devon County Council (SCG2).

7.133 The Infrastructure Needs Assessment (O9A) (Appendix 3) identifies the need for a new primary school at Woolwell as “strategic critical”
7.134 In terms of retail strategy/hierarchy there are no plans to create a new local centre in Woolwell as part of retail strategy. However, to support additional population and to help establish the new community, it is appropriate to provide opportunity for new facilities and services to support the increase in residents.

7.135 There is no evidenced quantitative need for new retail, as considered under Matter 6. Woolwell is well related to existing food retail provision in the area.

*Is it appropriate for the policy to restrict occupation of any dwellings on the site until the A386 Woolwell to the George Junction Transport Scheme has been implemented?*

7.136 The JLP Councils believe that it is appropriate to restrict occupation of any dwellings until the A386 Woolwell to the George Junction Transport Scheme has been implemented and that this is a positively prepared, justified and effective policy, in accordance with paragraph 182 of the Framework.

7.137 With significant growth planned for the north of the city and traffic forecast to increase along this route it is vital that highway improvements are delivered to minimise congestion and delays and improve journey times and reliability for general traffic and buses. The Woolwell to the George Junction Transport Scheme is part of a package of strategically important infrastructure required to support planned economic growth.

7.138 The transport evidence base supporting the JLP has identified that the A386 Woolwell to the George Junction Transport Scheme is infrastructure needed to support the delivery of this policy (T18; Paragraphs 5.4.3 – 5.4.5 and B4H report T20i and Table 5.7). This is a major scheme needed to deliver sufficient capacity improvements and support sustainable travel option. Therefore the scheme is identified as a Strategic Critical Infrastructure in the Infrastructure Needs Assessment (O9A, Appendix 3). The scheme is deliverable in a timely manner which will not constrain the development of the site. This is set
out in the Statement of Common Ground between Rockspring Barwood Plymouth Ltd and the JLP Councils (SCG1)

7.139 However, as per the Statement of Common Ground (SCG1) and the schedule of proposed modifications (EXC10A) we are happy to accept a minor amendment to the policy whereby occupation of some dwellings can be achieved, prior to the implementation of the transport scheme, if it can be demonstrated that the impact on the Local Road Network, including public transport, is not severe.

7.140 The modification to the policy provides a caveat which is consistent with the wider policies of the plan in relation to managing transport impacts and is considered to be positively prepared and in accordance with paragraph 32 of the Framework.

7.141 However, we consider this point could be academic given that:

- The A386 Woolwell to the George Junction Transport Scheme is at an advanced stage and is scheduled to be delivered by 2022.
- Our latest trajectory for the delivery of Woolwell (TP3F) indicates first residential completions are anticipated to come forward in the period 2024-25.

7.142 We maintain that the scheme is necessary and deliverable. The Baseline Transport Conditions Report (T18 Figure 5.6) identifies Woolwell roundabout and the George Junction as congestion points on the local road network and this issue is expanded upon in paragraphs 5.4.3 – 5.4.5 which identify that

‘The whole corridor is affected by poor performance. Most key junctions are at or near capacity at peak times, including Woolwell roundabout, George Junction .....’

7.143 The report goes on to say that ‘Woolwell Roundabout to the George Junction; between these two points the A386 reduces to single carriageway, with knock-on effects for congestion and delay ’.
7.144 The report identifies that the design capacity of the link has already been exceeded (Table 5.7) and describes how the resultant poor performance of the A386 corridor affects cross-boundary journeys from other parts of the JLP, such as Tavistock, with journey times in the AM peak, varying by as much as 11 minutes (inbound to the City Centre) and 19 minutes outbound in 2012. This is why the Joint Councils believe that the Woolwell Roundabout to the George Junction Transport Scheme must be delivered before occupation of any dwellings because it is a strategic priority in terms of transport infrastructure (Framework 156).

7.145 We are also confident that, once implemented, the constraint on the network will be addressed and the allocation at Woolwell, and the allocations to the north of Woolwell, can be accommodated. This is borne out by the strategic highway modelling which has been undertaken as part of the evidence base for the JLP.

7.146 As part of the transport evidence base the three Highway Authorities for the plan area (Plymouth City Council, Devon County Council and Highways England) have prepared a series of position statements at key milestones during the development of the transport evidence base in order to understand the transport interventions (both sustainable transport programmes and infrastructure schemes) required to support the growth ambitions set out in the JLP.

7.147 Position Statement Four (T27) reports that at the time of the Examination the three Highway Authorities agree that results of the latest strategic highway assignment model scenario (HAM2 B4H) demonstrate that the highway network performs better in 2034 than in the scenario (A1) which considers the performance of the highway network in 2034 when only background growth and committed transport schemes are considered (T27, page 16). The B4H model includes Woolwell Roundabout to the George Junction as a pipeline scheme (T19, Appendix C), along with a number of other intervention as set out in Position Statement Four (Appendix One). The position statement also identifies that there are three locations where the precise details of the intervention required are still under investigation. The transport network between Woolwell Roundabout and the George Junction is not one of these locations (T27, page 16), providing evidence that the scheme is an appropriate
intervention, as part of a package of strategic infrastructure measures, complemented by the encouragement and enablement of sustainable transport which is also assumed in the model (T19: para3.3.18-3.3.28).

7.148 The Woolwell to the George Junction Transport Scheme is a PCC Capital Commitment, approved to the value of £15m in February 2017\(^1\) and hence the scheme will be delivered. However, Plymouth City Council, are also pursuing two potential funding opportunities to reduce the burden on the capital programme. Construction of the scheme is programmed to start in 2020 and be completed in 2021.

*It is suggested that the policy should include reference to Pick Pie Plantation to ensure its future management: is this appropriate?*

7.149 As currently worded policy PLY44 provides clear requirements for what the development proposed within the allocation should provide in delivering a sustainable urban extension. This includes the requirements for a strategic masterplan (PLY44.1).

7.150 Pick Pie Plantation has been designated as a Local Green Space within the JLP. Its identification and designation is fully in line with Framework para 77 and the protection of Local Green Spaces within the Plan area is clearly specified in DEV 29.

7.151 It is therefore deemed unnecessary in the strategic plan to go into such a level of detail as to reference the management of a site that is already designated through another policy. The management of the site and its incorporation into the urban extension will be dealt with through the development of the strategic masterplan for the site and through the development management process.

**Question 7.3(v)**

Does the evidence justify the infrastructure measures for the growth area as set out in Policy PLY47? Have any additional measures been identified?

7.152 We believe that the evidence does justify the measures set out. All the infrastructure measures identified in Policy PLY37 are contained within the Infrastructure Needs (O9, Appendix 3) which in turn is a key element of the JLP Councils’ robust infrastructure planning process. Further details of the infrastructure planning process are contained within Hearing Statement Matter 4.

7.153 Other infrastructure measures relevant to this growth area are referred to in other JLP Policies and all are brought together for ease of reference in JLP Annex 1. These are:

- Derriford Commercial centre transport infrastructure (Policy PLY38)
- Derriford Health and Wellbeing Hub (Policy PLY38)
- Glacis Park Green Corridor (Policy PLY39)
- Derriford Community Park (Policy PLY41)
- Woolwell Urban Extension Primary School (Policy PLY44)
- Woolwell Community Park (Policy PLY44)
- Woolwell Community and Sports Infrastructure (Policy PLY44)
- Plym Valley Strategic Greenspace (Policy PLY45)

**Question 7.3(vi)**

Is it appropriate to identify and set out within the JLP ‘opportunity sites this growth area (p134 of the JLP)?

7.154 The case for the inclusion of Opportunity Sites is set out in answer to Question 7.2 (x) and so is not repeated here.

7.155 The site identified in the Derriford and Northern Corridor Growth Area also falls within the eastern section of the boundary of PLY38, as a potentially longer term extension of the Derriford Commercial Area concept. Its inclusion as an Opportunity Site is an unnecessary duplication which has come to light through the Inspectors’ question. We suggest that this can be removed from the plan as a minor modification.

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
Issue 7.4: The Eastern Corridor Growth Area (Policies PLY48-PLY57)

Question 7.4(i)
In relation to the site allocations proposed for employment, retail, leisure and other commercial development within the Eastern Corridor Growth Area (housing site allocation questions are in 6.6 below):  
   a. Is the type and amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure  
   b. Is the development deliverable in the timescales envisaged?

7.156 Our approach to the identification of site allocation policies in the context of the Framework is set out in response to Question 7.2iii and is not repeated here.

7.157 The responses to the Inspectors’ questions are identified in Appendix 1 at the end of this Matter Statement.

Question 7.4(ii)
Policy PLY48 does not allocate land but instead supports the implementation of existing planning permissions and the strategic masterplan for the development of the Sherford new community. The requirement for Sherford Community Park Strategic Greenspace is set out in PLY48 and also separately in Policy PLY49. Is this approach justified and are the policies effective? In particular:  
   a. Do the policies allow sufficient flexibility to take account of changing circumstances which may occur for the site during the plan period?  
   b. The figure of 4,508 homes is very specific in PLY48: is it appropriate and justified or should the policy have an anticipated ‘about’ figure?  
   c. Is there justification for the inclusion of specific references to matters including places of worship and the historic environment within the policy?

Policy PLY48 does not allocate land but instead supports the implementation of existing planning permissions and the strategic masterplan for the development of the Sherford new community. The requirement for Sherford Community Park Strategic Greenspace is set out in PLY48 and also separately in Policy PLY49. Is this approach justified and are the policies effective? In particular:

   a. Do the policies allow sufficient flexibility to take account of changing circumstances which may occur for the site during the plan period?

   b. The figure of 4,508 homes is very specific in PLY48: is it appropriate and justified or should the policy have an anticipated ‘about’ figure?

   c. Is there justification for the inclusion of specific references to matters including places of worship and the historic environment within the policy?

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
out in PLY48 and also separately in Policy PLY49. Is this approach justified and are the policies effective?

7.158 Although the policy doesn’t have the words that the ‘site is allocated for’, the policy nonetheless includes a boundary around a specific site and proposes it for a particular form of development.

7.159 NPPG says: ‘Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required.’ We have tailored this policy to its specific circumstances – i.e. the policy recognises that the major strategic development has started and that it benefits from an outline planning permission and master plan. It also acknowledges that over time things changes and so we need a framework in place for managing change.

7.160 Policy PLY49 sets out that the community park is a strategic Green Infrastructure Allocation. We felt it helpful to have a bespoke policy to reflect that this is one of the key strategic Green Infrastructure projects for the area. However, perhaps it would be clearer if in PLY48.3 includes a cross reference to PLY49 (or to ‘supporting’ the delivery of ...). We would be happy to accommodate this as minor modification.

Do the policies allow sufficient flexibility to take account of changing circumstances which may occur for the site during the plan period?

7.161 We believe that the policies do allow sufficient flexibility. Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required. We have tailored this policy to its specific circumstances. Sherford is a major strategic development already underway which has a masterplan. The site is being built out over a 20 year period and the Councils acknowledge that over the lifetime of a construction period of that length circumstances are likely to change. However, this also makes it particularly important to re-state certain key principles and identify key development parameters in order to ensure that the process of change is set within the context of
the original vision for a high quality, sustainable and locally distinctive new community.

7.162 PLY48.1 sets higher level principles which have been carried forward from the South Hams Core Strategy and Sherford Area Action Plan. These are quite strategic and therefore flexible by nature.

7.163 PLY48.2 fits the Sherford development into the retail hierarchy for city which is important to maintain for the plan’s integrity. The district centres and local centres were established to help create a sustainable community. It provides for appropriate sized centres to meet local needs within acceptable walking distances. The make up and nature of the centres are determined by the planning permissions, but the policy sets this principle. There is sufficient flexibility to allow the makeup of these centres to come forward in the appropriate manner reflective of people behaviours, whilst ensuring the principle of walkable neighbourhoods and the sustainability ethos is retained.

7.164 PLY48.3-7 are reflective of the original AAP and consented masterplan, and are key components to the overall mitigation of the new community and its original allocation in this location. The level of environmental, social and physical infrastructure is also commensurate to the size of the population being delivered for 5500 houses. The policy outlines key aspects of the mitigation package that has been integrated as part of the masterplan, but there is sufficient flexibility to ensure that during the plan period the precise make up how these are achieved can be looked at but without reopening the principle.

*The figure of 4,508 homes is very specific in PLY48: is it appropriate and justified or should the policy have an anticipated ‘about’ figure?*

7.165 The figure 4,508 is derived from the planning consent and trajectory for delivery. The figure is included for calculating overall housing supply within plan area so it can be monitored - this approach is explained in para 1.18 of the JLP. It is only a precise figure rather than an ‘in the order’ of figure because it links back to a specific consent.
7.166 The JLP makes provision for 5,500 dwellings and cites about 4508 anticipated in plan window. As a result of bringing the housing trajectory up to the 2017 monitoring point and revising the delivery forecast downwards for the next few years it is now anticipated that 4,254 dwellings will come forward in the plan window and therefore 1,246 dwellings beyond the plan period. Answer to question 7.6i signposts to the trajectory agreement spreadsheet (TP3H) which points out the potential for more dwellings in the plan window should delivery rates increase to those envisaged by the Sherford consortium at the outset of the scheme.

Is there justification for the inclusion of specific references to matters including places of worship and the historic environment within the policy?

7.167 Although it is not strictly necessary, we are happy to propose a minor modifications to address some of the detailed matters raised by representors. See EXC10A (references M89 and M90). Faith provision was established during the original masterplan work when social infrastructure for the community was being identified. The policy reference we have included in the policy is important to help establish the flavour of the new community and ensuring a range of social infrastructure is provided to meet the needs of the population. We are not aware of a representation relating to the historic environment on this policy.

Question 7.4(iii)
Policy PLY50 also does not allocate land but instead supports the implementation of existing planning permissions and the strategic masterplan for the development of Saltram Meadow at Plymstock. Is this approach justified and the policy effective?

7.168 Although the policy doesn’t have the words that the ‘site is allocated for’, the policy nonetheless includes a boundary around a specific site and proposes it for a particular form of development.

7.169 Policy PLY50 relates to Saltram Meadow in Plymstock. This site has outline planning permission granted under 07/01094/OUT, this includes a Section 106 agreement and an approved Spatial JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
Master Plan which guides the form of development coming forward in phases as the individual reserve matters application come forward for this developing new community. This ensures a comprehensive approach is taken to this large site which is crucial to it coming forward in a sustainable way as a new community. The application was in respect of up to 1684 new homes within a mixed use development and the applicants have still to deliver phases 2 and 3 of the development over the forthcoming plan period.

7.170 Policy PLY50 seeks to ensure that this approach is continued throughout the plan period, it adds weight to the decision making process making it a clear requirement for development to come forward as part of the comprehensive way it was originally planned and previously secured through the planning consent. This approach is both aspirational, seeking the delivery of the development in a well planned way but also realistic, setting out considerations which should be considered should significant changes come forward as part of any review of delivery of the spatial masterplan over the years ahead. This follows the approach of paragraph 154 of the Framework. It is considered that this approach presents a logical approach to the site ensuring a clear policy position is provided going forward.

7.171 The policy also makes clear the key principles which should be continued should revisions come forward to that previously consented. This provides a clear policy provision on what will or will not be permitted, should such circumstances arise, adopting the approach required by paragraph 154 of the framework. The approach set out in the policy also secures the key infrastructure elements the JLP Councils consider should be provided by the development, to secure a sustainable new community. This approach is tailored to the needs of the local area in terms of the strategy set out in Policy PLY50 and is focused on the key issues that need to be address as the development is brought forward, as set out in the guidance in Paragraph: 002 Reference ID: 12-002-20140306

7.172 As a site with planning permission which is currently in delivery, we consider the approach set out in Policy PLY50 to be flexible
and realistic in supporting the potential for changes but clear in the consideration which must be taken into account and the infrastructure which is required. This approach is considered to be justified and effective in continuing to support such large scale development that has still to take place in a planned way over the plan period.

**Question 7.4(iv)**

*In relation to Policy PLY51 relating to the Langage employment site is the amount of employment floorspace proposed realistic? Is the provision for 247,300 sqm of employment floorspace supposed to be delivered during the plan period? Is it achievable?*

7.173 In accordance with the approach taken to site allocation in the plan set out in answer to Question 7.2(iii) the allocation is very much part of a positive planning strategy to promote development opportunities, to provide the market confidence about the investment opportunity (consistent with para 157 of the Framework, fifth bullet point). It is also about helping provide a range of sites to meet the scale and type of employment uses (consistent with para 23 of the Framework, 6th bullet point), and in this respect it provides a unique opportunity in the plan area to accommodate large footprint development.

7.174 As set out in answer to Matter 5, Question 5.2(ii), the floorspace figure in the JLP is incorrect and it should be 243,000 sqm, not 247,300 sqm. It was also explained in answer to 5.2(ii) that it is not the case that the employment floorspace is supposed to be delivered during the plan period, but the site is allocated given its status as a strategic employment site and to identify and protect the opportunity for strategic employment investment.

7.175 Appended to the Matter 5 statement is a briefing note prepared on behalf of Langage Energy Park Ltd (LEPL) in December 2015. Attachment B to this note identified a draft strategic concept masterplan which demonstrates that the level of floorspace identified in the policy is able to be achieved on the site. It will be noted from our response to Matter 5, Question 5.2(ii) that we have excluded from our calculation the parts of the site occupied by solar panels. This part of the site could potentially deliver a further 120,000 sqm of floorspace, according to Attachment B, but this is not included in the employment supply of the plan given that its current use is a significant economic constraint on this part of the JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
site coming forward in the plan period. However, we consider it appropriate for the allocation’s site boundary to include this land to make clear that the site is considered part of the wider strategic employment site and its future development will therefore be considered acceptable in principle.

7.176 Policy PLY51 sets out the detail for the delivery of the employment provision at Langage. It acknowledges that realising the full potential at Langage will require significant investment in infrastructure in terms of its physical accessibility and connections to the A38 through a new southern access road and improved connections for walking, cycling and public transport to the City Centre, Plympton, Sherford and Deep Lane Junction Park and Ride.

7.177 Deep Lane Junction improvements to the North (upgrade of the roundabout to a signalised junction and pedestrian improvements) were completed in June 2017 using developer contributions from Langage, Sherford and Growth Deal Grant, the total scheme value was £3.1 million. The upgrade to the south of Deep Lane Junction and delivery of a park and ride will be required before Sherford reaches construction of its 1300th dwelling. The Deep Lane improvements provide capacity for all Sherford traffic and 40,000 sqm of employment space at Langage.

7.178 It is the shared transport view of Plymouth City Council, Devon County Council and Highways’ England that a major transport scheme will be required to deliver future phases of Langage. In 2010 the three highway authorities undertook a public consultation to support a Major Scheme funding business case to the Department of Transport. There were a number of options considered including delivery of a Southern Access road and options for a new junction on to the A38 and pedestrian, cycling and public transport improvements. However the Major Scheme funding pot was withdrawn and at that time there was no clear funding opportunity to pursue. In order to progress the site beyond 40,000 sqm of employment space further assessment is needed which will be an integral part of developing the masterplan. The strategic transport working group which involves the three Highway Authorities provides a forum to have this dialogue and develop the transport strategy.

7.179 The delivery of Langage as a strategic allocation is a challenging project which could be some time being fully delivered, and
potentially beyond the plan period. However, the floorspace proposed is considered realistic accepting the proposition that the allocation is justified on the basis not of a requirement to deliver it all within the plan period but by the benefit of promoting the opportunity for delivery within or beyond the plan period.

7.180 The deliverability of the site is supported by a long standing commitment to joint working between South Hams District Council, Devon County Council, Plymouth City Council and LEPL. For example, this has helped facilitate early land assembly, including the compulsory purchase of land needed to deliver the Langage masterplan. The delivery of the proposal will need to develop a logical and efficient layout and structure for the development that makes best use of any secured public and private sector infrastructure funding. To deliver the site there is a need be flexible and responsive to priority market needs.

7.181 In terms of the future delivery of employment land at the Langage site, parts of the site at Langage already have planning permission. In tandem with the grant of planning permission of the Langage power station, outline planning permission was granted in 2000 for the ‘Langage Energy Park’, a 21.2ha area of employment land for office, light industrial, general industrial and warehousing use to be accessed via the A38 Deep Lane Junction. Some of the planning obligations associated with the construction of the power station are linked with the delivery of the Energy Park. Financial contributions have been made for the upgrade of Deep Lane with some of the improvements completed in June 2017 and to public transport improvements via Section 106 obligations.

7.182 Whilst the power station has been built, to date no new employment buildings have been implemented on the Energy Park site, although a material commencement has been made to reserved matters subsequently approved on part of the site. The payment of the transport contributions for Langage developments has safeguarded capacity within the improved network to Deep Lane for up to 40,000 sq m of employment development floorspace at Langage Energy Park.
**Question 7.4(v)**

Is the safeguarding of land at and to the north of the Hazeldene Quarry (Policy PLY55), including a 125m buffer zone justified and effective?

7.183 Policy PLY55 is justified on evidence and will be effective at managing competing demands within the city in relation to minerals development.

7.184 In terms of impact on local residents we recognise that particular sensitivity and potential conflict can arise between mineral development and other uses. This is because of the methods of extraction can result in significant off site impacts through the use of heavy plant and machinery as well as explosives and other techniques. As a result this can be a disturbance to both operator who need to extract resources where they occur, as well as neighbouring uses, including residential uses, that expect the quiet enjoyment of their personal lives. As a result the plan seeks to ensure that appropriate mitigation and assessment of environmental issues is provided by the Minerals Operators and enforced through regular monitoring and planning conditions.

7.185 We have used national guidance to shape the Minerals Safeguarding Area (MSA), as defined by Policy PLY55. This is in the form of paragraphs 142-149 of the Framework as well as ‘A guide to Mineral Safeguarding in England, British Geological Survey 2007’. These documents identify that minerals can only be worked and safeguarded in known locations of mineral resources and recognise the potential for offsite impacts through extraction techniques. The BGS Guidance provides a toolkit to provide help and guidance relating to the delineation of MSAs. This guidance advises to use the best available geological and mineral resource information, refine resources in discussion with the industry and account for possible sterilisation resulting from proximal development.

7.186 To define the MSA in Plymouth we have used the British Geological Survey Data to map the extent of the limestone resource that is being worked at Hazledene Quarry. Appendix 5 identifies the bedrock geology and shows that the limestone resource extends to the north of Hazledene Quarry to include areas around the Golf Driving Range and the Nursery. We have
also worked with the Minerals Operator to understand their requirements and constraints when it comes to extraction. Aggregate Industries are supportive of the approach that we have taken. Included within the MSA is a 125m buffer from the limestone resource. This buffer has been designed to take into account possible sterilisation resulting from proximal development, as will allow for further consideration to be given to how non minerals development will impact upon mineral extraction.

7.187 This approach was supported in the adopted North Plymstock Area Action Plan (2007), where proposal NP13 the known mineral reserve and a buffer of 125m in width was identified.

7.188 It is also noted that in accordance with paragraph 143 of the Framework 2012 that there is no presumption that resources defined within the MSA will be worked as this would be subject to a detailed planning application for the LPA to determine. Likewise Policy PLY5 does not preclude development within the MSA, rather it allows for the material planning considerations to be considered in relation to the need for minerals development and the impacts it will have on extraction.

7.189 It is therefore considered that the Policy PLY55 is fully justified and will be an effective mechanism to balance and manage competing demands of development within the city.

**Question 7.4(vi)**

*Does the evidence justify the infrastructure measures for the growth area as set out in Policy PLY57? Have any additional measures been identified?*

7.190 We believe that the evidence does justify the measures set out. All the infrastructure measures identified in Policy PLY37 are contained within the Infrastructure Needs Assessment (O9, Appendix 3) which in turn is a key element of the JLP Councils’ robust infrastructure planning process. Further details of the infrastructure planning process are contained within Hearing Statement Matter 4.
7.191 Other infrastructure measures relevant to this growth area are referred to in other JLP Policies and all are brought together for ease of reference in JLP Annex 1. These are:
- Sherford Primary Schools (3) (Policy PLY48)
- Sherford Sports and Recreation Facilities (Policy PLY48)
- Sherford Secondary School (Policy PLY48)
- Sherford Community Facilities (Policy PLY48)
- Sherford Health and Social care (Policy PLY48)
- Sherford Community Park (Policy PLY49)
- Saltram meadow Primary School (Policy PLY50)
- Plympton Urban Extension Primary School (Policy PLY52)
- Saltram Countryside Park (Policy PLY54)

**Question 7.4(vii)**

Is it appropriate to identify and set out within the JLP an ‘opportunity site’ in this growth area (p154 of the JLP)?

7.192 The case for the inclusion of Opportunity Sites is set out in answer to Question 7.2 (x) and so is not repeated here.

7.193 The two sites identified in the Eastern Corridor Growth Area are included because they could have a transformational impact in this location supporting the city’s growth agenda. Both were allocated in the North Plymstock Area Action Plan (Policy NP03).
Issue 7.5: Other areas and sites within the PPA (Policies PLY58-PLY61)

Question 7.5(i)
Policies PLY58-60 allocate some sites for employment, retail, leisure and other commercial development in south Plymouth, north Plymouth and Plympton and Plymstock to the east (housing site allocation questions are in 6.6 below):

a. Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

b. Is the development deliverable in the timescales envisaged?

7.194 Our approach to the identification of site allocation policies in the context of the Framework is set out in response to Question 7.2iii and is not repeated here.

7.195 The responses to the Inspectors’ questions are identified in Appendix 1 at the end of this Matter Statement.

Question 7.5(ii)
Does the evidence justify the infrastructure measures as set out in Policy PLY61? Have any additional measures been identified?

7.196 We believe that the evidence does justify the measures set out. All the infrastructure measures identified in Policy PLY37 are contained within the Infrastructure Needs Assessment (O9, Appendix 3) which in turn is a key element of the JLP Councils’ robust infrastructure planning process. Further details of the infrastructure planning process are contained within Hearing Statement Matter 4.

7.197 Other infrastructure measures relevant to this area are referred to in other JLP Policies and all are brought together for ease of reference in JLP Annex 1. These are:

- European marine Site (Policy SPT13)
- High Quality Public Transport network (Policy SPT10)
- Her Majesty’s Naval Base and Dockyard (Policy PLY4)
**Question 7.5(iii)**

Is it appropriate to identify the Mount Gould Hospital as an 'opportunity site' (p171 of the JLP)?

7.198 The case for the inclusion of Opportunity Sites is set out in answer to Question 7.2 (x) and so is not repeated here.

7.199 The site identified is potential a site that will deliver a transformational scale of change in its local community. It has been considered under the One Public Estate programme although no conclusion has been reached yet on its long term future.

7.200 One Public Estate is an initiative by the Cabinet Office to encourage different parts of the public sector to work together to maximise the effective use of land and buildings. The Plymouth OPE programme focuses on two elements: rationalisation of the public estate; and health and well-being. The health and well-being strand of the programme looks to bring together various parties responsible for delivering health and social prescribing services to work closer together to create a series of “Hubs” across the city.

7.201 This aligns with the NHS Transformation Agenda and Five Year Plan, alongside various independent Government reviews such as the Carter Review, which seeks to improve the efficiency of the health service, reduce waste and improve productivity and outcomes.

7.202 A key element of the Plymouth OPE programme, aligning to the wider NHS objectives, is to make better use of the Mount Gould Hospital site. This may include redeveloping existing, single storey, aged buildings into modern, more efficient space, relocating some existing services into other areas of the healthcare estate or bringing in services onto the site to release assets across Plymouth.

7.203 In addition to direct health and well-being uses, the site may offer the opportunity to release surplus land for a range of ancillary and complementary uses, including care homes,
supported living and respite/convalescence care, along with supporting commercial uses such as retail and recreation to improve the amenity of the site for users. Alternatively, there may be opportunities for market and affordable housing.

7.204 The partners involved with the site will commission a team of architects, health planners, engineers and cost consultants in January 2018 to undertake a review of health services across Plymouth with the aim of delivering a masterplan for Mount Gould during the first half of 2018. The site was identified as an Opportunity Site rather than a specific allocation in light of the need to finalise operational retained on site activities, thereby allowing the identification of land that was known to be suitable and deliverable for housing and related land uses but which at the time of submission in July 2017 was not available. Land will be available for housing and other development sometime during the latter part of 2018/2019.
**Issue 7.6: Housing delivery within the PPA (Housing site allocations, the housing trajectory and Policies DEV7, DEV11 and DEV12)**

**Question 7.6(i)**

In relation to housing site allocations proposed for development within the PPA:

a. *Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?*

b. *Is the housing trajectory (TP3B) realistic for each allocation: are there any sites which might not be delivered in accordance with the timescale set out in the trajectory?*

c. *Are the specific development requirements of each site allocation policy effective and justified by evidence?*

d. *For those sites where masterplans and design codes are required, what are the timescales for their production and have these been taken in to account within the delivery timescale for the development? Is this reflected in the housing trajectory?*

e. *Will the allocations achieve sustainable development?*

**Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?**

7.205 The approach to establishing the scale of housing in each allocation has had regard to constraints and provision of necessary infrastructure and is therefore justified and consistent with paragraph 017 Reference ID:3-017-20140406 of NPPG Housing and Economic Land Availability Assessment.

7.206 The approach to estimating the site potential of each site is set out in the Plymouth SHLAA (HO2). Paragraphs 3.4.1 to 3.4.5 sets out the approach taken with regard to appropriate density for each site. Paragraphs 3.4.6 to 3.4.11 sets out the approach taken to net developable area for each site which takes account of constraints and infrastructure provision i.e. the larger the site the more likely to require provision for infrastructure and thus reducing the developable area for housing. Where sites have been deemed to have less or more constraints/infrastructure requirements that suggest the formula isn’t appropriate, adjustments have been made to the capacity and these reasons are cited in Appendix 6 to this Matter Statement.

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
7.207 In addition a number of allocations have had bespoke masterplanning / in house work to assess capacity potential, or are at a stage in the development process where planning applications and pre-application discussions have been able to give a more precise assessment of housing potential. Where such work exists it has been used instead of the SHLAA methodology to establish capacity potential.

7.208 The SHLAA’s approach to net developable area and density was ratified by the SHLAA panel and no alternative approaches or size trigger assumptions were offered. Appendix 6 sets out the justification for the scale of housing on each allocation.

Is the housing trajectory (TP3B) realistic for each allocation: are there any sites which might not be delivered in accordance with the timescale set out in the trajectory?

7.209 It is assumed that the Question should have referenced TP3B rather than TP3C as TP3C is the TTV trajectory.

7.210 The forecasts and assumptions for each allocation are realistic and have been based on evidence of past lead in times and delivery rates that have been achieved in the city as well as delivery programme intelligence from developers/land promoters. TP3H sets out the forecast for each allocation, whether the forecast has been agreed with the main developer/landowner and what assumptions have been used regarding lead in times/delivery rates\(^2\) in the absence of agreement. Where forecasts have not been agreed TP3H also sets out alternative forecasts put forward by developers/landowners.

7.211 In a number of cases developers / landowners have indicated that the JLP Councils’ forecasts are pessimistic and the allocation could come forward earlier or alternative quantums have been suggested. Where this is the case (TP3H) identifies in the forecast assumptions column that the site has the potential to

\(^2\) See also HO2G (Plymouth SHLAA appendix 7 – methodology, lead in times) & HO2H (Plymouth SHLAA appendix 8 – methodology, delivery rates)
come forward earlier and/or deliver at a higher rate than that assumed in the trajectory and sets out the reasons why the JLP Councils have been more cautious in the approach to expected delivery timeframe. This column also indicates where alternative quantum’s have been put forward. Other than the sites referred to above, there is no evidence to suggest that allocations might not be delivered in accordance with the trajectory.

7.212 The Plymouth SHLAA (HO2) sets out in paragraphs 3.4.8 through to 3.4.13 and appendix 7 (HO2G) and appendix 8 (HO2H) the methodologies used for applying lead in times and delivery rates. The methodologies for lead in times and delivery rates were based on analysis of lead in times and housing delivery rates in the city over the last 10 years. The Plymouth SHLAA approach to lead in time and delivery rate was applied unless alternative additional realistic evidence of delivery programmes was submitted by those promoting sites. This approach was ratified by the Joint SHLAA panel, no alternative approaches/timeframes or delivery rate assumptions were put forward by the joint SHLAA panel members\(^3\). The approach taken to timescale and rate of development in the Plymouth SHLAA and in updating the housing trajectory to the 2017 monitoring position is consistent with paragraph 023 reference ID:3-023-20140306 of NPPG Housing and Economic Land Availability Assessment.

Are the specific development requirements of each site allocation policy effective and justified by evidence?

7.213 The JLP Councils consider that the specific requirements of the policies are effective and justified by evidence.

7.214 Appendix 6 sets out the primary evidence base sources that have been used to help identify development requirements. It should be noted that our intended approach has been to only add points / criteria to site allocation policies where we feel it is helpful to identify something specific which may already be covered

\(^3\) SHLAA Paragraph 3.4.26 lists the organisations represented on the SHLAA panel which included several representatives from volume house builders

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
generically in a DEV policy.

For those sites where masterplans and design codes are required, what are the timescales for their production and have these been taken in to account within the delivery timescale for the development? Is this reflected in the housing trajectory?

7.215 In relation to allocation policies which refer to the need for masterplans or design codes:

- PLY29 (Millbay Waterfront) – The policy refers to an existing masterplan and sets a framework for any revision to it, should this be proposed. This would need to be submitted with any planning application. However, the assumption is that existing masterplan will be delivered and this is accounted for in the housing trajectory (TP3F).
- PLY32 (Stonehouse Barracks) – The need for a masterplan is referred to in policy to allow for assessment of site’s heritage assets. The housing trajectory assumes housing completions from 2027/28 which provides ample time to prepare masterplan before the planning application process commences.
- PLY38 (Derriford Commercial Centre) – The strategic masterplan framework has been provided in the JLP, although the policy requires conformity with this and anticipates work being submitted with applications to demonstrate how this is to be achieved, through more detailed masterplan work. The housing trajectory assumes housing completions from 2024/25 which provides ample time for more detailed masterplanning work before the planning application process commences.
- PLY39 (Glacis Park) – The policy requires a strategic masterplan to be prepared and consulted upon in advance of consideration of a planning application. The housing trajectory assumes housing completions from 2027/28 which provides ample time to prepare masterplan before the planning application process commences.
- PLY40 (Seaton Neighbourhood) - The policy refers to an existing masterplan and sets a framework for any revision to it, should this be proposed. This would need to be submitted with any planning application. However, the assumption is that existing masterplan will be delivered and this is accounted for in the housing trajectory.
• PLY44 (Woolwell) - The policy requires a strategic masterplan and design code to be prepared and consulted upon in advance of consideration of a planning application. The housing trajectory assumes housing completions from 2024/25 which provides ample time to prepare masterplan before the planning application process commences.
• PLY48 (Sherford) – The policy refers to existing masterplan and sets a framework for any revision to it, should this be proposed. This would need to be submitted with any planning application. However, assumption is that existing masterplan will be delivered and this is accounted for in the housing trajectory.
• PLY50 (Saltram Meadow) - The policy refers to an existing masterplan and sets a framework for any revision to it, should this be proposed. This would need to be submitted with any planning application. However, the assumption is that existing masterplan will be delivered and this is accounted for in the housing trajectory.
• PLY53 (Former China Clay dryer complex, Coypool – The policy requires delivery in accordance with a strategic masterplan for the site. The housing trajectory assumes housing completions from 2022/23 which provides ample time to prepare masterplan before the planning application process commences.
• PLY58.5 (North Prospect phase 4) – The policy requires delivery in accordance with existing North Prospect masterplan. No impact on housing trajectory.
• PLY58.6 (North Prospect phase 5) – The policy requires delivery in accordance with existing North Prospect masterplan. No impact on housing trajectory.

7.216 Other sites which already have a strategic masterplan in place (not referred to specifically in the policy) and for which have no adverse implication for the housing trajectory, include:
• PLY7 (Colin Campbell Court) – City Centre Strategic Masterplan
• PLY10 (Cornwall Street East) – City Centre Strategic Masterplan
• PLY11 (Cornwall Street West) – City Centre Strategic Masterplan
• PLY12 (New George Street West) – City Centre Strategic Masterplan
Will the allocations achieve sustainable development?

7.217 The allocations set out in the plan will achieve sustainable development, provided that the policies of the plan (and the Framework where the plan is silent on a particular matter) are adhered to.

7.218 The JLP Councils’ response to EXC2 (EXC3) explains in paras 1.18-1.22 the distinction that has been drawn between the allocation of sites within the context of an overall sustainable distribution strategy and the more detailed sustainability matters that are addressed in the context of specific proposals at planning application stage, as guided by the policies of the plan.

7.219 The allocations have been guided by the Sustainability Assessment (as discussed under Matter 1) so as to be consistent in principle with the plan’s spatial strategy which sets the overall framework for sustainable development and a sustainable...
distribution strategy (the SPT policies) (as discussed in Matter 2).

7.220 Additionally, many of the allocations include detailed provisions designed to ensure that the detailed scheme actually implemented accords with sustainable development principles and will be considered in the context of the other development (DEV) policies of the plan which will help address site specific sustainability issues.

7.221 The sustainability appraisal of the site is found at SUB9G (Reg 18 stage); SUB9J (Reg 19 stage) and is summarised in EXC3D.

**Question 7.6(ii)**

Some policies, for example PLY16 and PLY18, allocate land for mixed use development and support residential development including student accommodation. Is the quantum of housing provision on such sites known, is it included within the housing trajectory and is it deliverable?

7.222 The quantum of housing provision is only included within the housing trajectory where a specific housing figure is included in the policy. In all other cases the policy merely identifies the acceptability in principle of housing without making it a firm requirement. This approach is set out in para 1.18 of the JLP.

7.223 Policies PLY16 and PLY18 are allocations which promote development opportunities, to provide the market confidence about the investment opportunity (consistent with para 157 of the Framework, fifth bullet point), and which positively plan for flexible use of land where appropriate, e.g. through mixed use allocations which might be less prescriptive about a balance of uses where appropriate (consistent with para 157 of the Framework, fifth bullet point). See response to Question 7.2(iii).

7.224 The deliverability of PLY16 and PLY18 is considered in Appendix 1 to this Matter Statement.
**Question 7.6(iii)**

*Is the housing trajectory realistic for the Sherford new community and Saltram Meadow sites which have planning permission?*

7.225 Yes, the trajectory as set out for both Sherford and Saltram Meadow are considered realistic.

7.226 PLY48: Sherford – The housing trajectory has been updated to the 2017 monitoring position (see TP3F). As requested the forecast has been amended to reflect the latest position on site with regard to delivery in 2017/18. The consortium of house builders have not offered alternative forecasts but have indicated that delivery will be less than 264 per annum at present, but will ramp up to 264 dwellings per annum in a few years (88dpa per outlet). The updated delivery forecast assumptions are set out in TP3H. The assumptions are realistic and achievable given the current status of the site and the presence of three outlets. The assumptions within the housing trajectory are below the consortiums assertions for the site being a 15 to 20 year build which puts delivery rates at an average of 366dpa or 275 dpa respectively and should be seen as being more cautious and realistic than the developers assert. It is reasonable to assume that as the site builds out delivery rates are likely to increase as infrastructure is provided and the attractiveness of the new town and community takes hold. Sherford therefore has the potential to bring forward more dwellings at a higher delivery rate than that cited in the 5 year supply and within the plan period as a whole.

7.227 PLY50 - Saltram Meadow. The housing trajectory has been updated to the 2017 monitoring position (see TP3F). The forecast in the 2017 trajectory has been agreed with the developer response (See TP3H) which indicates a delivery rate of 85dpa going forward. The site has been delivering at a rate of 89dpa across the three years of completions with the first 2 years of development seeing a rate of 100 and 110 completions. Site survey (November 2017) reveals that 158 dwellings are anticipated to complete by March 2018, with Bovis likely to achieve 77dpa in the year. One of the developer’s (Taylor Wimpey) started on site later than others and it is anticipated to deliver 23 dwellings by the end of March 2018. Realistic prospect that the delivery rate across the site will increase over the next 2 years and achieve 264 per annum by 2020/21 at the latest. The consortium confirms that the delivery rates will ‘ramp up’ to the level envisaged in the trajectory.

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4 Site survey (November 2017) reveals that 158 dwellings are anticipated to complete by March 2018, with Bovis likely to achieve 77dpa in the year. One of the developer’s (Taylor Wimpey) started on site later than others and it is anticipated to deliver 23 dwellings by the end of March 2018. Realistic prospect that the delivery rate across the site will increase over the next 2 years and achieve 264 per annum by 2020/21 at the latest. The consortium confirms that the delivery rates will ‘ramp up’ to the level envisaged in the trajectory.
per annum (average of 105dpa) The forecast for Saltram Meadow is realistic perhaps even pessimistic given it is below what has already been achieved. Arguably a delivery rate in excess of 100dpa is achievable and therefore it is also realistic to suggest the site is capable of delivering additional dwellings above the forecast i.e. 20 dpa above the forecast in the trajectory.

**Question 7.6(iv)**
Is there sufficient flexibility in the trajectory to ensure that housing land supply will be maintained and will deliver the requirement of Policy STP3?

7.228Yes, the end March 2017 housing trajectory for the PPA (TP3F) is a robust forecast of the delivery of housing supply over the plan period. The Councils consider there is sufficient flexibility in that forecast to maintain supply in the PPA and deliver the requirement for PPA set out in SPT3 for the following reasons.

7.229**Delivering the requirement**

7.230The TP3F evidence provides the latest forecast of housing supply from completions in the plan period. 20,684dws are forecast to be built in the PPA in the plan period. This is sufficient to deliver the PPA requirement of at least 19,000. Supply is forecast to reach this minimum target in 2031/32. By the end of the plan period supply is forecast to exceed the minimum target by approx.1,700 dwellings. At 9%? this is a robust level of ‘headroom’ and a strong indication of sufficient flexibility in the trajectory (see also the JLP Councils’ response to Q3.3ii). So, if some sites do not deliver as forecast, there is sufficient supply already identified that could come forward and still deliver the minimum requirement. A further 1,686 dwellings are identified for delivery beyond 2034 on two of the ‘urban extensions’ (Sherford and Woolwell) that are delivering dwellings in the plan window and therefore have the potential to deliver further dwellings within the plan window.
The JLP Councils consider that the forecast of delivery of supply in total and the constituent supply categories is robust. This underpins the conclusions about the flexibility of the PPA trajectory. See the JLP Councils’ responses to:

- Q3.3viii March 2017 monitoring point trajectories
- Q3.3iii Commitments; completions; Small non-garden land windfalls
- Q3.3iii Student HMO release allowance
- Q3.iv lapsed rates
- Q7.6.i PPA Site Allocations - Individual sites’ supply

**Maintaining supply**

**Supply over the plan period.** The TP3F evidence demonstrates that supply can be maintained over the plan period. Graphs PPA2 (2a) and (2b) illustrate the 'Plan Monitor Manage' analysis of supply. They are based on the evidence of the combined completions totals across the policy area forecast for each year over the plan period. That evidence is set out in Table PPA2 (TP3F). The three analyses in this table demonstrate that supply is maintained. The graphs illustrate the trajectory and those analyses, whereby maintaining supply means that:

**Plan** The forecast supply in PPA (illustrated by the purple bars in graph PPA2a) is above the annualised target of 950 pa (the green Plan line) in every year from 2017/18 until 2029/30 with the only exception 2019/20. At 2031/32 the minimum target is met. Delivery continues after that point, albeit at a lower rate. This provides a high level of flexibility. Even if supply is not delivered as quickly as forecast, with a 9% ‘headroom’ there are still reasonable prospects that the target will be achieved by the end of the plan period, or earlier from the supply sources identified at the 2017 Monitoring Point.

**Plan** The forecast future supply in PPA illustrated by the purple bars in Graph PPA2a also shows that supply is ‘front loaded’. That is, after the March 2017 Monitoring Point, there is a higher annual supply earlier in plan period notably in 2017/19 and 2021/23, compared to supply towards the end of the plan period. This is consistent with the Framework objective to
significantly boost supply. Early delivery is supported by robust evidence in TP3H, which has been informed by evidence provided by developers about their intentions regarding implementing current consents, to submit planning applications in 2018 and for swift site starts. Front-loading is another indicator of flexibility. Early delivery reduces the risk of not achieving the target by 2034. The PPA does not depend on a high percentage of supply delivery much later in the plan period.

### 7.236 Monitor
A surplus supply position is forecast over the whole plan period in the PPA from 2018/19 onwards. A shortfall is identified in the first 4 years of the plan period due to market factors and not a lack of sufficient supply (see response to Q 3.3 vii). This is evidenced in Table PPA5, where there are separate rows for the forecast cumulative completions and the cumulative target at each year. The forecast of delivery for each year, illustrated by the red Monitor line in Graph PPA2b, is therefore above the X axis for all years after 2018/19. See response to Q 7.6v below regarding shortfall and the 5 year supply land position.

### 7.237 Manage
Graph PPA2a, based on Table PPA5, provides evidence that at this time supply does not need to be brought forward from later in the plan period in the PPA. The orange Manage line is not a ‘hockey stick’ shape. In fact, it is quite the opposite. This means that at the end of the plan period the Manage line is below the X axis and curves steeply downwards. This occurs because the requirement is forecast to be met from supply delivered earlier in the plan period, and requirement is met before the end of the plan period. It is proof that supply is not back loaded. It is also evidence that there is sufficient flexibility if in future supply needs to be brought forward, were delivery of some sites not to occur when forecast.

### 7.238 The plan sets out the approach to managing housing land supply.

### 7.239 JLP Paragraph 3.32 outlines the Housing Implementation Strategy whereby the LPAs will undertake proactive actions to assist developers to bring sites forward as effectively and
efficiently as possible, from the supply sources already identified in the trajectory. This approach enhances the flexibility of supply. The Housing Implementation Strategy for the full range of housing describes how the JLP Councils will maintain delivery of a five-year supply of housing land to meet their housing target (Framework para 47 4th Bullet Point). The Governance Topic Paper [insert ref and correct title] identifies the mechanisms for collaborative working by the JLP Councils to undertake the proactive actions in that Strategy.

7.240 Ample site allocation provision is made within PPA by the site allocation policies in the JLP. This provision of 16,260 dwellings with a range of sites (locations, type and size) consistent with the JLP spatial strategy provides greater certainty of policy intention. This supply category is equivalent to 86% of target; and to 79% of supply. This overall level allocation is a major reason why forecast overall supply is sufficient. It is an effective way to manage risk. In the event that some sites don’t come forward there is sufficient provision identified. The Councils consider their forecasts to be robust but acknowledge that it is not possible to guarantee that a site will definitely be delivered.

7.241 At the 2017 monitoring point it is also worth noting that some 9,424 dwellings5 in the PPA (Table PPA4) already has planning consent. This in itself represents planning consent attained for 50% of the housing requirement in the PPA or 62% of the housing requirement when including dwellings already completed in the period 2014-17.

7.242 The mix of sites in the PPA in terms of the range of supply sources/categories also contributes to the flexibility of the trajectory. The charts below demonstrate that supply over time is not dependent on a single supply category. This mix in itself contributes to the inherent flexibility of the trajectory.

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5 From a combination of commitments and JLP allocations
Source: TP3F – Table PPA3

Source TP3F – Table PPA3
7.243 The JLP does not allocate contingent reserve sites to be brought forward, or trigger mechanisms to release such sites for development. The plan already allocates sufficient sites to provide ‘headroom’ at an appropriate level of confidence and degree of flexibility in the supply figures. It is not necessary to make further provision.

7.244 There is no general phasing policy in JLP to restrict timing of development sites coming forward. So if a site is not delivered when predicted in the trajectory, other sites currently shown later in the forecast could be brought forward to meet need, unless specific policy requirements preclude this.⁶

7.245 The JLP provides the policy context for the Councils to determine windfall development proposals. The trajectory includes a forecast of delivery from small, non-garden land windfalls which adds to flexibility. The PPA trajectory doesn’t include a forecast of future large windfall developments permitted after March 2017 because the JLP makes sufficient provision and therefore it is not necessary to include this supply category at this time. Nevertheless, such sites continue to come forward and it is reasonable to expect them to add to supply in the plan period. They will add to the forecast supply in PPA. For example Appendix 7 shows that in Plymouth large windfalls that have come forward since the production of the SHLAA in 2009 would suggest an average annual supply of 52 dwellings per annum over the last 8 years. Such sites add to supply and to the level of flexibility already provided by the trajectory. Some of these may be sites that were assessed for SHLAA purposes as sites with constraints or unviable where those matters might be overcome in the future or which had been unavailable but which may come forward through future SHLAA updates and become available. The emerging Brownfield Register may be another tool to bring forward consents on qualifying opportunity sites in between plan review.

7.246 JLP Paragraph 1.22 commits the Councils to a full review of key parts of the plan such as the development strategy to be undertaken at least once every five years. Plan-making is the

⁶ E.g. with regard to PLY 44 Woolwell there is a link to infrastructure provision which effects timing of delivery
appropriate process for introducing changes to supply as part of the development plan. This is part of the management mechanism that enables delivery of housing supply to meet housing need,

7.247 **Maintaining supply does not mean** that the whole requirement must be delivered early in the plan period (although the PPA trajectory provides evidence demonstrating that delivery rates in PPA are forecast to rise substantially in the immediate future from that achieved in recent years\(^7\) and demonstrates that the plan is boosting supply). Nor does it mean that the annualised figure must be delivered each year. Any supply surplus compared to cumulative targets can be taken into account when considering the 5 year housing land supply for the next 5 years.

7.248 **Demonstrating a 5 year housing land supply is a policy approach** in Framework paragraphs 47 and 49 for maintaining housing supply. Graph PPA3 illustrates the ‘Rolling 5 year housing land supply’ analysis for the PPA (TP3F). This is based on Table PPA6 (TP3F) and shows the 5 YLS position at every year in the trajectory. For each year over the plan period it compares forecast housing delivery against the forecast targets for the next 5 years derived from Policy SPT3, and is based on the 2017 Monitoring point evidence from Table PPA2.

7.249 This evidence demonstrates that the JLP results in a robust supply position in the PPA, with a continuous supply being maintained over the plan period. That is, both at the point of adoption, and into the future. The graph shows that there is more than 5 years land supply in this Policy Area for all forecast years from 2017/18 to the point when the minimum target is achieved in 2031/32. The point of adoption is likely to be between the 2018 and 2019 monitoring points, where the trajectory forecasts a supply in PPA of 5.3 and 5.4 years respectively based on a 20% buffer. Supply would be 6.1 and 6.2 years respectively with a 5% buffer (see response to Q3.3vii regarding whether a 20% buffer is necessary at this time). This

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\(^7\) Due in no small part to Plymouth’s record of intervention and housing delivery outcomes addressing housing need and market failings. See response to Q 3.3vii

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
is a very healthy supply position. It is also a sign of considerable flexibility this early in the plan period. (See also JLP Councils’ response to questions Q7.6v and Q3.3v about 5 year housing land supply)

**Question 7.6(v)**
*Will the housing provision made within the PPA have a reasonable prospect of delivering its share of the five year housing land supply at the point of adoption of the JLP?*

7.250 Yes, based on the SPT3 housing provision requirement for at least 19,000 new homes in the plan period, the evidence in the housing trajectory for the PPA (TP3F) demonstrates that there is a reasonable prospect\(^8\) of a 5 year housing land supply in the PPA area at the point of adoption. The JLP Councils’ response to Q3.2 sets out why SPT3 expresses provision in terms of Policy Areas and why the correct provision for JLP policy for the PPA is at least 19,000 dwellings. In accordance with Framework paragraph 47- 4\(^{th}\) bullet point, the housing implementation strategy for the full range of housing outlined by paragraphs 3.32 and 3.33 in the Submission JLP describes how the JLP Councils will maintain delivery of a five-year supply of housing land to meet their housing target.

7.251 Demonstrating a 5 year housing land supply is important because of Framework paragraphs 47 and 49 policy towards maintaining housing supply. If the LPA cannot demonstrate a 5 year supply of deliverable sites then relevant policies for the supply of housing should not be considered up to date. If a development plan is out of date, then for decision taking this triggers the ‘tilted balance’ in Framework paragraph 14.

7.252 Demonstrating a 5 year housing land supply at the point of plan adoption is necessary. It provides the evidence that the development plan would not be out of date at point of adoption of the JLP. Submission JLP Figure 3.5 states the five year land supply statistics for the whole plan area and for the two Policy Areas. These are based on a 20% buffer and an assumed point

\(^8\) The concept of reasonable prospect is considered in TP3(rev) paragraphs A6.17 to A6.19

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
of plan adoption at March 2018. They show a forecast supply in PPA equivalent to 5.5 years, based on the evidence in the 2016 monitoring point PPA trajectory (TP3B and TP3Bi).

7.253 Mindful of the ongoing JLP Examination, the JLP Councils now expect the point of adoption of the JLP to be between 2 monitoring points. That is, end March 2018 and end March 2019. TP3Bi shows a forecast supply in PPA equivalent to 5.7 years as at end March 2019.

7.254 The Framework requires the Councils to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. The 5 years are from the monitoring point when there is a complete set of supply data. The latest monitoring point for the PPA housing trajectory is end March 2017 (TP3F), so the forecast 5 year period (years 1 to 5) would be April 2017 to end March 2022. Analysis of the 5 year supply at point of adoption is partly beyond that timeframe. In effect, the forecast supply at adoption at April 2018 would be years 2 to 6 and at April 2019 would be years 3 to 7 from the latest monitoring point supply evidence. The JLP Councils consider that the supply identified in years 1 to 5 in the latest trajectory meet the criteria in Framework footnote 11. They consider that the supply identified in years 6 to 7 in the latest trajectory also meet the criteria in Framework footnote 11, which exceeds the requirement of Framework paragraph 47 3rd bullet point and

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9 Framework footnote 11 To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
footnote 12\textsuperscript{10} where the test in those years is for sites to be ‘developable’.

7.255 The results in Submission JLP Fig 3.5 have now been superseded by the evidence in the end March 2017 monitoring point PPA housing trajectory (TP3F). This is the latest up to date available evidence. The calculations and the results for the end March 2018 and end March 2019 monitoring points are shown in Table PPA6 and Graph PPA3. This demonstrates that the housing land supply position is above 5 years (with a 20% buffer and significantly above 5 years with a 5% buffer), and is forecast to be as follows:

- 5.3 years at end March 2018 and 5.4 years at end March 2019, based on a 20% buffer
- 6.1 years at end March 2018 and 6.2 years at end March 2019, based on a 5% buffer.

7.256 The reasons why there is a reasonable prospect of a 5 YLS by at the point of adoption are as follows:

a) The latest trajectory evidence is up to date and robust. This includes the evidence in the individual large site trajectories (for the latter see the Councils responses to Q3.3, Q7.6i and Q8.5i, including the level of agreement with the developers regarding the large site trajectories, TP3H). The large sites (5+) in the trajectory have been assessed individually, and all large sites with dwelling completions forecast for Years 1 to 5, and Years 6 and 7 from the March 2017 Monitoring Point:
   i. Are available now or with regard to sites identified to commence delivery in years 6 and 7 have a reasonable prospect of being available;
   ii. offer a suitable\textsuperscript{11} location for development now; and

\textsuperscript{10} Framework footnote 12 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged

\textsuperscript{11} For the purposes of assessing the 5 year housing land supply at point of adoption, the trajectories assume that JLP policies with site allocations that are forecast to deliver housing in years 1 to 7 that do not have
iii. are achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission that have not expired as at the 2017 monitoring point are included as deliverable. Where there is clear evidence that schemes will not be implemented within five years, or later, these have been excluded.

b) The method for calculating the 5 year housing land supply is correct. The calculations and results for 2018 and 2019 are set out below and further amplification is set out in the revised Housing Topic Paper, TP3(rev) paragraphs 8.18-8.33. The JLP Councils conclude that:

The correct calculation is made of the forecast requirement for the next 5 years, including the appropriate buffer. This is:

- The annualised 950 PPA target (as a minimum) multiplied by 5 years (i.e. 4,750)
- Where there is a shortfall of cumulative completions compared to cumulative target since the start of the plan period to the monitoring point, all the backlog is then added to the 4,750, to give a 5 year requirement before a buffer is added. Where there is a surplus, this is taken into account on a residual basis, as explained in TP3(rev) paragraph A.6.42, to give a 5 year requirement before a buffer is added.
- The buffer is then applied to the 5 year requirement. This gives the target for the next 5 years to use in the 5 year housing land supply position calculations.
  - From the 2016 monitoring point trajectory (TP3B/Bi)
    - at end March 2018 this was 4,942 (i.e. 4,750 plus a shortfall of 192 dwellings to be added to the requirement for the 5 years as per the ‘Sedgefield approach’). Adding the 20% buffer results in 5,930 dwellings. Annualised, this equates to **1,186 dpa**. Adding the 5% buffer planning permission as at the 2017 monitoring point will be found sound, included in the adopted JLP, and can therefore be counted as part of supply.
results in **5,189** dwellings. Annualised, this equates to **1,038 dpa**

- at end March 2019 this was 4,734 (i.e. 4,750 minus the 16 which is the residual surplus for the 5 years) Adding the 20% buffer results in **5,680** dwellings. Annualised, this equates to **1,136 dpa**. Adding the 5% buffer results in **4,970** dwellings. Annualised, this equates to **994 dpa**

- From the updated 2017 monitoring point JLP housing trajectory (TP3F),
  - at end March 2018 this is 5,023 (i.e. 4,750 plus a shortfall of 273 dwellings to be added to the requirement for the 5 years as per the ‘Sedgefield approach’). Adding the 20% buffer results in **6,028** dwellings. Annualised, this equates to **1,206 dpa**. Adding the 5% buffer results in **5,275** dwellings. Annualised, this equates to **1,055 dpa**
  - at end March 2019 this is **4,668** dwellings. (i.e. 4,750 minus the 82 which is the residual surplus for the 5 years) Adding the 20% buffer results in **5,601** dwellings. Annualised, this equates to **1,120 dpa**. Adding the 5% buffer results in **4,901** dwellings. Annualised, this equates to **980 dpa**

The correct calculation is made of the forecast supply for the next 5 years. This is the sum of the forecast net completions for each of the next 5 years from the relevant monitoring point. At end March 2018 this was 6,510 and at end March 2019 this was 6,475 dwellings for the PPA (TP3B/Bi). In the updated PPA housing trajectory (TP3F) the respective forecasts are 6,409 and 6,040 dwellings.

The correct way to estimate the 5 year housing land supply position in the JLP PPA is as follows:

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JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
### Point of Adoption

<table>
<thead>
<tr>
<th></th>
<th>2016 Monitoring Point Trajectory (TP3B)</th>
<th>2017 Monitoring Point Trajectory (TP3F)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>End March 2018</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Forecast supply for the next 5 years (A)</td>
<td>6,510</td>
<td>6,409</td>
</tr>
<tr>
<td>Annualised requirement plus shortfall/surplus and 5% buffer applied for the next 5 years (B)</td>
<td>1,038</td>
<td>1,055</td>
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<tr>
<td>Years equivalent (A/B)</td>
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<td><strong>6.1</strong></td>
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<tr>
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<td>1,206</td>
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<tr>
<td>Years equivalent (A/B)</td>
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<td><strong>5.3</strong></td>
</tr>
<tr>
<td><strong>End March 2019</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Forecast supply for the next 5 years (C)</td>
<td>6,475</td>
<td>6,040</td>
</tr>
<tr>
<td>Annualised requirement plus shortfall/surplus and 5% buffer applied for the next 5 years (D)</td>
<td>994</td>
<td>980</td>
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<td>Years equivalent (C/D)</td>
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<td><strong>6.2</strong></td>
</tr>
<tr>
<td>Annualised requirement plus shortfall/surplus and 20% buffer</td>
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<td>1,120</td>
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</table>

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
<table>
<thead>
<tr>
<th>Years equivalent (C/D)</th>
<th>5.7</th>
<th>5.4</th>
</tr>
</thead>
</table>

(Note: numbers have been rounded)

7.257 The 2016 monitoring point forecast supply of 6,510 and 6,475 at the two monitoring points is lower than the latest forecast for those years in TP3F (6,409 and 6,040 respectively). This is simply because the production of the 2017 monitoring point trajectories requires updated intelligence gathering and forecast assumptions given the potential change in status/circumstances on sites that may have occurred 12 months on from the 2016 monitoring point. The steps undertaken by the City Council to update forecast delivery are set out in the JLP Councils’ response to Q3.3. TP3H provides the intelligence on forecast agreements with developers/landowners for every large (5+) site in the trajectory and the assumptions used for lead in times/delivery rates where disagreement occurs or where intelligence from developers/landowners was not forthcoming.

7.258 Consequently, the Councils can rely on robust evidence about lead in times, the likely date of the first completions on sites, and delivery rates. This evidence supports a higher number of dwellings forecast to be delivered in the 5 year periods April 2018 to March 2023 and April 2019 to March 2024 than required. See also response to matter 3.3vii.

**Question 7.6(vi)**

Does Policy DEV7 adequately address the needs of different groups in the PPA in accordance with the first two bullet points in paragraph 50 of the Framework? Are the needs set out in DEV7 point 1 i-iii based on robust evidence?

Does Policy DEV7 adequately address the needs of different groups in the PPA in accordance with the first two bullet points in paragraph 50 of the Framework?

7.259 Paragraph 50 of the Framework sets out what local planning authorities should do in order to deliver a wide choice of high
quality homes. The main elements of the City Council’s approach to this include:

- Setting in place appropriate policies in the local plan (these include of course DEV7 and DEV9, but also the housing allocations which will help deliver a range and choice of homes).
- Providing more detailed guidance to amplify the housing policies of the plan through the Plymouth Policy Area Supplementary Planning Document (SPD). We currently use the Planning and Affordable Housing SPD but this will be replaced by the PPA SPD.
- Preparation of masterplans and site planning assessments as appropriate to promote specific development opportunities, as well as proactively working through our Housing Delivery Team to identify and support the delivery of a wide range of housing opportunities.

7.260 Policy DEV7, supported by Policy DEV9, does in our view adequately address the needs of different groups in the PPA in accordance with the first two bullet points in paragraph 50 of the Framework.

7.261 DEV7 plans to deliver a wide choice of high quality homes across all sizes and tenures to improve access and opportunities for homeownership, particularly first time buyers, as well as households trading up and down in the market, the provision of rented homes and a range of affordable homes to meet the needs of different groups in the community to support sustainable, inclusive and mixed communities. This includes suitable housing for older people and households with specific needs, as well as general needs accommodation for all sizes of households.

7.262 Policy DEV7 is supported DEV9 which seeks to deliver a range of affordable tenures, custom and self-build, build to rent and support to ensure a mix of accessible housing to meet needs of households with physical disabilities and older people.

7.263 Detailed guidance on the implementation policies will be given through the Plymouth Policy Area SPD. This will give specific
guidance regarding the delivery of affordable housing, including affordable housing target, affordability, thresholds, tenure mix, commuted sums and the involvement of Registered Providers through the Plymouth Housing Development Partnership. It will replace our Planning Obligations and Affordable Housing SPD, 2nd review, adopted 30 July 2012, that currently provides this detailed guidance.

7.264 We have identified site allocations across the PPA that will be able meet a range of housing needs.

7.265 Our proactive Housing Delivery activity demonstrates a strong track record of delivery, including our Plan for Homes initiatives and negotiations through planning applications on a site by site basis, to enable the delivery of a wide range of homes including Extra Care housing for older people and households with support needs, self and custom build, service veterans schemes and affordable homes to rent and buy. Housing delivery is monitored annually and will feed into the future Plan reviews.

*Are the needs set out in DEV7 point 1 i-iii based on robust evidence?*

7.266 The housing needs set out in DEV7 are evidenced by our Strategic Housing Market Assessment and Objectively Assessed Need for Affordable Housing 2017 (HO13A - see in particular: chapter 4. Type and tenure of future housing needed which describes the long-term balancing housing markets (LTBHM) model to determine future demand for housing by size and tenure; chapter 6. The requirements of specific groups of the population; appendix 6. Specialist accommodation needs).

7.267 This strategic evidence is supplemented by local evidence of housing needs from our Housing Register (Devon Home Choice), Help to Buy, Self and Custom Build and Right to Build registers. A snapshot of current housing needs data is set out in Appendix 8.

7.268 Our strategic and local evidence identifies high demand for one and two bedroom units for younger households to rent and buy
as well as a range of suitable accommodation for older people, including opportunities for downsizing.

7.269 There are identified needs for all sizes of additional units and DEV7 also supports the delivery of a range of larger family homes where supply (new homes and relets) is limited, including executive homes helping to support the prosperity of the city.

7.270 It allows the providers of open market homes to deliver the homes in demand and that will sell in the local housing market.

**Question 7.6(vii)**

Policy DEV7 point 2 requires at least 30% affordable homes on developments of 11 or more dwellings:

a. *Is the level of affordable housing proposed supported by the evidence or would a higher figure be justified?*

b. *Is the use of the term 'at least' appropriate and does it provide certainty about the affordable housing requirements?*

c. *It has been suggested that the current higher affordable housing levels sought by PCC should continue. Does the policy seek to deliver a higher % of affordable homes (above 30%) where relevant and if so how will this be achieved?*

d. *Is the exception for sites of 11-14 dwellings to provide an off-site affordable housing contribution justified? How will the contribution be calculated? Should this mechanism apply to larger sites? Is it clear how off-site contributions will deliver the required affordable homes? Has on-site provision been considered?*

*Is the level of affordable housing proposed supported by the evidence or would a higher figure be justified?*

7.271 The requirement for at least 30% affordable housing is supported by evidence from our Strategic Housing Market Assessment and Objectively Assessed Need for Affordable Housing 2017; Appendix 5 Local authority-level results for affordable housing need model identifies the total annual affordable housing need in Plymouth of 21.5% and 24.4% across HMA (HO13A).
7.272 We need to deliver a range and mix of 30% affordable housing across the qualifying sites in the JLP to be able to meet our affordable housing needs in full. This provides some headroom recognising from past performance that the fact that not all qualifying sites might be able to viably deliver policy compliant levels of affordable housing due to site or market constraints at the time of delivery, and recognising too that many sites will come forward which are below the policy threshold for provision of affordable housing.

7.273 However, we consider that a higher figure is not justified by the evidence.

Is the use of the term ‘at least’ appropriate and does it provide certainty about the affordable housing requirements?

7.274 The term ‘at least’ is appropriate as it provides certainty and clarity that developments should deliver at least 30%, subject to viability, whilst also allowing housing providers to exceed 30% affordable homes if they propose to.

7.275 For example on the 33 sites (138 acres of land) brought forward for housing development under the Plan for Homes, over 50% of the homes were offered by housing providers as affordable housing. Many sites have been completed that have delivered affordable homes in excess of 30%: Aster Centre 100% affordable; PlymView 46% affordable; PLUSS Building 100%; Dover Road 100% affordable; Yardley gardens 100% affordable. Also Wain Homes recently offered to deliver 35% affordable housing on a site that was being reviewed (not on housing grounds) at inspection.

It has been suggested that the current higher affordable housing levels sought by PCC should continue. Does the policy seek to deliver a higher % of affordable homes (above 30%) where relevant and if so how will this be achieved?

7.276 The affordable housing levels sought in the plan are the same as (and not lower or higher than) what is sought through the current Plymouth Core Strategy.
7.277 The policy does not seek to deliver a higher % of affordable housing, as the policy of 'at least 30%' is evidenced as meeting our identified affordable housing need and has been tested as viable in both the JLP and in our Strategic Housing Land Availability Assessment. There is nothing to prevent housing providers from offering more than 30% in their planning applications should they wish to do so, as detailed above. The City Council is not seeking higher levels.

Is the exception for sites of 11-14 dwellings to provide an off-site affordable housing contribution justified? How will the contribution be calculated? Should this mechanism apply to larger sites? Is it clear how off-site contributions will deliver the required affordable homes? Has on-site provision been considered?

7.278 The off-site provision recognises that a small number of affordable homes on small schemes can provide for less efficient and effective management for partner Registered Providers, but acknowledges the role that small sites and smaller housing providers have to play in helping to meet our affordable housing needs. The policy also allows for on-site provision to be considered for sites of this size too.

7.279 The method for calculating the contribution will be incorporated in the Plymouth Policy Area SPD, which will replace the Planning Obligations and Affordable Housing SPD (where current method for calculating the contribution is provided).

7.280 The current methodology is set out below, and any contributions are subject to overall scheme viability considerations:
   i) Rented unit contribution = Open Market Value (minus 15% developers profit on cost) minus the appropriate RSL purchase price
   ii) Shared ownership contribution = 5-0% of Open Market Value minus 15% profit on cost

7.281 On larger sites the presumption is for on-site delivery of affordable housing. However the provision of an off-site affordable housing contribution can apply only if it is robustly justified.

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
7.282 The amount of off-site contribution and its application to deliver affordable homes off-site elsewhere in the policy area are captured in the S106 agreement on each scheme. The use of a commuted sum to support the delivery of affordable homes is considered on a scheme-by-scheme basis as determined by viability and housing priority considerations.

**Overall is the policy based on robust evidence, will it meet the objectively assessed need for affordable housing and is it viable?**

7.283 The policy is evidenced by the Strategic Housing Market Assessment and Objectively Assessed Need for Affordable Housing 2017 (HO13A) as contributing towards meeting our identified affordable housing need, and has been tested as viable in the supporting evidence base.

7.284 The JLP viability assessment took into account a 30% affordable housing policy across both policy areas. The tenure split was based on recent delivery which was 1/3 social rented, 1/3 affordable rent and 1/3 intermediate or shared ownership. The PBA Viability Report concluded that the policies (including the 30% affordable housing policy) could be accommodated in the majority of JLP typologies (O5, PBA Viability Report, section 6.2). The only typology in Plymouth which could be unviable was the 11 unit site typology in Plymouth West. The report points out that on sites such as this there would be scope to enable the development to become viable through minor tweaking, such as delivering more units to improve the return, or fewer units to bring it below the affordable housing threshold.

**Question 7.6(viii)**

*Does Policy DEV11 plan positively for the development of HMOs? Is it supported by evidence and will it be effective?*

7.285 Policy DEV11 seeks to make it clear that the Local Planning Authority will not support unlimited planning applications for HMOs in areas where there is perceived to be an imbalance in the mix of housing available. We consider it to be positive planning to defend the concept of balanced communities. In this...
respect, we have taken the view that the Article 4 Direction in place is actually a positive planning measure to support balanced communities and the policy needs to be worded accordingly to reflect this position.

7.286 Policy DEV11 complies with the Framework (paragraph 50) which makes clear that plan areas should provide a wide choice of quality homes that are inclusive. Furthermore, Framework para 50 encourages LPAs to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Through Policy DEV11, we are seeking to deliver a mix of housing types and tenures that will meet the projected future needs of Plymouth’s population as identified in section 4 of document HO13A.

7.287 Policy DEV11 also complements the aspirations of JLP Policy SPT2 part 4 which seeks to deliver sustainable linked communities by supporting ‘a good balance of housing types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs’ and also addresses part 5 of the same policy by promoting ‘resilience to future change by ensuring a well balanced demographic profile with equal access to housing and services’.

7.288 In 2012, the City Council proactively sought to address the disparity in Plymouth’s housing supply and enforced an Article 4 Direction across a number of centrally located neighbourhoods. As set out in Plymouth Student Accommodation (HO16, page 7) the Direction sought to address concerns about the over concentration of HMOs and removed permitted development rights to change a dwelling house into an HMO and such changes of use have since required planning permission.

7.289 Further to the details provided in HO16, we have used data held by the City Council to map the location of all large scale HMOs that are licensed and all properties that have a council tax exemption code owing to exclusive student occupation. This map work provides invaluable information about where HMOs are located and it is an essential tool to assist planning officers when assessing planning applications against the requirements
of Policy DEV11. With accuracy, officers can create a map that shows all properties within a 100 metre radius of the proposed development site. The data can then be aggregated to show the percentage of HMOs in relation to other non HMO properties within the 100 metre sample area. It is recognised that due to the types of information and resources available to the City Council, it is not possible to identify all of the HMOs in the City, for example, smaller HMOs that do not require a license that are not exclusively occupied by students are more difficult to monitor, therefore, the outputs from the map work will provide a minimum number of HMOs within any given sample area rather than a definitive number. It is noteworthy that due to the sensitivity of this address point data; these maps have not been published by the City Council and will not be made publically available.

7.290 It is clear to see from the information we have available that a significant number of neighbourhoods within Plymouth’s Article 4 Area have a large proportion of HMO properties and such neighbourhoods provide a restricted and imbalanced housing mix that does not meet the range of housing needs within the city. For these reasons, a threshold has been set within Policy DEV11 that restricts the number of new HMOs in a neighbourhood. The threshold has been set at 10% and this is considered to be appropriate and necessary to help redress the balance of housing types, to deliver Framework requirements, and to achieve the aspirations set out in Policy SPT2. The 10% threshold is tried and tested by other local authorities across the UK; it is supported by the National HMO Lobby and was initially referenced in evidence that informed the Article 4 Direction. Setting a threshold will help to future proof housing options over the plan period.

7.291 It is considered that Policy DEV11 will be an effective way of controlling and improving the housing mix and will contribute to the creation of sustainable linked neighbourhoods.

7.292 In accordance with the details set out in JLP paragraph 7.23, there is a commitment to monitor, manage and review Policy DEV11 and respond to changes in the evidence base.
Question 7.6(ix)
Does Policy DEV12 plan positively for purpose built student accommodation (PBSA) and is it consistent with national policy? Are the 11 criteria clearly justified? Paragraph 6.47 of the JLP refers to the Plymouth Plan SPD: is it clear what its purpose is in relation to Policy DEV12?

7.293 Policy DEV12 has been worded to ensure that new planning proposals to deliver PBSA are rigorously assessed, given evidence of the current and pipeline supply of student accommodation (HO16, page 6). The criterion based approach is intended to assist developers, planners and other stakeholders with the preparation and determination of planning applications for PBSA. We consider this to be a positive approach in that the evidence does not support a generally permissive approach to student accommodation but there is justification for an approach that seeks to ensure that such development supports positive planning outcomes.

7.294 The policy seeks to address a number of recurring concerns and speculative comments regarding PBSA as referenced in Document HO16 (page 2). The checklist format of this policy is intended to make the planning process more efficient and effective and will enable transparent and consistent decision making.

7.295 Each criterion was prepared in consultation with the city’s higher education institutes (HEIs), they have been carefully constructed to address pertinent issues associated with PBSA and we consider each criterion to be justified for the reasons that follow:

- Criterion 1 – The Framework makes no direct reference to the housing requirements of students; however, the Framework is clear that plan areas should provide a wide choice of quality homes that are inclusive. Furthermore, Framework paragraph 50 encourages LPAs to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Document HO16 provides evidence relating to
the current and projected housing needs of students and this information is inextricably linked to Policy DEV12 criterion 1.

- **Criterion 2** - To encourage the use of sustainable modes of transport in accordance with Framework paragraph 35 and Policy SPT9 ‘strategic principles for transport planning and strategy’, criterion 2 of Policy DEV12 requires PBSA to be delivered in an appropriate location which is easily accessible to university/college facilities.

- **Criterion 3** - Document HO16 reports on the importance of student accommodation and details the benefits that Plymouth’s student population can bring to the city, however, a high quantity of students living within a neighbourhood can place pressures on the physical and social infrastructure of an area and transform the character. The transient nature of student living can also undermine the social and physical fabric which defines a community and this can lead to community tensions and lack of cohesion. Criterion 3 seeks to balance the need for additional PBSA against the aspiration to deliver sustainable, inclusive and balanced communities in accordance with paragraph 37 of the Framework and Policy SPT2 ‘sustainable linked neighbourhoods and sustainable rural communities’. It is recognised that proposals for PBSA are often located in and around the City Centre on sites that would be sustainable for alternative uses such as mainstream or affordable housing and commercial premises that could meet wider needs in the community.

- **Criterion 4** - As set out in document HO16, over recent years there has been an increase in speculative planning applications for PBSA in and around Plymouth’s city centre, whereby proposals have sought to demolish buildings and change existing uses on prime functional sites, examples include the proposed loss of office spaces, a large cinema complex, congress hall and various retail outlets. Criterion 4 therefore seeks to ensure that the sustainability and qualities of a community are not continuously undermined and eroded.
by PBSA. This approach is consistent with Framework paragraph 17 bullet point 5.

- Criterion 5 - As detailed in Document HO16, the higher education sector is a highly competitive market and for Plymouth’s HEI’s to compete at a national and international scale, it is essential that we offer a suitable range of high quality and affordable student accommodation to meet a wide range of student needs. Through discussions with HEI providers, it became apparent that student housing choices can be influenced by a number of dynamic and interrelated factors. The importance of including spaces within PBSA that would facilitate social interaction were emphasised as a way of overcoming student isolation and associated welfare concerns. The factors that can often influence student accommodation choices are detailed in Document HO16. Ensuring PBSA has appropriate amenity space is consistent with Framework paragraph 17 bullet point 4.

- Criterion 6 - PBSA can often be of a large scale and will frequently offer a significant number of bed spaces to the student population, it is therefore important to ensure that an existing area would not be detrimentally affected by the built form of PBSA or the sudden increase in the day to day activities of student residents. Likewise, students have a degree of vulnerability when living away from home, so it is important to ensure they live in areas that are safe and secure to ensure their welfare. Criterion 6 of policy DEV12 seeks to address these concerns and supports the aspirations of Policy SPT1 ‘delivering sustainable development’ and SPT2 ‘sustainable linked neighbourhoods and sustainable rural communities’, it also supports paragraph 70 of the Framework.

- Criterion 7 - Management plans have been requested to set out how the proposed PBSA will be professionally managed, the welfare and security of the residents ensured and the amenity of local residents safeguarded. Management plans would be expected to provide details such as health and safety standards and procedures, maintenance and repairs,
student welfare, anti-social behaviour and disciplinary measures. By requiring management plans, the Local Planning Authority seeks to deliver safe and accessible environments in accordance with Framework paragraph 69 and reduce opportunities for crime and fear of crime in support of Policy DEV10 ‘place shaping and the quality of the built environment’ point 6.

- Criterion 8 - Through stakeholder engagement, Plymouth University specifically mentioned the need to provide measures to manage student arrivals at PBSA at the start of the academic term, where it was highlighted that poor or no management can lead to congestion hotspots and wider implications for the city’s highway network. In accordance with JLP Policy SPT9 ‘strategic principles for transport planning and strategy’, arrival plans will be required to provide information on sustainable modes of travel, accessible parking provision and student ‘drop off’ arrangements to improve highway network efficiency and minimise the impact of additional vehicles on the city’s roads during peak times in the academic year.

- Criterion 9 - In accordance with paragraph 9 of the Framework, the local planning authority is pursuant of sustainable development through criterion 9 of Policy DEV12. In particular, providing better building designs that are flexible and adaptable to change. Requiring PBSA to be future proofed through design will ensure that often large buildings can be adapted for alternative uses without the need for complete demolition. This approach is supported by Policy DEV13 Waste Management and paragraph 14 of the Framework.

- Criterion 10 - Criterion 10 of policy DEV12 supports Policy DEV31 ‘specific provisions relating to transport’, by ensuring that consideration is given to any parking requirements associated with the PBSA. It is also compliant with Framework paragraph 17 and the more general thrust of the Framework to deliver sustainable development.
Criterion 11 - Criterion 11 of policy DEV12 ensures that refuse storage is considered at the beginning of the design process and this approach supports Framework paragraph 17 bullet point 4 and Policy DEV33 ‘waste management’.

7.296 The policy wording is intended to help avoid ad hoc planning applications for new PBSA; rather all new applications will be assessed against each criterion. It is hoped that this approach will reduce the high lapse rates of planning permissions for PBSA that has been documented in Document HO16 and improve delivery rates.

7.297 The proposed Plymouth Policy Area Supplementary Planning Document (SPD) will expand upon policies within the JLP. In terms of Policy DEV12, the SPD will provide guidelines on the level of detail and type of evidence that would be expected to support PBSA planning applications, in accordance with paragraph 153 of the Framework, the guidance is intended to help applicants make successful planning applications that can be efficiently processed and determined.
## APPENDIX 1: SCHEDULES OF COMMERCIAL SITES

### Qu. 7.2iii – City Centre and Waterfront Growth Area

<table>
<thead>
<tr>
<th>Policy</th>
<th>Site Description</th>
<th>Allocation</th>
<th>Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?</th>
<th>Is the development deliverable in the timescales envisaged?</th>
<th>Do relevant site allocation policies take appropriate account of issues including design and the historic environment?</th>
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</thead>
<tbody>
<tr>
<td>PLY8</td>
<td>Land at Royal Parade (between Armada Way and Old Town Street)</td>
<td>Retail led mixed use</td>
<td>Yes. Allocation consistent with City Centre Strategic Masterplan which has taken into consideration key constraints (SGA4, page 27). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. The site has been promoted by the lease holders, British Land, as an integral part of their wider portfolio of assets in the City Centre. The site has also been promoted by PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4) as one of the strategic retail opportunities. JLP Viability Study (O5) identifies the generic category of 'town centre retail' as marginally unviable - see Table 8.7. This is in anticipation of the cost of redevelopment of existing sites. Mixed use allocations however provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. This particular allocation is not for redevelopment but refurbishment and additional storeys in order to make the buildings more commercially attractive. Therefore it is reasonable to assume that a viable development could be delivered over the plan.</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see page 27 and Section 4.0 Masterplan Framework on pages 75-102) and HE4 (see page 4); further amplification of historic environment provisions sought by Historic England which JLP Councils are happy to accept as minor modifications (see EXC10A reference M42).</td>
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<tr>
<td>Policy</td>
<td>Site</td>
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<td>Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?</td>
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<td>PLY9</td>
<td>Mayflower Street East</td>
<td>Office-led mixed use development with active ground floor uses and student accommodation as enabling development</td>
<td>Yes. Allocation consistent with City Centre Strategic Masterplan which has taken into consideration key constraints (SGA4, pages 24 and 52-53). Employment floor space derived from SGA4 (p53).</td>
<td>Yes. The site has been promoted by PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4) to establish an office cluster in the City Centre. PCC own the Freehold of the site and operates part of the site as a pay &amp; display car park and Coburg House (subject to multiple short-term leases) as office. There are a further 6 leasehold interests on the site. JLP Viability Study (O5) identifies the generic category of 'town centre offices' as unviable - see Table 8.6. Mixed use allocations however provide the opportunity for introducing higher value uses. The policy specifically allows for student housing as enabling development, which is viable - see Table 8.9. It should be noted that there is an existing planning consent for part of the site (Mayflower House) by developer Guildhouse UK which includes new Grade A office enabled by student accommodation. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see pages 24 and 52-53, and Section 4.0 Masterplan Framework on pages 75-102) and HE4 (see page 5)</td>
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<td>PLY10</td>
<td>Cornwall</td>
<td>Mixed use -</td>
<td>Yes. Allocation consistent with City Centre Strategic Masterplan which has taken into consideration key constraints (SGA4, pages 24 and 52-53). Employment floor space derived from SGA4 (p53).</td>
<td>Yes. The site has been promoted by PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4) to establish an office cluster in the City Centre. PCC own the Freehold of the site and operates part of the site as a pay &amp; display car park and Coburg House (subject to multiple short-term leases) as office. There are a further 6 leasehold interests on the site. JLP Viability Study (O5) identifies the generic category of 'town centre offices' as unviable - see Table 8.6. Mixed use allocations however provide the opportunity for introducing higher value uses. The policy specifically allows for student housing as enabling development, which is viable - see Table 8.9. It should be noted that there is an existing planning consent for part of the site (Mayflower House) by developer Guildhouse UK which includes new Grade A office enabled by student accommodation. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see pages 24 and 52-53, and Section 4.0 Masterplan Framework on pages 75-102) and HE4 (see page 5)</td>
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<td></td>
<td>Street East</td>
<td>retail / housing / parking</td>
<td>Centre Strategic Masterplan which has taken into consideration key constraints (SGA4, pages 24 and 48-49). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4) as one of the strategic retail opportunities. PCC own the Freehold of the site and operates part of the site as a pay &amp; display multi-storey car park. There are multiple additional leasehold interests on the site. JLP Viability Study (O5) identifies the generic category of 'town centre retail' as marginally unviable - see Table 8.7 (it does not test the viability of multi-storey car parks). This is in anticipation of the cost of redevelopment of existing sites. Mixed use allocations however provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. Plymouth City Council owns the Freehold of the site and operates part of the site as a multi-storey car park. The car park is very well used being located in very close proximity to Drakes Centre and the retail core but in a poor state of repair. There is an existing planning consent for part of the site (Former Good Companions) by developer Burrington Estates which includes student accommodation and site clearance has been carried out. This evidence in SGA4 (see pages 24 and 48-49, and Section 4.0 Masterplan Framework on pages 75-102) and HE4 (see page 8) further amplification of historic environment provisions sought by Historic England which JLP Councils are happy to accept as minor modifications (see EXC10A references M43 and M44)</td>
<td>evidence in SGA4 (see pages 24 and 48-49, and Section 4.0 Masterplan Framework on pages 75-102) and HE4 (see page 8) further amplification of historic environment provisions sought by Historic England which JLP Councils are happy to accept as minor modifications (see EXC10A references M43 and M44)</td>
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<td>PLY11</td>
<td>Cornwall</td>
<td>Mixed use</td>
<td>Yes. Allocation consistent with City</td>
<td>Yes. The site has been promoted by Burrington Estates which includes student accommodation and site clearance has been carried out. This does not prevent the remainder of the site being developed out in accordance with the policy. The site provides one of the only opportunities in the City Centre for major new retail use with associated public car parking. Opportunity exists to significantly increase car parking numbers on the site through a larger multi-storey format. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to</td>
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<tr>
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<tr>
<td></td>
<td>Street west</td>
<td>commercial / housing</td>
<td>Centre Strategic Masterplan which has taken into consideration key constraints (SGA4, page 24). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4). JLP Viability Study (O5) identifies the generic category of 'town centre retail' as marginally unviable - see Table 8.7 (it does not test the viability of multi-storey car parks). This is in anticipation of the cost of redevelopment of existing sites. Mixed use allocations however provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. Plymouth City Council owns the Freehold of the site and operates part of the site as a surface car park. There are multiple additional leasehold interests on the site. The car park is very well used being located in very close proximity to the West End shops and Coach Station. The car park is newly completed. A small part of the site has recently been developed by Aspire Student Living 3 for purpose built student accommodation. This does not prevent the remainder of the site being developed out in accordance with the policy. The site provides one of the only opportunities in the City Centre for new retail use with associated public</td>
<td>evidence in SGA4 (see page 24 and Section 4.0 Masterplan Framework on pages 75-102) and HE4 (see page 10)</td>
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<tr>
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<tr>
<td>PLY12</td>
<td>New George Street West</td>
<td>Mixed use - retail / housing</td>
<td>Yes. Strategic Masterplan which has taken into consideration key constraints (SGA4, pages 24 and 49-50). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>car parking. Opportunity exists to significantly increase car parking numbers on the site through a multi-storey format. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see pages 24 and 49-50, and Section 4.0 Masterplan Framework on pages 75-102) and HE4 (see page 12)</td>
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<tr>
<td>PLY13</td>
<td>Royal Assurance site, Armada Way</td>
<td>Mixed use - retail and housing</td>
<td>Yes. Strategic Masterplan which has taken into consideration key constraints (SGA4, pages 25 and 48-50). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. The site has been promoted by PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4) as one of the strategic retail opportunities. JLP Viability Study (O5) identifies the generic category of 'town centre retail' as marginally unviable - see Table 8.7. This is in anticipation of the cost of redevelopment of existing sites. Mixed use allocations however provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. This particular allocation is not for redevelopment but refurbishment and additional storeys. Plymouth City Council owns the Freehold of the site and operates part of the site as a surface car park. There are only two known additional leasehold interests on the site. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see pages 25 and 48-50, and Section 4.0 Masterplan Framework on pages 75-102). Further amplification of historic environment provisions sought by Historic England which JLP Councils are happy to accept as minor modifications (see EXC10A reference M45).</td>
</tr>
<tr>
<td>PLY14</td>
<td>Land at 19 The Crescent,</td>
<td>Mixed use - housing, hotel and enabling</td>
<td>Yes. Allocation consistent with City Centre Strategic Masterplan which has taken into consideration key constraints.</td>
<td>Yes. The site has been promoted by PCC in accordance with the recommendations of the City Centre</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see page 25, and Section 4.0)</td>
</tr>
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</table>

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

105
<table>
<thead>
<tr>
<th>Policy</th>
<th>Site</th>
<th>Allocation</th>
<th>Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?</th>
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<tr>
<td></td>
<td>Derrys Cross</td>
<td>student accommodation</td>
<td>(SGA4, page 25). The site was identified as a particular opportunity for hotel development in the Plymouth Hotel Market Study (EC5, p35). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Strategic Masterplan (SGA4.) JLP Viability Study (O5) identifies the non-residential uses outlined in the policy as generally unviable - see Tables 8.6-8.8. This is in anticipation of the cost of redevelopment of existing sites. Mixed use allocations however provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. The site has a turbulent financial history having gone into receivership and development schemes have been frustrated by this. Despite this the site is currently vacant except for some surface car parking and the Local Planning Authority are currently engaged in scoping discussions with prospective developers for schemes broadly aligned with the Policy intent. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Masterplan Framework on pages 75-102 and HE4 (see page 14). further amplification of historic environment provisions sought by Historic England which JLP Councils are happy to accept as minor modifications (see EXC10A reference M46)</td>
</tr>
<tr>
<td>PLY15</td>
<td>Civic Centre</td>
<td>Mixed use - residential and commercial</td>
<td>Yes. Allocation consistent with City Centre Strategic Masterplan which has taken into consideration key constraints (SGA4, page 25). The site was identified as a particular opportunity for hotel development in the</td>
<td>Yes. The site has been promoted by the land owners, Urban Splash. The site has also been promoted by PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4). JLP</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see page 25) and HE4 (see page 16,17 and Section 4.0 Masterplan Framework on pages 75-102). further amplification of</td>
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<tr>
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<tr>
<td>PLY16</td>
<td>Plymouth Railway Station and Intercity House and</td>
<td>Mixed use - improvements to the station's facilities (including</td>
<td>Yes. Allocation consistent with City Centre Strategic Masterplan which has taken into consideration key constraints (SGA4, pages 23 and 30-34). Employment floor space derived from</td>
<td>Yes. The site has been promoted by PCC in accordance with the recommendations of the City Centre Strategic Masterplan (SGA4) as one of the top three priorities for</td>
<td>Yes. Policy criteria respond to evidence in SGA4 (see pages 23 and 30-31, and Section 4.0 Masterplan Framework on pages 75-102).</td>
</tr>
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Plymouth Hotel Market Study (EC5, p35). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).

Viability Study (O5) identifies the non-residential uses outlined in the policy as generally unviable - see Tables 8.6-8.8. This is in anticipation of the cost of redevelopment of existing sites. Mixed use allocations however provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. While this is undoubtedly a very challenging site given the constraints and viability challenges, the developers Urban Splash have a significant track record in delivering projects of a similar nature. The site will be phased, with the conversion of the Civic Centre building as a priority as a vacant Listed building. Urban Splash has confirmed the intention to submit pre-application enquiry and subsequent planning application in early 2018. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.

historic environment provisions sought by Historic England which JLP Councils are happy to accept as minor modifications (see EXC10A reference M47)
<table>
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<tr>
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<td></td>
<td>land adjacent</td>
<td>complementary retail), university educational facilities, student accommodation, offices and residential</td>
<td>SGA4 (p32).</td>
<td>intervention. The mix of uses identified in this policy responds to the detailed feasibility study for the site contained in the City Centre Masterplan (SGA4) and to the project concept design as developed subsequently by a project team commissioned by PCC, Network Rail, GWR and Plymouth University. The viability challenges for the project are well known but the project team has been successful in securing a mix of public and private sector funding for the initial phases to be implemented. The project team has confirmed their intention to submit pre-application enquiry and subsequent planning application in early 2018. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>No specific historic environment mitigation measures required (HE4, page 18)</td>
</tr>
<tr>
<td>PLY17</td>
<td>Plymouth University and Plymouth College of Art</td>
<td>University uses</td>
<td>Yes. The policy responds to and reaffirms the existing role of the universities campuses.</td>
<td>Yes. The mix of uses identified in this policy respond to the future development needs of Plymouth University and Plymouth College of Art. Both institutions have taken a proactive approach to the planning and management of their campuses and have plans in place to implement these in a phased approach over the plan period.</td>
<td>Yes. Policy criteria respond to evidence in HE4 (see page 20) as well as continuing provisions from previous development plan allocations (Proposals CC16 and CC17 of City Centre and University Area Action Plan, adopted April 2010).</td>
</tr>
<tr>
<td>Policy</td>
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<tr>
<td>PLY18</td>
<td>North Hill/Tavistock Place</td>
<td>History Centre and education-led mixed use development</td>
<td>Yes. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. The History Centre (now known as The Box) is under construction, and substantially into the build, with completion expected 2020. Plymouth City Council own a substantial part of the Tavistock Place part of the site. It is proposed to develop a site planning statement in 2018 in order to promote the site. The uses proposed are specialist in nature and have not been subject to viability testing, with the exception of student accommodation which the JLP Viability Study (O5) identifies as viable - see Table 8.9. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to evidence in HE4 (see page 22).</td>
</tr>
<tr>
<td>PLY23</td>
<td>Plymouth Fruit Sales, Sutton Road</td>
<td>Mixed use - housing / offices /</td>
<td>Yes. The type of development is consistent with the Sutton Harbour Area Action Plan (Policy SH07), the lapsed</td>
<td>Yes. Landowner Rowe Group Ltd confirms it intends to deliver the site. Planning consent was given for</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (see page 24 and Section 4.0)</td>
</tr>
<tr>
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<tr>
<td></td>
<td>commercial / leisure</td>
<td>2008 planning consent for the site and the Plymouth Waterfront Strategic Masterplan (SGA5, see diagram on page 80). Key constraints considered through these processes. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>residential-led mixed use tower scheme in 2008 (08/02267/FUL). This consent has since lapsed, but the developer has commissioned Alder King to review development options and hopes to see site developed within next five years. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Masterplan Framework on pages 79-87) and HE4 (see page 24). There are no heritage assets on the site itself, but we are mindful that the site lies across the water from the Barbican Conservation Area. Various provisions cover historic environment and design issues. Provision 2 says that development should provide for high quality architecture that responds positively to the site’s heritage and Sutton Harbour’s historic character and distinctiveness.</td>
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</tr>
<tr>
<td>PLY24</td>
<td>Sutton Road West</td>
<td>Mixed use - housing / offices / commercial / leisure</td>
<td>Yes. The type of development is consistent with the Sutton Harbour Area Action Plan (Policy SH07) and the Plymouth Waterfront Strategic Masterplan, which have taken into consideration key constraints (SGA5, pages 24 and 52/53, and diagram on page 80). A planning application has just been submitted for Harbour Arch Quay. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. Part of the site including the waterfront are owned by Sutton Harbour Holdings (SHH) who are promoting development of this site. Sutton Road frontage owned by Jewsons who are not yet actively promoting development, but have been in discussion with SHH. SHH say they have confidence of delivery in 2022/23. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (Section 4.0 Masterplan Framework on pages 79-87) and HE4 (see pages 26and 52/53). Various provisions (including Provisions 1, 2 and 5 cover historic environment and design issues and these are considered appropriate.</td>
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<td>PLY25</td>
<td>Sugar House, Sutton Harbour</td>
<td>Mixed use development to deliver new residential accommodation, offices and active ground floor uses (A use classes)</td>
<td>Yes. The type of development is consistent with the Sutton Harbour Area Action Plan (Policy SH07), the extant planning consent for the site and the Plymouth Waterfront Strategic Masterplan (SGA5, see diagram on page 80). Key constraints considered through these processes. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. Site owned by Sutton Harbour Holdings (SHH) who are promoting development of this site. Site has extant planning consent. Pile foundations are already in place. Pre-application discussions are ongoing for a new scheme. Developer considers that delivery will happen in 2022/23. Therefore it is reasonable to assume that a viable development could be delivered over the plan period, and potentially could come forward early in the plan period.</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (Section 4.0 Masterplan Framework on pages 79-87) and HE4 (see page 28). Various provisions (including Provisions 1, 2 and 5 cover historic environment and design issues and these are considered appropriate.</td>
</tr>
<tr>
<td>PLY26</td>
<td>Sutton Harbour Fish Quay</td>
<td>Enhancement of existing fish quay and market, with complementary leisure related uses</td>
<td>Yes. The type of development identified is based upon the current use of the land for fishing purposes. The Plymouth Employment Land Review (EC6, 3.5.2, p28) highlights deficiency of sites with direct waterfront access which should be safeguarded for marine uses. The importance of fisheries is well documented in evidence base studies. See particularly the Port of Plymouth Study (T5, para 2.60, 2.61/Table 2.13, page 54/Table 3.1, para 7.39/Table 7.5, para 10.15/Table 10.1) and (T5A, para B.1.25, B.1.31-39, D.1.117. Additionally, in Spring/Summer of 2017, the City Council undertook an analysis of the City’s fishing industry including a significant survey of those working in the fishing industry locally, particularly boat operators.</td>
<td>Yes. The operator of the very significant Fish Market at the Fish Quay (Plymouth Trawler Agents) together with the wider fishing industry support the general enhancement of the site to improve capacity and efficiency alongside complementary uses. In August 2016 the City Council facilitated two workshop sessions with fishing sector representatives the aim of which was to develop an industry SWOT Analysis. This revealed a strong commitment to further developing the fishing industry cluster within Plymouth and a belief that significant opportunities exist. The full report of this is attached at Appendix 10.</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (Section 4.0 Masterplan Framework on pages 79-87, including opportunity for improved public access to Aquarium) and HE4 (see page 30). Provisions 4, 5, and 6 cover historic environment and design issues and these are considered appropriate.</td>
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<td>PLY27</td>
<td>Register office, Lockyer Street</td>
<td>Mixed use - hotel / housing</td>
<td>Yes. Allocation consistent with Waterfront Strategic Masterplan which has taken into consideration key constraints (SGA5, sites 1 and 19 on pages 23/26/27, and page 30 commentary on Armada Way). This is a flexible policy which seeks to owners and skippers. This identified the national significance of Plymouth’s fishing industry and a need for/importance of improved facilities and safeguarding the future of fishing and the Fish Quay in particular. The report on this analysis is attached at Appendix 9.</td>
<td>The landowner Sutton Harbour Holdings also supports the enhancement of the site, although seeks greater specificity in the policy about a wider range of uses that could be developed on site alongside fish industry activities. The most recent statistics on the scale of fish sales through the Fish Quay’s market (of fish landed locally and from surrounding ports) are attached at Appendix 11. A currently steady (though historically high) volume of fish sold is evident which has achieved a useful increase in sales values. Brexit opportunities may well add further impetus to growth. Meanwhile various actions (e.g. in respect of design and funding) are underway to take forward the enhancement process. It is noted finally that the policy is flexible to allow enhancement of the site at many scales and it is reasonable to expect that this can be achieved in the Plan period.</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (sites 1 and 19 on pages 23/26/27, page 30 commentary on Armada Way, and Section 4.0 Masterplan Framework on pages 79-87) and HE4 (see...</td>
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<tr>
<td>PLY28</td>
<td>Quality Hotel, land north of Cliff Road</td>
<td>Mixed use - hotel / housing</td>
<td>Yes. Allocation consistent with Waterfront Strategic Masterplan which has taken into consideration key constraints (SGA5, page 25). The site was identified as a particular opportunity for hotel development in the Plymouth Hotel Market Study (ECS, p35). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need so development amount not specified (cf. para 157 of the Framework, fifth bullet point).</td>
<td>Yes. The site was purchased by PCC and the existing building demolished. An extensive competitive tender exercise has been carried out and Henley Real Estate (HRE) have been selected as preferred developer for a new hotel and residential apartments. HRE has secured planning consent for a new hotel and residential apartments and construction is anticipated to commence soon.</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (see site 11 on page 25 and Section 4.0 Masterplan Framework on pages 79-87) and HE4 (see page 36), and to masterplan and planning consent.</td>
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<tr>
<td>PLY29</td>
<td>Millbay waterfront</td>
<td>Mixed use neighbourhood</td>
<td>Yes. Part of the site is a pier, and appropriate for safeguarding marine related uses and deep water berthing. The remainder of the site benefits from planning consents for the uses detailed in the policy and key constraints were considered through this process.</td>
<td>Yes. The northern part of the site is currently under construction (Plots A2 and C2), and is expected to continue delivery under an outline consent. Part of the site (Millbay Marina Village) has full planning permission, which is yet to be</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (see site 11 on page 25 and Section 4.0. Masterplan Framework on pages 79-87) and HE4 (see page 36), and to masterplan and planning consent.</td>
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<td>PLY30</td>
<td>Bath Street West</td>
<td>Mixed use - housing led mixed use regeneration</td>
<td>Allocation consistent with Waterfront Strategic Masterplan which has taken into account key constraints (SGA5, site 11 on page 25). The employment floorspace has been derived from the planning consent. The site was identified as a particular opportunity for hotel development in the Plymouth Hotel Market Study (EC5, p35).</td>
<td>implemented. Trinity Pier is the most challenging for delivery due to its constraints, however can be phased at a later stage in the plan period.</td>
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<tr>
<td>PLY31</td>
<td>Bath Street East</td>
<td>Mixed use - arena / commercial / housing</td>
<td>Allocation consistent with Waterfront Strategic Masterplan which has taken into consideration key constraints (SGA5, pages 44-49). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. Large parts of the site have been purchased by PCC and the HCA and some of the existing buildings have been demolished. Negotiations continue with existing occupiers of the site. An extensive competitive tender exercise has been carried out and preferred developer is expected to be announced soon.</td>
<td>Yes. Policy criteria respond to evidence in SGA5 (see page 23 on Millbay boulevard, pages 44/45 and Section 4.0 Masterplan Framework on pages 79-87) and HE4 (see page 40). Further amplification of historic environment provisions sought by Historic England which JLP Councils are happy to accept as minor modifications (see EXC10A reference M59 and M60).</td>
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JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

114
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which JLP Councils are happy to accept as minor modifications (see EXC10A reference M62 and M63) |
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<tr>
<td>PLY32</td>
<td>Stonehouse Barracks</td>
<td>Mixed used - residential and sports</td>
<td>Yes. Detailed assessment of the site is yet to be undertaken but the site is known to contain buildings and sites of historic importance and is likely to include constraints such as hazardous risk, ground conditions and site availability. Allocation consistent with Waterfront Strategic Masterplan (SGAS, see site 21 on page 27). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. The site is owned by the MoD and they have confirmed their intent to dispose of the site as part of their national review of the defence estate. The site is significant in scale and the policy includes a wide range of potential uses. The design and disposal strategy for the site will be led by the MoD but we understand that this will be within the plan period.</td>
<td>Yes. Policy criteria respond to evidence in HE4 (see page 42) and SGAS (see sites 14 and 21 on pages 26/27 and Section 4.0 Masterplan Framework on pages 79-87).</td>
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<tr>
<td>PLY33</td>
<td>Oceansgate, South Yard</td>
<td>Employment</td>
<td>Yes. Type and quantum of development identified through masterplan and planning consent for site which has taken into account key constraints. Additionally, the Plymouth Employment Land Review (EC6, 3.5.2, p28) highlights deficiency of sites with direct waterfront access which should be safeguarded for marine uses. Appendix G to EC6 identifies this site as part of employment land supply. The site is identified in EC6A as site 95.</td>
<td>Yes. The site has been designated as an Enterprise Zone and is actively marketed by the Oceansgate team. Phase 1 of the site has been masterplanned, planning consents gained and is under construction. A detailed programme exists for the delivery of subsequent phases.</td>
<td>Yes. Informed by masterplan and planning consent.</td>
</tr>
<tr>
<td>PLY35</td>
<td>Drakes</td>
<td>Heritage-led</td>
<td>Yes. The site has significant amount of</td>
<td>Yes. The site benefits from both full</td>
<td>Yes. Policy criteria responds</td>
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JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

115
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<td>PLY36.1</td>
<td>Island</td>
<td>regeneration with controlled community access</td>
<td>constraints including lack of access to services and amenities, the need for infrastructure, challenging ground conditions, flood zone and ground conditions. The proposal for heritage led regeneration has considered these constraints. The sites benefits from a recent (2017) planning consent for scheme in accordance with the site policy, which addressed the various site constraints. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf. para 157 of the Framework, fifth bullet point).</td>
<td>and listed building planning approval. Whilst the scheme has not yet been implemented, discussions are ongoing with the developer in relation to the planning conditions and introduction of phasing, which gives a good indication of the intent to implement the consents.</td>
<td>to HE4 (see page 44) and planning consent.</td>
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<tr>
<td>PLY36.4</td>
<td>Millfields Trust, 278 Union Street</td>
<td>Mixed use community hub for Stonehouse</td>
<td>Yes. On this basis a mixed use development is considered appropriate. Allocation consistent with Waterfront</td>
<td>Yes. The architect in behalf of Millfields Trust has agreed with the delivery forecast (2025 - 26).</td>
<td>Yes. Policy criteria respond to evidence in HE4 (see page 52) and SGA5 (see site 12 on...</td>
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<td>including employment and office use, community space, health and wellbeing and residential</td>
<td>Strategic Masterplan which has taken into consideration key constraints (SGA5, site 12 on page 25). Commercial floorspace as advised by Millfields Trust masterplan.</td>
<td>page 25 and Section 4.0 Masterplan Framework on pages 79-87.</td>
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| PLY38 | Derriford Commercial Centre | Mixed use - new commercial and district centre | Yes. The type and amount of development guided by strategic masterplan framework (fig 4.5 of JLP) with detailed capacity assessment workings, which has taken into consideration key constraints. Only housing and office floor space is quantified as these support the overall housing and employment supply position. Retail floor space is not specified, supported by evidence in EC9 (see particularly 4.45-4.47). The general approach taken in the policy including its mixed use approach is supported by evidence in EC9 (particularly 4.17-4.21). It should be noted that since the submission of the JLP, a planning consent has been granted consistent with the allocation accounting for over 8,000 sqm on non food retail and nearly 8,000 sqm of B1 office, with the potential for a further 4,500 sqm just to the north of the site. Additionally, a major landowner (PCC) has commissioned a detailed masterplan for the large part of the site in its ownership - early drafts suggesting provision of in the order of 350 residential units (excluding sheltered accommodation) and a further 11,380 sqm commercial/B1 floorspace. This potentially accounts for in the order of 70% of the B1 in PLY38. Given that major land areas at North West Quadrant, the Lone Eagle site, the Ambulance Trust site and potentially the Territorial Army site will come forward during the plan period, this work gives confidence about the overall development quantities identified in the policy. | Yes. The policy approach incorporated in the plan is designed to facilitate a market-led approach to delivery within the context of a masterplan framework. Past attempts to identify one site to the exclusion of others have led to an adversarial approach (and an over-reliance on individual anchor stores to facilitate delivery) which has hindered actual delivery on the ground. This change of approach is summarised on pages 16 -19 of JLP5 and is justified by EC9 (particularly 4.49-4.65). Development of significant parts of the site are being actively pursued by different land owners and developers, and 4 of the 5 landowners are engaged in the site (the exception being the MoD but their land is a peripheral part of the overall allocation). Planning permission has very recently been granted for a Range superstore and office headquarters on the southern part of the allocation, including some of the early infrastructure for the strategic masterplan led approach. Planning permission has already been granted for a new multi-storey car park, offices and small-scale retail on the northern part of the site to facilitate the availability of the site for redevelopment, and a live planning application proposes healthcare facilities with further small scale retail. Both incorporate, and will contribute to, new infrastructure consistent with the strategic masterplan framework. Positive discussions are also being held with further landowners within the site. A detailed masterplan is currently under preparation by one landowner (PCC) for the former Parade Ground and Derriford business park part of the site, to be consistent with the framework. A landowner (Lone Eagle) has indicated support and an intention to be part of the wider plan for the area once existing leases expire in 2020. JLP Viability Study (O5) identifies the generic category of}
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<td>There is a significant history to the identification of the opportunities for a new heart for the north of Plymouth, including a district centre, with many documents that evidence the evolution of strategy from the pre-Plymouth Core Strategy day to the present time (all published for the Derriford AAP Public Examination). The JLP Public Examination library does not include all these documents. However, EC9 contains a useful high level summary of the journey (4.3-4.14) and three of the key reports are set out in SGA2. SGA1 is included as it identifies key issues that the JLP is seeking to address in the area including lack of sense of place (2.3.1 and pages 10-11), extensive areas of surface car parking (2.3.1 - fig 14), lack of clear structure of buildings, streets and spaces (2.3.1 - fig 15), majority of development turning its back on green valleys, with limited access (pages 10-11), roads not pedestrian friendly streets and oversized infrastructure (page 11) and poor movement structure and lack of connectivity (page 21 and figures 28,29 and 31). Part 7 of the policy lists the infrastructure requirements that individual developments will be expected to contribute to in order to deliver the policy.</td>
<td>'town centre retail’ as marginally unviable - see Table 8.7. This is in anticipation of the cost of redevelopment of existing sites, which is not the case for much of this site. Additionally, mixed use allocations provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. Some of the development is likely to be public sector led - including health related uses.</td>
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<tr>
<td>PLY39</td>
<td>South West Water Site, Glacis Park</td>
<td>Mixed use development - including housing, office / B1, community and education uses</td>
<td>Yes. An internal capacity assessment has been undertaken for the site to demonstrate the site capacity based on a series of assumptions about the mix of uses having regard to the significant constraints on the site. This is a complex site in multiple landownership with 3 owners for the key parts of the site. Significant constraints include gradient and topography and the historic environment, given the proximity of Crownhill Fort and other heritage.</td>
<td>Yes. It is accepted that this site is unlikely to come forward comprehensively until later in the plan period and this has been supported by a recent email from the agent of the 3 landowners (see Appendix 4). However, it is reasonable to assume that the site will be delivered during the plan period given the assets that exist within a higher value part of the city and it is incumbent upon the plan to provide a positive framework for delivery. It should be noted that the three landowners are seeking to bring the site forward for residential led mixed use, as</td>
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<td>PLY43</td>
<td>University of St Mark and St John</td>
<td>University uses, including sports hub</td>
<td>Yes. The policy responds to the existing role of the university campus and reaffirms that. In relation to its sporting use, this is supported through the Sport and Leisure Facilities Plan (EN35 - page 7; para 2.6; 2.17), EN35B (para.3.4, 5.25 and page 64). There is no infrastructure constraints that prevent the implementation of the policy.</td>
<td>Yes. The policy is supportive of aspirations of the university to expand. The plan does not set out specific timescales and instead puts in place a supportive policy environment. Marjon are part of the Steering Group for the Plan for Playing pitches (EN20 Page 12 figure 1.1). They will be part of future updates and their future project will form part of updates to the action plan.</td>
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<tr>
<td>PLY46.1</td>
<td>Plymouth International Medical and Employment (predominantly B1 use)</td>
<td>Yes. This is one of a relatively small number of plots remaining in an established and well serviced business park. There are no overriding constraints</td>
<td>Yes. JLP Viability Study (OS) identifies the generic category of 'business park uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative...</td>
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<td>Technology Park - Plot A</td>
<td>Classes</td>
<td>To delivery on site. See Plymouth Employment Land Review (EC6, Appendix H). The floor space potential is identified in EC6A (see site 71). B1a uses generally excluded from PIMTP site as these are town centre uses; B8 excluded given qualitative offer of PIMTP.</td>
<td>Development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. Much of PIMTP is already developed and it is reasonable to expect all of its remaining plots to be successfully developed. Development interest and take-up of Plymouth International Medical and Technology Park (PIMTP) sites has continued over recent years, a picture consistent with Plymouth-wide property market review indications in respect of industrial property such as Vickery Holman's 2016-17 Review which also reported rises in industrial floor space values in Plymouth across the size ranges. Development of the plan's PIMTP plots is therefore expected to take place comfortably within the plan period. See Appendix 12.</td>
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<tr>
<td>PLY46.2</td>
<td>Plymouth International Medical and Technology Park - Plot E</td>
<td>Employment (predominantly B1 uses)</td>
<td>Yes. This is one of a relatively small number of plots remaining in an established and well serviced business park. There are no overriding constraints to delivery on site. See Plymouth Employment Land Review (EC6, Appendix H). The floor space potential is identified in EC6A (see site 73). The area was revised from EC6A figure to reflect change in context (see TP4 Appendix 2). B1a uses generally excluded from PIMTP site as these are town centre uses; B8 excluded given qualitative offer of PIMTP.</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of 'business park uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. Much of PIMTP is already developed and it is reasonable to expect all of its remaining plots to be successfully developed. Development interest and take-up of Plymouth International Medical and Technology Park (PIMTP) sites has continued over recent years, a picture consistent with Plymouth-wide property market review indications in respect of industrial property such as Vickery Holman's 2016-17 Review which also reported rises in industrial floor space values in Plymouth across the size ranges. Development of the plan's PIMTP plots is therefore expected to take place comfortably within the plan period. See Appendix 12.</td>
</tr>
<tr>
<td>PLY46.3</td>
<td>Plymouth International</td>
<td>Employment (predominantly)</td>
<td>Yes. This is one of a relatively small number of plots remaining in an established and well serviced</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of 'business park uses' as unviable - see Table 8.6. Para</td>
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<td>Medical and Technology Park - Plot F</td>
<td>y B1 use classes</td>
<td>business park. There are no overriding constraints to delivery on site. See Plymouth Employment Land Review (EC6, Appendix H). The floor space potential is identified in EC6A (see site 74). B1a uses generally excluded from PIMTP site as these are town centre uses; B8 excluded given qualitative offer of PIMTP.</td>
<td>8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. Much of PIMTP is already developed and it is reasonable to expect all of its remaining plots to be successfully developed. Development interest and take-up of Plymouth International Medical and Technology Park (PIMTP) sites has continued over recent years, a picture consistent with Plymouth-wide property market review indications in respect of industrial property such as Vickery Holman's 2016-17 Review which also reported rises in industrial floor space values in Plymouth across the size ranges. Development of the plan's PIMTP plots is therefore expected to take place comfortably within the plan period. See Appendix 12.</td>
</tr>
<tr>
<td>PLY46. 4</td>
<td>Plymouth International Medical and Technology Park - Plot G</td>
<td>Employment (predominantly B1 use classes)</td>
<td>Yes. This is one of a relatively small number of plots remaining in an established and well serviced business park. There are no overriding constraints to delivery on site. See Plymouth Employment Land Review (EC6, Appendix H). The floor space potential is identified in EC6A (see site 75). B1a uses generally excluded from PIMTP site as these are town centre uses; B8 excluded given qualitative offer of PIMTP.</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of 'business park uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. Much of PIMTP is already developed and it is reasonable to expect all of its remaining plots to be successfully developed. Development interest and take-up of Plymouth International Medical and Technology Park (PIMTP) sites has continued over recent years, a picture consistent with Plymouth-wide property market review indications in respect of industrial property such as Vickery Holman's 2016-17 Review which also reported rises in industrial floor space values in Plymouth across the size ranges. Development of the plan's PIMTP plots is therefore expected to take place comfortably within the plan period. See Appendix 12.</td>
</tr>
<tr>
<td>PLY46.</td>
<td>The Ship,</td>
<td>Mixed use -</td>
<td>Yes. This is the reuse of an existing building - EC6A</td>
<td>This scheme has now been implemented.</td>
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<tr>
<td>5</td>
<td>Derriford</td>
<td>office / leisure</td>
<td>site 80. The development for mixed office and leisure is now complete. Grade II* listed building.</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of 'business park uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. Much of Plymouth Science Park is already developed and it is reasonable to expect all of its remaining plots to be successfully developed. Phase 6 is a key enabler for the growth aspirations and deliverables of the Park's current vision. Phase 5 is completed (end 2016) and the Park is now on target for its forecast occupancy levels, with much of the Phase 5 space having been pre-let before completion. Demand for space and services on the Science Park continues to be strong with significant interest for supporting emergent technologies unable to be met. The Park is looking to invest in cutting edge equipment and services that will serve as a pull for 'next-generation' technology companies in medical, digital and engineering sectors. Plymouth Science Park Ltd is therefore looking to bring the Phase 6 site forward within the next 5 years. See Appendix 12.</td>
</tr>
<tr>
<td>PLY46. 6</td>
<td>Plymouth Science Park Phase 6</td>
<td>Employment (B1 use classes)</td>
<td>Yes. This is the last remaining plot in Plymouth Science Park. There are no overriding constraints to delivery. Floor space calculated on basis of plot ratio calculation (see TP4, page 15). B1a uses generally excluded from site as these are town centre uses; B8 excluded given qualitative offer of Science Park.</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of 'business park uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. Much of Plymouth Science Park is already developed and it is reasonable to expect all of its remaining plots to be successfully developed. Phase 6 is a key enabler for the growth aspirations and deliverables of the Park's current vision. Phase 5 is completed (end 2016) and the Park is now on target for its forecast occupancy levels, with much of the Phase 5 space having been pre-let before completion. Demand for space and services on the Science Park continues to be strong with significant interest for supporting emergent technologies unable to be met. The Park is looking to invest in cutting edge equipment and services that will serve as a pull for 'next-generation' technology companies in medical, digital and engineering sectors. Plymouth Science Park Ltd is therefore looking to bring the Phase 6 site forward within the next 5 years. See Appendix 12.</td>
</tr>
<tr>
<td>PLY46. 11</td>
<td>Land south west of Belliver Way (Former Playing Field to west of Becton Dickinson)</td>
<td>Employment</td>
<td>Yes. The key constraint is that this site is in current use for playing pitch. However, it is a site in an industrial estate and provided that sports pitch is relocated employment is clearly a suitable use. EN20 page 7 (Figure ES1) is a summary table of current and projected provision of pitches that demonstrates that there is a shortfall in all four types of playing pitch. This provides that evidence that the existing pitches on this site must be re-provided if the site is re-developed. Floor space calculated on basis of plot ratio calculation (see TP4, page 15).</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of industrial / warehouse uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. This is an established industrial estate and it can reasonable be anticipated that a scheme would come forward during the plan period. The site offers particular potential as an expansion site for Becton Dickinson. It is also noted that PBA undertook the plan-wide</td>
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<td>TP4, page 15). B1a uses excluded from site as these are town centre uses.</td>
<td>viability test of industrial units based on a similar scale of unit to what is currently in existence in Plymouth. These units are generally quite large and have been built in the 70s, 80 and 90s. In the last 10 years we have seen a significant shift towards much smaller industrial units built as part of multi-unit developments. The demand for these is very buoyant and a number of schemes over the last few years have been built out. These smaller (sub-100sqm) units sell for around £1300 per sqm whereas the older, larger units have been identified by PBA as worth in the region of £778 psqm. What we can see from this is that the industrial market has shifted and what occupiers currently want (ie. smaller units) are a significantly more viable development and therefore we have no concerns with these types of developments coming forward. See Appendix 12.</td>
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<td>PLY46. 12 Land North of Broadley Park Road Employment (B1b,c, B2, B8 use classes) Yes. This is a serviced gap site on the north of Broadley industrial estate, situation between a consent and a developed and occupied plot. The site is at the edge of Tamar Valley AONB and screened by a hedgerow; strategic landscaping is identified in the policy in response to this fact. See EN22, fig 1.2: and EN22A page 158 (guidance for managing change in UF03, especially in relation to AONB). Floor space calculated on basis of plot ratio calculation (see TP4, page 15). B1a uses excluded from site as these are town centre uses.</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of industrial / warehouse uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. This is an established industrial estate and it can reasonable be anticipated that a scheme would come forward during the plan period. Its also noted that PBA undertook the plan-wide viability test of industrial units based on a similar scale of unit to what is currently in existence in Plymouth. These units are generally quite large and have been built in the 70s, 80 and 90s. In the last 10 years we have seen a significant shift towards much smaller industrial units built as part of multi-unit developments. The demand for these is very buoyant and a number of schemes over the last few years have been built out. These smaller (sub-100sqm) units sell for around £1300 per sqm whereas the older, larger units have been identified</td>
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<tr>
<td>PLY46.13</td>
<td>Land North of Tamerton Road and south of Roborough House</td>
<td>Employment and sports pitches</td>
<td>Yes. The site is potential expansion land for a major employer (Plessey). The key constraint is that this site is in current use for playing pitch; and the site is also sloping in parts with greenfield land, but out of sight of the AONB. Provided that sports pitch is relocated on site expansion of the employment facilities is justified. The floor space figure is based on outline masterplanning work shared with the JLP Councils by Plessey senior management (TP4, Appendix 2). EN20 page 7 (Figure ES1) is a summary table of current and projected provision of pitches that demonstrates that there is a shortfall in all four types of playing pitch. This provides that evidence that the existing pitches on this site must be re-provided if the site is re-developed B1a uses excluded from site as these are town centre uses.</td>
<td>Yes. JLP Viability Study (O5) identifies the generic category of industrial / warehouse uses as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. The site offers particular potential as an expansion site for Plessey. Indications (from face-to-face discussions with the business concerned) are that development is likely to be required, quite possibly in the early part of the plan period. Its also noted that PBA undertook the plan-wide viability test of industrial units based on a similar scale of unit to what is currently in existence in Plymouth. These units are generally quite large and have been built in the 70s, 80 and 90s. In the last 10 years we have seen a significant shift towards much smaller industrial units built as part of multi-unit developments. The demand for these is very buoyant and a number of schemes over the last few years have been built out. These smaller (sub-100sqm) units sell for around £1300 per sqm whereas the older, larger units have been identified by PBA as worth in the region of £778 per sqm. What we can see from this is that the industrial market has shifted and what occupiers currently want (i.e., smaller units) are a significantly more viable development and therefore we have no concerns with these types of developments coming forward. See Appendix 12.</td>
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## Qu. 7.4i – Eastern Corridor Growth Area

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<tr>
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<tbody>
<tr>
<td>PLY48</td>
<td>Sherford new community</td>
<td>Major housing led mix use community</td>
<td>Yes, Sherford is being built out by a consortium of 3 house builders. The s106 sets out all the infrastructure obligations which are required at various trigger points throughout the build of the development. This includes delivery of 3 primary schools, a secondary school and major transport schemes which have been or are about to be delivered. External funding has also been secured to bring forward the early delivery (in advance of the s106 triggers) to help accelerate house building.</td>
<td>Yes. Sherford is on site and good progress is being made. The Urban Fringe Delivery Team maintain a focus on keeping momentum on the site, securing funding to bring forward infrastructure. Sherford is currently in its first phase of delivering 700 homes, with a significant amount of up front infrastructure already in place</td>
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<td>PLY50</td>
<td>Saltram Meadow</td>
<td>Major housing led mix use community</td>
<td>Yes. The site is currently under construction for a new residential community with associated facilities and services to support the new population, including a new primary school, education and sports facilities and a new local centre. The constraints and necessary infrastructure has been established and appropriate mitigation secured through the approval of planning consent.</td>
<td>Yes. The site is under construction and the new community is starting to form with residential element of the scheme occupation steadily increasing. Plans to implement the non-residential elements are advancing with the primary school likely to be the next phase of significant infrastructure investment.</td>
</tr>
<tr>
<td>PLY51</td>
<td>Langage</td>
<td>Employment (B1b,c, B2, B8 use classes)</td>
<td>Yes. See answer to 7.4iv in this Matter Statement, which provides a fuller explanation of the type of development and how the amount was determined. Langage is a strategic site, well located off the A38 in the Plymouth Urban Fringe. It is a unique site capable of providing large B2/B8 development which can not be found else where in the PPA. A first phase of Langage extension (40,000 sq m) is not yet developed, although the planning permission has is in place. The Section 106 contributions to Deep Lane improvements have</td>
<td>Yes. See answer to 7.4iv in this Matter Statement, which provides additional commentary on the deliverability of the allocation. JLP Viability Study (O5) identifies the generic category of 'industrial / warehouse uses’ as ‘unviable' - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. This is a unique strategic employment site with significant potential for long term employment provision - including for</td>
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<td>secured its transport capacity. CPO has recently completed and there is an emerging master plan to develop the rest of the site. The two planning authorities (PCC and SHDC) and three highway authorities (PCC, HE and DCC) are working together to enable a joined up approach to assessing the required infrastructure and funding opportunities to deliver the future phases of Langage. It is accepted that a major junction improvement will be required to delivered future phases of Langage but more assessment is required.</td>
<td>major inward investment opportunities. It is also noted that PBA undertook the plan-wide viability test of industrial units based on a similar scale of unit to what is currently in existence in Plymouth. These units are generally quite large and have been built in the 70s, 80 and 90s. In the last 10 years we have seen a significant shift towards much smaller industrial units built as part of multi-unit developments. The demand for these is very buoyant and a number of schemes over the last few years have been built out. These smaller (sub-100sqm) units sell for around £1300 per sqm whereas the older, larger units have been identified by PBA as worth in the region of £778 per sqm. What we can see from this is that the industrial market has shifted and what occupiers currently want (i.e., smaller units) are a significantly more viable development and therefore we have no concerns with these types of developments coming forward. See Appendix 12. The delivery of the proposal will be further developed by the recently set up the Urban Fringe Delivery Team, to work with the land promoters to develop a logical and efficient layout and structure for the development that makes best use of any secured public and private sector infrastructure funding. To deliver the site there is a need to be flexible and also responsive to priority market needs.</td>
</tr>
<tr>
<td>PLY56.2</td>
<td>Pomphlett Industrial Estate</td>
<td>Mixed use - housing / retail</td>
<td>Yes. The allocation of this site for residential and retail development is to complement and enhance the adjacent Saltram Meadow development. It is in current use for employment with a range of small business units which are anticipated to be relocated within the Saltram Meadow site. The development of this site should be considered in the context of the larger site to explore the potential of some relocation of uses to provide a stronger presence at the main entrance with</td>
<td>Yes. JLP Viability Study (O5) identifies all retail uses with the exception of town centre retail as being viable (table 8.7). It can therefore be reasonably assumed that a scheme will come forward and be delivered within the plan period.</td>
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JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

127
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<thead>
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<tr>
<td>PLY56.3</td>
<td>Chelson Meadow Recycling Centre</td>
<td>Waste management uses</td>
<td>active frontages. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. The site is owned by the City Council and given the nature of the allocation is reasonable to assume that should there be a need for further waste management development needed within the plan period, then this could be achieved.</td>
</tr>
<tr>
<td>PLY56.4</td>
<td>Former Western National site, Laira Bridge</td>
<td>Mixed use incorporating commercial uses (potentially small scale retail, leisure and/or hotel)</td>
<td>Yes. The allocation seeks to establish a positive framework for the redevelopment of this brownfield site which has been vacant for some time, and to overcome key constraints. At a key gateway location in the eastern corridor, this site is considered suitable for a range of commercial uses which can address and overcome the constraints identified. The opportunity for the site was initially identified through the Eastern Gateway Framework Study (particularly T1 and T1A), although a more bespoke solution to the transport infrastructure constraints was later implemented. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. JLP Viability Study (O5) identifies small scale retail as a viable development use in the city; however hotel development is marginally unviable. Mixed use allocations however provide the opportunity for introducing higher value uses; and developers can generate value for specific projects through creative solutions or pre-lets. Therefore it is reasonable to assume that a viable development could be delivered over the plan period.</td>
</tr>
<tr>
<td>PLY56.5</td>
<td>Prince Rock playing</td>
<td>Mixed use development</td>
<td>Yes. The allocation seeks to provide mixed use development which maximises the waterfront</td>
<td>Yes. Mixed use allocations provide the opportunity for introducing higher value uses. The site is within PCC</td>
</tr>
<tr>
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<td>pitch site</td>
<td>exploiting waterfront location and situated on strategic cycle network and Plym Valley. Public house / restaurant, leisure related retail and cycle hire facilities with parking.</td>
<td>location and helps to strengthen the eastern corridor gateway with site PLY56.4, providing that suitable mitigation and relocation of the playing pitch can be delivered. The opportunity for the site was initially identified through the Eastern Gateway Framework Study (particularly T1 and T1A), although a more bespoke solution to the transport infrastructure constraints was later implemented. This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>ownership and therefore it is reasonable to assume that a viable development could be delivered over the plan period.</td>
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Qu. 7.5i – PPA other

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<tr>
<td>PLY58. 1</td>
<td>Land at St. Levan Gate</td>
<td>Medium sized food retail store</td>
<td>Yes. Development will help meet an identified qualitative need for new food retail in west of city (EC9). The site is identified as part of a positive planning strategy to promote development opportunities, to provide the market confidence about the investment opportunity (cf para 157 of the Framework, fifth bullet point). The size of store will need to be tested through retail impact assessment; the site is capable of providing a small-medium size supermarket with car parking.</td>
<td>Yes. The site is in singular ownership and is currently in use for low value storage units which does not prevent redevelopment of the site. JLP Viability Study (O5) identifies the generic category of 'smaller supermarket' as being viable - see Table 8.7. This particular allocation is known to have contamination issues that will need to be remediated in any development proposals, but as retail is a high value use this is not considered to have an over bearing impact on the potential for the site to come forward and it is therefore reasonable to assume that a viable development could be delivered over the plan period.</td>
</tr>
<tr>
<td>PLY58. 2</td>
<td>Home Park</td>
<td>Completion of stadium improvements and appropriate ancillary uses.</td>
<td>Yes. Justification to support the redevelopment plans for the Football Club with appropriate enabling uses. This is a flexible policy which seeks to promote the opportunity based on the needs of the football club (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. Planning permission has been granted for stadium improvements and ancillary uses since submission of the plan; it is therefore reasonable to assume that the site is available for development and deliverable within the plan period.</td>
</tr>
<tr>
<td>PLY58. 16 Bull Point Barracks</td>
<td>Mixed use refurbishment to provide new homes and employment / training space for local community</td>
<td>Yes. The redevelopment of this site supports the aspirations expressed in the draft Barne Barton Neighbourhood Plan which has considered the site in the context of key constraints.</td>
<td>Yes. The site is confirmed as available in the SHLAA and as such there is reasonable prospect that it will be delivered. JLP Viability Study (O5) identifies the generic category of industrial / warehouse uses' as unviable - see Table 8.6. Para 8.6.2 recognises that this is in the context of speculative development rather than pre-lets, or mixed use developments such as is the case here. Furthermore, sites can be brought forward by the public sector, or with public sector subsidy, as has been the case in a number of locations in Plymouth and the wider Plan Area. Its also noted that PBA undertook the plan-wide viability...</td>
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<tr>
<td>PLY58. 18</td>
<td>Weston Mill sports pitches</td>
<td>Enhancements of sports facilities and enabling food retail</td>
<td>Yes. There will need to be a significant investment in infrastructure to support the redevelopment of the site. EC9 identifies the qualitative gap in retail provision in the west of the city. The allocation seeks to provide an enhancement of the existing sports facilities with enabling development in the form of a new food retail store to meet the qualitative need for new retail provision. The retail floor space requirement of the scheme is not defined in policy. This will need to be informed by a Retail Impact Assessment and on the basis of improved and enhanced sports provision.</td>
<td>Yes. The site has been confirmed as available. JLP Viability Study (O5) identifies the generic category of 'supermarket' as being viable - see Table 8.7. This particular allocation is focussed on the enhancement and reprovision of the sports facilities with the provision of a new supermarket as enabling development. As retail is a high value use, it is therefore reasonable to assume that the reprovision of the sports facilities and the necessary mitigation of identified constraints will result in a viable development that could be delivered over the plan period.</td>
</tr>
<tr>
<td>PLY59. 2</td>
<td>Land either side of Clittaford Road</td>
<td>Mixed use - housing with small / medium sized food store</td>
<td>Yes. The retail element of the proposal already has planning permission and is implemented.</td>
<td>Yes. The food store has been completed and is operational and there are early discussions with the landowner regarding the residential development.</td>
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<tr>
<td>PLY59. 6</td>
<td>Toshiba Site, Ernesettle Lane, Ernesettle Employment (B1b,c, B2, B8 use classes)</td>
<td>Yes. The site has the benefit of planning consent under 13/01916/OUT and 16/01451/REM, which will have included consideration of key constraints. Plymouth Employment Land Review (EC6, Appendix G) identifies this site as part of employment land supply. This is part of site 36 in EC6A. Floor space calculated on basis of plot ratio calculation (see TP4, page 15).</td>
<td>Yes. The site has the benefit of planning consent for northern part of site and therefore it would be reasonable to assume that the site is available for development. JLP Viability Study (O5) identifies the generic category of 'B class uses' as unviable – see Table 8.6. This is consistent with other locations in England and Wales outside of major cities. However, this site is in an established employment area with good connections to the A38 Strategic Road Network. It is noted that PBA undertook the plan-wide viability test of industrial units based on a similar scale of unit to what is currently in existence in Plymouth. These units are generally quite large and have been built in the 70s, 80 and 90s. In the last 10 years we have seen a significant shift towards much smaller industrial units built as part of multi-unit developments. The demand for these is very buoyant and a number of schemes over the last few years have been built out. These smaller (sub-100sqm) units sell for around £1300 per sqm whereas the older, larger units have been identified by PBA as worth in the region of £778 per sqm. What we can see from this is that the industrial market has shifted and what occupiers currently want (i.e., smaller units) are a significantly more viable development and therefore we have no concerns with these types of developments coming forward. See Appendix 12.</td>
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<tr>
<td>PLY59. 13</td>
<td>Land behind Marett Road, St Budeaux Commercial or mixed use opportunity</td>
<td>Yes. The site offers an opportunity for a commercial / mixed use development on a site which is well located in relation to the A38 Strategic Road Network. It has been considered in the past for the possible relocation of uses from sites being considered for wider development (incl Derriford commercial centre). This is a flexible policy which seeks to promote the opportunity; it is not seeking to address a specific objectively assessed need in relation to commercial</td>
<td>Yes. The site is confirmed as available in the SHLAA and as such there is reasonable prospect that it will be delivered. JLP Viability Study (O5) identifies the generic category of 'B class uses' as unviable - see Table 8.6. This is consistent with other locations in England and Wales outside of major cities. However, this site is well located in relation to the A38 Strategic Road Network with good connections to the city and wider sub-region.</td>
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<td>Policy</td>
<td>Site</td>
<td>Allocation</td>
<td>Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?</td>
<td>Is the development deliverable in the timescales envisaged?</td>
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<td>floorspace so development amount not specified (cf para 157 of the Framework, fifth bullet point).</td>
<td>Yes. Part of the site has the benefit of planning consent and therefore it is reasonable to assume that the site is available for development. JLP Viability Study (O5) identifies the generic category of ‘B class uses’ as unviable - see Table 8.6. This is consistent with other locations in England Wales outside of major cities. However, this is a prime waterside site that is important to support local marine industries, particularly its access to deep water berthing. Planning permission has been granted for part of this site and it would therefore it would be reasonable to assume that the site could be delivered within the plan period. It is also noted that PBA undertook the plan-wide viability test of industrial units based on a similar scale of unit to what is currently in existence in Plymouth. These units are generally quite large and have been built in the 70s, 80 and 90s. In the last 10 years we have seen a significant shift towards much smaller industrial units built as part of multi-unit developments. The demand for these is very buoyant and a number of schemes over the last few years have been built out. These smaller (sub-100sqm) units sell for around £1300 per sqm whereas the older, larger units have been identified by PBA as worth in the region of £778 per sqm. What we can see from this is that the industrial market has shifted and what occupiers currently want (i.e. smaller units) are a significantly more viable development and therefore we have no concerns with these types of developments coming forward. See Appendix 12.</td>
<td>Yes. The site has the benefit of planning consent and therefore it is reasonable to assume that the site is available for development. JLP Viability Study (O5) identifies the generic category of ‘B class uses’ as</td>
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<td>Policy</td>
<td>Site</td>
<td>Allocation</td>
<td>Is the type and amount of such development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?</td>
<td>Is the development deliverable in the timescales envisaged?</td>
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<td></td>
<td>Floor space calculated on basis of plot ratio calculation (see TP4, page 15).</td>
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<td>Unviable - see Table 8.6. This is consistent with other locations in England Wales outside of major cities. However, planning permission has been granted for B1b, c, B2 and B8 uses and it would therefore be reasonable to assume that the site could be delivered within the plan period. It is also noted that PBA undertook the plan-wide viability test of industrial units based on a similar scale of unit to what is currently in existence in Plymouth. These units are generally quite large and have been built in the 70s, 80 and 90s. In the last 10 years we have seen a significant shift towards much smaller industrial units built as part of multi-unit developments. The demand for these is very buoyant and a number of schemes over the last few years have been built out. These smaller (sub-100sqm) units sell for around £1300 per sqm whereas the older, larger units have been identified by PBA as worth in the region of £778 per sqm. What we can see from this is that the industrial market has shifted and what occupiers currently want (i.e. smaller units) are a significantly more viable development and therefore we have no concerns with these types of developments coming forward. See Appendix 12.</td>
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APPENDIX 2: EXTRACT FROM DERRIFORD AND SEATON AREA ACTION PLAN SUSTAINABILITY APPRAISAL (DECEMBER 2012)

Please note that each of these documents listed in the heading row of the table can be found in the JLP Public Examination library.

- Plymouth Sustainable Growth Study (HO5, Stage 1, section 8: Stage 2, and Stage 2)
- Report on Proposed New District Shopping Centre 2007 (SGA2, see specific references in table)
- Report on Proposed New District Shopping Centre 2009 (SGA2, see specific references in table)
- Report on Proposed New District Shopping Centre 2011 (SGA2, see specific references in table)

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<tr>
<td>b 1</td>
<td>Considered Derriford/Seaton area as a whole rather than district centre site specific options, but made some relevant commentary on airport site – see below.</td>
<td>In physical terms the easiest site to realise a district centre development on. Cleared, access road in place. Frontage to Tavistock Road. Adjacent to existing bus stops and pedestrian crossings. Located slightly away from existing retail and commercial uses. Spatially, the site is logically considered as being a central part of the office campus in the area, and its relative lack of physical constraints to</td>
<td>In physical terms the easiest site to realise a district centre development on. Cleared, access road in place. Frontage to Tavistock Road. Adjacent to existing bus stops and pedestrian crossings. Located slightly away from existing retail and commercial uses. Located to the east of the Tavistock Road and therefore contrary to the Core Strategy. Located slightly away from existing retail and commercial uses.</td>
<td>Site being considered enlarged to include Derriford Business Park and Territorial Army (TA) site. In physical terms the easiest site to realise a district centre development on. Cleared, access road in place. Frontage to Tavistock Road. Adjacent to existing bus stops and pedestrian crossings. Located slightly away from existing retail and commercial uses. Located to the east of the Tavistock Road and therefore contrary to the Core Strategy. Located slightly away from existing retail and commercial uses. Spatially, the site is logically considered as being a central part of the office campus in the area, and its relative lack of physical constraints to</td>
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JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

135
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<tr>
<td>b 2</td>
<td>South West Water (SWW) Site</td>
<td>Considered Derriford/Seaton area as a whole rather than district centre site specific options, but made some relevant commentary on airport site – see below.</td>
<td>Largest site Need to relocate water treatment works. – Montrose Capital indicate this could be achieved relatively quickly. Need to acquire 3rd party land to achieve road frontage Attractive site for a superstore operator. Located adjacent to existing major retail area. Furthest away from existing major employment uses both in terms of distance and physical barriers. Most potential for future development by virtue of its size.</td>
<td>Largest site Dawnan land is capable of accommodating scenario 1. Need to acquire 3rd party land to achieve road frontage. Need to relocate water treatment works, in particular the SWW reservoir. Practicalities of doing this not clear. Fundamental constraint is therefore the funding and timing of the relocation. Recommend that PCC make further enquiries of SWW, OFWAT (The Water Services Regulation Authority) and South Hams District Council to fully assess risk to site delivery.</td>
</tr>
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</table>

Development should prove most attractive to this form of development. Long term expansion? (paragraphs 6.2 –6.5) uses. Spatially, the site is logically considered as being a central part of the office campus in the area, and its relative lack of physical constraints to development should prove most attractive to this form of development. Long term expansion? (paragraphs 8.5 – 8.9)
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<td>b3</td>
<td>Considered Derriford/Seaton area as a whole rather than district centre site specific options, but made some relevant commentary on airport site – see below.</td>
<td>Most prominent site in relation to Derriford Roundabout and Tavistock Road. Very good position in relation to major employment uses, other commercial uses, accessibility, potential for future expansion. Very little prospect for reconfiguration in the short to medium term. (paragraphs 6.13 – 6.16)</td>
<td>Located adjacent to existing major retail area. Furthest away from existing major employment uses both in terms of distance and physical barriers. Most potential for future development by virtue of its size. (paragraphs 8.10 – 8.20)</td>
<td>Most prominent site in relation to Derriford Roundabout and Tavistock Road. Prohibitive entry cost for redevelopment given the outstanding lease period on the BandQ unit and the need to relocate the BandQ operation. Very good position in relation to major employment uses, other commercial uses, accessibility, potential for future expansion. Despite this, the site is not available in the plan period. (paragraphs 8.21 – 8.29)</td>
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<td>b4</td>
<td>Considered Derriford/Seaton area as a whole rather than district centre site specific options, but made some relevant commentary on airport site – see below.</td>
<td>Closer than the airport to the natural centre of gravity in Derriford. In use as hospital car parking. Subject to relocation of car parking appears free of constraints and available in the short term. Relatively limited frontage to</td>
<td>Reasonably well located in relation to the natural centre of gravity in Derriford. Multi-storey car park planning permission means that the site is available for redevelopment. Relatively limited frontage to the Derriford Roundabout and the Tavistock Road in relation to</td>
<td>Considered as a site including Ambulance Trust but excluding Eagle One. Multi-storey car park planning permission means that the site is available for redevelopment. Relatively limited frontage to the Derriford Roundabout and the Tavistock Road in relation to other</td>
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JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

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<td>the Derriford Roundabout and the Tavistock Road compared to the former parade ground or BandQ sites. Change in topography could pose difficulties for the development of a building with a single level gross footprint of about 4650 sq m for an anchor store. Potential for a decked development at the southern end of the site but land here is limited due to the presence of the Ambulance Trust land. Including that land could significantly improve the position. Concerns over accessibility. No potential for longer term expansion. Well located in relation to existing commercial and employment uses, and to public transport hub. Short term prospect for an intensive, high quality mixed use scheme including some limited retail floorspace. (paragraphs 6.20 – 6.26)</td>
<td>other sites. Change in topography could pose difficulties for the development of a building with a single level gross footprint of about 5000 sq m for an anchor store. In addition a large food store would likely seek to be located close to the edge of the Tavistock Road, where the site tapers. Potential for a decked development at the southern end of the site but land here is limited due to the presence of the Ambulance Trust land, and this is a sub-optimum solution for food retailers. Concerns over accessibility. No potential for longer term expansion. Well located in relation to existing commercial and employment uses, and to public transport hub. Short term prospect for a mixed use scheme. Can accommodate scenario 1 with the acquisition of the ambulance trust land. Scenario 2 would be more challenging therefore long term growth potential of the new Derriford district centre might not be</td>
<td>sites. Change in topography could pose difficulties for the development of a building with a single level gross footprint of about 5000 sq m for an anchor store. In addition a large food store would likely seek to be located close to the edge of the Tavistock Road, where the site tapers. Potential for a decked development at the southern end of the site but land here is limited due to the presence of the Ambulance Trust land, and this is a sub-optimum solution for food retailers. Concerns over accessibility. No potential for longer term expansion. Well located in relation to existing commercial and employment uses, and to public transport hub. Short term prospect for a mixed use scheme. (paragraphs 8.34 – 8.45)</td>
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<td>5</td>
<td>Plymouth City Airport site</td>
<td>Stage 1:</td>
<td>The support of the airport is important in regard to the promotion of a new heart for Derriford which will help create a focus for the north of Plymouth. Assessment of airport as potential site for new district centre excluded ‘because of the distance from the centre of gravity at Derriford’. (paragraphs 2.44, 8.1)</td>
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<td>Stage 1:</td>
<td>Located on the northern periphery of the Derriford area. Spatially, not the correct location for a district centre. No frontage onto Tavistock Road either directly or in longer range views. Other forms of development may be more appropriate in due course than a district centre development. (paragraphs 6.17 – 6.19)</td>
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<td>Located on the northern periphery of the Derriford area. Spatially, not the correct location for a district centre. No frontage onto Tavistock Road either directly or in longer range views. Other forms of development may be more appropriate in due course than a district centre development. (paragraphs 6.17 – 6.19)</td>
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<td>The support of the airport is important in regard to the promotion of a new heart for Derriford which will help create a focus for the north of Plymouth. Assessment of airport as potential site for new district centre excluded ‘because of the distance from the centre of gravity at Derriford’. (paragraphs 2.44, 8.1)</td>
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<td>away from centre of gravity of area.</td>
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<td>Overall conclusions</td>
<td>SWW and NWQ sites offer the most realistic alternatives, but both have significant constraints. SWW site best fits with the overall vision in the Core Strategy. (paragraphs 6.27 – 6.30)</td>
<td>NWQ and the Dawnan site could accommodate a scheme in the order of scenario 1. Dawnan site is the commended location for the first phase district centre. Recommend ruling out airport and former parade ground given view that there are more appropriate business uses for the sites and airport is too far from centre of gravity. Crownhill Retail Park (B&amp;Q) site also probably ruled out given deliverability issues, although could form part of longer term expansion. (paragraphs 8.42 – 8.49)</td>
<td>Both SWRDA and NWQ site could accommodate a scheme in the order of Scenario 1 and are likely to be able to do so by 2015/16. Dawnan/SWW could accommodate Scenario 1 and 2 but unlikely before 2020, and a risk that does not become available for many years to come. Airport land ruled out because there are more appropriate business uses going forwards and the airport is too far away from Derriford’s ‘centre of gravity’. Crownhill Retail Park (B&amp;Q) site probably rule out of contention because of deliverability issues. The SWRDA land is the commended location for the first phase retail development of circa 10,000 – 15,000 sq m by 2016. (paragraphs 8.46 – 8.53)</td>
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APPENDIX 3: EXTRACTS FROM INSPECTOR’S REPORT INTO DERRIFORD AND SEATON AAP RELATING TO DISTRICT CENTRE LOCATION (23 AUGUST 2013)

District Centre Location

45. Proposal DS16 identifies that the District Centre would be located on the former Seaton Barracks site. This runs contrary to the CS Area Vision 9 objective 3 and CS paragraph 5.78, which identifies that the location would be most appropriately centred to the west of the A386.

46. However, I accept that the CS was based on the evidence available at the time of its adoption and that, as recognised by the Inspector examining the CS, further detailed work relating to Derriford and the District Centre would be required. Subsequent evidence has been produced which enables due consideration of alternative arrangements. The alteration of approach to the location of the District Centre within the Plan is recognised by the proposed changes of the Council which explicitly identifies that the CS is superseded in such regards.

47. Nonetheless, the question remains as to whether the evidence indicates that the proposed location for the District Centre is the most appropriate with due regard to reasonable alternatives? In this matter, the evidence has its complexities and can be (indeed has been) cited in support of a range of potential sites.

Glacis Park – South West Water/Dawnan

48. Initially, the evidence supported a site to the west of the A386, based on Glacis Park. The 2007 Cushman and Wakefield ‘Report on Proposed New District Shopping Centre’ assessed five potential options for the District Centre. This report did not support the use of land at the Airport, Seaton Barracks and Crownhill Retail Park and found more merit in the North West Quadrant and more still in the South West Water/Dawnan site at Glacis Park. The 2009 ‘Report on Proposed New District Shopping Centre’ reassessed site options and, in summary, recommended ruling out land at Plymouth Airport, Seaton Barracks and Crownhill Retail Park whilst land at the North West Quadrant and Glacis Park were deemed the most realistic, albeit with limitations, for an early phase of development. Subject to cost assessments and timescales of delivery, the report endorsed the South West
Water/Dawnan site with frontage premises as the most appropriate location to pursue the delivery of the District Centre.

49. The Cushman and Wakefield Report of 2011 once again reassessed the District Centre options. In this instance the difficulty of delivering the South West Water/Dawnan site was highlighted. Thus the Report summarily concluded that the North West Quadrant and Seaton Barracks sites were the most realistic options to deliver a District Centre and that Seaton Barracks was endorsed as the most appropriate location.

50. Submissions have been made to the Examination indicating how the South West Water/Dawnan site may be redeveloped to accommodate the aspirations of the Plan. Whilst these are indicative of potential layouts, uses and design they nevertheless illustrate that potential exists, including basic assumptions of viability, for a comprehensive approach to the District Centre in a location west of the A386. There is little evidence that, in terms of location, the site could not deliver a new heart for northern Plymouth with expansion potential.

51. However, the fundamental issue facing the South West Water/Dawnan site is its timely deliverability. In essence, the existing on-site water infrastructure is intended to be relocated leaving the site available for redevelopment. However and despite correspondence15, there remains some uncertainty as to the timing of the relocation. There is no substantive evidence that the site would be meaningfully available for reasonably comprehensive redevelopment within the next 5 years. The timely delivery of a District Centre, necessary to contribute towards securing the objectives of the Plan, is thus not evidently feasible. In the context of the Plan, the allocation of the site therefore would not be effective in the timescales desired.

North West Quadrant (NWQ)

52. Land at NWQ is identified by its proponents to be 6.6 hectares of brown field land used to a large extent for car parking, to be available for development and to have some reasonable potential for future expansion of any District Centre with the acquisition of neighbouring land which appears available in principle.

53. The NWQ site lies to the north of Seaton Barracks/Derriford Business Park, to the east of the A386 and adjacent to Derriford Hospital. It consequently lies within an area already well served by bus routes and is well related to other key sites within the

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

142
Plan, albeit with limited visible frontage towards the A386 and with a gradient across the site.

54. An appeal has recently been dismissed concerning a retail led scheme upon the NWQ site and the Council affirms it has very carefully considered the merits of the site for a District Centre. With due regard to its SA, the Council considers the evidence does not support a contention that the NWQ site would deliver a high quality mixed use major district centre within a reasonable time frame.

55. Nonetheless, the dismissed appeal scheme may not represent the only development solution for the site. There is no substantive evidence that alternative arrangements, which may be capable of delivering the aspirations of the Plan, are not readily feasible. The balance of evidence points to the potential availability of the site and, with regard to the submissions made, active interest from key commercial interests in developing upon the site.

56. I am mindful that the SA identified that "with the exception of alternative b5 (Plymouth airport), there is little overall difference in the sustainability performance of the different district centre options. Those differences that do exist relate primarily to the likelihood of a scheme coming forward that provides sufficient financial viability to meet affordable housing and community infrastructure needs. Additionally, alternative b4 (North West Quadrant), which is accessed off the congested Derriford junction has a particularly negative impact on the transport planning issues, given that it fails to utilise existing transport capacity at William Prance Road junction and instead creates the need to prioritise as an early phase of transport infrastructure measures an expensive reconfiguration of Derriford junction". However, there is insufficient substantive evidence that transport infrastructure could not, on a site specific basis, be reasonably developed to accommodate the District Centre at the NWQ site.

57. Within this context, the evidence does not robustly enable a clear conclusion at this current time that the NWQ site is not a reasonable alternative which falls to be considered with regard to the evolving evidence of Plymouth’s economic needs (referenced further below) and the continuing work on the transport infrastructure of the locality.

Plymouth Airport Site

58. As previously referenced, the site of Plymouth City Airport lies outside of the submitted Plan area although it did form part, for
apparent reasons of its airport use, of CS Area Vision 9. Notwithstanding my concerns that the Plan appears to have been prepared largely in isolation of and without regard to potential uses of the airport land in question, the geographic location of the airport is towards the practical periphery of the Derriford and Seaton Area when assessed on the ground.

59. The Plymouth Sustainable Growth Study16, prepared to primarily assess the sustainability of option for residential and mixed use development in the Plymouth sub region, does not provide support for a new District Centre on the Airport site, although at the time of its production the airport was functioning for its historic use and alternative sites for an airport were being explored. Indeed, the site found no support from the three Cushman and Wakefield Reports. It is the airport’s geographic position, away from the more central locations of Derriford which is a limiting factor in its suitability as a District Centre and which also limit the extent to which the CS objectives, iterated in Area Vision 9, could be satisfied.

60. The airport site is of a substantial size, would appear to be currently available, is submitted as being previously developed land and, with regard to the isochronal evidence, appears to be more closely related to a clear residential cohort than other options. These factors weigh in favour of its consideration as a location for the District Centre. However, with due regard to the SA and its addendum, the airport location is physically distant from the core of activities which form the focus of the evidence studies produced by the Council and is not consistent with the thrust of the CS to have, for example, a District Centre located with improvements to the A386 frontage and to resolve the broader fragmentation of large single land uses. The available evidence does not currently support a robust conclusion that the site is a better reasonable alternative for the District Centre at this time. The Council are suitably reviewing their strategic approach to the airport and its uses which is a sensible and appropriate mechanism for ensuring a comprehensive approach to its relationship with the wider Derriford and Seaton locality and the city as a whole.

61. The production process of the Plymouth Plan appears to be the logical planning vehicle for assessing the role of the airport site in northern Plymouth and any alternative uses which may be justified.
Former Seaton Barracks Parade Ground

62. Proposal DS16 identifies the former Seaton Barracks parade ground as the primary location for the new District Centre. As summarised above, significant support for this site, historically part of the Plymouth International Medical and Technology Park (PIMPT), was not identified by the evidence until 2011 when the potential scope for more flexible uses of the land became clearer.

63. The site is of sufficient size to accommodate a District Centre albeit the indicative design details available appear not to make the best possible contribution to improving the A386 frontage. Whilst there are issues to resolve, such as levels, trees and existing tenancies, there is also reasonable scope to accommodate further expansion into the adjoining areas, particularly the Derriford Business Park. These may take time but there is no evidence to indicate that, in the longer term, these factors are an irreconcilable bar to future expansion.

64. The evidence suggests that the former Seaton Barracks site is deliverable in the shorter term. The site also appears capable of accommodating a range of uses in line with the aspiration of the Plan and therefore has the potential to deliver the objectives contained within the Plan. However, and as discussed below, the site has historically been considered part of the Plymouth International Medical and Technology Park (PIMTP) wherein, amongst others, Policy CS04 applies. With due regard to the content of the CS overall, its previous promotion by the South West Regional Development Agency and the fact that it is a sizeable and vacant land parcel, it is not unreasonable to conclude that the CS envisaged that the site would make a positive contribution to supporting the strategic employment role of the PIMTP as a whole. With regard to the available economic/employment evidence, it is the uncertainty as to the extent to which this is required and will be secured which constrains the acceptability of the site as indicated within Proposal DS16 at this current time.

Conclusion

65. There is a qualitative need for retail development in the Derriford and Seaton Area. The Plan provides flexibility to accommodate such growth with safeguards to ensure it is complementary to the balance of retail provision across the city. The location for the District Centre is a finely balanced judgement. The Plan has been
informed by a range of evidence sources which, most recently, support its location at the Seaton Barracks. The absence of clarity on the needs of Plymouth for the employment land contained within the PIMTP weakens the justification for the submitted site, particularly when the alternative of the NWQ site is considered. These concerns cumulatively undermine the soundness of the Plan when considered as a whole. The creation of the district centre as envisaged by Proposal DS16 is not justified adequately by the totality of the evidence base at this time.
APPENDIX 4: COPY OF EMAIL RELATING TO PLY39, GLACIS PARK

Apologies, I was waiting for instructions from my client. My clients are still reviewing their approach with regards to the delivery of a mix of uses on the site. The intention is to develop a mixed use residential/led scheme and we would like to discuss this with the Council at an appropriate stage.

In the meantime, it seems sensible to assume that any residential uses would be delivered towards the end of the plan period, as you have indicated below. The precise mix and level of residential will be reviewed when we commence with further masterplanning, as well detailed phasing which reflects the stages at which various parts of the site will become available.

I hope that this above is helpful in the meantime.

Please let me know if you have any further questions.

Kind regards,

Sarah

[Email image]
APPENDIX 5: MATTER 7.4(V) EXTRACT FROM BGS SURVEY DATA SHOWING EXTENT OF LIMESTONE
### APPENDIX 6: SCHEDULE OF HOUSING SITES (QU 7.6)

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<tr>
<th>JLP Housing Allocation</th>
<th>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</th>
<th>Are the specific development requirements of each site allocation policy effective and justified by evidence?</th>
<th>SHLAA formula (progressive net developable area x density assumption)</th>
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<td>PLY7 Colin Campbell Court</td>
<td>Yes. Scale of housing based on City Centre Strategic Masterplan (SGA4) assessment which has taken into consideration key constraints. A separate Site Planning Statement has also been prepared.</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and City Centre Masterplan (SGA4), as also development through the Colin Campbell Court Site Planning Statement. HE4: the provisions support a positive strategy for heritage, especially in relation to promoting a city grid pattern and retention of Colin Campbell House (p2). SGA4: the provisions support the specific design objectives and criteria for the site set out on pages 25 and 35-37; they also support general principles and design guidance eg reconnecting the City Centre with its neighbours (p19), re-animating the public realm (p20), improving frontages and retaining higher quality buildings (p25), including the masterplan framework for Western Approach (p83-85).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY10 Cornwall Street East</td>
<td>Yes. Scale of housing based on City Centre Strategic Masterplan assessment which has taken into consideration key constraints.</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and City Centre Masterplan (SGA4). HE4: the provisions support a positive strategy for heritage, especially in relation to promoting a city grid (p8). SGA4: the provisions support the specific design objectives and criteria for the site set out on pages 24 and 48-49; they also support general principles and design guidance eg reconnecting the City Centre with its neighbours (p19), re-animating the public realm (p20), improving frontages and retaining higher quality buildings (p25), including the masterplanning framework for Cornwall Street (p88-89).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY11 Cornwall Street West</td>
<td>Yes. SHLAA formula based SHLAA formula / assessment but moderated down by 50% to reflect mixed use nature of opportunity.</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and City Centre Masterplan (SGA4). HE4: the provisions support a positive strategy for heritage, especially in relation to promoting a city grid (p10). SGA4: the provisions support the specific design objectives and criteria for</td>
<td>Gross to net ratio =99% (gross site area 0.80Ha, net developable area 0.79Ha) Density applied =200dph (Density range of 150dph to</td>
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</table>

12 Site Planning Statements are informal design guidance documents that the City Council prepares to help identify and market opportunities for development. These documents are published at [https://www plymouth.gov.uk/planningandbuildingcontrol/siteplanningstatements](https://www plymouth.gov.uk/planningandbuildingcontrol/siteplanningstatements)

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

149
<table>
<thead>
<tr>
<th>JLP Housing Allocation</th>
<th>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</th>
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<tr>
<td>PLY12 New George Street West</td>
<td>Yes. Scale of housing based on City Centre Strategic Masterplan assessment which has taken into consideration key constraints.</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and City Centre Masterplan (SGA4). HE4: the provisions support a positive strategy for heritage, especially in relation to promoting a city grid (p12). SGA4: the provisions support the specific design objectives and criteria for the site set out on pages 24 and 48-50; they also support general principles and design guidance eg reconnecting the City Centre with its neighbours (p19), re-animating the public realm (p20), improving frontages and retaining higher quality buildings (p25), including the masterplan framework for New George Street (p91-93).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY13 Royal Assurance site, Armada Way</td>
<td>Yes. Scale of housing based on City Centre Strategic Masterplan assessment which has taken into consideration key constraints.</td>
<td>Yes. The development requirements are primarily justified by the City Centre Masterplan (SGA4). SGA4: the provisions support the specific design objectives and criteria for the site set out on pages 25 and 48-50. They also support the opportunity to refurbish, re-use and add floorspace to one of the most iconic buildings in the City Centre (p50), including the masterplanning frameworks for Armada Way (p77-78), Royal Parade (p80-82) and New George Street (p91-93).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY14 Land at 19 Derry's Cross, Derry's Cross</td>
<td>Yes. Scale of housing based on City Centre Strategic Masterplan assessment which has taken into consideration key constraints.</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and City Centre Masterplan (SGA4). HE4: The provisions support a positive strategy for heritage by providing a more sightly backdrop to the attractive Grade 2 II* and Grade II terrace, The Crescent (p14). SGA4: the provisions support the specific design objectives and criteria for the site set on page 100. It supports better links between the City Centre and the waterfront and celebrating the higher quality buildings along this route with the sensitive addition of contemporary new buildings with the potential for taller buildings.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY15 Civic Centre</td>
<td>Yes. Scale of housing based on City Centre Strategic Masterplan</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and City Centre Masterplan (SGA4).</td>
<td>n/a</td>
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<td>assessment which has taken into consideration key constraints.</td>
<td>HE4: The provisions support a positive strategy for heritage by providing refurbishment of a landmark building in City Centre which is currently standing in a poor state of repair. It will also enhance the setting of nearby listed buildings (p15) and support for high quality new build development where it would not have a detrimental impact on the surrounding heritage assets (p16). SGA4: the provisions support the specific design objectives and criteria for the site set on page 25 which support the mixed use refurbishment of an iconic building, opportunity to restore listed public space and exploring the opportunity to provide a better frontage to Old George Street, The Bank and Theatre Royal, including the masterplanning framework for Armada Way (p77-78).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY23 Plymouth Fruit Sales</td>
<td>Yes. Scale of housing estimated based on pre-application work at time of plan preparation which accounts for key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4), and the Waterfront Strategic Masterplan (SGA5). HE4: the provisions support a positive strategy for heritage, especially due to its proximity to other historical assets, including the Grade II listed China House and the Barbican Conservation Area (p23-24). SGA5: the masterplan framework principles for Sutton Harbour (p80-81).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY24 Sutton Road West</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4) and the Waterfront Strategic Masterplan (SGA5). HE4: the provisions support a positive strategy for heritage, especially due to its proximity to other historical assets, including the China House (Grade II), Mayflower House (Grade II) and Church of St John the Evangelist (Grade II) (p25). SGA5: the masterplan framework principles for Sutton Harbour (p80-81).</td>
<td>Gross to net ratio =97% (gross site area 0.91Ha, net developable area 0.89Ha) Density applied =220dph (Density range of 150dph to 250dph applied to site location which generates dwelling range of 133 to 222 dwellings.</td>
</tr>
<tr>
<td>PLY25 Sugar House, Sutton Harbour</td>
<td>Yes. Scale of housing informed by planning case officer view in the context of pre-app discussions, taking in account key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4) and the Waterfront Strategic Masterplan (SGA5). HE4: the provisions support a positive strategy for heritage, especially due to its proximity to other historical assets, including the China House (Grade II) and the Barbican Conservation Area (27). SGA5: the masterplan framework principles for Sutton Harbour (p80-81).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY27 Register</td>
<td>Yes. Scale of housing informed</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and the Waterfront Strategic Masterplan (SGA5). HE4: the provisions support a positive strategy for heritage, especially due to its proximity to other historical assets, including the China House (Grade II) and the Barbican Conservation Area (27). SGA5: the masterplan framework principles for Sutton Harbour (p80-81).</td>
<td>n/a</td>
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### JLP Housing Allocation

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<td>office, Lockyer Street</td>
<td>by in house capacity assessment which accounts for key constraints. A separate Site Planning Statement has been prepared for the site.</td>
<td>Impact Assessment (HE4) and Waterfront Masterplan (SGA5). Key evidence documents informing list of policy requirements include: HE4: The provisions support a positive strategy for heritage which responds positively to the Hoe Conservation Area and nearby heritage assets (p32). SGA5: The provisions support the specific design objectives and criteria for the site set on pages 27 and 30. They support the opportunity to greatly increase the amount of development on this site including office, hotel or residential uses in a landmark building with active ground floor uses to encourage greater activity in Hoe Park and Armada Way including the masterplanning framework on pages 82-83.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY28 land north of Cliff Road, The Hoe</td>
<td>Yes. Scale of housing informed by planning consent which takes account of key constraints. A separate Site Planning Statement has also been prepared</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and Waterfront Masterplan (SGA5). Key evidence documents informing list of policy requirements include: HE4: The provisions support a positive strategy for heritage, especially through development which is sympathetic to the designated heritage assets nearby with the opportunity to create a key landmark building for this important location (p34). SGA5: the provisions support the specific design objectives and criteria for the site set out on page 25. They support development of one of the city’s most enviable locations which has been left vacant and been subject to vandalism. They also support the opportunity to improve east-west connections, improving waterfront links between West Hoe and Millbay, including the masterplanning framework on pages 82-83.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY29 Millbay Waterfront</td>
<td>Yes. Scale of housing informed by planning consent which takes account of key constraints.</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and Waterfront Masterplan (SGA5). Key evidence documents informing list of policy requirements include: HE4: The provisions support a positive strategy for heritage, especially through development which is sympathetic to the setting of nearby heritage assets (p36). SGA5: the provisions support the specific design objectives and criteria for the site set out on pages 23 and 44 along with the masterplanning framework on pages 84-85. In particular the aspiration to create stronger links between the city centre and waterfront areas, through quality public realm including the Millbay Boulevard. They support the new mixed use</td>
<td>n/a</td>
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<td>PLY30 Bath Street West</td>
<td>Yes. Scale of housing based on more detailed assessment in Waterfront Masterplan (SGA5), accounting for key constraints, which identified capacity for 292 and consistent with the SPS which shows in the region of 300. A separate Site Planning Statement has been prepared.</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and Waterfront Masterplan (SGA5), as also developed through the Bath Street Site Planning Statement. Key evidence documents informing list of policy requirements include: HE4: The provisions support a positive strategy for heritage through development which is sympathetic to the setting of nearby heritage assets (p38). SGA5: the provisions support the specific design objectives and criteria set out on pages 23 and 44-47 and masterplanning framework on pages 84-85, in particular the aspirations to create a stronger link between the city centre and waterfront areas in part through high quality public realm and the creation of Millbay Boulevard.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY31 Bath Street East</td>
<td>Yes. Scale of housing based on more detailed assessment in Waterfront Masterplan (SGA5) accounting for key constraints - option with arena relocated on site (figure would be 275 with arena remaining in current location).</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and Waterfront Masterplan (SGA5). Key evidence documents informing list of policy requirements include: HE4: The provisions support a positive strategy for heritage through development which is sympathetic to the setting of nearby heritage assets (p40). SGA5: the provisions support the specific design objectives and criteria set out on pages 23 and 44-47 and masterplanning framework on pages 84-85, in particular the aspirations to create a stronger link between the city centre and waterfront areas in part through high quality public realm and the creation of Millbay Boulevard.</td>
<td>n/a</td>
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<tr>
<td>PLY32 Stonehouse Barracks</td>
<td>Yes. Scale of housing provided as part of MOD strategic review of defence estate. The SHLAA formula assessment of a higher figure demonstrates that this is able to account for key constraints.</td>
<td>Yes. The development requirements are primarily justified by the Plan for Playing Pitches (EN20); Flood Risk Sequential and Exceptions Test Report (F11) and Heritage Impact Assessment (HE4); Key evidence documents informing list of policy requirements include: EN20A: page 7 highlights the need for more sports pitch provision in the city. F11: the provision supports a positive strategy for managing flood risk (p35). HE4: the provisions support a positive strategy for heritage, especially around the repair and regeneration of the existing heritage assets and</td>
<td>n/a</td>
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<tr>
<td>PLY36.1 Melville Building, Royal William Yard</td>
<td>Yes. Scale of housing based on planning consent which has taken account of key constraints. However, this is no longer included in housing trajectory given alternative uses that may come forward instead.</td>
<td>Yes. The development requirements are primarily justified by Plymouth Greenspace Policy Development Process (EN31); Heritage Impact Assessment (HE4) and the Waterfront Masterplan (SGA5). Key evidence documents informing list of policy requirements include: EN31: The provision supports the identification of Devils Point Park as local green space for its recreational value (page 16). HE4: The provision supports a positive strategy for heritage, especially the sensitive conversion which should avoid harm to the historic fabric of the building, its setting and that of neighbours (p46). SGA5: the provision supports the aspiration to improve the character and quality of greenspace around Devils Point (page 26) and contains a masterplanning framework on pages 86-87.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY36.2 Mount Wise Devonport Area A</td>
<td>Yes. Scale of housing based on planning application at time of plan preparation, which has taken account of key constraints. An overall masterplan for the site was prepared at the outline planning application stage.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4). HE4: the provisions support a positive strategy for heritage, especially due to the sites proximity to the remains of New Bastion (Grade II) including part of the counterscarp wall and the Old Gun Wharf Wall (Grade II) (p47).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY36.3 Mount Wise Devonport Area D</td>
<td>Yes. Scale of housing based on planning application at time of plan preparation, which has taken account of key constraints. An overall masterplan for the site was prepared at the outline planning application stage.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4). HE4: the provisions support a positive strategy for heritage, especially due to the sites location within the Devonport conservation area and the number of designated heritage assets within the proximity of the site (p49).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY36.4 Millfields Trust, 278 Union Street</td>
<td>Yes. Scale of housing based on in house capacity assessment of PCC - using landowner/development</td>
<td>Yes. The development requirements are primarily justified by the Heritage Impact Assessment (HE4) and Waterfront Masterplan (SGA5). Key evidence documents informing list of policy requirements include: HE4: the provision supports a positive strategy for heritage which requires</td>
<td>n/a</td>
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<tr>
<td>PLY36.5 Broadreac site, Richmond Walk</td>
<td>Yes. Scale of housing based on landowner/developer assessment of capacity and current pre-application, accounting also for key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth and South West Devon Joint Local Plan: Flood Risk Sequential and Exceptions Test Report (F11). F11: the provisions support a positive strategy for managing flood risk (p43).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY38 Derriford Commercial Centre</td>
<td>Yes. Scale of housing Based on in house capacity assessment of PCC - using PCC's strategic masterplan framework which has considered key constraints. A detailed masterplan is currently under preparation for the PCC part of the site, which identifies opportunities for at least 206 new homes. Taken with the NWQ EIA scoping application (16/01175/ESR10) which identifies the potential for a further 460 homes it seems clear that the overall provision in DEV38 is consistent with the wider aspirations of landowners.</td>
<td>Yes. See Qu 7.3(ii). The development requirements are primarily justified by the Employment Land Review (EC6); the Plymouth Retail Study (EC9), the Plymouth city-wide District Energy Strategy (EN39); the Heritage Impact Assessment (HE4); the Derriford Development Framework Evidence Report (SGA1); the Derriford and Seaton AAP Report on Proposed New District Shopping Centre (SGA2); the Strategic Cycle Network (T23). Key evidence documents informing list of policy requirements include: EC6: the provisions support the emphasis on employment provision in three key locations, including Derriford (p19). EC9: the provisions support the identification of Derriford as a new District Centre to meet a qualitative need in provision for food retail. EN39: the provisions support the requirement for a future connection to a district heating network in response to significant heat areas of heat demand in Derriford and where a network is considered feasible (p 7, 9, 11 and 20). HE4: the provision supports a positive strategy for heritage by ensuring that new development is sympathetic to the setting of nearby heritage assets (p57). SGA1: the provision identifies key issues that the JLP is seeking to address in the area including lack of sense of place (2.3.1 and pages 10-11), extensive areas of surface car parking (2.3.1 - fig 14), lack of clear structure of buildings, streets and spaces (2.3.1 - fig 15), majority of development turning its back on green valleys, with limited access (pages 10-11), roads not pedestrian friendly streets and oversized infrastructure (page 11) and</td>
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<td>PLY39 Glacis Park</td>
<td>Yes. Scale of housing based on in house capacity assessment of PCC which has considered key constraints.</td>
<td>poor movement structure and lack of connectivity (page 21 and figures 28,29 and 31). Part 7 of the policy lists the infrastructure requirements that individual developments will be expected to contribute to in order to deliver the policy. T18: the provisions support a positive transport strategy for the site to ensure there is significant highway capacity (p59), including specific projects such as Morlaix Drive access improvements (p69). T23: the provision supports the aspiration to create strong legible cycle routes through the site to the surrounding area including the Community Park (map).</td>
<td>n/a</td>
</tr>
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</table>

Yes. The development requirements are primarily justified by the Plymouth Greenspace Policy Development Process (EN31); Plymouth city-wide District Energy Strategy (EN39); Flood Risk Sequential and Exceptions Test Report (F11); Heritage Impact Assessment (HE4); the Derriford Development Framework Evidence Report (SGA1); and the Strategic Cycle Network (T23). Key evidence documents informing list of policy requirements include: EN31: the provision supports the identification of Glacis Park Corridor as local green space for its richness in wildlife (p16). EN39: the provisions support the requirement for a future connection to a district heating network in response to significant heat areas of heat demand in Derriford and where a network is considered feasible (p 7, 9, 11 and 20). F11: the provisions support a positive strategy for managing flood risk (p45). HE4: the provision supports a positive strategy for heritage by ensuring that development is sympathetic to the heritage assets (p58). SGA1: the provision identifies key issues that the JLP is seeking to address in the area including lack of sense of place (2.3.1 and pages 10-11), extensive areas of surface car parking (2.3.1 - fig 14), lack of clear structure of buildings, streets and spaces (2.3.1 - fig 15), majority of development turning its back on green valleys, with limited access (pages 10-11), roads not pedestrian friendly streets and oversized infrastructure (page 11) and poor movement structure and lack of connectivity (p21 and figures 28,29 and 31). Part 7 of the policy lists the infrastructure requirements that individual developments will be expected to contribute to in order to deliver...
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<td>PLY40 Seaton Neighbourhood</td>
<td>Yes. Scale of housing based on planning consent and additional land identified to west of site which is not part of current outline consent through SHLAA formula / assessment. The constraints have been accounted for through the granting of planning permission.</td>
<td>Yes, the development requirements are primarily justified by the Employment Land Review 2011 to 2031 (EC6), Plymouth Greenspace Policy Development Process 2017 (EN31) and the Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report (T18). EC6: the provisions support the emphasis on employment provision in three key locations, including Derriford and Seaton (p19). EN31: the provisions support the objective to create a new community park which will deliver significant resource in the north of the City (p2). T18: the provisions support a positive transport strategy for the site to ensure there is significant highway capacity (p45).</td>
<td>Consented site figures used. For part of site without consent: western extension site - Gross to net ratio = 89% (gross site area 1.94Ha, net developable area 1.73Ha) Density applied = 40ph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 61 to 78 dwellings. (Allocation figure relies on consent figures plus assumption of 60 dwellings for western extension)</td>
</tr>
<tr>
<td>PLY44 Woolwell</td>
<td>Yes. Scale of housing is informed by the need to ensure that the scale of growth is consistent with the principle of supporting Woolwell as a sustainable linked neighbourhood (Policy SPT2) and is validated by comparison with the SHLAA formula assessment in the S Hams SHLAA which identifies a potential for much of the potentially developable area as 2,200 homes. In response to the scale of the site and the necessary infrastructure,</td>
<td>Yes, the development requirements are primarily justified by the Landscape Impact Assessment of Potential Allocation Sites in the Plymouth Policy Area (EN27), Plymouth Greenspace Policy Development Process 2017 (EN31), the Plymouth and South West Devon Joint Local Plan: Flood Risk Sequential and Exceptions Test Report (F11), Plymouth Policy Area Education Infrastructure Planning Evidence Base Report (O11) and the Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report (T18). EN27: the provisions support the objectives to protect the impact of development at Woolwell on Dartmoor National Park and the sensitivities/vulnerabilities surrounding it (p17). EN31: the provisions support the objective to create a new community park which will deliver significant resource and a landscape buffer to the wider countryside (p2, 4 and 5). F11: the provisions support a positive strategy for managing flood risk (p47).</td>
<td>n/a</td>
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<td>PLY46.7 Island Farmhouse, Plymbridge Road</td>
<td>including a new community park, playing pitches and primary school, whilst also carefully addressing landscape constraints, the scale of development is considered appropriate to achieve a sustainable development which is balanced and well related to the existing residential community. Key constraints are accounted for through the specific policy requirements to create a sustainable urban extension.</td>
<td>O11: the provisions supports meeting the needs for additional education, children and young people infrastructure provision as part of new development (p13 and 14). T18: the provisions support a positive transport strategy for the site to ensure there is significant highway capacity (p36 and p46).</td>
<td>Gross to net ratio =100 % (gross site area 0.5Ha, net developable area 0.5Ha) Density applied =40ph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 18 to 23 dwellings.</td>
</tr>
<tr>
<td>PLY46.8 Land at Tamerton Foliot Road</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report (T18). T18: the provisions support a positive transport strategy for the site to ensure contribution to transport infrastructure needs.</td>
<td>Gross to net ratio =94 % (gross site area 1.27Ha, net developable area 1.19Ha) Density applied =40ph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 42 to 54 dwellings. (Allocation figure relies on moderated figure to account for preference for low density</td>
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<tr>
<td>PLY46.9 BT Depot</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth Greenspace Policy Development Process 2017 (EN31) and the Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report (T18). EN31: the provisions support the objective to create a green space biodiversity network. Glacis Park corridor in particular is protected for its richness of wildlife (p16). T18: the provisions support a positive transport strategy for the site to ensure contribution to transport infrastructure needs.</td>
<td>Gross to net ratio = 86 % (gross site area 2.54Ha, net developable area 2.18Ha) Density applied = 40ph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 76 to 98 dwellings).</td>
</tr>
<tr>
<td>PLY46.10 Land adjacent to Plumer Road</td>
<td>Yes. Scale of housing informed by SHLAA assessment. Following a successful appeal, planning consent now in place for this site for 61 new homes. This has been incorporated in updated housing trajectory.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report (T18). T18: the provisions support a positive transport strategy for the site to ensure contribution to transport infrastructure needs.</td>
<td>Gross to net ratio = 100 % (gross site area 0.5Ha, net developable area 0.5Ha) Density applied = 40ph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 18 to 23 dwellings).</td>
</tr>
<tr>
<td>PLY48 Sherford</td>
<td>Yes. Scale of housing informed by planning consent in accordance with a masterplan which considers key constraints. The JLP makes provision for 5500 dwellings and cites about 4508 anticipated in plan window, based on the planning consent and trajectory at time of submission. As a result of bringing the housing trajectory up to the 2017 monitoring point and revising the delivery forecast downwards for the next few years it is now anticipated that 4254 dwellings will come forward.</td>
<td>Yes, the development requirements are primarily justified by the Employment Land Review 2011 to 2031 (EC6), Plymouth Retail Study 2017 (EC9), Plan for Playing Pitches 2015 to 2018 (EN20), Plan for Playing Pitches 2015 to 2018: Appendices 1 to 4 and NA1, 2 and 4 (EN20A), Plymouth and Plymouth Urban Fringe Landscape and Seascapes Assessment (Chapter 4) (EN22A), Plymouth Greenspace Policy Development Process 2017 (EN31), Plymouth Policy Area Education Infrastructure Planning Evidence Base Report (O11), Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report (T18), Position Statement Two: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group (T25). EC6: the provisions support the emphasis on employment provision at Sherford New Community to meet the needs of a growing population (p10 and 71). EC9: the provisions support the current retail commitments to meet the need (p127) EN20: the provisions support the objective to meet the demand for a range</td>
<td></td>
</tr>
</tbody>
</table>

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

159
<table>
<thead>
<tr>
<th>JLP Housing Allocation</th>
<th>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</th>
<th>Are the specific development requirements of each site allocation policy effective and justified by evidence?</th>
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<tr>
<td>PLY50 Saltram Meadow</td>
<td>in the plan window and therefore 1246 dwellings beyond the plan period. The b) part of 7.6i will signpost to the trajectory agreement spreadsheet (TP3H) which points out the potential for more dwellings in the plan window should delivery rates increase to those envisaged by the Sherford consortium at the outset of the scheme)</td>
<td>of sports pitches due to the planned residential development. EN22A: the provisions support the objective to protect the Urban Fringe Sensitivity Area and its characteristics (p172). EN31: the provisions support the objective to create a new community park which will deliver significant resource to mitigate the impact of new housing (p2). O11: the provisions supports meeting the needs for additional education, children and young people infrastructure provision as part of new development (p15). T18: the provisions support a positive transport strategy for the site to ensure there is significant highway capacity to mitigate against the impact of development (p46).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY52 Land at West Park Hill</td>
<td>Yes. Scale of housing informed by planning consent in context of a masterplan which has regard to key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Review of City, District and Local Centres in Plymouth for the Joint Local Plan (EC11) and the Plymouth Policy Area Education Infrastructure Planning Evidence Base Report (O11). EC11: the provisions support a positive strategy for retail to ensure the hierarchy is maintained (p3). O11: the provisions supports meeting the needs for additional education, children and young people infrastructure provision as part of new development (p15).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY53 Former</td>
<td>Yes. Scale of housing informed by an outline masterplan design for the site following landowner marketing and selection of delivery partner, which takes account of key constraints. A housing potential of about 480 homes. The figure in the allocation has been reduced to support a lowering of the assumed density given the edge of city nature of this site.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment, (Chapter 4 onwards) (EN22A), Landscape Impact Assessment of Potential Allocation Sites in the Plymouth Policy Area (EN27) and the Plymouth Policy Area Education Infrastructure Planning Evidence Base Report (O11). EN22A: the provisions support the objective to protect the Urban Fringe Sensitivity Area and its characteristics (p168). EN27: the provisions support the objectives to protect the character and sensitivities of the wider landscape character (p22). O11: the provisions supports meeting the needs for additional education, children and young people infrastructure provision as part of new development (p14).</td>
<td>n/a</td>
</tr>
</tbody>
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JLP Councils PSWDJLP Examination Hearing Statement – Matter 7
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<tbody>
<tr>
<td>China Clay dryer complex, Coypool</td>
<td>by landowner/developer assessment of capacity, and having regard to constrained nature of site and greenspace areas which significantly reduces net developable area. In this respect a study of the site for the City Council in 2006 suggested that only about 14 hectares of the site was developable land. It is possible that more housing could be delivered but we feel it appropriate to take a cautious approach for the purpose of identifying the potential supply.</td>
<td>and Plymouth Urban Fringe Landscape and Seascape Assessment, (Chapters 1 to 3) (EN22) and the Plymouth Policy Area Education Infrastructure Planning Evidence Base Report (O11). EN22: the provisions support the objective to protect the characters area at Boringdon Park Farmland (p15, 17, 19, 21). O11: the provisions supports meeting the needs for additional education, children and young people infrastructure provision as part of new development (p14).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY56.1 Former Nursery Site, Haye Road</td>
<td>Yes. Scale of housing informed by previous pre application assessments but lower figure given constrained nature of site and opportunity to deliver lower density executive housing scheme on the site.</td>
<td>Yes, the development requirements are primarily justified by the Strategic Cycle Network (T23). T23: the provisions support the objective to create a positive strategy for sustainable modes of transport.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY56.2 Pomphlett Industrial Estate</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula. A separate Site Planning Statement has also been prepared for this site.</td>
<td>Yes, the development requirements are primarily justified by the Review of City, District and Local Centres in Plymouth for the Joint Local Plan (EC11). EC11: the provisions support a positive strategy for retail to ensure the hierarchy is maintained (p3).</td>
<td>Gross to net ratio =94 % (gross site area 1.17Ha, net developable area 1.10Ha) Density applied =40ph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 39 to 50 dwellings.</td>
</tr>
<tr>
<td>PLY58.3 Coombe Way &amp; Kings Tamerton Road</td>
<td>Yes. Scale of housing based on pre application discussions at time of plan preparation, but consistent with SHLAA formula /</td>
<td>Yes, the development requirements are primarily justified by the Plymouth Greenspace Policy Development Process 2017 (EN31). EN31: the provisions support the objective to create a network of green space, including improved access to the Kings Tamerton Woods Local Nature</td>
<td>Gross to net ratio =82 % (gross site area 3.44Ha, net developable area 2.8Ha) Density applied =40ph</td>
</tr>
</tbody>
</table>

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7 161
<table>
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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>PLY58.4 Tamar Valley School Barne Barton</td>
<td>Yes. Scale of housing initially informed by SHLAA assessment.</td>
<td>Reserve (p17).</td>
<td>(Density range of 35dph to 45dph applied to site location which generates dwelling range of 39 to 50 dwellings.</td>
</tr>
<tr>
<td>PLY58.5 North Prospect phase 4</td>
<td>Yes. Scale of housing based on North Prospect Area Planning Statement which informed masterplanning and capacity exercises undertaken by PCH for the regeneration, and had regard to key constraints.</td>
<td>The requirement to comply with the existing masterplan is justified on the basis that these are the later phases of a well-established programme of regeneration, as identified in the Plymouth Plan Housing Need and Supply Topic Paper (PCC3, see reference on page 19).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY58.6 North Prospect phase 5</td>
<td>Yes. Scale of housing based on North Prospect Area Planning Statement which informed masterplanning and capacity exercises undertaken by PCH for the regeneration, and had regard to key constraints.</td>
<td>The requirement to comply with the existing masterplan is justified on the basis that these are the later phases of a well-established programme of regeneration, as identified in the Plymouth Plan Housing Need and Supply Topic Paper (PCC3, see reference on page 19).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY58.7 Douglass House</td>
<td>Yes. Scale of housing reflects the fact that housing likely to be minor component of overall development. The scale is less than that identified through the SHLAA formula which itself has regard to key constraints.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY58.8 Land at</td>
<td>Yes. Scale of housing informed</td>
<td>n/a</td>
<td>Gross to net ratio =100 %</td>
</tr>
</tbody>
</table>

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

162
<table>
<thead>
<tr>
<th>JLP Housing Allocation</th>
<th>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</th>
<th>Are the specific development requirements of each site allocation policy effective and justified by evidence?</th>
<th>SHLAA formula (progressive net developable area x density assumption)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Windsor Road, Compton</td>
<td>by SHLAA assessment / formula.</td>
<td>The access requirement relates to advice from the Local Highway Authority when sites were being assessed for inclusion in the plan. The constraint of contaminated land remediation was identified in the SHLAA (HO2F, Site 0746 Plan Area 5).</td>
<td>(gross site area 0.66Ha, net developable area 0.66Ha) Density applied =40ph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 23 to 30 dwellings.</td>
</tr>
<tr>
<td>PLY58.9 Former Gas Works, St Levan Road Site</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>The access requirement relates to advice from the Local Highway Authority when sites were being assessed for inclusion in the plan.</td>
<td>Gross to net ratio =99 % (gross site area 0.81Ha, net developable area 0.81Ha) Density applied =70ph (Density range of 60dph to 80dph applied to site location which generates dwelling range of 49 to 65 dwellings.</td>
</tr>
<tr>
<td>PLY58.10 Land off Ham Drive</td>
<td>Yes. Constraints have been accounted for through the granting of planning permission which has had regard to key constraints.</td>
<td>The access requirement relates to advice from the Local Highway Authority when sites were being assessed for inclusion in the plan.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY58.12 Land at Stuart Road/Victoria Park</td>
<td>Yes. Scale of housing initially informed by in house assessment which has had regard to key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4). HE4: the provisions support a positive strategy for heritage, especially as the site includes a small section of the Great Western railway which remains with the brick piers and one of the cantilever arms standing as testament of that time (p82).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY58.13 MDEC Central Park Avenue</td>
<td>Yes. Scale of housing initially informed by in house assessment which has had regard to key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth and South West Devon Joint Local Plan: Flood Risk Sequential and Exceptions Test Report (F11) F11: the provisions support a positive strategy for managing flood risk (p18).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY58.15 Savage Road, Barne Barton</td>
<td>Yes. Scale of housing based on pre application discussions at time of plan preparation. In</td>
<td></td>
<td>n/a</td>
</tr>
<tr>
<td>JLP Housing Allocation</td>
<td>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</td>
<td>Are the specific development requirements of each site allocation policy effective and justified by evidence?</td>
<td>SHLAA formula (progressive net developable area * density assumption)</td>
</tr>
<tr>
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</tr>
<tr>
<td>PLY58.16 Bull Point Barracks</td>
<td>Yes. Scale of housing based on pre application discussions at the time of plan preparation which has had regard to key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4). HE4: the provisions support a positive strategy for heritage, especially as the site is the Grade II listed Bull Point Barracks (p85).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY58.17 Seventrees, Baring Street, Greenbank</td>
<td>Yes. Scale of housing based on capacity study for One Public Estate Programme which has had regard to key constraints.</td>
<td>Re-provision of dental identified as necessary infrastructure for this site in the Infrastructure Needs Assessment (O9A, top of 19th page)</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.1 Former Woodlands &amp; Hillside School</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints. Site under construction.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.2 land either side of Clittaford Road</td>
<td>Yes. Scale of housing based on pre application discussions at the time of plan preparation which has had regard to key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Review of City, District and Local Centres in Plymouth for the Joint Local Plan (EC11) EC11: the provisions support a positive strategy for retail to ensure the hierarchy is maintained with supporting facilities for a growing population (p3 and 40).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.3 Land to the North of Clittaford Road</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints.</td>
<td>The access requirement relates to advice from the Local Highway Authority when sites were being assessed for inclusion in the plan.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.4 Former Southway Primary School</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints. Site under construction.</td>
<td>The access requirement relates to advice from the Local Highway Authority when sites were being assessed for inclusion in the plan.</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.5 Stirling House &amp; Honicknowle Clinic, Honicknowle</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>n/a</td>
<td>Gross to net ratio =100% (gross site area 0.5Ha net developable area 0.5Ha) Density applied =40dph (Density range of 35dph to 50dph)</td>
</tr>
<tr>
<td>JLP Housing Allocation</td>
<td>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</td>
<td>Are the specific development requirements of each site allocation policy effective and justified by evidence?</td>
<td>SHLAA formula (progressive net developable area x density assumption)</td>
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<tr>
<td>------------------------</td>
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<td>-------------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Green</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>n/a</td>
<td>45dph applied to site location which generates dwelling range of 18 to 23 dwellings.</td>
</tr>
<tr>
<td>PLY59.7 Land south of Langley Crescent</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>n/a</td>
<td>Gross to net ratio =100 % (gross site area 0.34Ha net developable area 0.34Ha) Density applied =40dph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 12 to 16 dwellings.</td>
</tr>
<tr>
<td>PLY59.8 Land off Tamar Way, West Park</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints. Development now complete.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.9 Southway Campus, Skerries Road</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints. Site under construction.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.10 Woodvale Nurseries, Truro Drive</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>n/a</td>
<td>Gross to net ratio =100 % (gross site area 0.78Ha net developable area 0.78Ha) Density applied =40dph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 27 to 35 dwellings.</td>
</tr>
<tr>
<td>PLY59.12 Fields to north of St Budeaux A38 junction</td>
<td>Yes. Scale of housing based on in house capacity assessment. This has taken account of key constraints. A revision to the yield is proposed as a minor modification (EXC10A, reference M103).</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4), Plymouth Greenspace Policy Development Process 2017 (EN31) and Plymouth and South West Devon Joint Local Plan: Flood Risk Sequential and Exceptions Test Report (F11) EN31: the provisions support the objective to create a network of green space, including protection and maintenance of existing green space (p19). F11: the provisions support a positive strategy for managing flood risk</td>
<td>n/a</td>
</tr>
<tr>
<td>JLP Housing Allocation</td>
<td>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</td>
<td>Are the specific development requirements of each site allocation policy effective and justified by evidence?</td>
<td>SHLAA formula (progressive net developable area x density assumption)</td>
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<td>(p19). HE4: the provisions support a positive strategy for heritage, especially as the site is close to a number of heritage assets, it abuts the Ernesettle Battery east extension that runs along the north side of St Budeaux churchyard and is 42m (at its eastern point) from the scheduled Agaton Fort to the north east (p102 (96)). Further criteria agreed as part of SOCG with Historic England in response to internal design assessment by PCC (SGA4).</td>
<td></td>
<td>Gross to net ratio =100 % (gross site area 0.44Ha net developable area 0.44Ha) Density applied =40dph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 15 to 20 dwellings.</td>
</tr>
<tr>
<td>PLY59.14 Land North of Clittaford Road</td>
<td>Yes. Scale of housing based on SHLAA formula but moderated down by 50% given shape of site.</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>PLY59.16 Land between 140 and 150 Dunraven Drive</td>
<td>Yes. Scale of housing initially informed by SHLAA assessment but moderated to reflect low density executive housing scheme.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth Greenspace Policy Development Process 2017 (EN31) EN31: the provisions support the objective to create a network of green space, including improved access to Southway Woods Local Green Space (p19).</td>
<td>Gross to net ratio =100 % (gross site area 0.28Ha net developable area 0.28Ha) Density applied =40dph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 10 to 13 dwellings.</td>
</tr>
<tr>
<td>PLY59.17 Whitleigh Community Centre</td>
<td>Yes. Scale of housing informed by planning application which has had regard to key constraints.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.18 Chaucer Way School</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY59.19 Former Lakeside Residential</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
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</tr>
<tr>
<td>Home</td>
<td></td>
<td>Yes, the development requirements are primarily justified by the Plymouth Greenspace Policy Development Process 2017 (EN31) EN31: the provisions support the objective to mitigate against loss of greenspace (p17).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY60.1 Redwood Drive, Plympton</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints. Site under construction.</td>
<td></td>
<td>n/a</td>
</tr>
<tr>
<td>PLY60.2 Downham School</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints. Site under construction.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY60.3 Former Plymouth Hospital</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints. Site under construction.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY60.5 Land at 60 Vinery Lane</td>
<td>Yes. Scale of housing informed by SHLAA assessment and the opportunity to deliver lower density executive housing.</td>
<td>n/a</td>
<td>Gross to net ratio =100 % (gross site area 0.52Ha, net developable area 1.18Ha) Density applied =40dph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 18 to 23 dwellings. (Allocation figure relies on judgement about lower delivery to achieve preferred executive housing scheme).</td>
</tr>
<tr>
<td>PLY60.7 Land between Undercliff Road and Barton Road, Turnchapel</td>
<td>Yes. Scale of housing informed by pre application at time of planning preparation which has taken account of key constraints.</td>
<td></td>
<td>n/a</td>
</tr>
<tr>
<td>PLY60.8 Errill Retail Park, Plymouth Road</td>
<td>Yes. Scale of housing informed by in house capacity assessment which has had regard to key</td>
<td></td>
<td>n/a</td>
</tr>
</tbody>
</table>

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

167
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</tr>
</thead>
<tbody>
<tr>
<td>PLY60.9 Land at Plympton House</td>
<td>Yes. Scale of housing based on planning consent which has had regard to key constraints.</td>
<td>Yes, the development requirements are primarily justified by the Heritage Impact Assessment (HE4) and Plymouth Greenspace Policy Development Process 2017 (EN31). HE4: the provisions support a positive strategy for heritage, especially as the site is all within the parkland area surrounding the Grade I Plympton House. (p107). EN31: the provisions support the objective to create a network of green space, including improved access to Registered Parks and Gardens (p18).</td>
<td>n/a</td>
</tr>
<tr>
<td>PLY60.10 Land off Newnham Road, Colebrook</td>
<td>Yes. Scale of housing informed by SHLAA assessment / formula.</td>
<td>Yes, the development requirements are primarily justified by the Plymouth and South West Devon Joint Local Plan: Flood Risk Sequential and Exceptions Test Report (F11). F11: the provisions support a positive strategy for managing flood risk (p74).</td>
<td>Gross to net ratio =70 %, adjusted downward to account for onsite constraints (gross site area 1.87Ha, net developable area 1.31Ha) Density applied =40dph (Density range of 35dph to 45dph applied to site location which generates dwelling range of 46 to 59 dwellings.</td>
</tr>
</tbody>
</table>

JLP Councils PSWDJLP Examination Hearing Statement – Matter 7

168
**APPENDIX 7: PLYMOUTH CITY COUNCIL LARGE (5+) WINDFALL APPROVAL SITES AND THEIR CURRENT STATUS**

Plymouth City Council (PCC) each year monitors the number of applications that have been approved on windfall sites.

The following table shows the sites that have come forward since 2009 and that were not identified in the 2009 SHLAA and their current status.

**Table 1: Windfall Approved Sites and the current Status as of 1st April 2017 (Excluding student Accommodation)**

<table>
<thead>
<tr>
<th>Site address</th>
<th>Number of Dwellings</th>
<th>Status Of Site</th>
<th>Number of Complete Dwellings</th>
<th>Number of Dwellings Under Construction</th>
<th>Number of Dwellings Not Started</th>
<th>Planning Application Number</th>
<th>Date of Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ashley Place, Arundel Crescent, Stonehouse</td>
<td>6</td>
<td>Complete</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>08/01788/FU</td>
<td>13/03/2009</td>
</tr>
<tr>
<td>37A To J, St Aubyn Street, Devonport</td>
<td>7</td>
<td>Complete</td>
<td>7</td>
<td>0</td>
<td>0</td>
<td>09/00368/FU</td>
<td>11/06/2009</td>
</tr>
<tr>
<td>14 Channel Park Avenue, Efford</td>
<td>7</td>
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<td>0</td>
<td>0</td>
<td>7</td>
<td>16/01269/OU</td>
<td>16/11/2015</td>
</tr>
<tr>
<td>49 to 83 Duke Street, Devonport</td>
<td>12</td>
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<td>12</td>
<td>0</td>
<td>0</td>
<td>09/01116/FU</td>
<td>27/10/2009</td>
</tr>
<tr>
<td>Paternoster House, Efford Lane, Efford</td>
<td>10</td>
<td>Complete</td>
<td>10</td>
<td>0</td>
<td>0</td>
<td>09/01749/FU</td>
<td>22/03/2010</td>
</tr>
<tr>
<td>Oxford House, 27 Oxford Avenue, Peverell</td>
<td>6</td>
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<td>6</td>
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<td>0</td>
<td>10/00299/FU</td>
<td>14/05/2010</td>
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<tr>
<td>Land bounded By Plymbridge Lane, Derriford Road and Howeson, Derriford</td>
<td>16</td>
<td>Complete</td>
<td>16</td>
<td>0</td>
<td>0</td>
<td>10/01140/FU</td>
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<tr>
<td>Land rear of Queen Anne’s Quay, East End</td>
<td>23</td>
<td>Complete</td>
<td>23</td>
<td>0</td>
<td>0</td>
<td>10/00499/FU</td>
<td>18/10/2010</td>
</tr>
<tr>
<td>Land off Garrison Close, Devonport</td>
<td>5</td>
<td>Complete</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>10/00826/FU</td>
<td>22/10/2010</td>
</tr>
<tr>
<td>Car park site, Trafalgar Street, City Centre</td>
<td>6</td>
<td>Complete</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>12/01455/FU</td>
<td>25/01/2013</td>
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<tr>
<td>Land adjacent 64 Wolseley</td>
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<td>8</td>
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<td>10/01336/FU</td>
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</tr>
<tr>
<td>Site address</td>
<td>Number of Dwellings</td>
<td>Status Of Site</td>
<td>Number of Complete Dwellings</td>
<td>Number of Dwellings Under Construction</td>
<td>Number of Dwellings Not Started</td>
<td>Planning Application Number</td>
<td>Date of Approval</td>
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<tr>
<td>-------------------------------------------------</td>
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<td>----------------------------------------</td>
<td>-------------------------------</td>
<td>-----------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Hornby Court, 7 Craigie Drive, Stonehouse</td>
<td>12</td>
<td>Complete</td>
<td>12</td>
<td>0</td>
<td>0</td>
<td>10/01412/FUL</td>
<td>06/12/2010</td>
</tr>
<tr>
<td>River View, East End</td>
<td>21</td>
<td>Complete</td>
<td>21</td>
<td>0</td>
<td>0</td>
<td>12/01321/FUL</td>
<td>19/11/2012</td>
</tr>
<tr>
<td>North Prospect scheme, Woodhey Road, North Prospect</td>
<td>148</td>
<td>Complete</td>
<td>148</td>
<td>0</td>
<td>0</td>
<td>10/02026/FUL</td>
<td>25/02/2011</td>
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<td>139 Victory Street</td>
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<td>08/11/2011</td>
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<td>0</td>
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<td>11/00238/FUL</td>
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<td>Laira United Church, 247 Old Laira Road</td>
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<td>0</td>
<td>14</td>
<td>11/00028/FUL</td>
<td>03/05/2011</td>
</tr>
<tr>
<td>The Town House, 32 Harwell Street</td>
<td>5</td>
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<td>5</td>
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<td>0</td>
<td>11/01410/FUL</td>
<td>24/05/2011</td>
</tr>
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<td>Waterloo Court, Waterloo Close</td>
<td>21</td>
<td>Complete</td>
<td>21</td>
<td>0</td>
<td>0</td>
<td>12/01321/FUL</td>
<td>17/09/2013</td>
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<td>The Cottage, Hillsborough</td>
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<td>Lapsed</td>
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<td>0</td>
<td>9</td>
<td>12/00721/OUT</td>
<td>13/12/2012</td>
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<td>The Albert Gate, 28 Charlotte Street</td>
<td>7</td>
<td>Complete</td>
<td>7</td>
<td>0</td>
<td>0</td>
<td>12/01498/FUL</td>
<td>18/10/2012</td>
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<td>Woodville Road</td>
<td>347</td>
<td>Under Construction</td>
<td>335</td>
<td>12</td>
<td>0</td>
<td>12/01304/FUL</td>
<td>13/02/2013</td>
</tr>
<tr>
<td>Dawson Close</td>
<td>12</td>
<td>Complete</td>
<td>12</td>
<td>0</td>
<td>0</td>
<td>12/01891/FUL</td>
<td>31/01/2013</td>
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<tr>
<td>27 Springfield Close, and Land to Rear</td>
<td>16</td>
<td>Complete</td>
<td>16</td>
<td>0</td>
<td>0</td>
<td>12/02082/FUL</td>
<td>26/02/2013</td>
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<td>North Prospect Road</td>
<td>39</td>
<td>Complete</td>
<td>39</td>
<td>0</td>
<td>0</td>
<td>11/01384/REM</td>
<td>05/12/2011</td>
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<tr>
<td>The Astor Community Centre, Dartmoor View</td>
<td>12</td>
<td>Complete</td>
<td>12</td>
<td>0</td>
<td>0</td>
<td>14/01355/FUL</td>
<td>16/12/2014</td>
</tr>
<tr>
<td>Astor Hotel, 14 Elliot Street</td>
<td>14</td>
<td>Complete</td>
<td>14</td>
<td>0</td>
<td>0</td>
<td>13/01702/FUL</td>
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<td>12</td>
<td>0</td>
<td>0</td>
<td>13/01688/FUL</td>
<td>10/12/2013</td>
</tr>
<tr>
<td>10 Haystone Place</td>
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<td>Lapsed</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>13/02187/FUL</td>
<td>22/01/2014</td>
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<td>Status Of Site</td>
<td>Number of Complete Dwellings</td>
<td>Number of Dwellings Under Construction</td>
<td>Number of Dwellings Not Started</td>
<td>Planning Application Number</td>
<td>Date of Approval</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
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<td>------------------------------</td>
<td>----------------------------------------</td>
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<td>---------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Church Of Weston Mill, St Philip, Bridwell Lane North</td>
<td>11</td>
<td>Complete</td>
<td>11</td>
<td>0</td>
<td>0</td>
<td>13/02009/FUL</td>
<td>04/02/2014</td>
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<tr>
<td>The Mermaid ,15 Frogmore Avenue</td>
<td>1</td>
<td>Planning permission but Not Yet Started</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>16/02370/FUL</td>
<td>07/03/2017</td>
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<tr>
<td>8 to 10 Whimple Street</td>
<td>43</td>
<td>Complete</td>
<td>43</td>
<td>0</td>
<td>0</td>
<td>14/00054/GPD</td>
<td>14/02/2014</td>
</tr>
<tr>
<td>Former Government Offices, Hoegate Street</td>
<td>30</td>
<td>Complete</td>
<td>30</td>
<td>0</td>
<td>0</td>
<td>13/02395/FUL</td>
<td>12/09/2014</td>
</tr>
<tr>
<td>Mannnamead Centre, 15 Eggbuckland Road</td>
<td>29</td>
<td>Planning permission but Not Yet Started</td>
<td>0</td>
<td>0</td>
<td>29</td>
<td>14/02336/FUL</td>
<td>15/05/2015</td>
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<td>Former Community Centre, Ham Drive</td>
<td>17</td>
<td>Complete</td>
<td>17</td>
<td>0</td>
<td>0</td>
<td>13/01865/FUL</td>
<td>12/06/2014</td>
</tr>
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<td>Land at Percy Street</td>
<td>11</td>
<td>Complete</td>
<td>11</td>
<td>0</td>
<td>0</td>
<td>13/02445/FUL</td>
<td>09/05/2014</td>
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<td>0</td>
<td>5</td>
<td>14/00743/FUL</td>
<td>24/06/2014</td>
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<td>Land off Dover Road</td>
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<td>0</td>
<td>0</td>
<td>14/01304/FUL</td>
<td>19/02/2015</td>
</tr>
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<td>Land adjacent Yardley Gardens</td>
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<td>Complete</td>
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<td>0</td>
<td>0</td>
<td>14/01317/FUL</td>
<td>19/02/2015</td>
</tr>
<tr>
<td>Seawings,101 Lawrence Road</td>
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<td>Planning permission but Not Yet Started</td>
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<td>0</td>
<td>7</td>
<td>14/02381/FUL</td>
<td>09/02/2015</td>
</tr>
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<td>Sherwell house, 30 North Hill</td>
<td>11</td>
<td>Complete</td>
<td>11</td>
<td>0</td>
<td>0</td>
<td>15/01881/GPD</td>
<td>09/11/2015</td>
</tr>
<tr>
<td>Land off Park Avenue, Park Avenue</td>
<td>11</td>
<td>Under Construction</td>
<td>0</td>
<td>11</td>
<td>0</td>
<td>15/00922/FUL</td>
<td>11/03/2016</td>
</tr>
<tr>
<td>Goodwin Crescent</td>
<td>8</td>
<td>Complete</td>
<td>8</td>
<td>0</td>
<td>0</td>
<td>15/01329/FUL</td>
<td>17/09/2015</td>
</tr>
<tr>
<td>North Prospect phase 3, Wordsworth Road/Wordsworth Crescent</td>
<td>159</td>
<td>Under Construction</td>
<td>0</td>
<td>72</td>
<td>87</td>
<td>15/01956/FUL</td>
<td>11/03/2016</td>
</tr>
<tr>
<td>Site address</td>
<td>Number of Dwellings</td>
<td>Status Of Site</td>
<td>Number of Complete Dwellings</td>
<td>Number of Dwellings Under Construction</td>
<td>Number of Dwellings Not Started</td>
<td>Planning Application Number</td>
<td>Date of Approval</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
<td>---------------------</td>
<td>--------------------------------------------</td>
<td>-----------------------------</td>
<td>----------------------------------------</td>
<td>--------------------------------</td>
<td>-------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Plot corner of Savage road/Kelly close</td>
<td>8</td>
<td>Under Construction</td>
<td>0</td>
<td>8</td>
<td>0</td>
<td>15/01952/FUL</td>
<td>03/02/2016</td>
</tr>
<tr>
<td>Fort House, Fort Terrace</td>
<td>14</td>
<td>Planning permission but Not Yet Started</td>
<td>0</td>
<td>0</td>
<td>14</td>
<td>14/01815/FUL</td>
<td>29/06/2015</td>
</tr>
<tr>
<td>Hilltop Community Centre, Cunningham Road</td>
<td>12</td>
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<td>12</td>
<td>0</td>
<td>0</td>
<td>15/00415/FUL</td>
<td>05/06/2015</td>
</tr>
<tr>
<td>Former Tamerton Vale School</td>
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<td>Under Construction</td>
<td>0</td>
<td>66</td>
<td>26</td>
<td>15/01332/FUL</td>
<td>18/12/2015</td>
</tr>
<tr>
<td>53 Hooe Road</td>
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<td>0</td>
<td>12</td>
<td>15/01609/FUL</td>
<td>26/11/2015</td>
</tr>
<tr>
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<td>Planning permission but Not Yet Started</td>
<td>0</td>
<td>0</td>
<td>12</td>
<td>16/02027/FUL</td>
<td>30/01/2017</td>
</tr>
<tr>
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<td>0</td>
<td>76</td>
<td>16/00154/FUL</td>
<td>04/11/2016</td>
</tr>
<tr>
<td>10 &amp; 11 The Crescent</td>
<td>10</td>
<td>Planning permission but Not Yet Started</td>
<td>0</td>
<td>0</td>
<td>10</td>
<td>16/02046/FUL</td>
<td>20/01/2017</td>
</tr>
<tr>
<td>5 To 6 The Crescent</td>
<td>13</td>
<td>Under Construction</td>
<td>0</td>
<td>13</td>
<td>0</td>
<td>13/02118/FUL</td>
<td>07/02/2014</td>
</tr>
<tr>
<td>Pearn House, Eggbuckland Road</td>
<td>10</td>
<td>Planning permission but Not Yet Started</td>
<td>0</td>
<td>0</td>
<td>10</td>
<td>16/02342/FUL</td>
<td>06/03/2017</td>
</tr>
<tr>
<td>Plot Corner Of Savage Road/Kelly Close</td>
<td>8</td>
<td>Under Construction</td>
<td>0</td>
<td>8</td>
<td>0</td>
<td>15/01952/FUL</td>
<td>03/02/2016</td>
</tr>
<tr>
<td>Lakeside, Ernesettle Green</td>
<td>15</td>
<td>Planning permission but Not Yet Started</td>
<td>0</td>
<td>0</td>
<td>15</td>
<td>16/01973/FUL</td>
<td>01/02/2017</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>1464</strong></td>
<td></td>
<td><strong>935</strong></td>
<td><strong>190</strong></td>
<td><strong>339</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total (excluding North Prospect)</strong></td>
<td><strong>771</strong></td>
<td></td>
<td><strong>413</strong></td>
<td><strong>106</strong></td>
<td><strong>252</strong></td>
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<td></td>
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</table>
Table 2: Total and Average Completions on Windfall Sites from 2009-2017

<table>
<thead>
<tr>
<th>Description</th>
<th>Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Completed Dwellings</td>
<td>935</td>
</tr>
<tr>
<td>Average Number of Completions on Windfall Sites from 2009-2017 (8 years)</td>
<td>117 dwellings per annum</td>
</tr>
<tr>
<td>Total Completed Dwellings (excluding North Prospect Sites) (2009-2017)</td>
<td>413</td>
</tr>
<tr>
<td>Average Number of Completions on Windfall Sites from 2009-2017 (8 years) (Excluding North Prospect)</td>
<td>52 dwellings per annum</td>
</tr>
</tbody>
</table>

Table 3: Total Dwellings Under Construction and Not Started on Windfall Sites from 2009-2017

<table>
<thead>
<tr>
<th>Description</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Dwellings Under Construction and Not Yet Started</td>
<td>529</td>
</tr>
<tr>
<td>Total Dwellings Under Construction and Not Yet Started (Excluding North Prospect Sites)</td>
<td>358</td>
</tr>
<tr>
<td>Total Number of Dwellings Under Construction and Not Started that are anticipated to Complete 2017-2022 (this removes dwellings on consents that have lapsed and dwellings that are deemed to not be deliverable)</td>
<td>291</td>
</tr>
<tr>
<td>Total Number of Dwellings Completed and anticipated to Complete 2009-2022</td>
<td>704</td>
</tr>
<tr>
<td>Average Number of Dwellings to complete on Windfall Sites 2009-2022 (13 years) (Excluding North Prospect Sites)</td>
<td>54 dwellings per annum</td>
</tr>
</tbody>
</table>

**CONCLUSION**

The total number of Dwellings that have been approved on Windfall Sites from 2009 to 2017 is 1464. 935 of these dwellings have completed within this time frame making an average of 117 dwellings per annum.

If North Prospect is excluded from this, the number approved on windfall sites from 2009 to 2017 is 771 dwellings. 413 of these dwellings have completed within this time frame making an average of 52 dwellings per annum.

There are 529 dwellings yet to complete. 190 of these are dwellings Under Construction and 339 are yet to commence. However excluding North Prospect, there are 358 dwellings yet to complete.
complete. 106 of these are dwellings Under Construction and 252 are yet to commence. After removing dwellings on consents that have lapsed and dwellings that are deemed to be undeliverable, there are 291 dwellings that are projected to complete between 2017 and 2022. Therefore making an average of 54 dwellings per annum across the period 2009 to 2022 on windfall sites when including what has already completed between 2009-2017.
## APPENDIX 8: SNAPSHOT OF PLYMOUTH HOUSING NEEDS DATA

### 9765 Households on Housing Register.
Total of 9765 on register of which 6,728 are assessed as being in priority need (bands A to D)

<table>
<thead>
<tr>
<th>Bed need</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Band A</td>
<td>3</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Band B</td>
<td>844</td>
<td>344</td>
<td>112</td>
<td>63</td>
<td>60</td>
<td>12</td>
<td>1435</td>
</tr>
<tr>
<td>Band C</td>
<td>715</td>
<td>725</td>
<td>552</td>
<td>267</td>
<td>18</td>
<td>1</td>
<td>2278</td>
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<tr>
<td>Band D</td>
<td>2374</td>
<td>497</td>
<td>116</td>
<td>21</td>
<td>3</td>
<td>0</td>
<td>3011</td>
</tr>
<tr>
<td>Band E</td>
<td>1582</td>
<td>1020</td>
<td>384</td>
<td>48</td>
<td>3</td>
<td>0</td>
<td>3037</td>
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<tr>
<td>Total</td>
<td>5518</td>
<td>2587</td>
<td>1164</td>
<td>399</td>
<td>84</td>
<td>13</td>
<td>9765</td>
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</tbody>
</table>

### 177 Households on Right to Build Register

<table>
<thead>
<tr>
<th>1 bed</th>
<th>2 bed</th>
<th>3 bed</th>
<th>4 bed</th>
<th>5+ beds</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>20</td>
<td>86</td>
<td>58</td>
<td>12</td>
</tr>
</tbody>
</table>

### 826 Households on Help to Buy Register

<table>
<thead>
<tr>
<th>2 bed</th>
<th>3 bed</th>
<th>4 bed</th>
<th>Other</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>455</td>
<td>238</td>
<td>97</td>
<td>36</td>
<td>826</td>
</tr>
</tbody>
</table>
APPENDIX 9: PLYMOUTH FISHING INDUSTRY ANALYSIS

Plymouth City Council, Economic Development, July 2017

In 2015, the total number of registered fishing vessels in Plymouth reached 488 – accounting for more than 15% of the English fishing fleet. The figures also showed that Plymouth is the fastest growing fishing fleet in the country. Similarly, again in 2015, Plymouth supported 951 full-time fishermen – more than any other port in the United Kingdom, and accounting for over 19% of full-time fishermen in England. Both the number of vessels and number of fisherman have increased significantly from 2014 to 2015.

The fishing industry brings over £12m in GVA to Plymouth each year, and accounts for around 15% of the entire English fishing fleet by FTEs-supported.

Plymouth Fisheries is owned by Sutton Harbour Holdings. Plymouth Trawler Agents act as the agent to the majority of fishermen selling fish at Plymouth Fish Market, with fish landed at other ports across Devon and Cornwall regularly transported to Plymouth to be sold. In 2016, the Plymouth Trawler Agents handled the catches of 376 different fishing vessels and auctioned 5,096 tonnes of fish to a value of £17.4 million from its base at Plymouth Fish Market in Sutton Harbour.

On average, Plymouth lands 13.2% of England’s total fish catch each year – accounting for around 9.6% of the total catch value.

The Need for an Evidence Base

In the aftermath of the EU Referendum, the UK fishing industry faces an uncertain future. Great opportunities are accompanied with serious risks to the ongoing sustainability of the fleet; Plymouth City Council aims to support the local fishing industry and the citizens that it employs.

In response to industry-led engagement, Plymouth City Council determined that an empirical evidence base was needed to identify the issues and opportunities facing the local fishing fleets.

Online Survey

An online survey was opened to the local fishing industry at the beginning of April 2017, and closed at the end of May 2017. A total of 79 responses were collected during this period; responses have been anonymised and collated. This report will analyse the catching and onshore sectors separately, unless otherwise stated.

Analysis

Of the 79 respondents, 74% were employed in the sea-going aspect of the industry, whilst 26% were part of the onshore sector. The majority of respondents were Boat Owners and Skippers, which we hope gives confidence in the reliability of this survey. The majority of respondents, both seagoing and onshore, were based in Plymouth. However, there were also responses from visiting skippers, crew and associated workers, eliciting responses from Penzance, Brixham, Newlyn and the Isle of Wight. Twenty responses from the seagoing sector and six from the onshore sector were returned incomplete, with minimal information provided. Over 141 crewmen are represented in the responses – skippers and boat owners.
were asked to provide details of how many crews they employed, and how many vessels they controlled.

**Seagoing Sector Respondents**

(One declined to answer)

Over 90% of respondents had secured their first choice of berth within Sutton Harbour and the wider Plymouth area, with a nearly half of all vessels moored against the harbour walls in Sutton Harbour. A further third moor on the provided pontoons, whilst the remaining minority of vessels anchored on swinging moorings or in nearby sheltered waters.

There was concern from some respondents that harbour-side wall space was severely restricted by the harbour’s geography, and some respondents expressed a wish for more space to be found. A minority of vessel owners highlighted an issue with a lack of deep water berths within the harbour, expressing the opinion that the harbour needed to be dredged back to original charted depths.

The average annual cost of mooring within Sutton Harbour was £1,051. The majority of respondents had seen mooring fees increase in the past five years, with 65% experiencing cost increases. Fees had remained the same for remaining 35% of vessels.

Sutton Harbour Holdings was the sole supplier of marine diesel within the Sutton Harbour marina, although more than one vessel had switched their engines to petrol and now purchased fuel from commercial fuel stations. 65% of respondents felt that fuel was more expensive in Sutton Harbour than in other South West England ports, whilst 35% felt that “it was about the same” (or similar answers). A number of respondents who bought their fuel in Brixham felt that Brixham Harbour had some of the cheapest fuel in the region. No respondent felt that Sutton Harbour offered more affordable fuel than other regional ports.

Plymouth Trawler Agents are the sole-agent of the overwhelming majority of respondents; one or two respondents primarily sold at Brixham and hence used Brixham Trawler Agents. One fisherman acted as his own agent.

**Potential Barriers to Growth - Catching Sector**

![Diagram showing potential barriers to growth for catching sector](image-url)
Future Needs of the Catching Sector

<table>
<thead>
<tr>
<th></th>
<th>Not Important</th>
<th>Neutral</th>
<th>Desirable</th>
<th>Important</th>
<th>Essential</th>
</tr>
</thead>
<tbody>
<tr>
<td>More access</td>
<td>8%</td>
<td>8%</td>
<td>25%</td>
<td>28%</td>
<td>31%</td>
</tr>
<tr>
<td>Pontoon berths</td>
<td>14%</td>
<td>9%</td>
<td>40%</td>
<td>23%</td>
<td>14%</td>
</tr>
<tr>
<td>Electricity points</td>
<td>6%</td>
<td>11%</td>
<td>11%</td>
<td>26%</td>
<td>46%</td>
</tr>
<tr>
<td>More space in Fisheries Complex</td>
<td>3%</td>
<td>6%</td>
<td>25%</td>
<td>25%</td>
<td>42%</td>
</tr>
<tr>
<td>Storage facilities</td>
<td>6%</td>
<td>11%</td>
<td>9%</td>
<td>31%</td>
<td>43%</td>
</tr>
<tr>
<td>More forklifts</td>
<td>12%</td>
<td>18%</td>
<td>32%</td>
<td>21%</td>
<td>18%</td>
</tr>
<tr>
<td>Cranes</td>
<td>6%</td>
<td>11%</td>
<td>17%</td>
<td>37%</td>
<td>29%</td>
</tr>
<tr>
<td>Business support</td>
<td>11%</td>
<td>11%</td>
<td>19%</td>
<td>31%</td>
<td>28%</td>
</tr>
</tbody>
</table>

additional storage facilities and electricity points are needed, as well as additional general space on the Fisheries Complex. Fewer respondents prioritised pontoon berths, and the provision of business support was seen by many as more important than additional forklifts.

Onshore Sector Respondents

Around one-third of onshore respondents were Fish Merchants, whilst 20% were employed with the marine-technical industry. Transport companies, chandlers, fish-farmers and welfare officers all responded to the survey, albeit in smaller numbers. The majority of respondents did not have premises on the Fisheries Complex, but 67% were interested in acquiring premises on the Complex if they were to become available.

100% of respondents felt that parking and access to the market was a problem. Over 40% had a need to unload vessels directly into lorries, and 100% of those surveyed felt that there was not enough space for this within the Fisheries Complex.

Potential Barriers to Growth - Onshore Sector
**Future Needs of the Onshore Sector**

<table>
<thead>
<tr>
<th></th>
<th>Not Important</th>
<th>Neutral</th>
<th>Desirable</th>
<th>Important</th>
<th>Essential</th>
</tr>
</thead>
<tbody>
<tr>
<td>More access</td>
<td>7%</td>
<td>0%</td>
<td>7%</td>
<td>64%</td>
<td>21%</td>
</tr>
<tr>
<td>More space in Fisheries Complex</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>54%</td>
<td>46%</td>
</tr>
<tr>
<td>Storage facilities</td>
<td>0%</td>
<td>8%</td>
<td>15%</td>
<td>38%</td>
<td>38%</td>
</tr>
<tr>
<td>More forklifts</td>
<td>0%</td>
<td>15%</td>
<td>31%</td>
<td>31%</td>
<td>23%</td>
</tr>
<tr>
<td>Cranes</td>
<td>0%</td>
<td>38%</td>
<td>31%</td>
<td>8%</td>
<td>23%</td>
</tr>
<tr>
<td>Business support</td>
<td>0%</td>
<td>31%</td>
<td>8%</td>
<td>31%</td>
<td>31%</td>
</tr>
</tbody>
</table>

The onshore sector appears more polarised in their opinion of the future needs of the industry; nearly all respondents attached great importance to improved Fisheries Complex-access, further storage facilities and increased business support.

**Other Comments – Catching and Onshore Sectors**

There was widespread support within the industry for increasing public engagement, both to increase fish sales through raising awareness and also to bring forth the next generation of the industry. The lack of 24-hour access showers and conveniences in the Fisheries Complex seems to be a real issue; many respondents made comments about how crew were sleeping on boats in the harbour without the ability to wash themselves. The ice plant also proved contentious; a majority of respondents feel that it is below par.

Security appears to be another major issue within the Fisheries Complex. There is no access control, although there does appear to be an ANPR system logging car number plates as they enter the Complex. Multiple respondents complained of suffering serious financial damage due to theft and criminal damage on the Fisheries Complex, and it was concerning to see allegations from a non-Plymouth skipper that the Port of Plymouth had a reputation for heavy drug and alcohol use amongst crews and captains. No further evidence or information was offered, but the respondent did leave contact details.

There is fairly widespread concern about Sutton Harbour Holdings’ future intentions with the Fisheries Complex, but more general support for the work done by Plymouth Trawler Agents. A multitude of suggestions were put forward for the future safeguarding of the port, from a marketing campaign to raise public awareness, to a compulsory purchase of the Fish Market by Plymouth City Council. A number of comments advocated Plymouth Trawler Agents being placed in charge of the Complex in its entirety.

*(detailed comments available in full report)*
APPENDIX 10: FISH QUAY SWOT ANALYSIS AND FUNCTIONALITY ASSESSMENT

Summary

The SWOT analysis identified the following strengths:

1. A diversity of fishing opportunities is accessible from Plymouth, supporting a diverse fleet, a popular fish market which achieves good prices, and providing processing opportunities;
2. The port infrastructure in Plymouth still offers opportunities to upgrade fish sector facilities;
3. Plymouth has good transport links by road, rail and ferry (direct ferries to export markets in France and Spain). Support for exporting will help exploit these opportunities;
4. Plymouth has a strong fishing sector community, still having fishing skills, and a cluster of viable businesses operating in all sub-sectors;
5. Plymouth has local expertise in gear design and a network of fishermen prepared to test new approaches to reducing the impact of fishing on fish stocks and on the wider environment. Plymouth also has an exceptionally strong, well-equipped marine science community, comprising four major research institutions with different marine expertise: Plymouth Marine Laboratories, Plymouth University, Marine Biological Association and the Sir Alistair Hardy Foundation.

The analysis identified the following opportunities:

1. Port of Plymouth needs improved facilities at the current fish market and fish quay site.
2. Port of Plymouth needs strategic investment in port facilities.
3. Port of Plymouth needs a clear and comprehensive marketing strategy.
4. Port of Plymouth needs to develop a “sustainable port” approach.
5. Port of Plymouth needs a more professionalised fishing and seafood sector.

A further piece of work focussed on the functionality of the fish quay site, again being stakeholder led and requiring critical assessment. This work suggested that the fish quay plays a critical role as an activity hub and point of transfer/exchange in the economy of the sector and that weakening of these interlinkages through dispersal of the businesses and activities located there would be detrimental to the sector.

See over for Full Report.
Plymouth Plan
Consultation Event Report:

Fish Quay
Fish Quay workshop. 4th and 6th August 2016. Fish Market, Plymouth.

In the course of developing a bid to the European Maritime and Fisheries Fund to establish a Fisheries Local Action Group in Plymouth (during February 2016) it became apparent that there were many operational aspects of the fishing industry about which little was known within the City Council.

A SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis was undertaken to provide the basis of the FLAG bid and to identify key actions. This is presented in Annex 2. An economic analysis is presented in Annex 3. At the same time a Waterfront Masterplanning process was underway, and the preparation of the Plymouth Plan Part 2. Given the strategic location of the Fish Quay and the value of waterfront infrastructure generally in a range of contexts (tourism, marine technology, residential, marine leisure, etc) it was realised that a better understanding of these operational aspects of the fishing and seafood sector would provide a valuable resource to aid decision-making regarding land use.

In August 2016 (4th and 6th) drop-in workshop sessions were held to engage with fish quay users in order to gather from them information regarding the use of the fish quay, and how facilities and infrastructure could be improved (and so indirectly also highlighting problems which people would like resolved). A ‘Planning for Real’ style technique was used, asking participants to write information on colour coded flags and place these in relevant locations on an aerial photograph of the fish quay and surrounding area. Thus, the spatial characteristics of the comments and opinions gathered were also captured. Over 50 people involved in the industry participated.
On the basis of the distribution of comments the Fish Quay area was divided into the following functional sub-areas to aid reporting:

1. Entrance area
2. Units
3. Main Quay
4. Fish Market
5. Market loading/turning area
6. Market quay
7. Lock gate area
8. Old market area
9. Pontoons and open water.
Summary conclusions

Overall, a consistent message came through from this group of stakeholders of:

- a vibrant business area, with a high degree of beneficial interdependency between businesses operating there
- a high value was attached to the market and quay as a source of local employment
- claims of a lack of space (for storage, parking, loading/unloading, repairs and maintenance, manoeuvring and berthing of boats)
- apparent deficiencies in facilities (toilets/showers, fuel/water, ice, food hygiene, waste and recycling)
- perceptions of excessive charges (rents, fuel, parking, mooring fees)
- health and safety concerns regarding proposed public access
- fears of the quay being lost to the industry, or its use seriously compromised, by redevelopment.

Note: The comments and views underpinning these conclusions have not yet been investigated to establish their validity or otherwise.

A summary is presented below of comments for each functional area. The report of the workshop is limited to reporting comments only, no analysis of them being undertaken.

1. Entrance

The entrance area provides some space for parking, net mending and general repairs. The food stall at the entrance is popular and is the only food available on site.

Positive links to the National Marine Aquarium, bringing together science, fisheries and education are highlighted.

The area was suggested for additional storage, parking and waste and recycling facilities, and for a segregated public viewing area.

A group of comments focussed on the strategic importance of the site for Plymouth and proposed it be taken into not-for-profit ownership, perhaps through compulsory purchase, in order to protect it for the industry and its present and future needs.

2. Work Units

The units house businesses that service fishing vessels (welding, general repairs, engineering, chandlery etc) and fish merchants/processing (including some training for chefs).
Businesses servicing fishing vessels need to be on-site so as to have ready access to both the job and to specialist tools and equipment without wasting time journeying between sites. For at least some merchants the benefits of being adjacent to the market are seen in the quality of their products (ability to keep fish fresh) and access to city centre customers (restaurants/hotels) and consequent reduced distribution costs. Retail sales are made on site to the public and merchants would like to develop this further.

Parking is considered a constraint, both its cost and its availability.

The role of educating the public, children and professionals (chefs) was highlighted as a role that could be developed.

Many complaints were made about rents and rates, the perception being that these are excessive given, *it is assumed*, the relatively low profit margins in the sector.

### 3. Main Quay

This area is multi-purpose, the quay surface being used to service boats, for storage and for parking, and the quayside for mooring fishing boats of all sizes. At various time fork lift trucks transport pallets of nets or large pieces of machinery or fishing gear. Boats use derricks to crane catch onto the quayside and bring supplies on board. Gear, nets and warps are stretched out over large areas for servicing, repairs, and replacement. Generators power equipment, donkey engines operate winches, electric welding repairs and other ‘hot works’ take place.

Some areas of the Quay are reserved to take on supplies and to land catch. Areas for taking on ice, water and fuel are limited and demand quick turnaround times. Boats can be queuing to use these facilities or to land catch. Landing berths generally were felt to be insufficient in availability.

Concerns were expressed regarding health and safety in connection with proposals for greater public access.

Many improvements were suggested. In the main these related to:

- Faster turn-around of vessels by having faster pumps (fuel, water), more reliable ice supply, more fork lift trucks
- More space, for repairs, parking, storage, loading
- Lower rates for berthing, fuel charges etc
- A lack of investment over decades was cited, and fears expressed that encroaching residential development would lead to complaints about noise (especially at night) and creeping restrictions on quayside operations.
- Providing safe, segregated public access - from a viewing area or an elevated walkway.
4. Fish Market

The fish market building and the auction held within, 5 days a week, is seen as central to the success of the fishing industry in Plymouth. The building also provides some office space. Its design was originally intended to handle about £1,000,000 worth of fish. It now handles fish/shellfish in excess of £20,000,000 annually.

Improvements suggested concern mainly the handling and transhipment of fish. Market facilities are dated, the handling chain of fish could be organised better to comply with modern hygiene regulations and refrigeration is thought to be insufficient despite recent improvements. Parking for lorries, loading and turning bays are considered inadequate and restrictive to efficient operation and increased trade.

The lack of washing and toiletry facilities for workers and fishermen using the Fish Quay is highlighted, presumably the market building being seen as a suitable location for them.

The scope for use of the market to support education was noted.

5. Market Loading area

The market loading area houses the loading bays for fish leaving the market hall, but also has to accommodate turning and reversing articulated lorries and parking for other vehicles. That it was too restricted is a widely held view. The space is nevertheless eyed up for other uses such as storage and repairs as it is the one large open area!

6. Market Quay

Intended primarily for landing fish into the market, parts of it are also used for general servicing and repairs. The west face of the quay is generally kept clear for landing fish.

General comments regarding lack of quayside working space are repeated.

7. Lock gate area

The lock gate provides access to Sutton Harbour from the sea, but also retains water in the harbour at low tide so that boats remain afloat. It also has a footbridge leading to and from the Barbican. [It also serves a flood protection function].

Moorings/pontoons to the west of the lock gate were reserved for inshore (small) fishing boats until recently. They are now occupied largely by leisure boats, reducing the number of moorings in Plymouth for fishing boats and so excluding, it is claimed, some local boats from berthing in the Harbour.
Recent maintenance activity made entry into the harbour difficult for fishing vessels.

There is no slipway in Sutton Harbour for servicing vessels.

8. Old market area
The Barbican, where the fish market was located until the early 1990s, is seen as important still, as many restaurants serve local fish. The area is also seen as important for fishing heritage, which could be promoted more.

9. Pontoon and open water
The harbour is seen as overcrowded with leisure pontoons. This has reduced berthing opportunities for larger vessels and makes manoeuvring difficult and potentially hazardous, especially when vessels are sheltering during storms and space is consequently very tight. The pontoons are lacking electricity and lighting, which is stated as a cause for concern for health and safety reasons. The value of Vauxhall Beach for emergency laying up was highlighted, given the lack of a slipway in the Harbour.

Complaints were made regarding the cost of moorings, which are priced at leisure mooring rates.

Annexes removed from this Appendix (but available if required)

Annex 1 - Transcript of workshop responses
Annex 2 - SWOT analysis prepared for European Maritime and Fisheries Fund application
Annex 3. Evidence of the economic value of fishing and seafood to Plymouth

Fishing supports 4000 jobs (direct and indirect) in Plymouth, 3.5% of total employment and roughly equivalent in number to the University or Babcock Engineering at the Royal Naval Dockyard. The loss of either of these employers would be seen as a significant shock to Plymouth’s economy, in employment terms alone. The dependency of Plymouth on fishing should be considered in this light.

For 2014 the financial contribution to the economy of fishing (measured as GVA) was over £56m.

Sutton Harbour is the central focus of the fishing industry in Plymouth and hosts the fish market, and medium and small boats, fishmongers and related activity.

Commercial wharves are regularly used by larger trawlers to land catch and there is potential to increase the proportion of fishing use, subject to improving facilities and access.

Coastal tourism is closely aligned with fishing and seafood, the fishing port being located in the Barbican and close to Mayflower Steps, these being amongst the top visitor destinations in Plymouth. Food tourism in the city is on the increase and seafood features prominently, building its reputation on fresh, local fish.

Data Tables

Fish landings in Plymouth:

<table>
<thead>
<tr>
<th>Quantity ('000 tonnes)</th>
<th>Value (£ million)</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.4</td>
<td>14.3</td>
</tr>
</tbody>
</table>

Note: The tables do not accurately reflect the importance of the local fish-market to Plymouth. The figures in the tables represent the actual physical landings within the Port of Plymouth but do not record the weight or value of fish sent to the market from other ports within the South West. For example: In 2014 5,700 tonnes of fish were sold across the auction market to a value of £17 million. Of this £17m, £6m worth of fish was sent overland to Plymouth from many different ports in the South West illustrating its value to both the local and the regional economy as a competitive fish auction hub.
Licenced fishing vessels in Plymouth:

<table>
<thead>
<tr>
<th></th>
<th>Total Vessels</th>
<th>Vessels under 10m</th>
<th>Vessels over 10m</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>342</td>
<td>255</td>
<td>87</td>
</tr>
<tr>
<td>2013</td>
<td>365</td>
<td>275</td>
<td>90</td>
</tr>
<tr>
<td>2014</td>
<td>364</td>
<td>276</td>
<td>88</td>
</tr>
</tbody>
</table>

Employment:


Analysis of economic impact of fishing and seafood sector:

<table>
<thead>
<tr>
<th>Subsectors (SIC codes)</th>
<th>FTEs</th>
<th>GVA per FTE</th>
<th>GVA</th>
<th>Employment multiplier</th>
<th>Employment effect (indirect + induced FTEs)</th>
<th>Output multiplier</th>
<th>Output effect (indirect + induced GVA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>03110 : Marine fishing*</td>
<td>730.0</td>
<td>£5,000</td>
<td>£3,650,000</td>
<td>3.21</td>
<td>2,343.30</td>
<td>3.42</td>
<td>£12,483,000</td>
</tr>
<tr>
<td>10200 : Processing and preserving of fish, crustaceans and molluscs</td>
<td>269.7</td>
<td>£31,600</td>
<td>£8,522,795</td>
<td>5.926</td>
<td>1,598.29</td>
<td>4.78</td>
<td>£40,738,962</td>
</tr>
<tr>
<td>46380 : Wholesale of other food, including fish, crustaceans and molluscs</td>
<td>65.9</td>
<td>£26,900</td>
<td>£1,773,794</td>
<td>1.9</td>
<td>125.29</td>
<td>1.8</td>
<td>£3,192,830</td>
</tr>
<tr>
<td>47230 : Retail sale of fish, crustaceans and molluscs in</td>
<td>8.5</td>
<td>£25,600</td>
<td>£171,496</td>
<td>1.3</td>
<td>11.04</td>
<td>1.4</td>
<td>£304,494</td>
</tr>
<tr>
<td>Plymouth total</td>
<td>1074.1</td>
<td>£14,164,086</td>
<td>total</td>
<td>4,078</td>
<td>Plymouth total</td>
<td>118,154</td>
<td>£5,195,000,000</td>
</tr>
</tbody>
</table>

% of Plymouth total

3.5% 1.1%

* data from 2014 Sea Fishery Statistics
APPENDIX 11: FISH MARKET SALES TONNAGES AND VALUES FOR THE LAST FIVE YEARS

Sales volumes and values at the Fish Market, Fish Quay, Plymouth, over the last five years are set out in the table below.

It can be seen that sales volumes have remained fairly steady at around 5m kg / 5,000 tonnes a year while sales values have shown a useful increase to nearly £19m a year from around £16m a year in the earlier part of the period.

**Fish Market, Fish Quay, Plymouth, Sales Volumes and Values, 2013-17**

<table>
<thead>
<tr>
<th>Year</th>
<th>Volume (kg)</th>
<th>Value (£)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>5,189,661</td>
<td>£ 15,855,379</td>
</tr>
<tr>
<td>2014</td>
<td>5,424,382</td>
<td>£ 16,872,826</td>
</tr>
<tr>
<td>2015</td>
<td>5,060,398</td>
<td>£ 15,286,135</td>
</tr>
<tr>
<td>2016</td>
<td>4,925,807</td>
<td>£ 17,104,107</td>
</tr>
<tr>
<td>2017</td>
<td>5,039,213</td>
<td>£ 18,829,555</td>
</tr>
</tbody>
</table>

Source: Plymouth Trawler Agents, January 2018
APPENDIX 12: EVIDENCE RELATING TO PLYMOUTH MARKET FOR INDUSTRIAL PREMISES

Extracts from Vickery Holman Market Review 2016-17

Plymouth Industrial

A quieter year in terms of the volume of transactions but still this is the most consistent sector in the City. Rents and capital values continue to improve. There remains a pretty solid demand for small units (up to 2,000 sq ft) thus supporting further development schemes, especially on the northern side of the City and at Langage. This has also seen the continuation of the pattern of growth in values established in 2014/15.

There continues to be a stagnation in activity for 5,000 to 10,000 sq ft units, albeit rents have marginally increased. Compounded to this there is a healthy demand for 10,000 sq ft plus units, although a limited supply, hence there is no real evidence of an increase in values, yet.

The desire to be owner-occupiers has not faltered over the past 12 months and with some evidence of a more reased approach from the prime and secondary bankers, funding has supported this activity.

12 Vickery Holman - Plymouth
Sales at new Apollos Court development, Neptune Park, Plymouth