

**Joint Local Plan Team**

For Plymouth City Council, South Hams District Council and West Devon Borough Council

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Please ask for: Richard Grant

23 August 2018

Dear Mrs Burden and Mrs Wright

JLP Councils Response to Inspectors' Post Hearing Advice Note (EXCI5)

Many thanks for sending the Post Hearing Advice Note to the JLP Councils. I can confirm that the Councils accept the changes to the JLP that have been set out in the Note, in addition to the Main Modifications that were developed as a result of discussions during the hearings sessions.

A number of matters have been raised in the Note and the Councils have been asked for their response to these issues.

Settlement Boundaries

Paragraphs 12 to 15 of the Note set out reservations regarding the approach taken in the JLP to settlement boundaries, and the JLP Councils are given three options for resolving these reservations. The JLP Councils propose to follow the Inspectors Option b, and to commit to producing a subsequent DPD setting out Settlement Boundaries. The Councils will make consequential amendments to JLP policies to ensure that guidance is given to decision makers during the time that the DPD is being developed, and, as indicated in paragraph 15 of the Note, will make clear that settlement boundaries set out in 'made' NPs would retain full weight following adoption of the JLP. We recognise that the Inspectors wish to agree a Schedule of Main Modifications with the Councils, as set out in paragraph 32 of the Note, and will therefore set out the wording of such policy changes in the draft Schedule.

The Councils wish to move quickly to the production of a Settlement Boundaries DPD and will set out a timetable for doing so in a revision to the Local Development Scheme to be published in Autumn 2018.

Local Green Space

Paragraphs 22 to 28 of the Note set out reservations regarding the approach taken in the JLP to the designation of Local Green Spaces (LGS), and the JLP Councils are given two options for resolving these objections.

Following the close of the hearings into the JLP, the Councils produced a note setting out further explanation of how LGS sites had been identified for inclusion in the JLP (EXD65). We recognise that this further explanation has not been sufficient to satisfy the Inspectors that the JLP approach to LGS designations is justified. The Councils therefore propose to follow Option 1 that is set out in the Note, to remove the LGS designations from the Policies Map and make consequential changes to Policies SPT11 and DEV29.

In considering what consequential changes are appropriate, the Councils would make the following suggestions to the Inspectors:

- Given that emerging and future neighbourhood plans may seek to designate LGSs, it would seem to be appropriate to maintain the approach of LGSs forming part of the suite of green space designations, and to therefore maintain a policy relating to them, even if the JLP itself doesn't designate any sites. This approach would provide a JLP strategic context for LGSs designated by neighbourhood plans and other potential future development plan documents, each of which could include more detailed, locally specific LGS policies.
- The consequence of removing the LGS designations without anything replacing them would be to leave a gap in the hierarchy of green spaces in the Plymouth Policy Area and therefore a potential policy vacuum for important green spaces in the city. The neighbourhood green spaces (NGSs) would remain in place, yet the even more valuable sites that had been proposed as LGSs would not have an associated policy. The Plymouth Open Space Assessment (POSA) (EN34 and EN34a) provides substantial evidence of the green space value of each site and justifies a tiered policy differentiation. In light of this, we suggest that a new local Plymouth specific green space designation (perhaps 'City Green Space') could be created, relying on this evidence base, which would carry less than the 'green belt-equivalent' level of protection afforded to LGSs by the Framework, but more than that for NGSs. This could be covered in a Main Modification to DEV29. Appendix 5 of the POSA collates the value scores for each green space site, with the detailed assessments in EN34a, providing sufficient information to differentiate between what sites would be proposed as CGSs and what sites as NGSs.

An alternative would be for the sites currently shown as LGSs to instead rely on other policy protections already set out in the plan (eg many could be converted to NGSs). However, for this approach to be effective, there would need to be some further consequential changes to the NGS provisions of DEV29 so that it can cover a broader range of sites in terms of their evidenced green space importance. A further alternative would be to simply convert LGSs to NGSs with no consequential changes to DEV29. However, our concern with this is that it would carry less justification in terms of the evidence base than the new designation suggested.

If the inspectors are happy for these changes to be explored, the Councils propose to set out more detail in a revision to document EN31 (Plymouth Greenspace Policy Development Process). The Councils would therefore welcome early guidance from the inspectors on this matter.

Next Steps

As a result of the choices set out above, it should be clear that the Councils do not wish to make any choices which result in a suspension of the Examination, and therefore wish to move rapidly to a consultation on a Schedule of Main Modifications.

The Councils will therefore produce a draft Schedule of Main Modifications. At the same time the Councils will produce an addendum to the Sustainability Appraisal and to the Habitats Regulations Assessment setting out assessments of the Main Modifications, and will agree all of these documents with the Inspectors ahead of consultation as required by paragraphs 32 and 33 of the Note. The

Councils would welcome guidance from the Inspectors as to how they would like to agree the Main Modifications and addendums to the SA and HRA ahead of consultation.

In terms of a timetable, the Councils would aim to agree a Schedule and addendums to the SA and HRA with the inspectors by the end of September at the latest, and to move to a consultation process commencing in late October/early November at the very latest. This timetable would lead to the consultation ending before Christmas 2018, and the Councils will ensure that all duly made representations received are forwarded to the Inspectors as quickly as possible.

As recognised in paragraph 34 of the Note, the Councils will also produce a Schedule of Additional Modifications (having agreed with the Inspectors that no AMs should actually be considered as MMs) and a Schedule of Changes to be made to the Policies Map, and will consult on these at the same time as consulting on the Schedule of Main Modifications. The Councils will ensure that it is clear to anyone responding to the consultation that these two Schedules are not a matter for the Inspectors.

The Councils will be happy to answer any queries the Inspectors may have regarding the contents of this letter

Yours sincerely

Richard Grant

Strategic Planning Manager (Joint Local Plan)

For Plymouth City Council, West Devon Borough Council and South Hams District Council.