



**PLYMOUTH &
SOUTH WEST
DEVON JOINT
LOCAL PLAN
2014-2034**

**STRATEGY
TOPIC PAPER
JULY 2017**

Plymouth & South West Devon Joint Local Plan

Strategy Topic Paper

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Introduction

This topic paper has been produced to explain the strategic principles which underpin the aims and objectives of the Plymouth and South West Devon Joint Local Plan. It does not introduce new evidence – rather it explains and clarifies the approach taken by the three local authorities in setting out a vision for Plymouth and South West Devon up to 2034, and signposts to the key evidence base documents which have informed that approach.

This topic paper has been submitted alongside the Plymouth and South West Devon Joint Local Plan (the JLP), in order to assist the Inspector and other participants in the Examination in Public to understand the approach taken in the JLP.

Why a Joint Local Plan?

The Plymouth and South West Devon Joint Local Plan is being produced collaboratively by Plymouth City Council, South Hams District Council and West Devon Borough Council. The decision to produce a Joint Local Plan arose from work the three local authorities had been pursuing through the Duty to Cooperate on their separate Local Plans – the Plymouth Plan, the West Devon Our Plan and the South Hams Our Plan.

The three local authorities had been working together through the Duty to Cooperate, along with Dartmoor National Park Authority, Devon County Council and Cornwall Council, for several years before the decision by the three authorities in December 2015 to move to a Joint Local Plan. This cooperation resulted in joint evidence base documents being produced, and the identification of cross boundary issues that each local authority would need to address in their Local Plans. Those issues include housing, employment, transport/ infrastructure; strategic green infrastructure, protected environments including European site designations, flood risk/coastal management. Some of these issues revolved around the emerging requirement for Plymouth City Council to work with its neighbours to explore whether some of its needs could be met in adjoining local authority areas. In effect this meant that South Hams District Council and the City Council would need to work closely to find potential locations for urban extensions on the edge of Plymouth, within South Hams District Council's area.

The concept of producing a single Joint Local Plan had clear benefits for the three local authorities, including the ability to set out a clear vision and approach to the planning of the area, and to set out a single, clear spatial strategy:

- It enabled the three local authorities to plan more effectively for the needs of the HMA in a single plan, setting out a single strategy and subject to one plan making process.

- It enabled the cross boundary issues which would have required close alignment of separate Local Plans, to be tackled more simply and effectively in one plan which was not constrained by local authority administrative boundaries.
- The three local authorities would be able to better handle development proposals and delivery through a single integrated set of policies.
- A single, Joint Local Plan would give Plymouth and South West Devon a single, stronger voice in the wider region.

More information on how the Joint Local Plan came about is set out in the Duty to Cooperate Statement (SUB12)).

What Are the Key Drivers of Change in Plymouth and South West Devon?

When looking at the basis for the strategy set out in the Joint Local Plan, it is useful to consider the factors which have driven change in the area in the past, and which will continue to influence the lives of residents and businesses in the future. The key factors we considered in drawing up the Joint Local Plan were:

- The growth and regeneration ambitions of the City of Plymouth. Since the publication of the Vision for Plymouth in 2005 (O5), an ambitious agenda for the transformation of Plymouth into ‘one of Europe’s most vibrant waterfront cities’ has been pursued by the City Council and its partners. This vision is based around a transformation of the economy of the city, including the growth of the city’s population to 300,000 people. The vision was advanced through the city’s Core Strategy (adopted in 2007) and Local Development Framework. Since the Vision for Plymouth, Plymouth had achieved notable success in beginning the transformation of the city’s economy and attracting investment in a number of notable schemes, including the expansion of the University and the Oceansgate Marine Science Park.
- A second important driver for the wider area, and key characteristic of South West Devon, is the attractiveness of the rural and coastal areas which surround Plymouth. Clearly the natural environments of the South Hams and West Devon comprise high quality landscapes, areas of biodiversity value, and the undeveloped coast but there is pressure on these environments. It comes from existing residents, businesses and visitors as well as from development and a growing population, including people looking to retire, for second homes and tourist facilities, and to meet needs for more affordable homes. The quality of the natural environment is also a key consideration attracting people and businesses to Plymouth and South West Devon, emphasising the need to carefully balance the sensitivities of these environments with the pressure for growth.
- The area contains or abuts national and international environmental designations created and protected by legislative means. They include

European protected sites, landscape designations such as two Areas of Outstanding Natural Beauty, as well as the setting of Dartmoor National Park, and areas with protected habitats - including the marine environment - and species. The area also has a World Heritage Site and many historic and cultural assets. It is important to recognise the need to conserve and enhance these assets. This drives elements of the strategy, protecting these assets from detrimental impacts on their natural beauty, or from impacts that would compromise the favourable condition or conservation status, consistent with their designation. For more detail on these assets see the environmental evidence base documents (prefixed with the letters EN) and the HRA (SUB10)

- A fourth driver is national policy. This is a major factor which we have used to guide the approach in the plan. Government policy is to promote sustainable economic growth and boost productivity, alongside driving a significant increase in the delivery of new homes. The NPPF also clearly expects Local Plans to be positively prepared and to significantly boost the supply of housing, and promotes sustainable economic development. Factors such as Brexit and public sector funding changes will have an effect on the context for growth, but it is currently uncertain to what extent they will affect the growth prospects of Plymouth and South West Devon. The clear ambition both nationally and locally, however, is to promote sustainable growth and a transformed economy.
- Strategic connectivity is a factor which the JLP addresses and which is of significant importance to the growth of the city of Plymouth, and the wider economy of the plan area. The South West is often perceived as being remote from key markets in London and the South East, the Midlands and the North. The Joint Local Plan area is connected to national road and rail networks, and broadband connectivity is good, but there is still a need to look at further improvements to promote links between Plymouth and South West Devon and the rest of the country.
- Finally, there are a number of social and community factors which drive elements of the strategy particularly in the more rural areas of South West Devon. The rural areas are characterised by market towns and their hinterlands of larger villages and smaller settlements. Some of these areas are remote, and all are characterised by an ageing population, and in some locations high accommodation costs. So in order to promote sustainable settlements which offer facilities and opportunities for all elements of the population, the JLP has had to find a way to enable sufficient investment in the rural settlements to balance the needs of sustainable communities with the high quality natural environments and the proximity to a thriving and growing city. More on this element of the Strategy is set out later in this paper in the section entitled “The Spatial Strategy for the Distribution of Development in the Thriving Towns and Villages”. The need for infrastructure and services to support and help assimilate growth applies to sustainable neighbourhoods and communities in both urban and rural areas.

Strategic Planning Factors to be Considered

The Duty to Cooperate discussions between the three authorities revealed clear strategic planning principles, which reflect the strategic cross boundary issues set out above. These factors go to the heart of the dynamic and mutually beneficial relationships between Plymouth, the South Hams and West Devon, and have underpinned the development of the JLP strategy, in particular:

- **The Plymouth Housing Market Area** - which is defined as comprising the administrative areas of Plymouth, South Hams and West Devon Councils. The justification for this definition is set out in the SHMNA Part One (Feb 2017) (HO13). Fundamentally, production of a joint plan with effective joint planning allows the authorities to consider HMA matters comprehensively, as is set out in great detail in the Housing Topic Paper (Feb 2017) (TPI) and for which evidence is set out in the SHMNA Part One. The Joint Local Plan area comprises most of the Housing Market Area, with the remainder of the HMA being that part of the South Hams and West Devon within Dartmoor National Park.
- **The Joint Local Plan area also represents the Functional Economic Area of Plymouth.** The Assessment of Employment Forecasts by PBA (EC8) sets out how employment needs across the JLP area should be considered and the Employment Topic Paper (TP4) explains how this evidence has informed the approach to planning for the local economy in the JLP. In addition, the JLP aligns with the objectives of the Strategic Economic Plan produced by the Heart of the South West Local Economic Partnership (see the Employment Topic Paper). It should be noted that the SEP was produced as a highly aspirational document designed to set out the full ambition of the LEP area, and to attract funding for key infrastructure projects, many of which are within the JLP area. The JLP has not considered the SEP jobs figures from its growth scenarios to be a reasonable alternative to the workforce jobs figures in the evidence on which the JLP relies, as they are not based on detailed evidence and are not aligned to the evidence base which underpins the rest of the plan.

Clearly, addressing these matters of new homes and jobs across the Joint Local Plan area shows that the Duty to Cooperate has been embraced by the three local authorities and has been met in a way that meets the legal requirements and fully aligns with the Government's aspirations as set out in the Housing White Paper. The JLP provides the opportunity to express a strategy which addresses all these issues at the HMA level, and for the three local authorities to be collectively responsible for the delivery of the plan's approach. In addition, again through the Duty to Cooperate, the JLP enables the local authorities to engage effectively with local authority partners in the plan making process (Devon County Council and Dartmoor National Park Authority), and with neighbouring authorities to begin to develop common themes across the wider south west region. The detail of these

discussions is set out in the Duty to Cooperate Statement (SUB12), and the result is set out in Policy SPT7 of the Joint Local Plan.

What are the Strategic Outcomes of these Factors?

Many of the factors set out above have clearly been well recognised in the plans prepared by the local planning authorities of Plymouth and South West Devon over the last 15 – 20 years. The relatively new concepts of a Housing Market Area and a Functional Economic Area clearly provided fresh ways to look at these well understood factors.

As part of the formulation of the JLP, we therefore considered these old and new factors again to set out the key principles which should guide the strategy to be set out in the JLP. This exercise was important, as the JLP was the first time that a single plan has been prepared setting out the vision and strategy for the whole of Plymouth and South West Devon, and while there was clearly an element of checking that previous approaches are still valid, there was also a sense that the JLP represented an opportunity to consider new approaches. Some clear themes have therefore been identified which guide the vision, objectives and spatial strategy of the Joint Local Plan. These themes are:

- **The role of Plymouth and the importance of the city and its transformation to the wider area.** Plymouth is the second largest city in the South West of England and has been pursuing a growth agenda for over 10 years which has so far resulted in significant successes in attracting investment and improvements to facilities, jobs and new homes. It is the most sustainable location for growth in the JLP area, and provides opportunities for residents of the South Hams and West Devon to find employment, access higher level education and health facilities and to enjoy the cultural, shopping and leisure offer that can be found in a large and diverse city. A successful and growing Plymouth is beneficial to the residents and businesses of the wider area.
- **The roles of the rural areas and their relationships to each other and to the city.** The network of market towns, larger villages and smaller settlements, and the countryside areas which rely upon them is a key consideration of the JLP. The hierarchy of settlements in the South Hams and West Devon within the JLP area enables each town and village to play its role within the rural area, regarding jobs, services and homes. This means that they should be resilient, sustainable and also have opportunities for growth commensurate with their levels of services. They should have roles and strengths in their own rights, and clear relationships with other rural settlements, with Plymouth and in some cases with settlements in neighbouring HMAs such as Exeter and Launceston.
- **The roles of high quality environments in the wider area.** The high quality landscape areas, countryside and coastal areas, nationally and internationally designated areas and the character of South West Devon are

strengths which require recognition and protection.

- **Meeting our needs in full.** The Joint Local Plan uses these considerations to set out evidence based assessments of needs for new homes, jobs and the infrastructure to support them, which takes account of the city's growth aspirations. The final consideration in setting out a strategy is that the authorities are clear that they want needs of the Plymouth HMA to be met in full within the HMA.

The Key Elements of the Strategy.

The Plymouth and South West Devon sets out a comprehensive strategy responding to these considerations and aiming to deliver the growth required for a successful city and thriving wider area. The JLP sets out a clear Vision for the plan area (page 8 of the JLP), a spatial portrait of the plan area (paragraphs 2.1 to 2.11), and a set of 12 strategic objectives that respond directly to the points set out in this topic paper (page 11 of the JLP). The JLP also sets out a spatial strategy to deliver the vision, which is explained in paragraphs 3.1 to 3.4 of the plan, and stated as Strategic Objective 1 (SO1).

Within this Strategy, there is a clear understanding of how the JLP will meet the need for new homes and jobs in the HMA:

- All needs, and the requirements to meet those needs are understood at the HMA level. The HMA need derives from aggregating the need calculated for each district. The latter ensures that each LPA can meet the primary duty of assessing the needs of the LPA area. This does not mean that the housing and employment policy requirements must be based on LPA administrative boundaries. The JLP presents us with the opportunity to approach the identification of needs, the translation of those needs into plan requirements, and the identification of a spatial strategy for the distribution of those requirements at a strategic level which is meaningful to local residents and businesses, and which results in the most appropriate strategy.
- When setting the Joint Local Plan policy requirements for new homes and jobs, these are expressed in the JLP firstly at the whole plan level, and then for the two policy areas:
 - **The Plymouth Policy Area** which includes those parts of South Hams District Council area which are considered to comprise the Plymouth urban fringe adjoining the city. The JLP sets out the policy requirements for new homes and new jobs for the Plymouth Policy Area (PPA), which the strategy expects to be provided within the PPA and to not apply in any way to the Thriving Towns and Villages Policy Area. This is because the purpose of the Plymouth Policy Area is to ensure that the growth needed to drive the transformation of Plymouth into “One of Europe’s finest waterfront cities” takes place in Plymouth either within the city or in urban extensions such as

Sherford, and makes it clear that the PPA requirement cannot be met in other parts of the HMA.

- **The Thriving Towns and Villages (TTV) Policy Area**, which comprises the rest of the South Hams and West Devon local planning authority areas. The TTV Policy Area also has its own plan requirements for new homes and jobs, which aim to ensure that new development reinforces the sustainability and levels of services in the main towns of the area, balancing this need with the high quality and sensitive natural environments in the TTV.
- The requirement for homes and jobs in the Joint Local Plan is not expressed at Local Planning Authority level. This approach means that the Joint Local Plan sets out housing requirements for the plan area and for the 2 policy areas. It does not set out policy requirements for the individual local planning authorities. Consequently housing trajectories and 5 year land supply forecasts are produced for the whole plan area and the two policy areas.
- Going forwards it is therefore expected that the local planning authorities will monitor housing delivery and assess future 5 year land supply on the basis of the whole plan requirement and each policy area requirement rather than attempt to disaggregate these into local planning authority areas. Given the drivers behind the vision, objectives and spatial strategy set out in the plan, it is clear that attempting to translate these requirements into local planning authority areas would not only confuse the approach taken in the plan, but it would also risk undermining that approach and the whole basis of the Joint Local Plan. In effect, if we had decided to take an approach which based the JLP strategy and requirements around the three local planning authority areas, the advantages and policy solutions to the strategic cross boundary issues which had been identified would have been weakened and de-valued. The solutions to the issues identified are found by considering those issues at the strategic level and setting strategic principles for guidance. This is the approach taken in the JLP.
- In saying this, the authorities are aware of paragraph 47 of the NPPF and its statement that “To boost significantly the supply of housing, **local planning authorities** should:
 - use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the **housing market area**, ...
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements.” (our emphasis)

Nevertheless, the authorities also refer to Paragraph: 010 Reference ID: 2a-010-20140306 of the National Planning Policy Guidance. This states that “Where there is a joint plan, housing requirements and the need to identify a 5 year supply of sites **can apply across the joint plan area**. The approach being taken should be set out clearly in the plan.”

Taken together, we interpret paragraph 47 of the NPPF, when applied to local authorities who have collaborated on a Joint Local Plan and set out a spatial strategy for the distribution of development based upon policy areas, as setting out that it is for each local planning authority to set out collectively how plan requirements are being delivered against the strategy set out in the Joint Local Plan. This means that although each local planning authority is the relevant responsible organisation for monitoring delivery of housing (and other plan objectives), it is the spatial strategy set out in the Joint Local Plan which should be monitored. In the case of the Plymouth and South West Devon Joint Local Plan, this would mean that the three local planning authorities must monitor housing delivery and set out annual updates to the five year land supply on the basis of the whole plan requirement, and the two policy area requirements, because that is the strategy set out by the Joint Local Plan.

The Joint Local Plan, however, does set out housing figures by Local Planning Authority area as a Key Indicator in Annex 2 of the Joint Local Plan (Indicator IIA), enabling five year land supplies to be set out for each LPA as required.

The Joint Local Plan provides the opportunity to establish a strategy to direct need within the HMA. The reasoning and evidence behind the distribution strategy set out in the JLP was explained and discussed in the Distribution Topic Paper (TPI) which was published for consultation in November 2016. This paper set out the key factors which were considered when devising the strategy for the distribution of development across the Joint Local Plan area, and therefore which led to the setting of the two policy areas. The paper set out that the preferred option for the distribution strategy was one of urban concentration, avoiding widespread rural dispersal of development and taking account of the sensitive landscapes of the National Park and AONBs.

The Integrated Assessment March 2017 which includes the Sustainability Appraisal and the Strategic Environmental Assessment considered distribution (paragraphs 5.7-5.12) and assessed the suite of distribution options in Appendix IX. This listed which options were not realistic and therefore not reasonable alternatives, which of the reasonable alternatives were rejected and which were not rejected. Each of the alternative options for distributing the growth were consulted on during November/December 2016 and were the subject of the IA included in the consultation document (Integrated Assessment - Appendix X) and through this a preferred option began to emerge.

Having considered the responses to that consultation, and in the absence of any new evidence to justify rejecting that preferred option or selecting another option, the spatial strategy in the Joint Local Plan reflects the preferred option.

The approach taken in the Joint Local Plan has the following implications:

- It means that in the event that a shortfall in housing delivery were to occur in the Plymouth Policy Area, and/or that a five year land supply of specific, deliverable sites could not be demonstrated in the Plymouth Policy Area, the remedy for the shortfall or lack of 5 year land supply would have to be found in the Plymouth Policy Area. The JLP strategy would prevent the remedy being sought in the Thriving Towns and Villages Policy Area.
- Conversely, it means that housing delivery and a 5 year land supply in the Thriving Towns and Villages Policy Area must be demonstrated across the whole Thriving Towns and Villages policy area, not in the individual local planning authorities, and that a shortfall in delivery could be made up anywhere in the policy area.
- There is therefore collective responsibility across the local planning authorities for ensuring that housing delivery takes place to meet the needs of the HMA in full.

The Spatial Strategy for the Distribution of Development in the Thriving Towns and Villages – What makes a Main Town, a Town or Larger Village, and a Sustainable Village?

The Thriving Towns and Villages policy area uses a settlement hierarchy to inform the distribution of new homes and jobs to be delivered by the Joint Local Plan. The identified hierarchy reflects an established approach across both South Hams and West Devon in previous adopted Local Plans, with the exception of the identification of Dartington as a Key Village.

Main Towns

The six main towns in the TTV policy area have a number of characteristics in common, not least that they are represented by town councils, and have a significantly larger population and spatial footprint than any other settlements within the policy area. They also have a clear relationship with the strategic transport network, benefit from moderately sized employment areas, have defined town centres and are the only settlements within the TTV policy area that have secondary schools.

Towns and Key Villages

Whilst the JLP treats settlements within this tier in the same way regarding policy, it is considered helpful to explain which of the TTV settlements fall into each category.

The towns are identified as Hatherleigh, North Tawton, Modbury and Salcombe. Of these settlements, all have Town Councils with the exception of Modbury. However, from a spatial point of view, Modbury supports a number of smaller coastal settlements and has a hinterland in keeping with the other settlements in this category, and benefits from a similar range of services and facilities, in part due to the town being located on the A379 to Plymouth. Modbury was categorised as a 'small market town' in the adopted South Hams Core Strategy, and this was restated in the adopted Rural Areas Site Allocations DPD. The JLP continues to recognise that role as a town for strategic planning.

All of the towns have populations within a range of 1,000 to 2,500, although population on its own does not fully inform the role and function of a settlement, hence the application of local knowledge provides an understanding of spatial significance and the scale of supporting hinterland.

The key villages are all served by Parish Councils, and are more likely to have a smaller population than the Towns. This is not true of Bere Alston, and Stokenham & Chillington however. In the case of Bere Alston, it is located on a peninsula that is spatially more isolated than the Towns, and as such it is more appropriately described as a key village. Traditionally Stokenham and Chillington have been paired together, because in combination the two settlements offer a complimentary range of services and facilities that is equivalent to other settlements on this list. Spatially Stokenham and Chillington support a large number of coastal villages and hamlets, and both villages are located on the key A379 route between Kingsbridge and Dartmouth. Understanding how the settlements function collectively, and the extent of the supporting hinterland, is critical to justifying inclusion as a Key Village. It should be noted that when assessed individually, Stokenham and Chillington do not display the required characteristics of a Key Village. There is no willingness or need to seek to join the two distinct settlements, indeed the countryside between the villages, either within the AONB or the setting of the AONB, enables each village to retain its local distinctiveness and positive sense of place and identity. Development in that countryside gap that would undermine those qualities is considered inappropriate. Although separate, there is a footpath connection and a shared bus service sees the communities of both settlements regularly accessing the services and facilities of the adjacent village.

For a number of years the settlement hierarchies of South Hams and West Devon have not changed, largely because in rural areas the character of a settlement is rarely altered to such a degree that the settlement functions in a way that it has not done before.

However, the way that rural communities behave, has changed over the last 20 years. The way that we live, work, shop and socialise has all changed dramatically, and as such it was considered appropriate to update our understanding of how the rural settlements function, not just in isolation, but how settlements relate to, and depend, on each other.

This led to the evidence in the village sustainability assessment framework (February 2017), which uses a number of different criteria to determine if a settlement meets the minimum requirements to be considered 'sustainable'. The criteria, and the

different weighting applied to them, were subject to two rounds of consultation with over 1500 consultees towards the end of 2016. The Councils considered the responses to the consultation before the framework was finalised prior to the Regulation 19 stage for the Joint Local Plan.

Over 70 villages in the TTV policy area were subject to the assessment, resulting in the list of sustainable villages in the JLP. Whilst undertaking the assessment one village was clearly distinct from other villages, in that it scored significantly higher than all of the other villages, and also some key villages.

Dartington has traditionally been seen in planning terms as a village, but when reviewing the village assessment, and understanding the spatial role of the village it became apparent that it displayed more characteristics of a Key Villages than a Sustainable Village. In particular, the village benefits from strategic transport connections, has moderate sized employment areas, a thriving retail area, a historic cultural asset in Dartington Hall and a large village primary school. For these reasons, it is considered appropriate to identify Dartington as a Key Village within the JLP.

Sustainable Villages

To effectively manage change across the plan area, the JLP needs to demonstrate that it understands how different settlements function, and how some areas are spatially distinct from others. This is particularly relevant to rural villages, where the concept of sustainability is not always clearly evident, and where the line between settlements and countryside is not always clearly defined. Paragraph 10 of the NPPF states that “Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.” As such, it is appropriate to examine the characteristics of our rural villages, and understand how they function in relation to each other, the rural transport network and within the wider settlement hierarchy.

The assessment framework was used to determine if a settlement meets a minimum requirement to be considered ‘sustainable’. A figure of 15 was considered by planning officers as a required minimum, as this would necessarily include at least a handful of the higher weighted criteria.

Where is the Countryside?

The villages listed as sustainable in paragraph 5.10 of the JLP for the purposes of Policy TTV1, and as evidenced by the village sustainability assessment framework, have settlement boundaries drawn around the edge of the built form. The boundaries have been subject to public consultation, and are subject to a consistent set of overarching objectives that help to explain where the boundary is drawn.

Development proposals outside an identified settlement boundary are considered to be in the countryside, and as such will be required to meet the provisions of policy TTV31 – Development in the Countryside, and possibly policy TTV32 – Replacement Dwellings and Residential Extensions, depending on the nature of the proposal.



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