



**Plymouth and South West Devon Joint Local Plan Examination**

**Matter 2 – Spatial Strategy**

**Mr Edward Heynes, Heynes Planning Ltd**

**For D Stratton/R and B Bennet/J Stratton**

**Place Land LLP**

**Diocese of Plymouth**

- 1.1 Heynes Planning Ltd have been instructed by D Stratton/R and B Bennet/J Stratton, Place Land LLP and the Diocese of Plymouth to make representations on the Plymouth and South West Joint Local Plan 2014 – 2034 (referred to in this document as the 'JLP').
- 1.2 In respect of D Stratton/R and B Bennet/J Stratton and the Diocese of Plymouth representations have been made by Heynes Planning on behalf of our Clients in relation to the pre-submission version of the JLP and earlier versions, including the Plymouth Plan. Our representations dated 26<sup>th</sup> April 2017 made on behalf of our Clients in relation to the pre-submission consultation under Regulation 19 confirm firstly, the land to which the representations relate and secondly, sets out when various submissions have been made on behalf of those Clients.
- 1.3 In respect of Place Land, representations have been made solely in relation to the submission consultation of the JLP under Regulation 19. They are contained in a letter dated 26<sup>th</sup> April 2017.
- 1.4 The contents of the submissions as set out above are relied upon in terms of evidence for the hearing sessions that we have been invited to on behalf of our Clients. That said, it is supplemented with additional material as a direct response to the matters and issues for investigation as set out in document EXC7, Matter 2.

**2.0 Inspectors Questions and Answers**

**Main Issue - Does the JLP set out the most appropriate strategy to deliver the vision, objectives and outcomes set out in the plan, which is justified, and consistent with national policy?**

***2.1 Spatial strategy (Policies SPT1 and SPT2) (Other policies in the spatial strategy chapter of the plan are set out under separate topic areas below)***

***Q. i) Policies SPT1 and SPT2 provide lists of sustainable development principles: are they necessary, justified and consistent with national policy? As the policies in the JLP when considered as a whole should form the framework for delivering sustainable development within the plan area, are the policies effective and is it clear how they will be used by decision-makers when considering development proposals?***

- 2.1 Draft Policies SPT1 and SPT2 are two policies that sit amongst a suite of draft policies (SPT1 to SPT13) within the JLP that seek to ensure that that the key strategic objectives of the Plan are

met. Collectively, these policies are important as they provide a framework and mechanism for the delivery of development balanced with ensuring that the character and appearance of the natural environment is maintained and enhanced. In that context, they need to be cross referenced with Strategic Objective SO1 which sets out how the spatial strategy is to be delivered.

- 2.2 Draft Policy SPT1 confirms that the three Councils support development and change in the Plan area. This phrase is supported as it reflects the general presumption of sustainable development as set out in the NPPF. The draft Policy then confirms that the development and change so referenced will be planned for and managed through the principles of sustainable development. Importantly, this is in both a strategic sense (as referenced by the phrase 'planned for' in the draft Policy) and in relation to decision on planning applications through the development management process (also referenced by the term 'managed' in the draft Policy).
- 2.3 Draft Policy SPT2 then sets out a set of principles to guide how development and growth takes place in the Plan Area with reference being made to sustainable linked neighbourhoods and sustainable rural communities.
- 2.4 In terms of whether these two policies are necessary, we submit that a 'headline policy' that ensures that the JLP delivers sustainable development is justified and consistent with the objectives of the NPPF. However, there is potential for the two policies to be merged on the basis that SPT1 could be considered superfluous having regard to the fact that development should always be sustainable in any event whether planned for through the planning making process or in the context of decision making. In that context, the Policy is not deemed necessary.
- 2.5 If draft Policy SPT1 were to remain as a single Policy we have concerns however regarding the inclusion of the term 'reducing the need for greenfield development' in para. 3 i). Whilst national planning policy does seek to encourage brownfield sites it should be noted that greenfield sites have an important role in delivering development particularly housing. They must be given consideration and be the subject of planning permissions (where appropriate either through the delivery of planned i.e. allocated and windfall sites) otherwise housing targets will not be met and the important objective of boosting the supply of housing will not be achieved.
- 2.6 We reiterate the observations made in the representations dated 26<sup>th</sup> April 2017 where we stated, in summary, that whilst priority may be given to brownfield sites and regeneration, this should not be at the expense of greenfield sites. The inclusion of this term is at odds with the approach within the JLP regarding planned growth and, furthermore, in a development management context the inclusion of such a term could lead to the refusal of planning applications on a greenfield site in certain circumstances.
- 2.7 Within para. 2 i), it would be appropriate to make reference to 'housing' after the term 'local services' given that the housing is a key component of any neighbourhood and community.
- 2.8 With respect to draft Policy SPT2 in general terms it is necessary, justified and consistent with national policy in our view.
- 2.9 In terms of their effectiveness and clarity in the decision making process we consider that the opening paragraph to draft Policy SPT2 could be better phrased by inserting the words '*be provided as appropriate that supports*' after the word 'should'.

**ii) Para 3.17 (p18 of the JLP) states that the measures/standards set out in figure 3.2 will be used in implementing Policy SPT2 when considering development proposals. Does this need to be clearly set out in policy and are the measures/standards justified?**

- 2.10 In answering this question, we refer in the main to our original representations dated 26<sup>th</sup> April 2017. Further, we note reference in paragraph 3.17 that the standards as set out will always be available in the evidence base documents informing the JLP and the accompanying Supplementary Planning Documents. In that respect, the Councils need to confirm in the context of both the Examination and through proper referencing in the Explanatory Text exactly which policies/guidance have been used in formulating these standards. In addition, are these criteria the only criteria throughout the JLP that should be adhered to in meeting the objectives of SPT2? There should be appropriate cross referencing in the same paragraph to other relevant criteria.