



Hearing Statement – Matter 8: Policy Area Strategies: Thriving Towns and Villages

Plymouth & S.W Devon Joint Local Plan

Emery Planning on behalf of Wainhomes (South West)
Holdings Ltd

16-303

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

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Author : John Coxon

Approved by : Stephen Harris

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Issue - Does the JLP provide a robust framework for the management and delivery of development across the Thriving Towns and Villages Policy Area (TTVPA) that is justified, effective and consistent with national policy?

1. 8.1 Approach to development (Policies TTV1 and TTV2)

ii. Where settlement boundaries are identified are they justified and do they take account of any outstanding planning permissions?

1.1 It is not clear what status is of the plans at JLP20, although they were not part of the submitted draft plan or the policies maps. The plan specifically states in Policy TTV1 that settlement boundaries will be defined and reviewed through Supplementary Planning Documents. For clarity, we consider that settlement boundaries can only be defined within a development plan document if they are to relate to the application of the development plan policies for the purposes of Section 38(6) of the Act and Paragraph 14 of the Framework. Settlement boundaries defined through Supplementary Planning Documents should only be given limited (if any) weight.

1.2 In terms of the settlement boundaries at JLP20 for the settlements where we have made representations on omission sites, the boundaries are drawn tightly and do not appear to provide any flexibility for future growth. We have proposed the allocation of a number of sites which would necessitate amendments to the settlement boundaries in JLP20, but as a minimum we consider that a more flexible approach to the definition and application of settlement boundaries is required.

iii. Figure 5.1 on p176 of the JLP identifies site allocation totals by settlement type and also includes an allowance for Sustainable Villages.

a. Can the figures be updated to 2017? Would their inclusion within Policy TTV1 aid certainty?

1.3 As we have set out elsewhere, we consider that the distribution of housing to the TTVPA should be significantly increased. This would impact the figures in Figure 1, and we cannot support their inclusion as currently drafted. Furthermore, as there is little evidence to support the figure for the sustainable villages, we disagree that the figure should be elevated to the policy itself. It should be treated as indicative and a minimum.

c. How has the distribution of development across the settlements been determined and is it supported by evidence?

- 1.4 There is insufficient evidence to support the proposed distribution. We have set out elsewhere that needs across the TTVPA would not be met through the proposed distribution. However even the disaggregation lacks justification and appears to be largely based upon existing commitments rather than any comprehensive assessment of needs and service provision.
- 1.5 Taking one example, we have put forward an omission site in North Tawton, which could provide a mixed use development including housing plus an extension to the local centre, employment development and a new primary school / sports pitches. However, the explanatory text at paragraphs 5.137 and 5.138 simply refers to the existing level of service provision, and concludes that 61 dwellings (at site TTV29-18 Batheway Fields, which is already committed) is an “appropriate scale of growth to support the future sustainability of the town”. This would appear to align with paragraph 5.156, which identifies a number of factors for the assessment of sustainable villages, but fails to consider of opportunities to maintain or enhance service provision.

iv. Policy TTV2 seeks to deliver sustainable development in the TTVPA and lists specific attributes of rural sustainability. As the policies in the JLP when considered as a whole should form the framework for delivering sustainable development within the plan area, is the policy justified and is it clear how it will be used when considering development proposals? (Also refer to Matter 2 Q ii regarding Policies SPT1 and SPT2)

- 1.6 The policy is supported as it would support sustainable rural communities and is compatible with the concept of ‘thriving towns and villages’. However, our concern is that the positive approach set out in SPT2 is not matched by other policies within the plan, and in particular the proposed distribution of development; although clearly (as noted within the question) the development plan must be read as a whole.

2. 8.4 Sustainable Villages and the Countryside (Policies TTV30-32)

i On what basis have the indicative levels of housing within each sustainable village as set out in Figure 5.8 of the JLP been determined?

- 2.1 It is not clear what evidence there is to support the proposed figures, but they appear far too low in relation to numerous settlements in terms of meeting local needs for market and affordable housing, and providing a level of development capable of supporting and enhancing local service provision. We also note that past developments within the identified settlements have exceeded the figures set out in Figure 5.8, and have been found to comprise sustainable development. We therefore cannot see any justification for the imposition of such arbitrary figures.
- 2.2 Taking an example, we are aware Housing Needs Report for the Parish of Brixton, dated April 2016, which identified a need for 11 affordable homes and 18 open market homes within the next 5 years. Notwithstanding the fact that a Parish Housing Needs Report cannot capture the full level of need for a village in relation to the OAN (which inevitably include large components of migration) and does not have regard to future service provision, 29 dwellings in 5 years significantly exceeds the “around 10 dwellings” for which Brixton is identified for the entire plan period.

iv Are any other amendments required to make the policies sound?

- 2.3 In relation to Policy TTV30, there is no justification for only supporting development that meets “essential local needs of local communities”. What forms an essential local need is not defined. We consider that the policy should be amended to state that development that meets “an identified development need” will be supported.