Mr Robert Young  
Joint Local Plan Team  
Strategic Planning and Infrastructure  
Plymouth City Council  
Ballard House  
West Hoe Road  
Plymouth  
PL1 3BJ  

8th January 2018

Dear Mr Young

Matter 8 policy Area Strategies: Thriving Towns and Villages

Further to the representation submitted by Heynes Planning on our behalf (dated 26th April 2017), please accept this as the response to the Inspector’s matters and issues for investigation (doc. no. EXC7). Ed Heynes is unable to represent Place Land LLP at the examination session into Matter 8, hence this letter direct from us.

We will keep this letter brief and rely on previously made representations and views expressed at the examination. Comments are made in the context of the NPPF(182), i.e. tests relating to the plan being positively prepared, justified, effective and consistent with national policy.

In respect of Matter 8.1(i) – The overarching purpose of the JLP must be facilitation of delivery of development, including housing. In the context of historically low delivery rates leading to an acknowledged lack of the required minimum of a five-year supply of land for housing, the JLP must be permissive and seek to direct growth in the most sustainable manner. This however is not a binary argument where one location is ‘sustainable’ and another is ‘unsustainable’. We, of course, understand the requirements for some form of settlement hierarchy to guide development to sustainable locations. However, the difficulty of the arbitrary drawing of a line between one village being in one category in the hierarchy and another village being in another is that is stops delivery in a settlement deemed less sustainable. We maintain that, in rural districts (i.e. the TTVPAs) development needs to occur in rural settlements. We acknowledge that the JLP allows this, but it is overly restrictive by expecting this to only occur later in the trajectory and by reference to neighbourhood plans. Where there has been a recent undershoot against the need for a five-year land supply, the JLP should not restrict supply from sites in sustainable villages. Whilst one can assume a reliance on trajectories and sites coming forward at predetermined times, recent experience
suggest that a restrictive approach only leads to challenge at s78 when these assumptions do not play out as expected. A miniscule allowance for sustainable villages is counter intuitive where more housing is required. Actively and positively planning for growth in sustainable villages gives control to the local planning authority and to communities as the spectre of a lack of adequate housing land is unlikely to raise its head and thus challenge at a appeal is less likely. The current restrictive approach acts against greater delivery of housing (where a national housing crisis exists, where significant areas of Government housing policy seek increases in delivery and where there has been an inadequate level of housing delivery). In response to the posed question, the hierarchy is not justified in that it is overly restrictive and does not adequately plan for positive housing growth in the identified sustainable villages. There are clearly levels of ‘sustainability’ (by reference to level of facilities and services) within settlements identified in paragraph 5.10, as acknowledged in Table 5.8.

If the objective of national and local policy is delivery of sustainable development and certain settlement are deemed ‘sustainable’, we question why there is an overly strict limitation on the growth of these settlements. To not actively plan for housing growth for defined sustainable villages furthers historic sociological and economic change that has occurred where many are priced out of living in the villages; this is a general acknowledged phenomenon. To rely on neighbourhood plans and/or exception sites to take up the baton in this regard is inadequate. It is essential that the JLP incorporates flexibility to allow sustainable housing growth to come forward in the sustainable villages through the development management process.

In respect of matter 8.1(iii)(c) – We question whether evidence supports allocating ‘the bit left over’ of the identified housing growth to sustainable villages, where there is a small ‘allowance’. Implementation of planning policy should not be covert social engineering where those unable to afford to live in rural areas have to move to the larger settlements because a planning policy team decided that this is where the housing growth should be largely limited to. We consider that planning policy should not seek to manage and restrict things, as currently set out, to the nth degree, but should provide a flexible framework to allow sustainable growth in sustainable settlements, as envisaged by NPPF(55).

In respect of matter 8.1(iv) – Policy TTV2 offers generic advice on what sustainable housing growth is and offers little in the way of guidance to the decision maker. One can see a great deal of interpretation required, which could be interpreted either way, in implementing this policy in the context of a development management decision. Much development, if proposed on the edge of a sustainable village, would adequately address the main policy test as set out in the first sentence of the policy. Alternatively, interpretation of the various

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2 As evidenced by various successful appeal decisions relating to 5yr HLS in South Hams
‘attributes’ could mean that not meeting one counts against the proposal or that they are vague guidelines where it is optional on whether something accords with it or not. NPPF(154) states 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". This policy fails in this regard.

In respect of matter 8.4 – We share what we assume is the inspector’s concerns on the thoughts processes that went behind arbitrarily (it would seem, without the evidence) limiting development to certain levels in defined settlements. Could the delivery of 60 dwellings in Blackawton be sustainable (as recently provided for) for example? The answer is that it would not be deemed sustainable by reference to table 5.8. On the basis that Policy 12V2 identifies an attribute of rural sustainability to be enhancing and maintaining rural communities, could a proposal for 75 units (primarily for families, including those who need affordable housing) in a settlement with a preponderance of more expensive and larger properties aid this ‘attribute’? If the answer is ‘yes’ or at least if the possibility of it being a yes exists, then the arbitrary limits within Table 5.8 are entirely unnecessary and plainly wrong. This is important and the ramifications will be widely felt by actual people over the plan period and beyond. Distribution of homes for people and families should not be reduced to a planning policy team thinking of a number ‘left over’ and dividing it by a number of settlements (albeit deemed ‘sustainable’) and arriving at a number which is then used as a limitation for growth. We question this part of the JLP.

We look forward to attending on the day and being able to contribute to assist the Inspector in her deliberations.

Yours sincerely

Neal Jillings BSc(Hons) MA MRTPI

For and on behalf of Place Land LLP