



# Hearing Statement – Matter 2: Spatial Strategy

Plymouth and S.W Devon Joint Local Plan

Emery Planning for Wainhomes (South West) Holdings Ltd

Project : 16-303  
Site address : Plymouth & S.W Devon  
Joint Local Plan  
Client : Wainhomes (South West)  
Holdings Ltd

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## 1. Introduction

**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?**

- 1.1 Our main concern in relation to the spatial strategy is the distribution of housing development. This is dealt with under Matter 3 (Housing). We deal with the specific questions set out under issue 2.1 below.

## 2. 2.1 Spatial strategy (Policies SPT1 and SPT2)

**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 The lists are not necessary, in that they are generic repetitions or interpretations of national planning policy, with little to no spatial aspect that relates specifically to the three LPA areas.

**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?**

- 2.2 We do not consider that it is appropriate to use the criteria as standards against which individual development proposals will be assessed against. As such we would strongly object to an even greater elevation of status of the criteria at Figure 3.2.

- 2.3 Paragraphs 29 and 34 of the Framework clearly set out the need to recognise the differences in accessibility between urban and rural areas, and furthermore that accessibility is only one strand of sustainable development and there is a need to take into account other policies in the Framework, particularly in rural areas. These sections of the Framework link back to the findings of the Taylor Report (2008), as referred to in our original representations and specifically endorsed by the Council as “still pertinent to the way that we consider how our rural settlement function” (O6, page 2). In particular, the summary of Section 1 of the Taylor Report provides:

*“Planning must not determine the future development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be. In too many places this approach writes off rural communities in a ‘sustainability trap’ where development can only occur in places already considered to be in narrow terms ‘sustainable’. The question planners must address is “how will development add to or diminish the sustainability of this community?” taking a better balance of social, economic, and environmental factors together to form a long term vision for all scales of communities. A mix of housing and employment opportunities are essential for the sustainability of rural communities.”*

- 2.4 We consider that Figure 3.2 represents exactly the sort of tick-box exercise that national planning policy is seeking to avoid. As such the approach is unsound, in that it is inconsistent with national planning policy. It is also not justified, as it is not clear how the application of such criteria would affect the delivery of the quantum of development required during the plan period.