



West Devon
Borough
Council

West Devon Council

Title:	Summons																																													
Date:	Tuesday, 26th March, 2019																																													
Time:	4.01 pm																																													
Venue:	Chamber - Kilworthy Park																																													
Full Members:	<p style="text-align: center;">Mayor Cllr Davies Deputy Mayor Cllr Leech</p> <p><i>Members:</i></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Cllr Baldwin</td> <td style="width: 33%;">Cllr Musgrave</td> <td style="width: 33%;"></td> </tr> <tr> <td>Cllr Ball</td> <td>Cllr Oxborough</td> <td></td> </tr> <tr> <td>Cllr Cann OBE</td> <td>Cllr Parker</td> <td></td> </tr> <tr> <td>Cllr Cheadle</td> <td>Cllr Pearce</td> <td></td> </tr> <tr> <td>Cllr Cloke</td> <td>Cllr Ridgers</td> <td></td> </tr> <tr> <td>Cllr Edmonds</td> <td>Cllr Roberts</td> <td></td> </tr> <tr> <td>Cllr Evans</td> <td>Cllr Sampson</td> <td></td> </tr> <tr> <td>Cllr Hockridge</td> <td>Cllr Samuel</td> <td></td> </tr> <tr> <td>Cllr Jory</td> <td>Cllr Sanders</td> <td></td> </tr> <tr> <td>Cllr Kimber</td> <td>Cllr Sellis</td> <td></td> </tr> <tr> <td>Cllr Lamb</td> <td>Cllr Sheldon</td> <td></td> </tr> <tr> <td>Cllr McInnes</td> <td>Cllr Stephens</td> <td></td> </tr> <tr> <td>Cllr Moody</td> <td>Cllr Watts</td> <td></td> </tr> <tr> <td>Cllr Mott</td> <td>Cllr Yelland</td> <td></td> </tr> <tr> <td>Cllr Moyse</td> <td></td> <td></td> </tr> </table>	Cllr Baldwin	Cllr Musgrave		Cllr Ball	Cllr Oxborough		Cllr Cann OBE	Cllr Parker		Cllr Cheadle	Cllr Pearce		Cllr Cloke	Cllr Ridgers		Cllr Edmonds	Cllr Roberts		Cllr Evans	Cllr Sampson		Cllr Hockridge	Cllr Samuel		Cllr Jory	Cllr Sanders		Cllr Kimber	Cllr Sellis		Cllr Lamb	Cllr Sheldon		Cllr McInnes	Cllr Stephens		Cllr Moody	Cllr Watts		Cllr Mott	Cllr Yelland		Cllr Moyse		
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Interests – Declaration and Restriction on Participation:	Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.																																													
Committee administrator:	Member.Services@swdevon.gov.uk																																													

1. Apologies for Absence

2. Confirmation of Minutes

1 - 14

To approve and adopt as a correct record the Minutes of the Meeting of Council held on 12 February 2019.

3. Declarations of Interest

Members are invited to declare any personal or disclosable pecuniary interests, including the nature and extent of such interests they may have in any items to be considered at this meeting.

If Councillors have any questions relating to predetermination, bias or interests in items on this Summons, then please contact the Monitoring Officer in advance of the meeting.

4. To receive communications from the Mayor or person presiding

5. Business brought forward by or with the consent of the Mayor

15 - 18

1. Appointment of Electoral Registration Officer and Returning Officer

Report of the Monitoring Officer

6. The Mayor or the person presiding to answer questions which people in West Devon can ask and to receive deputations or petitions under Council Procedure Rule 21

7. To consider (any) questions submitted under Council Procedure Rule 21;

8. To consider (any) motions of which notice has been duly submitted by Members in accordance with Council Procedure Rule 15;

9. To receive the Minutes of the following Committees, to note the delegated decisions and to consider the adoption of those Unstarred Minutes which require approval:

19 - 88

(i) Development Management and Licensing Committee Meeting held on 26 February 2019

(ii) Overview and Scrutiny Committee

Meeting held on 26 February 2019

(iii) Standards Committee

Meeting held on 12 March 2019

Unstarred Minutes to agree:

SC 3 Annual Report

That Council be **RECOMMENDED** to appoint Mr Trevor Kirkin and Mr Peter Boreham to serve as West Devon Borough Council Independent Persons from the Annual Meeting in May 2019 until the Annual Meeting in May 2023.

SC 4 Review of Procedure for Dealing with Standards Complaints

That Council be **RECOMMENDED** that:

1. with effect from the Annual Council meeting on 21 May 2019, the revised 'Dealing with Standards Complaints' procedure (as attached at Appendix A of the presented agenda report) be adopted subject to inclusion of the following minor amendments:
 - That all reference to 'dual-hatted' Members be amended to read 'multi-hatted' Members; and
 - That the email address for the Monitoring Officer be updated to read: monitoring.officer@swdevon.gov.uk; and
2. authority be delegated for the review of the associated Hearing Procedure to the Monitoring Officer, in consultation with the Chairman of the Standards Committee.

(iv) Audit Committee

Meeting held on 12 March 2019

Unstarred Minutes to agree:

AC 38 Review of the Council's Constitution: Rules of Procedure, Members' Planning Code of Practice and Petition Scheme

That Council be **RECOMMENDED** that:

1. the amendments to Part 4 (Rules of Procedure) of the West Devon Borough Council's Constitution (as outlined at Appendix A of the minutes) be approved and formally adopted;

2. the draft Members' Code of Good Practice – Planning (as outlined at Appendix B of the minutes) be adopted;
3. the amendment Rules for the Petition Scheme (as outlined at Appendix C of the minutes) be adopted; and
4. the Political Structures Working Group be convened with the following Terms of Reference:
 - a) To review the roles of Hub Committee Members (paying particular attention to the circulation of information and communication with the wider membership);
 - b) To assess the circumstances in which Informal Hub Committee meetings take place in private;
 - c) To look at the involvement of non-Hub Committee Members in the deliberations of the Hub Committee (to include how to best make use of non-Hub Committee Members expertise); and
 - d) To review the extent of the Delegations to the Hub Committee.

AC 39 Devon Audit Partnership: Non-Voting Partner

That Council be **RECOMMENDED** to:

1. join the Devon Audit Partnership as a Non-Voting Partner from 1 April 2019 (or as soon as is reasonably practicable thereafter); and
2. delegate the details of the Service Level Agreement (including Terms of Reference) to the Monitoring Officer and Section 151 Officer, in consultation with the lead Hub Committee Member for Support Services and the Chairman of the Audit Committee.

(v) Hub Committee

Meeting held on 19 March 2019

Unstarred Minutes to agree:

HC 84 Peer Challenge Action Plan

It was then **RESOLVED** that:

- (i) Council be **RECOMMENDED** that a Joint Working Group be convened and the draft Terms of Reference for that group be approved as set out in Appendix B.

HC 85 Northern Outreach

It was then **RESOLVED** that Council be **RECOMMENDED** that the Hub Committee preferred option for the Northern Outreach Service was to reduce the service to a single day per week and monitored for a three month period and a report presented back to the Hub Committee meeting on 16 July 2019 that include the results of the monitoring, along with results of the monitoring at Tavistock, to enable a decision on the future provision of the service.

HC 89 Accomodation Strategy

It was then **RESOLVED** that Council be **RECOMMENDED**:

1. To agree a future accommodation strategy which will consider all alternative accommodation options and get best value for the site;
2. To form a Member Working Group of six Members, to be selected by the Group Leaders, to determine their terms of reference and work through options and to make recommendations to Hub Committee in July 2019; and
3. For the group to give consideration to each of the options outlined at paragraph 4.1 of the presented agenda report.

10.	Adoption of the Plymouth and South West Devon Joint Local Plan	89 - 512
11.	Internal Audit Report - Tavistock Hotel Proposal	513 - 530
12.	Registered Provider Application	531 - 534
13.	Public Toilet Closures	535 - 554
14.	2019/20 Capital Strategy, 2019/20 Investment Strategy and 2019/20 Treasury Management Strategy	555 - 614
15.	Commercial Investment Property	615 - 626
16.	Pay Policy Statement and Pay and Reward Strategy 2019/20	627 - 648
17.	Revised Political Composition of the Council	649 - 652

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Agenda Item 2

At the Meeting of the **WEST DEVON BOROUGH COUNCIL** held in the **COUNCIL CHAMBER, KILWORTHY PARK, TAVISTOCK** on **TUESDAY** the **12th** day of **FEBRUARY 2019** at **4.00pm** pursuant to Notice given and Summons duly served.

Present

Cllr M Davies – Mayor (In the Chair)
Cllr A F Leech – Deputy Mayor

Cllr R E Baldwin Cllr K Ball
Cllr W G Cann OBE Cllr D W Cloke
Cllr C Edmonds Cllr J Evans
Cllr L J G Hockridge Cllr N Jory
Cllr B Lamb Cllr J R McInnes
Cllr J B Moody Cllr C Mott
Cllr D E Moyse Cllr C R Musgrave
Cllr R J Oxborough Cllr G Parker
Cllr T G Pearce Cllr P J Ridgers
Cllr A Roberts Cllr R F D Sampson
Cllr L Samuel Cllr P R Sanders
Cllr D K A Sellis Cllr L Watts
Cllr J Yelland

Head of Paid Service
Monitoring Officer
Senior Specialist – Democratic Services
Section 151 Officer
Head Of Place Making Practice

CM 48 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllrs R Cheadle, P Kimber, J Sheldon and B Stephens.

CM 49 CONFIRMATION OF MINUTES

It was moved by Cllr P R Sanders, seconded by Cllr L Samuel and upon the motion being submitted to the Meeting was declared to be **CARRIED** and **“RESOLVED** that the Council agree the Minutes of the Meeting held on 4 December 2018 as a true record.”

CM 50 DECLARATION OF INTEREST

The Mayor invited Members to declare any interests in the items of business to be considered during the course of the meeting. These were recorded as follows:

Cllr R J Oxborough declared a personal interest in agenda item 9(i): ‘Minutes of Committees’ (Minute CM 51 below refers) and specifically Unstarred Minute HC 73: ‘Commercial Development Financing’ by virtue of being the Council’s appointed representative on the Tavistock BID Outside Body and he remained in the meeting and took part in the debate and vote thereon.

a. **Hub Committee – 4 December 2018 and 29 January 2019**

It was moved by Cllr P R Sanders, seconded by Cllr L Samuel and upon being submitted to the Meeting was declared to be **CARRIED** and “**RESOLVED** that the Minutes of the 4 December 2018 and 29 January 2019 be received and noted, with the exception of Unstarred Minutes HC 57, HC 67, HC 70 and HC 73. Specifically with regard to Unstarred Minutes HC 68 and HC 74, it was confirmed that these were scheduled for consideration as standalone agenda items later in the meeting (Minutes CM 52 and CM 53 respectively refer).

In respect of Starred Minute HC 71, Members were informed that a further report on the Public Toilet Review would now be presented to the next Council meeting on 26 March 2019.

In respect of the remaining Unstarred Minutes:

i. **HC 57 Revenue Budget Monitoring 2018/19**

It was moved by Cllr P R Sanders, seconded by Cllr L Samuel and upon being submitted to the Meeting was declared to be **CARRIED** and “**RESOLVED** that £100,000 of the additional planning income be transferred into the Planning Policy and Major Developments Earmarked Reserve at the end of the 2018/19 Financial Year.”

ii. **HC 67 Capital Budget Monitoring 2018/19**

It was moved by Cllr P R Sanders, seconded by Cllr L Samuel and upon being submitted to the Meeting was declared to be **CARRIED** and “**RESOLVED** that the capital requirement of the Public Conveniences Pay on Entry equipment of up to £50,000 be funded from the Strategic Change Earmarked Reserve.”

iii. **HC 70 Business Continuity Management Strategy and Work Programme**

It was moved by Cllr P R Sanders, seconded by Cllr L Samuel and upon being submitted to the Meeting was declared to be **CARRIED** and “**RESOLVED** that the Business Continuity Management Strategy and Work Programme be adopted.”

iv. **HC 73 Commercial Development Financing**

It was moved by Cllr P R Sanders and seconded by Cllr L Samuel:

‘That the Council:

1. undertake prudential borrowing of £10.631 million to fund the Commercial Developments (as set out in Exempt Appendix A of the agenda report presented to the Hub Committee meeting);
2. allocate £468,700 of Section 106 funding (as described in paragraph 3.26 of the agenda report presented to the Hub Committee meeting) to part fund the Tavistock Temporary Accommodation Development;
3. utilise £139,000 of Affordable Housing Budget to part fund the Tavistock Temporary Accommodation Development;
4. utilise the £100,000 Okehampton Capital Receipt to part fund the Okehampton Retail Hospitality Pod Development; and
5. fund the £502,385 upfront borrowing costs during the construction period of the projects (as set out in Exempt Appendix A of the agenda report presented to the Hub Committee meeting) from Earmarked Reserves as described in Paragraph 3.29 of the agenda report presented to the Hub Committee meeting.’

During the debate, an amendment was moved by Cllr N Jory and seconded by Cllr R F D Sampson as follows:

‘That the Council:

1. undertake the prudential borrowing (as set out in Exempt Appendix A of the presented agenda report to the Hub Committee meeting) in respect of the Tavistock Temporary Housing Development in the event that planning permission is secured;
2. allocate £468,700 of Section 106 Funding (as described in paragraph 3.26 of the presented agenda report to the Hub Committee meeting) to part fund the Tavistock Temporary Housing Development;
3. utilise £139,000 of Affordable Housing Budget to part fund the Tavistock Temporary Housing Development;
4. undertake the prudential borrowing (as set out in Exempt Appendix A of the presented agenda report to the Hub Committee meeting) in respect of Okehampton Pod in the event that Planning Permission is secured; and
5. utilise the £100,000 Okehampton Capital Receipt to part fund the Okehampton Retail Hospitality Pod Development;
6. undertake the prudential borrowing (as set out in Exempt Appendix A of the presented agenda report to the Hub Committee meeting) in respect of the Abbey Rise Car Park in the event that planning permission is secured; and

7. fund the upfront borrowing costs during the construction period of the approved project(s) (as set out in Exempt Appendix A of the presented agenda report to the Hub Committee meeting).'

At this point, Cllrs Sanders and Samuel (as the proposer and seconder of the original motion) confirmed that they were willing to accept this amendment and it therefore became the substantive motion.

The Mayor proceeded to advise that, in light of the significant concerns that had been raised over aspects of these proposals, it was his intention for each part of the substantive motion to be debated individually before then being voted upon.

Parts 1, 2 and 3:

In debate, a number of Members expressed their support for the proposed Tavistock Temporary Housing Development and the high level of local need was recognised.

When put to the vote, parts 1, 2 and 3 of the substantive motion were declared **CARRIED**.

Parts 4 and 5:

During the debate on Parts 4 and 5, a number of concerns were raised by the local Ward Members that included:-

- (a) the likely detrimental impact caused by the proposal to relocate the Taxi Rank;
- (b) the need for increased dialogue with the local community and stakeholders. Unfortunately, the Members were of the view that there had been insufficient local consultation in this instance; and
- (c) the belief that a Feasibility Study should be undertaken before any such proposals were approved.

In accordance with Council Procedure Rule 19(5), Members then called for two separate recorded votes on parts 4 and 5 of the substantive motion. The votes were subsequently recorded as follows:-

Part 4:

For the motion (0):

Against the motion (27): Cllrs Baldwin, Ball, Cann OBE, Cloke, Davies, Edmonds, Evans, Hockridge, Jory, Lamb, Leech, McInnes, Moody, Mott, Moyse, Musgrave, Oxborough, Parker, Pearce, Ridgers, Roberts, Sampson, Samuel, Sanders, Sellis, Watts and Yelland

Abstentions (0):

Absent (4): Cllrs Cheadle, Kimber, Sheldon and Stephens

And the vote was declared **LOST**.

Part 5:

For the motion (0):

Against the motion (27): Cllrs Baldwin, Ball, Cann OBE, Cloke, Davies, Edmonds, Evans, Hockridge, Jory, Lamb, Leech, McInnes, Moody, Mott, Moyse, Musgrave, Oxborough, Parker, Pearce, Ridgers, Roberts, Sampson, Samuel, Sanders, Sellis, Watts and Yelland

Abstentions (0):

Absent (4): Cllrs Cheadle, Kimber, Sheldon and Stephens

And the vote was declared **LOST**.

Part 6:

In debate on Part 6, there were widespread concerns raised over the proposals and the following points were raised:-

(a) When considering the strength of local opposition to the proposals, a number of Members regretted the lack of business and community engagement and consultation that had been carried out. As a result, the view was repeated and emphasised that lessons must be learned in this respect;

(b) Whilst local ward Members informed of their commitment to the regeneration of Tavistock Town Centre, this proposal was felt to be the wrong scheme on the wrong site for reasons that included:

- the negative impact upon the World Heritage Site;
- the resultant economic benefits to Tavistock being overstated and not taking into account the effect on existing small businesses;

- the real harm caused by the potential loss of car parking spaces. Furthermore, there had not been an alternative solution proposed to such an extensive loss of parking provision; and
- concerns over elements of the Business Plan which, in their view, did not make good financial sense to the Borough Council;

(c) A Member sought to remind his colleagues that, procedurally, the Unstarred Minute was only concerned with the mechanism to borrow the monies to fund the proposal and not the merits of the scheme (that had already been approved in line with the adopted Strategy);

(d) Regardless of the strength of local feeling, both Group Leaders stated that some of the offensive comments that had been posted on social media about their fellow Members and officers were wholly unacceptable. In particular, the aspersions that had been made on the integrity of Members and officers were considered to be deplorable;

In accordance with Council Procedure Rule 19(5), Members then called for a recorded vote on part 6 of the substantive motion. The vote was subsequently recorded as follows:-

For the motion (0):

Against the motion (27): Cllrs Baldwin, Ball, Cann OBE, Cloke, Davies, Edmonds, Evans, Hockridge, Jory, Lamb, Leech, McInnes, Moody, Mott, Moyse, Musgrave, Oxborough, Parker, Pearce, Ridgers, Roberts, Sampson, Samuel, Sanders, Sellis, Watts and Yelland

Abstentions (0):

Absent (4): Cllrs Cheadle, Kimber, Sheldon and Stephens

And the vote was declared **LOST**.

Part 7:

There was no debate on Part 7 of the substantive motion and, when put to the vote, it was declared **CARRIED**.

It was then "**RESOLVED**

That the Council:

1. undertake the prudential borrowing (as set out in Exempt Appendix A of the presented agenda report to the Hub Committee meeting) in respect of the Tavistock Temporary Housing Development in the event that planning permission is secured;
2. allocate £468,700 of Section 106 Funding (as described in paragraph 3.26 of the presented agenda report to the Hub Committee meeting) to part fund the Tavistock Temporary Housing Development;
3. utilise £139,000 of Affordable Housing Budget to part fund the Tavistock Temporary Housing Development;
4. fund the upfront borrowing costs during the construction period of the Tavistock Temporary Housing Development (as set out in Exempt Appendix A of the presented agenda report to the Hub Committee meeting)".

b. Development Management and Licensing Committee – 11 December 2018

It was moved by Cllr P R Sanders, seconded by Cllr A Roberts and upon being submitted to the Meeting was declared to be **CARRIED** and "**RESOLVED** that the Minutes of the 11 December 2018 meeting be received and noted".

c. Overview and Scrutiny Committee – 15 January 2019

It was moved by Cllr J Yelland, seconded by Cllr D E Moyse and upon being submitted to the Meeting was declared to be **CARRIED** and "**RESOLVED** that the Minutes of the 15 January 2019 meeting be received and noted".

d. Audit Committee – 22 January 2019

It was moved by Cllr M Davies, seconded by Cllr K Ball and upon being submitted to the Meeting was declared to be **CARRIED** and "**RESOLVED** that the Minutes of the 22 January 2019 meeting be received and noted, with the exception of Unstarred Minute AC 32".

In respect of the Unstarred Minute:

i. AC 32 Review of the Council's Constitution: Rules of Procedure and Members' Planning Code of Practice

It was moved by Cllr M Davies, seconded by Cllr G Parker and upon being submitted to the Meeting was declared to be **CARRIED** and "**RESOLVED** that the Part 4 (Rules of Procedure) of the West Devon Borough Council Constitution (as summarised in paragraph 2.5 of the presented agenda report and fully outlined at Appendix A) and the Draft Members' Code of Good Practice Planning (as outlined at Appendix B) be deferred to the Audit Committee meeting on 12 March 2019 for further consideration".

BUDGET PROPOSALS 2019/20 ONWARDS UPDATE REPORT

Consideration was given to a report that updated Members on the revenue budget position for the year 2019/20.

During debate, reference was made to:-

- (a) the proposal to reduce the Council Tax Support Grant paid to Town and Parish Councils by 8.6% for 2019/20. It was confirmed that this reduction was in line with the percentage reduction received from Central Government;
- (b) the proposed 2.99% increase in Council Tax. Whilst accepting that there was little option other than to increase Council Tax by 2.99% for 2019/20, a Member felt it to be very disappointing that the Council had the highest Council Tax levels in Devon;
- (c) New Homes Bonus funding. The Section 151 Officer confirmed that local authorities would not be informed until September 2019 of what Central Government was proposing to put in place of the New Homes Bonus fund;
- (d) the proposed Member Locality Fund. The Leader informed that, in light of the abolition of the Communities Together Fund, it was being recommended that a Member Locality Fund be established. It was intended that the Locality Fund would provide Members with a Fund of £500 to spend on projects and initiatives within their local Ward.

In accordance with statutory legislation, the Mayor then called for a recorded vote on part 1 only of the recommendation (i.e. that Council Tax be increased by 2.99% for 2019/20). The vote was subsequently recorded as follows:-

For the motion (25):	Cllrs Baldwin, Ball, Cloke, Davies, Edmonds, Evans, Hockridge, Jory, Lamb, Leech, McInnes, Mott, Moyse, Musgrave, Oxborough, Parker, Pearce, Ridgers, Roberts, Sampson, Samuel, Sanders, Sellis, Watts and Yelland
Against the motion (1):	Cllr Cann OBE
Abstentions (0):	
Absent (5):	Cllrs Cheadle, Kimber, Moody, Sheldon and Stephens

and the vote on part 1 was therefore declared **CARRIED**.

With no further issues raised, the Mayor then called for a recorded vote on parts 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13 of the recommendation and the vote was recorded as follows:-

For the motion (26): Cllrs Baldwin, Ball, Cann OBE, Cloke, Davies, Edmonds, Evans, Hockridge, Jory, Lamb, Leech, McInnes, Mott, Moyse, Musgrave, Oxborough, Parker, Pearce, Ridgers, Roberts, Sampson, Samuel, Sanders, Sellis, Watts and Yelland

Against the motion (0):

Abstentions (0):

Absent (5): Cllrs Cheadle, Kimber, Moody, Sheldon and Stephens

and the vote was therefore declared **CARRIED**.

It was consequently “**RESOLVED** that:-

- (i) Council Tax be increased by 2.99% for 2019/20 (Band D of £231.63 for 2019/20 – an increase of 13 pence per week or £6.72 per year). This equates to a Council Tax requirement of £4,673,499 (as shown in Appendix B of the presented agenda report));
- (ii) the financial pressures in Appendix A of the presented agenda report of £454,500 be approved;
- (iii) the contributions to Earmarked Reserves of £120,000 and the transfer of the one-off 2019/20 budget surplus of £43,635 into the Future Financial Stability Earmarked Reserve be approved to assist in meeting the predicted budget gap of £533,741 in 2020/21;
- (iv) the savings of £689,700 (as shown in Appendix A of the presented agenda report) be approved;
- (v) £375,000 of New Homes Bonus funding is used to fund the 2019/20 Revenue Budget (as set out in section 4.6 of the presented agenda report);
- (vi) the recommendations of the Financial Stability Review Group on Earmarked Reserves (as set out in sections 10.2 and 10.3 of the presented agenda report) be approved;
- (vii) authority be delegated to the Section 151 Officer, in consultation with the Leader and Deputy Leader of the Council, to agree the final amount of New Homes Bonus funding for the Dartmoor National Park for 2019/20;
- (viii) a collection fund surplus of £84,000 be utilised in 2019/20;
- (ix) the Total Net Expenditure of the Council is £7,078,595 for 2019/20;

- (x) the Council Tax Support Grant paid to Town and Parish Councils be reduced by 8.6% for 2019/20 (as set out at Appendix A of the presented agenda report);
- (xi) the 2019/20 Fees and Charges set out in Appendix D of the presented agenda report (Planning) and Appendix E (Environmental Health) be approved;
- (xii) the recommendation of the Waste Working Group (to commence the Garden Waste subscription period from 1 April 2019 instead of the current October renewal date) be approved. (NB. current subscriptions will be extended until 1 April 2020 without additional charge). Whilst service growth is achieved, any shortfall in income from 2019/20 and 2020/21 should be funded from reserves (the Strategic Waste Earmarked Reserve) and paid back through increased income generated in future years (as set out in sections 4.21 to 4.26 of the presented agenda report);
- (xiii) the level of Reserves (as set out within the presented agenda report) and the assessment of their adequacy and the robustness of budget estimates be noted (Section 10 of the presented agenda report refers). (NB. this is a requirement of Part 2 of the Local Government Act 2003. It is also recommended to retain the minimum level of Unearmarked Reserves at £750,000).

CM 53

CAPITAL BUDGET PROPOSALS FOR 2019/20

A report was considered that presented the draft Capital Programme Proposals for 2019/20.

In light of the decisions taken earlier in the meeting (Minute CM 51a iv refers), Members were informed that the recommendations had been amended accordingly.

With no further debate ensuing, in accordance with statutory legislation, the Mayor then called for a recorded vote on the recommendations. The vote was subsequently recorded as follows:-

For the motion (26): Cllrs Baldwin, Ball, Cann OBE, Cloke, Davies, Edmonds, Evans, Hockridge, Jory, Lamb, Leech, McInnes, Mott, Moyse, Musgrave, Oxborough, Parker, Pearce, Ridgers, Roberts, Sampson, Samuel, Sanders, Sellis, Watts and Yelland

Against the motion (0):

Abstentions (0):

Absent (5): Cllrs Cheadle, Kimber, Moody, Sheldon and Stephens

and the vote was therefore declared **CARRIED**.

Upon being submitted to the Meeting, it was then declared to be **CARRIED** and **“RESOLVED** that:

1. the Capital Programme Proposals for 2019/20 which total £500,000 (as detailed at Appendix A of the presented agenda report) be approved;
2. the Capital Programme Proposals for 2019/20 which total £1,576,000 (as detailed at Exempt Appendix C of the presented agenda report) be approved; and
3. the Capital Programme Proposals for 2019/20 (amounting to £2,076,000) be financed from the funding sources as set out in Section 4 of the presented agenda report.

CM 54

REVIEW OF THE STAFFING ESTABLISHMENT

The Council considered a report that outlined a review of the Staffing Establishment. Subject to a similar decision being taken by South Hams District Council, the report also sought approval of the appointment of the current Head of Paid Service to the role of Chief Executive.

In discussion, the Council noted that it was the unanimous view of the Members of the Review Panel that a recommendation should be presented to both the Council and South Hams District Council that sought approval of the current Head of Paid Service to the role of Chief Executive.

It was then moved by Cllr P R Sanders, seconded by Cllr L Samuel and, upon being submitted to the Meeting, was declared to be **CARRIED** and **“RESOLVED** that:

1. the impact of the T18 Transformation Programme on the Establishment be noted;
2. the Roles identified at paragraph 3.13 of the presented agenda report be added to the Establishment with effect from 21 February 2019;
3. the current Executive Director for Service Delivery and Head of Paid Service be appointed to the role of Chief Executive with effect from 21 February 2019;
4. the interim senior management arrangements be extended with a report being presented to the Council recommending a new structure within six months of the May 2019 local elections;
5. the current approach to staff appraisals and the outcome of the recent steadier state review of roles and salaries be noted; and

6. the new Pay and Grading Structure be approved in line with new national pay spines.”

CM 55

PEER CHALLENGE REPORT

Consideration was given to a report that set out a summary of the Peer Team’s findings. The report also detailed the proposal to develop an Action Plan for considering and implementing the recommendations that arose from the Review.

In his introduction, the Leader advised that discussions had been held with the Leader and Deputy Leader of South Hams District Council and both had expressed their support for the formation of a Joint Member / Officer Working Group. Moreover, the Leader highlighted the overall positivity of the Peer Challenge Report and felt that the Council should take great pride in the outcome.

In discussion, the following points were raised:-

- (a) As a Working Group, it was noted that there would be no requirement to apply the political balance rules and the Leader confirmed that it was intended that six Members (three from each Council) would be appointed to serve on the Group. For absolute clarity, the Leader reminded Members that the intention was for the Working Group to solely focus on formulating the draft Action Plan prior to its presentation to the Hub Committee meeting on 19 March 2019. In citing the recent good examples of joint working on the Leisure and Waste Reviews and the Joint Local Plan with South Hams District Council, some Members hoped that a Joint Steering Group could be re-established in the upcoming months;
- (b) In respect of the proposal to ‘prepare a viable future accommodation strategy’, Members were informed that it was intended that a detailed report would be presented to the next Hub Committee meeting on 19 March 2019 for further consideration;
- (c) A Member was disappointed at the lack of financial detail that was contained within the published Peer Challenge Report;
- (d) A Member expressed her support for the findings whereby the Council needed to improve upon its engagement with local residents and businesses. Also, the Member endorsed the need for the Hub Committee to improve upon its engagement with the wider membership.

In reply, the Leader emphasised that it was the duty (and personal responsibility) of all Members to keep themselves informed through means such as: asking questions; speaking to officers and fellow Members; reading Committee agendas and minutes; and attending Committee meetings (regardless of whether or not they were a Member of that Committee). With regard to Informal Council meetings, a request was made for consideration to be given to notes being taken at future sessions.

It was then moved by Cllr P R Sanders, seconded by Cllr L Samuel and, upon being submitted to the Meeting, was declared to be **CARRIED** and **“RESOLVED** that:

1. the recommendations set out in the Peer Challenge Report (as detailed in Appendix A of the presented agenda report) be endorsed;
2. agreement be given to the formation of a Member/Officer Working Group, jointly with South Hams District Council, with authority being delegated to the Leader of the Council to nominate the Member representatives for the Council; and
3. the draft Action Plan be presented to the Hub Committee for approval at its meeting on 19 March 2019, with responsibility for the ongoing monitoring of progress against the Action Plan then being allocated to the Overview and Scrutiny Committee.”

CM 56 CALENDAR OF MEETINGS 2019/20

The Council considered a report that sought formal approval of the Calendar of Meetings for 2019/20.

With no questions or comments raised, it was then moved by Cllr P R Sanders, seconded by Cllr L Samuel and, upon being submitted to the Meeting, was declared to be **CARRIED** and **“RESOLVED** that the Calendar of Meetings for 2019/20 (as detailed at Appendix A of the presented agenda report) be approved.”

CM 57 COUNCIL TAX REDUCTION SCHEME 2019/20

A report was considered that sought the approval of a new four banded Council Tax Reduction Scheme.

In discussion, reference was made to:-

- (a) the Council’s Exceptional Hardship Fund. Whilst the vast majority of persons should benefit from the revised Scheme, Members were reminded that any individuals who would be adversely affected should be signposted to the Council’s Exceptional Hardship Fund;

(b) the Council being a frontrunner. Since the Council was at the forefront of local authorities in developing this Scheme, it was noted that there was a potential income generation opportunity to be explored through officers providing advice and support to other Councils.

It was then moved by Cllr A F Leech, seconded by Cllr P R Sanders and, upon being submitted to the Meeting, was declared to be **CARRIED** and “**RESOLVED** that, with effect from 1 April 2019, the Council adopt a new four banded Council Tax Reduction Scheme (ranging from 85% to 25%) for 2019/20.”

CM 58

**TAMAR VALLEY AONB MANAGEMENT PLAN REVIEW 2019-2024
FINAL DRAFT**

Consideration was given to a report that presented the final Tamar Valley AONB Management Plan for adoption prior to its submission to DEFRA before 31 March 2019.

During discussion, the following points were raised:-

- (a) Officers confirmed that the AONB Manager had been reminded that, when determining planning applications, it was the Borough Council and not the AONB Unit that made the judgement with respect to what constituted ‘major development’ for the purposes of Paragraph 172 of the National Planning Policy Framework;
- (b) It was noted that officers had shared the Council’s pre-application process with the AONB Unit and it was intended that the organisation would establish a protocol that would run alongside the Management Plan. Officers also informed that the protocol would include aspects such as ensuring that the AONB Team did not meet any Developer without the express written agreement of the Council.

It was then moved by Cllr A Roberts, seconded by Cllr P R Sanders and, upon being submitted to the Meeting, was declared to be **CARRIED** and “**RESOLVED** that:

1. The content of the Final Draft of the Management Plan following the formal consultation exercise be noted; and
2. The final Management Plan for 2019/24 be adopted, subject to the addition of two amendments to Annex C of the Management Plan (as detailed in Section 3.5 of the presented agenda report).”

(The Meeting terminated at 6.40 pm)

Mayor

Report to: **COUNCIL**

Date: **26 March 2019**

Title: **Appointment of Electoral Registration Officer and Returning Officer**

Portfolio Area: **Leader of Council**

Wards Affected: **All**

Relevant Scrutiny Committee: **Overview and Scrutiny Committee**

Urgent Decision: **Y** Approval and clearance obtained: **Y**

Date next steps can be taken: **1 April 2019**

Author: **Catherine Bowen** Role: **Monitoring Officer**

Contact: **Email: Catherine.Bowen@swdevon.gov.uk**

RECOMMENDATION

That the Council agrees that, with effect from 1 April 2019, the Group Manager for Support Services and Customer First (Steve Mullineaux) be appointed as the Electoral Registration Officer and Returning Officer for West Devon Borough Council.

1. Executive summary

- 1.1 Members will be aware that the Council's previously appointed Electoral Registration Officer and Returning Officer (Helen Dobby) will be shortly leaving the employ of the Council.
- 1.2 As a consequence, this report seeks the approval of the Council to appoint the Group Manager for Support Services and Customer First (Steve Mullineaux) as the Electoral Registration Officer and Returning Officer for the Council with effect from 1 April 2019.

2. Background

- 2.1 It is both a statutory and constitutional requirement for the Council to appoint an officer of the Council as its Electoral Registration Officer and Returning Officer.
- 2.2 The main duties of the Electoral Registration Officer include the creation and maintenance of the registers of Electors. The statutory involvement of the post includes the provision of registers

and absent voter list for each Polling Station, as well as to candidates at the election and to the Returning Officer.

- 2.3 The main duty of the Returning Officer is to organise and conduct elections. As the roles are closely linked, for consistency, it is usual for the Electoral Registration Officer and the Returning Officer roles to be held by the same person, particularly as for UK Parliamentary Elections, the Electoral Registration Officer appointed for the Council automatically becomes the Acting Returning Officer.

3. Outcomes/outputs

- 3.1 It is recommended that the Group Manager for Support Services and Customer First (Steve Mullineaux) is appointed to the role of Electoral Registration Officer and Returning Officer for the Council from 1 April 2019.

4. Options available and consideration of risk

- 4.1 There is a statutory and Constitutional duty to appoint an officer to this post. The principal risks associated with this appointment fall on the officer appointed.
- 4.2 The risks to the Council are that, without making adequate provision to remunerate, train and indemnify these officers, it may fail to identify any persons prepared to undertake these statutory tasks. Also, having made such an appointment, the Council may run the reputational risk associated with a successful legal challenge that exposes the officer to significant financial loss as a result of the failure of the Council to do what is lawful and appropriate.

5. Implications

Implications	Relevant to proposals Y/N	Details and proposed measures to address
Legal/Governance		The Council has a duty under the Representation of the People Act 1983 to appoint one of its officers as an Electoral Registration Officer and Returning Officer.
Financial		The Returning Officer fees for external elections and referendums are set by regulations and are funded externally.
Risk		The risks associated with this report are outlined at Section 4 above.
Comprehensive Impact Assessment Implications		
Equality and Diversity		None directly related to this report.

Safeguarding		None directly related to this report.
Community Safety, Crime and Disorder		None directly related to this report.
Health, Safety and Wellbeing		None directly related to this report.
Other implications		N/A

Supporting Information

Appendices:

None

Background Papers:

Report and minutes arising from the Council meeting held on 20 February 2018.

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Agenda Item 9

At a Meeting of the **DEVELOPMENT MANAGEMENT & LICENSING COMMITTEE** held at the Council Chamber, Council Offices, Kilworthy Park, Drake Road, **TAVISTOCK** on **TUESDAY** the **26th** day of **FEBRUARY 2019** at **9.30am**

Present: Cllr P R Sanders – Chairman
Cllr A Roberts – Vice Chairman

Cllr R E Baldwin	Cllr W G Cann OBE
Cllr J Hockridge	Cllr C Mott
Cllr D E Moyse	Cllr G Parker
Cllr T G Pearce	Cllr J Yelland

Planning Senior Specialists (AHS, KC)
Planning Specialists (CS, BD, JH, NG)
Specialist Place Making (AW)
Specialist Place Making (PB)
DCC Highways Officer (PT)
Legal Advisor (PD)
Specialist Democratic Services (KT)

***DM&L 34 DECLARATION OF INTEREST**

Members were invited to declare any interests in the items of business to be considered and the following were made.

Cllrs Mott, Sanders and Yelland all declared a personal interest in application **3441/17/OPA**: Outline application with some matters reserved for the construction of 23 dwellings, associated car parking, access and estate road, private amenity space and public open space - Proposed development site at SX573976, Folly Gate, by virtue of each knowing one of the objectors. They each remained in the room and took part in the debate and vote thereon;

Cllr Mott also declared a personal interest in application **1667/18/FUL**: Erection of 3no. cottages – Land rear of London Inn, 22 West Street, Okehampton, by virtue of a close family member owning a property that overlooked the application site. She remained in the room and took part in the debate and vote thereon;

Cllr T G Pearce declared a personal interest in all applications by virtue of being a Member of the Devon Building Control Partnership. He remained in the meeting and took part in the debate and vote on the item.

***DM&L 35 URGENT BUSINESS**

The Chairman advised that application **3194/18/FUL**: Erection of two storey residential dwelling with associated parking – Axtown Lodge, Green Lane, Yelverton, had been withdrawn and therefore would not be presented to the Committee.

***DM&L 36 CONFIRMATION OF MINUTES**

The Minutes of the Development Management and Licensing Committee Meeting held on 11 December 2018 were confirmed and signed by the Chairman as a correct record.

***DM&L 37 PLANNING, LISTED BUILDING, TREE PRESERVATION ORDER AND ENFORCEMENT REPORTS**

Prior to the applications being presented to the Committee, the Lead Officer advised that, in relation to all the applications being presented, the officer reports had been reviewed in light of the amended National Planning Policy Framework (NPPF) published on 19 February 2019. Any necessary updates to the reports in light of the 2019 NPPF would be given as verbal updates as part of each presentation, and the quoted references within the report to the NPPF should now read as 2019 NPPF.

The Committee then considered the applications prepared by the Development Management Specialists and considered also the comments of Town and Parish Councils together with other representations received, which were listed within the presented agenda reports and summarised below, and **RESOLVED**:

(a) Application No: 2701/18/FUL Ward: Drewsteignton

Site Address: Land North of A30 Junction, Whiddon Down

Development of new shop and ancillary café with supporting secondary areas consisting of storage, WCs, offices and kitchen space (resubmission of 1255/18/FUL)

Case Officer Update: References in the report to the NPPF should read as NPPF 2019

Speakers included: Objector – Mrs Catherine Gillard: Parish Council: Cllr Graham Hester: Supporter – Mr Jack Mann: local Ward Member – Cllr Ridgers

RECOMMENDATION: Conditional Approval

Members discussed in detail whether the proposal size was actually net or gross area for retail. There was a sense that the application was vague in terms of the specific areas within the site and their related sizes. Some Members were concerned that the proposal would not support the local economy and, potentially, could harm existing businesses in the area. There were further discussions relating to whether a condition seeking to restrict the goods for sale in terms of ensuring they were locally sourced was enforceable. In respect of comments that the application had changed, the Lead Officer confirmed that the application had not changed, but that the use of the word ‘farm’ had been removed as it was the view of officers that the term was misleading as there was no direct link from the proposal to a farm. Finally, Members raised concerns over the possibly detrimental impact on biodiversity.

COMMITTEE DECISION: Refusal

Reasons:

1. This proposal is for an unrestricted retail use on a site in open countryside unrelated to a settlement, or to an existing agricultural or horticultural business. By virtue of its size, location and range of goods it has the potential to harm existing villages by diversion of trade and the applicant has not demonstrated the absence of harm by means of a retail impact assessment. This is contrary to Policies DEV15, DEV16, TTV31, SPT6 and saved policy ED20 and the guidance of the NPPF.

2. In light of the failure of the proposal to satisfy the Local Planning Authority that there is an imperative reason of over-riding public interest as such it fails the first derogation test. Thus the proposal is contrary to policy DEV28 of the JLP, SP19 of the Core Strategy and the guidance of the NPPF 2019.

(b) Application No: 2780/18/ARM Ward: Tavistock South West

Site Address: Land adjacent to Callington Road, Tavistock

Application for approval of reserved matters for details of appearance, landscaping, layout and scale for residential development comprising 157no. dwellings with associated landscaping and drainage infrastructure following outline approval 00554/2013

Case Officer Update: References in the report to NPPF should read as NPPF 2019. SWW had now responded to consultation on the application and their response was 'no comments'; Natural England had previously provided comments. Further revisions to the scheme were minor and therefore not circulated for consultation. Four further letters of representation had been received raising issues such as lack of supporting infrastructure, historic characteristics, lack of right of way to Phase three of the development and the wider townscape and ecological matters such as the felling of trees.

Speakers included: Objector – Mr Paul Richardson: Supporter – Mr Ian Jewson: Local Ward Members – Cllr Evans and Cllr Parker

RECOMMENDATION: Conditional Approval

COMMITTEE DECISION: Conditional Approval

Conditions:

1. Time limit
2. Accord with plans
3. Details of facing and roof materials
4. Details of eaves and verges
5. Retaining walls final finish details
6. Details of canopies, porches and chimneys
7. Zone of Influence mitigation
8. Details of parking court lighting
9. Details of rear/security gates
10. Electric vehicle charging points

(c) Application No: 3441/17/OPA Ward: Okehampton North

Site Address: Proposed development site at SX 573 976, Folly Gate

Outline application with some matters reserved for the construction of 23 dwellings, associated car parking, access and estate road, private amenity space and public open space

Case Officer Update: Condition 2 - Delete items v) x) xi)

After Condition 2 add new condition: "Accompanying any submission of reserved matters shall be full details of the provision of broadband ducting. Reason: To enable future connectivity and in the interests of amenity."

Condition 4 – Amend to include revised plan "Proposed Highway Layout 100 Rev A" and replace with "07014 105 Proposed Site Access"

Condition 7 – Add plan reference to read: "No works or development shall take place until a scheme for the protection of the retained trees as detailed on the Tree Constraints Plan 17.104/TCP Rev A has been agreed in writing with the Local Planning Authority."

Condition 10 – Amend to remove "Prior to commencement of development" and alter to: "Accompanying any application for reserved matters, the applicant shall submit for approval ..."

Condition 18 – delete as not necessary, other legal requirements secure the same outcome.

Condition 22 – reference to condition numbers would need amending to reflect above changes.

References in the report to NPPF should read as NPPF 2019.

Speakers included: Parish Council – Cllr David Sykes: Local Ward Members – Cllr Leech

RECOMMENDATION: Conditional Approval

During discussion, Members stated that in their view the application site was not sustainable, as the facilities in the village were limited. There were concerns over the viability of the scheme, and how approving this site might impact on the brownfield sites in the village which would be better sites for development. Finally, Members felt approval of this site was premature in light of the pending adoption of the Joint Local Plan.

COMMITTEE DECISION: Refusal

Reasons:

1. The proposed development, by reason of the number of new dwellings, both alone and in combination with other extant consents, would result in a scale of development too great for the village which has limited facilities yet the scheme is unable to make the required contributions to infrastructure. As such the proposal is contrary to the emerging Plymouth and South West Devon Joint Local Plan policies SPT1: Delivering Sustainable Development, DEL1: Approach to Development Delivery and Viability, Planning Obligations and the Community Infrastructure Levy, TTV1: Prioritising Growth Through a Hierarchy of Sustainable Settlements, DEV32:

Meeting the community infrastructure needs of new homes and the guidance of the National Planning Policy Framework.

2. The proposed development intrudes into the open countryside and infills between two distinctive built areas of the village detrimentally altering its character. As such the proposal is contrary to West Devon Borough Council Local Plan Review (2005) policy NE10: Development in the Countryside, and the emerging Plymouth and South West Devon Joint Local Plan policies TTV31: Development in the Countryside and TTV1: Prioritising Growth Through a Hierarchy of Sustainable Settlements and the guidance of the National Planning Policy Framework 2019.

(d) Application No: 1667/18/FUL Ward: Okehampton North

Site Address: Land rear of London Inn, 22 West Street, Okehampton

Erection of 3no. cottages

Case Officer Update: References in the report to the NPPF should read as NPPF 2019.

Speakers included: Supporter – Mr Ed Persse: local Ward Member – Cllr Leech

RECOMMENDATION: Conditional Approval

COMMITTEE DECISION: Conditional Approval

Conditions:

1. Time limit
2. Accord with plans
3. Archaeology recording (PTC – date agreed 07/02/19)
4. Natural slates
5. Stonework
6. Compliance with submitted surface water drainage scheme
7. Property level flood risk assessment and evacuation plan prior to occupation
8. Parking to be made available prior to occupation and retained

(e) Application No: 1738/18/HHO Ward: Tavistock North

Site Address: The Leaze, 7 Kilworthy Hill, Tavistock

Householder application for erection of wooden trellis and pergola

Case Officer Update: References in the report to NPPF should read as NPPF 2019.

Speakers included: Objector – Mr Roger Eveleigh: Supporter – Mrs Jane Flatman: local Ward Member – Cllr Moody

RECOMMENDATION: Conditional Approval

COMMITTEE DECISION: Conditional Approval

Conditions:

Standard time limit

Adherence to plans

Timber materials to be left to weather naturally or any alternative colour finish to be agreed, prior to installation, by Local Planning Authority.

***DM&L 38 PLANNING APPEALS UPDATE**

The Committee received and noted the updated list of Planning Appeals including Enforcement Appeals. .

(The Meeting terminated at 3.50pm)

Chairman

At a Meeting of the **OVERVIEW & SCRUTINY COMMITTEE** held at the Council Chamber, Council Offices, Kilworthy Park, Drake Road, **TAVISTOCK** on **TUESDAY** the **26th** day of **FEBRUARY 2019** at **4.00 pm**.

Present: Cllr J Yelland – Chairman
Cllr R Cheadle – Vice-Chairman

Cllr R E Baldwin	Cllr J Evans
Cllr P Kimber	Cllr J R McInnes
Cllr J B Moody	Cllr D E Moyse
Cllr C R Musgrave	Cllr G Parker
Cllr T G Pearce	Cllr P J Ridgers
Cllr D K A Sellis	

Head of Paid Service
Group Manager – Customer First and Support Services
Section 151 Officer
Senior Specialist – Democratic Services
Community Safety Specialist South Devon and Dartmoor Community Safety Partnership
Community Safety Partnership Chair

Also in Attendance: Cllrs C Edmonds, A F Leech, C Mott and P R Sanders

- * **O&S 88** **APOLOGIES FOR ABSENCE**
Apologies for absence for this meeting were received from Cllrs D W Cloke and J Sheldon
- * **O&S 89** **CONFIRMATION OF MINUTES**
The minutes of the Meeting of the Overview and Scrutiny Committee held on 15 January 2019 were confirmed and signed by the Chairman as a true and correct record.
- * **O&S 90** **DECLARATIONS OF INTEREST**
Members and officers were invited to declare any interests in the items of business to be considered during the course of this meeting, but there were none made.
- * **O&S 91** **CHAIRMAN'S ANNOUNCEMENT**
The Chairman advised the meeting that a formal Scrutiny Proposal Form had recently been received from Cllr Parker (with the support of Cllrs Baldwin, Ball, Evans, Jory, Moody, Oxborough and Sellis).

Whilst using the recent proposal to construct a Hotel on the Abbey Rise Car Park, Tavistock as a learning example, the request had sought to establish a Task and Finish Group to review the procedures for proposing Development funded by the Borough Council.

In line with the adopted procedure, it was a requirement for such proposals to be determined within 7 days by a 'Panel' comprising of the Head of Paid Service; the Group Manager Support Services and Customer First (in his capacity as the Scrutiny Lead Officer); and the Chairman and Vice-Chairman of the Panel.

In this instance, the 'Panel' had decided that this proposal should not be allowed for reasons that included:

- the Devon Audit Partnership (DAP) having already been commissioned to undertake a review. As part of this review, it was intended that each of those Members who had supported the Proposal Form would be given the opportunity to be interviewed;
- reference to the design and impact on the Heritage Status of the Abbey Rise Car Park proposals. If funding had been approved for these proposals, then matters including design and impact on the Heritage Status would then have been dealt with in detail as part of the planning process;
- the future use of Unstarred Minutes. As a governance matter, it had been concluded that the Political Structures Working Group would be a more appropriate forum to consider this matter (as opposed to a Member Task and Finish Group);
- the importance of the review being concluded before the May 2019 elections. To ensure that this was achieved, it was intended that the review would be considered at the following formal meetings:-
 - o the Hub Committee meeting on 19 March 2019;
 - o a single agenda item Special Overview and Scrutiny Panel meeting at 9.00am on 26 March 2019; and
 - o the full Council meeting at 4.00pm on 26 March 2019.

In reaching this decision, the Chairman stated that the strength of feeling that had been provoked by the recent proposals at the Abbey Rise Car Park and Okehampton Retail Hospitality Pod was very much appreciated. However, in the interests of transparency and fairness (and the overriding wish for the review to be completed before the elections), the proposed way forward had been concluded by the 'Panel' to be the most appropriate means of conducting a review.

Whilst she was not willing to invite questions (or debate) on this matter at this time, the Chairman did advise that she had received some questions prior to this meeting for which the Head of Paid Service would provide a reply. In so doing, the Head of Paid Service informed that:

- immediately after the Council decision had been taken on 12 February 2019 (Minute CM 54 a iv refers), the lead Hub Committee Member had requested that the Head of Paid Service and the Section 151 Officer commission the DAP to undertake an independent review;
- the Terms of Reference for the review would be circulated to Members upon the conclusion of this meeting; and
- the review would cost up to a maximum of £4,000. However, since the Commercial Property Strategy had already been identified as a project for inclusion in the Audit Plan for 2019/20, it was hoped that the total cost would be somewhat lower than £4,000 and ways of negating the costs were being discussed with the DAP.

*** O&S 92 PUBLIC FORUM**

There were no issues raised during the Public Forum session.

*** O&S 93 HUB COMMITTEE FORWARD PLAN**

Members considered the latest version of the Hub Committee Forward Plan and noted its contents without any further comment.

*** O&S 94 LEISURE CONTRACT – FUSION ANNUAL REPORT 2018**

It was noted that the Fusion Annual Report for 2018 had been deferred for consideration at the next Committee meeting on 2 April 2019.

*** O&S 95 COMMUNITY SAFETY PARTNERSHIP**

The Committee considered a report that provided Members with the opportunity to scrutinise the work of the Community Safety Partnership (CSP) as defined by Sections 19 and 20 of the Police and Justice Act 2006 and the Crime and Disorder (Overview and Scrutiny) Regulations 2009.

In the ensuing debate, reference was made to:-

- (a) performance measuring. When questioned, the Chair of the CSP confirmed that it was incredibly difficult to quantify the success of the Partnership. However, the Chair proceeded to cite a number of qualitative examples of good practice and successes that had been achieved by the CSP;
- (b) levels of resources being allocated to the CSP. When questioned, the representatives advised that the levels of resources that were allocated to the South Devon and Dartmoor CSP were comparable with the other CSP's across Devon. In addition, the Committee was assured that all of the CSP's in the county worked collaboratively to maximise their effectiveness;

- (c) the County Lines practice. By way of an update, the representatives informed that County Lines remained a significant challenge to all CSP's and the importance of working in a multi-agency partnership approach was emphasised. Some Members expressed the view that there was an increasing need for Central Government to be lobbied in an attempt to obtain additional funding to address County Lines. In terms of the most appropriate means of lobbying, it was felt that a Member should be encouraged to submit a Motion to a future meeting of the Full Council. In light of the extent of the concerns raised, the Committee requested that a Member Briefing on County Lines be held in the upcoming months. Furthermore, the request was also made for a link to be circulated to all Members that signposted them to the 'bite size training sessions on the implications of County Lines and Cuckooing' that were referred to in the published agenda report;
- (d) the re-introduction of 'Tavistock Matters' meetings. A local Ward Member asked for her thanks to be formally recorded at the decision to re-introduce the 'Tavistock Matters' meetings;
- (e) relationships with secondary schools. The Committee was advised that the CSP had developed excellent working relationships with the secondary schools in the area. As a result, these relationships were widely recognised throughout Devon as being examples of best practice;
- (f) CSP meetings. The Council's appointed Member Representative on the CSP highlighted the vast number of activities that were covered by the Partnership. In extending praise to the representatives, the Member also emphasised that the meetings of the CSP were both effective and very well attended;
- (g) the importance of local Ward Members. In stressing the importance of grass roots intelligence, Members were also encouraged to report any potentially untoward incidents via the online form on the Police website. Members also requested that they be in receipt of regular intelligence updates from the CSP.

It was then:

RESOLVED

That the contents of the report be supported and the comments expressed in the recorded minutes (above) be taken forward.

*** O&S 96**

SAFEGUARDING UPDATE

Members considered a report that provided an opportunity to scrutinise and review Safeguarding practice and procedure following an Internal Audit review in October 2017 that concluded that Safeguarding should be highlighted as a standalone topic due to its complexity.

During discussion, both the lead Hub Committee Member and the Members in attendance recognised the significance and relevance of Safeguarding and the proposal to receive an annual update was welcomed.

It was then:

RESOLVED

That Members:

1. review safeguarding as an annual standing agenda item;
2. contact the lead officer with any suggestions for other Safeguarding related items that should be included in the next published report;
3. note how the Council meets its Safeguarding duties and the consequent measures in place and associated risks;
4. support the inclusion of Safeguarding Briefings for Members after the local elections in May 2019; and
5. support a Safeguarding Policy review being undertaken during 2019/20.

*** O&S 97**

QUARTER 3 PERFORMANCE MEASURES

Members considered the Performance Measures for Quarter 3 for 2018/19 and noted that performance had generally continued at a high level, with only two measures (*'% of Benefits change of circumstances completed online'* and *'% of calls answered in 20 seconds'*) necessitating an Exception Report for this Quarter.

In debate, the following points were raised:-

- (i) Any Members who were experiencing access issues with the Pentana app were encouraged to contact officers accordingly; and
- (ii) There was widespread support expressed for the proposed new format for displaying performance reports.

It was then:

RESOLVED

1. That the performance levels against target communicated in the Balanced Scorecard and the performance figures supplied in the Background and the Exception Report be noted; and
2. That the proposed format has been considered and approved.

*** O&S 98 CUSTOMER SATISFACTION PROGRESS UPDATE: STANDING AGENDA ITEM**

The Chairman exercised her discretion to defer consideration of the latest progress update to the Committee meeting on 2 April 2019.

*** O&S 99 JOINT LOCAL PLAN: STANDING AGENDA ITEM**

It was noted that no update would be given to this meeting.

*** O&S 100 FINANCIAL STABILITY REVIEW GROUP UPDATE: STANDING AGENDA ITEM**

It was noted that no update would be given to this meeting.

O&S 101 TASK AND FINISH GROUP UPDATES

(a) Northern Link Area Outreach Services

The Committee was presented with an updated report following its decision at the meeting held on 15 January 2019 that: *'the Task and Finish Group be reconvened to produce a number of evidence based recommendations that will then be reported back to a future meeting of the Overview and Scrutiny Committee'* (Minute *O&S 85 refers).

In the ensuing debate, the following points were raised:-

- (i) The Committee supported the suggestion whereby its standing agenda item on 'Customer Satisfaction Progress Updates' should include the wish to examine the level of communication between the Council and its customers. Members also requested that a detailed standalone agenda item be presented to the Committee on this matter within the next six months. This request was **PROPOSED** and **SECONDED** and, on being put to the vote, was declared **CARRIED**;
- (ii) A local Ward Member expressed his disappointment that, despite having asked on a number of separate occasions, there was still no adequate promotion or advertising of the Outreach Service that was being provided at the Ockment Centre. In response, officers reminded those in attendance that the Council's approved strategy was to encourage channel shift by reducing face to face contact whilst increasing online (self-serve) contact. Therefore, any such promotion of a face to face contact service was effectively in contradiction to the Council's strategy.

Nonetheless, the majority of Members still felt that the review that was to be instigated by the lead Hub Committee Member for Customer First should still include consideration of the advertising and promotion of any future service provision and a motion to reflect this view was **PROPOSED** and **SECONDED** and when put to the vote was declared **CARRIED**.

It was then:

RECOMMENDED

That the Hub Committee be **RECOMMENDED**:

1. That, evidenced by the low footfall through the Ockment Centre, the lead Member for Customer First instigates a review (that includes the advertising and promotion of any future service provision) on how future service provision in the Okehampton and outlying areas could be provided and brings forward proposals to the Hub Committee; and
2. To note that the Overview and Scrutiny Committee will undertake a detailed examination of the level of communication between the Council and its customers through face to face, telephone and the internet. (NB. this will also include those customers with limited access and/or skills of IT and will take the form of):
 - o The standing agenda item that the Committee received on Customer Satisfaction Progress Updates; and
 - o A detailed standalone agenda item being presented to the Committee within the next six months.

*** O&S 102 ANNUAL WORK PROGRAMME 2018/19**

The Chairman introduced the latest version of the Work Programme for the remainder of the 2018/19 Municipal Year and noted its content without any further debate.

*** O&S 103 MEMBER LEARNING AND DEVELOPMENT OPPORTUNITIES ARISING FROM THIS MEETING**

It was noted that the following Learning and Development opportunities had arisen from this meeting:-

- The need to convene a Member Briefing on County Lines in the upcoming months; and
- The wish for Safeguarding to be included during the 2019 Member Induction Programme.

(The meeting terminated at 5.15 pm)

Chairman

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At a Meeting of the **STANDARDS COMMITTEE** held at the Council Chamber, Council Offices, Kilworthy Park, Drake Road, **TAVISTOCK** on **TUESDAY** the **12th** day of **MARCH 2019** at **11.00am**.

Present: Cllr A F Leech – Chairman

Cllr J Evans
Cllr B Lamb
Cllr J Yelland

Cllr C Edmonds - lead Hub Committee Member
Catherine Bowen - Monitoring Officer
Darryl White - Senior Specialist – Democratic Services

*** SC 1 APOLOGIES FOR ABSENCE**

An apology for absence was received from Cllr J Sheldon.

*** SC 2 CONFIRMATION OF MINUTES**

The Minutes of the Meeting held on 21 November 2017 were confirmed and signed by the Chairman as a true and correct record.

SC 3 ANNUAL REPORT

The Committee considered its Annual Report for the period December 2017 to March 2019. In particular, the report requested that the Committee consider granting dispensations in time for the next Council and recommended the appointment of additional Independent Persons.

In discussion, reference was made to:-

- (a) Members being entitled to receive an Allowance from other local authorities. The Monitoring Officer confirmed that, whilst Members of other local authorities and Outside Bodies were required to declare these on their respective Register of Interest forms, they would not need to declare a Disclosable Pecuniary Interest unless they claimed an Allowance from that organisation. Therefore, the proposal to grant a General Dispensation would enable those Members who were entitled to receive an Allowance from another organisation to speak and vote on relevant matters;
- (b) the justification for the appointment of two additional Independent Persons. Such were the potential time commitments on the Independent Persons that resulted from reviewing detailed complaints, that the Committee acknowledged there was a need two additional Members to be appointed. The Monitoring Officer confirmed that she would keep the workload of Independent Persons under ongoing review. In addition, the Committee was advised that a rota system was applied to ensure that there was a parity of workload for the Independent Persons;

- (c) the ability to co-opt up to two town/parish council representatives to serve on the Committee. Members were reminded of the constitutional provision whereby it could choose to co-opt representatives to serve on the Committee.

It was then **RESOLVED** that:

1. the Annual Report has been considered by the Committee and commented upon as recorded in the minutes above;
2. with effect from the Annual Council Meeting in May 2019 until the Annual Council Meeting in May 2023, General Dispensations be granted in accordance with Paragraph 2.4 of the presented agenda report so that:
 - a. Mutli-hatted Members of the Borough Council are able to speak and vote on matters where they are Members of another Local Authority and in receipt of a Members' Allowance;
 - b. Housing – a Member can speak and vote when they (or their spouse or partner) holds a tenancy or lease with the Council (as long as the matter does not relate to the Member's particular tenancy or lease);
 - c. Statutory Sick Pay – a Member can speak and vote if (s)he receives this or is entitled to receive it;
 - d. A Member can speak or vote on an Allowance, Travelling Expense, Payment or Indemnity that Members are entitled to receive;
 - e. A Member can speak or vote on any Ceremonial Honour given to Members;
 - f. A Member can speak or vote when the Council Tax or a Precept is being set; and
3. Council be **RECOMMENDED** to appoint Mr Trevor Kirkin and Mr Peter Boreham to serve as West Devon Borough Council Independent Persons from the Annual Meeting in May 2019 until the Annual Meeting in May 2023.

SC 4 REVIEW OF PROCEDURE FOR DEALING WITH STANDARDS COMPLAINTS

Consideration was given to a report that presented a review into the Council's 'Dealing with Standards Complaints' Procedure. The report informed that the main purpose of the Procedure was to outline how the Council dealt with complaints alleging that Borough Councillors and West Devon Town and Parish Councillors had broken their respective Codes of Members' Conduct.

In discussion, the following points were raised:-

- (a) In response to Member concerns over the lack of any meaningful sanctions associated with the Standards Complaints process, the Monitoring Officer highlighted that a review was currently ongoing in this respect.

At the request of the Committee, it was agreed that relevant website links would be circulated to Members outside of this meeting;

(b) Before recommending approval of the revised procedure, Members requested inclusion of the following minor amendments:

- That all reference to 'dual-hatted' Members be amended to read 'multi-hatted' Members; and
- That the email address for the Monitoring Officer be updated to read: monitoring.officer@swdevon.gov.uk;

(c) The Monitoring Officer confirmed that she would reinstate the practice whereby the Committee Chairman was in receipt of monthly updates on Standards Complaints. As a general point, the Monitoring Officer also advised that the practice whereby Standards Complaints were now shared amongst the Council's Legal Officers had proven to be very successful;

(d) With regard to considering whether or not a Councillor was '*acting in his/her private capacity*', Members felt that this was a very fine judgement that was often difficult for them to determine.

It was then **RESOLVED** that Council be **RECOMMENDED** that:

1. with effect from the Annual Council meeting on 21 May 2019, the revised 'Dealing with Standards Complaints' procedure (as attached at Appendix A of the presented agenda report) be adopted subject to inclusion of the following minor amendments:
 - That all reference to 'dual-hatted' Members be amended to read 'multi-hatted' Members; and
 - That the email address for the Monitoring Officer be updated to read: monitoring.officer@swdevon.gov.uk; and
2. authority be delegated for the review of the associated Hearing Procedure to the Monitoring Officer, in consultation with the Chairman of the Standards Committee.

(The Meeting terminated at 11.40 am)

Chairman

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At a Meeting of the **AUDIT COMMITTEE** held in the Council Chamber, Council Offices, Kilworthy Park, Drake Road, **TAVISTOCK** on **TUESDAY** the **12th** day of **March 2019** at **2.00pm**

Present: Cllr M Davies (Chairman)

Cllr K Ball
Cllr W G Cann OBE
Cllr B Lamb
Cllr L Watts

Officers in attendance:

Section 151 Officer
Internal Auditor Manager
External Auditor
Specialist Accountant
Specialist – Democratic Services
Senior Case Officer –Democratic Services

Also in attendance: Cllr C Edmonds (lead Hub Committee Member) and Cllr G Parker

*** AC 34 CONFIRMATION OF MINUTES**

The Minutes of the Committee Meeting held on 22 January 2019 were confirmed and signed by the Chairman as a correct record.

*** AC 35 AUDIT PROGRESS REPORT AND SECTOR UPDATE**

The External Auditor took Members through the report. Officers had been on site for 2 weeks looking at financial systems and the control environment and found delivery was on track. Concern was raised by Members that a decrease in audit fee could affect quality. The external audit partner confirmed that there would be no reduction or compromise on quality and the earlier deadlines would be achieved through working smarter and ongoing dialogue through the year. More work would also be carried out at the Interim Audit.

It was then **RESOLVED** that:

The report be noted

*** AC 36 GRANT THORNTON'S EXTERNAL AUDIT COMMITMENT**

The External Auditor took Members through the External Audit Commitment. There were no questions or issues raised from Members.

It was then **RESOLVED** that:

The report was noted

*** AC 37 DRAFT BUDGET BOOK 2019/20**

Cllr Edmonds introduced the Draft Budget Book 2019/20. There was a 2% pay award on all salaries. Answering a Member question the S151 officer confirmed the £50,000 saving on public toilets was on the rural toilets and that an update report was going to be presented to Council on 26 March 2019 on both Okehampton and Tavistock toilets and some of the rural toilet provision.

A question was asked around the projected reduction of housing benefit payments (from £11.8m to £8.2m) and the S151 Officer confirmed that this was due to the projected reduction in housing benefit caseload from Universal Credit.

There was also a question asked about the cost of running Kilworthy Park and why the figure in the budget book of £289,000 was higher than the figure provided at the Informal Council meeting. The S151 Officer explained that the figure contained with the Budget Book included £42,000 for Capital Charges (which is akin to a notional depreciation charge for the building) and therefore the Budget Book figure was higher as the figure mentioned at Informal Council only included direct costs and not indirect (notional costs such as depreciation).

It was then **RESOLVED** that:

The content of the draft Budget Book was noted

AC 38 REVIEW OF THE COUNCIL'S CONSTITUTION: RULES OF PROCEDURE, MEMBERS' PLANNING CODE OF PRACTICE AND PETITION SCHEME

Cllr Edmonds introduced the review of the Council's Constitution. It was confirmed that the report had previously been presented to the Audit Committee on 22 January 2019, but prior to presentation to Council it was confirmed that further revisions were required.

Those revisions had now been made and a revised set of Procedure Rules were attached as appendices. Members were generally supportive of the Procedure Rules, however there were queries raised regarding the Hub Committee Procedure Rules. Members discussed the working of the Hub Committee and the role of Hub Committee Members in more detail. It was then **PROPOSED**, **SECONDED** and on being put to the vote declared **CARRIED**, that an additional recommendation be included to request the Political Structures Working Group be convened to review the workings of the Hub Committee.

It was then **RESOLVED** that:

The Audit Committee RECOMMEND to council that:

1. The amendments to Part 4 (Rules of Procedure) of the West Devon Borough Council's Constitution (as summarised in paragraph 2.5 of the report and fully outlined at Appendix A) be approved and formally adopted;
2. The draft Members' Code of Good Practice – Planning (as attached at appendix B) be adopted;
3. The amendment Rules for the Petition Scheme (as attached at appendix C); and;
4. The Political Structures Working Group be convened with the following Terms of Reference:
 - a) To review the roles of Hub Committee Members (paying particular attention to the circulation of information, and communication with wider membership)
 - b) To assess the circumstances in which Informal Hub meetings take place in private
 - c) To look at the involvement of non Hub Members in the deliberations of Hub Committee, (to include how to best make use of non members expertise)
 - d) To review the extent of delegation to the Hub Committee

AC 39 DEVON AUDIT PARTNERSHIP - NON - VOTING PARTNER

Cllr Edmonds introduced members to the report. It was confirmed that a recommendation would be made to Council to join the Devon Audit Partnership as a non-voting partner.

A discussion arose as to whether there would be a conflict of interest when the internal audit service was procured. It was agreed that the S151 officer would seek advice from the procurement officer and Monitoring officer.

It was then **RESOLVED** that:

Council be RECOMMENDED to:

1. join the Devon Audit Partnership as a Non-voting partner from 1st April 2019 (or as soon as is reasonably practicable thereafter); and
2. delegate the details of the Service Legal Agreement (including terms of reference) to the Monitoring Officer and S151 Officer, in consultation with a Hub Committee Member for Support Services and the Chairman of the Audit Committee.

***AC 40 2019/20 INTERNAL AUDIT PLAN**

The internal auditor presented the Internal Audit Plan to members. It was noted that Plymouth City Council paid for the audit of the Joint Local Plan. Use of Social Media by officers and members was being reviewed and whether the policies in place were being followed.

It was then RESOLVED that:

1. the report was approved, and
2. The proposed Internal Audit Plan for 2019/20 at Appendix A was approved

*** AC 41 UPDATE ON PROGRESS ON THE 2018/19 INTERNAL AUDIT PLAN**

The internal auditor introduced the update on progress on the 2018/19 Internal Audit plan. No questions were raised.

It was then RESOLVED that:

The progress made against the 2018/19 internal audit plan, and any issues arising was approved.

***AC42 SHARED SERVICES METHODOLOGY 2018/19**

Cllr Edmonds introduced the Shared Services Methodology 2018/19.

It was then RESOLVED that:

The Audit Committee noted the methodology of the shared services apportionment of costs between West Devon Borough Council and South Hams District Council, as attached in Appendix A

AC43 STRATEGIC RISK & OPPORTUNITY MONITORING –REGULAR UPDATE

The S151 Officer took members through the report. Members thanked the finance team for their hard work.

It was then Resolved that:

The Audit Committee reviewed the strategic risk & opportunity register (see Appendix 1a &b) and made recommendations to Council on any Further action the Committee concluded should be considered.

(The Meeting terminated at 3.45 pm)

Dated this

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4 (2)

Access to Information Procedure Rules

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Access to Information Procedure Rules

1. **Scope**

These rules apply to all meetings of the Council and its Committees.

2. **Rights to attend meetings**

Members of the public may attend all meetings subject only to the exceptions in these rules.

3. **Notices of meeting**

The Council will give at least **five clear** days notice of any meeting by posting details of the meeting at West Devon Borough Council offices (Kilworthy Park, Drake Road, Tavistock, Devon, PL19 0BZ) and on its website (www.westdevon.gov.uk).

4. **Access to Agenda and reports before the meeting**

The Council will make copies of the agenda and reports open to the public available

for inspection at the designated offices at least **five clear days** before the meeting. If

an item is added to the agenda later, ~~the revised agenda will be open to inspection~~

~~from the time the item was added to the agenda. Where reports are prepared after~~

~~the agenda has been sent out~~, the Head of Paid Service shall make each such report

available to the public as soon as the report is completed by uploading onto the Council website and notifying Members..and sent to Councillors.

5. **Supply of copies**

The Council will supply copies of:

(a) any agenda and reports which are open to public inspection;

~~(b) any further statements or particulars necessary to indicate the nature of the items in the agenda; and~~

(c) any other documents (already supplied to Councillors in connection with an item), if the Head of Paid Service or Monitoring Officer thinks fit, to any member of the public,
~~person~~

on payment of a charge for postage and any other costs.

6 **Access to Minutes etc after the meeting**

The Council will make available copies of the following for six years after a meeting:

- (a) the minutes of the meeting excluding any part of the minutes of proceedings when the meeting was not open to the public or which disclose exempt or confidential information;
- (b) a summary of any proceedings not open to the public where the minutes open to inspection would not provide a reasonably fair and coherent record;
- (c) the agenda for the meeting; and
- (d) reports relating to items when the meeting was open to the public.

7. **Background Papers**

7.1 **List of Background Papers**

The ~~Monitoring Officer Head of Paid Service~~ will set out in every report a list of those documents (called background papers) relating to the subject matter of the report which in his/her opinion:

- (a) disclose any facts or matters on which the report or an important part of the report is based; and
- (b) which have been relied on to a material extent in preparing the report.

This list does not include published works or those which disclose exempt or confidential information (as defined in Rule 9).

7.2 **Public Inspection of Background Papers**

The Council will make available for public inspection for six years after the date of the meeting one copy of each of the documents on the list of background papers.

8. **The Constitution**

A copy of this Constitution shall be ~~kept available to the public at the Council Offices, Kilworthy Park, Drake Road, Tavistock, Devon PL19 0BZ~~ and available on the Council's website at www.westdevon.gov.uk

9. **Exclusion of access by the public to meetings**

9.1 **Confidential Information - Requirement to Exclude Public**

The public **must** be excluded from meetings whenever it is likely in view of the nature of the business to be transacted or the nature of the proceedings that confidential information would be disclosed.

9.2 **Meaning of Confidential Information**

Confidential information means information given to the Council by a Government Department on terms which forbid its public disclosure or information which cannot be publicly disclosed by Court Order.

9.3 **Exempt Information - Discretion to Exclude Public**

The public **may** be excluded from meetings whenever it is likely in view of the nature of the business to be transacted or the nature of the proceedings that exempt information would be disclosed.

Where the meeting will determine any person's civil rights or obligations, or adversely affect their possessions, Article 6 of the Human Rights Act 1998 establishes a presumption that the meeting will be held in public unless a private hearing is necessary for one of the reasons specified in Article 6 of the Human Rights Act 1998.

9.4 **Meaning of Exempt Information**

Exempt information means information falling within the following 10 categories (subject to any conditions):

Table of the exempt categories in Schedule 12A

Description of exempt information	Condition
1. Information relating to any individual.	Information relating to individuals is covered by the Data Protection Act 1998.
2. Information which is likely to reveal the identity of an individual.	
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).	"Financial or business affairs" includes contemplated as well as past or current activities.
4. Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matters arising between the authority or a Minister of the Crown and employees of, or office-holders under the authority.	"Labour relations matters" are as specified in paragraph (a) to (g) of section 29(1) of the trade Unions and Labour Relations Act 1974, i.e. matters which may be the subject of a trade dispute.

5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.	
6. Information which reveals that the authority proposes: (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or (b) to make an order or direction under any enactment	
7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.	
Qualifications	
8. Information falling within paragraph 3 is not exempt if it must be registered under the Companies Act, Friendly Societies Acts, Industrial and Provident Societies Acts, the Building Societies Act or the Charities Act.	
9. Information is not exempt if it relates to proposed development for which the local planning authority may grant itself planning permission pursuant to regulation 3 of the Town and Country Planning General Regulations 1992.	
10. Information which: <ul style="list-style-type: none"> • falls within paragraphs 1 to 7 and • is not prevented from being exempt by virtue of paragraphs 8 and 9 <p>is exempt information if and so long as, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.</p>	

10. **Exclusion of access by the public to reports**

If the Head of Paid Service thinks fit, the Council may exclude access by the public to reports which in his or her opinion relate to items during which, in accordance with Rule 9, the meeting is likely not to be open to the public. Such reports will be marked “Not for Publication” together with the category of information likely to be disclosed.

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4 (4)

Overview and Scrutiny Procedure Rules

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Overview and Scrutiny Procedure Rules

~~The Council Procedure Rules as set out in Part 4(1) of this Constitution shall apply to the Overview & Scrutiny Committees and sub-committees unless otherwise specified by these Rules.~~

1. Overview and Scrutiny Committee

1.1 The Council will appoint ~~one~~**two** Overview & Scrutiny Committee as set out in Article ~~xs~~ as set out in the terms of reference in Part 3.

2. Terms of Reference

~~2.1 The terms of reference of the Overview & Scrutiny Committees shall be:~~

2.2 The performance of all overview and scrutiny functions on behalf of the Council ~~are specified in including those functions specified in the terms of reference set in the~~ Part 3 of this Constitution.

3. Membership and Composition

3.1 **Number:** ~~The~~**Each** Committee shall consist of ~~fifteen~~**eleven** Members of the Council appointed in accordance with Council Procedure Rule 7.

3.2 **Eligibility:** All Members of the Council, with the **exception** of Members of the Hub Committee ~~and Audit Committee will~~**shall be eligible to** be members of the Overview & Scrutiny Committees. However, no Member shall be involved in scrutinising a decision taken by a committee of which, at the time of the decision, s/he ~~was~~**is** a voting member.

3.3 **Chairman:** The Chair~~m~~**en** and Vice Chair~~m~~**en** shall be appointed by Council in accordance with the Council Procedure Rules in Part 4 of the Constitution. The Chairmen of the Overview & Scrutiny Committees ~~s~~ cannot also be the Chairman of the Audit Committee.

3.4 **Co-optees:** The Committee shall be entitled to recommend to the Council the appointment of co-opted members (including members of the public).

7. Meetings

7.1 **Frequency:** There shall be at least **five meetings** of the Committee in each year. In addition, other meetings may be called in accordance with the Council's Procedure Rules as set out in Part 4 of this Constitution.

7.2 **Quorum:** The quorum for the Committee shall be ~~seven~~**four** members.

7.3 **Substitution** is not permitted on the Overview & Scrutiny Committees (see Procedure Rule 10).

8.03 **Annual report**

The Overview & Scrutiny Committee shall report annually to Council on their workings and make evidence based recommendations for future work programmes and amended working methods if appropriate.

1. Powers and Duties

- 4.1 **Sub-Committees:** The Overview and Scrutiny Committee shall have the power to appoint such sub-committees as it considers appropriate to discharge its functions. These Procedure Rules, including those on eligibility for membership, shall apply to any such sub-committee.
- 4.2 **Task and Finish Groups:** The Committees shall have the power to appoint and discontinue Task and Finish Groups.
 - 4.2.1 The Task and Finish Groups shall be appointed to undertake such work and within such time-scales as may be specified by the Committees.
 - 4.2.2 All Members of the Council are eligible for membership of the Task and Finish Groups.
 - 4.2.3 The Committees ~~(in consultation with leaders of the political groups)~~ shall establish the membership of the Task and Finish Groups.
 - 4.2.4 A Task and Finish Group shall report to the Overview & Scrutiny Committee which appointed it.
- 4.3 **Work programmes:** ~~Each~~ Overview & Scrutiny Committee shall be responsible for setting its own work programme.
- ~~4.5 The Committees may call that a joint meeting is held to discuss the Work Programme~~
- 4.6 **Agenda Items:** Any member of the Committees shall be entitled to give notice to the Chairman that s/he wishes an item to be included on the next appropriate agenda and the Chairman shall arrange for this to be done.
- 4.7 **Consideration of Overview and Scrutiny Reports:** The Head of Paid Service

will ensure that reports of the Overview & Scrutiny Committee are placed on the agenda for the appropriate committee or Council Summons if appropriate for consideration, ~~and in the case of a joint committee referred to that committee.~~

- 4.8 Members or Officers may propose that Overview & Scrutiny consider a particular matter by completing a Scrutiny Proposal Form (which can be obtained from member.services.Darryl.White@swdevon.gov.uk). See below for rules on Public Forum

~~[Insert link here to 'How and When to complete Scrutiny Proposal Form'](#)~~

5. Overview

~~5.1 The terms of reference in relation to overview functions are set out in the terms of reference in Part 3.~~

- 5.2 **Policy Review/Development:** In relation to the review or development of Council policies, the Overview & Scrutiny Committees may make proposals for consideration by the relevant committees, joint committees or Council if appropriate.

- 5.3 The Overview & Scrutiny Committees may receive requests from the Council and committees to review particular areas of Council activity. The Committees, having regard to their work programme, shall consider and respond to such requests.

- 5.4 The Overview & Scrutiny Committees may hold inquiries and investigate the available options for future direction in policy development and may appoint advisers and assessors to assist it in this process. They may go on site visits, conduct public surveys, hold public meetings, commission research and do all other things that they reasonably consider necessary to inform their deliberations.

6. Scrutiny

~~6.1 The terms of reference in relation to scrutiny functions are set out in the terms of reference in Part 3.~~

- 6.2 **Proposed decisions:** To assist with the function of scrutiny, members of the Overview & Scrutiny Committees shall be sent ~~links to copies of the~~ Council Summons and agendas of all committees.

- 6.3 **Call-in of decisions:** Call-in should only be used in exceptional circumstances, e.g. where members of the Overview & Scrutiny Committees have evidence which suggests that the Hub Committee did not take the decision in accordance

with the principles set out in Article 6 (Decision Making). ~~Call-in may be exercised only by the Committee who remit covers the decision in question.~~

6.3.1 Call-in will **not apply** to decisions of individual applications under development control, licensing, standards, registration, consents or other permissions where there is a statutory right of appeal.

6.3.2 Within **two days** (where reasonably practicable) of a meeting of the Hub Committee:

- the minutes of that meeting shall be published on the council website and Members advised ~~(where possible by electronic means) and shall be available at the main offices of the Council~~
- ~~copies of the minutes will be sent to all Members.~~

6.3.3 The minutes (as referred to in 6.3.2) will specify that any decision will come into force (and may then be implemented) on the **expiry of three working days** after the publication of the minutes, **unless** ~~the~~ Overview & Scrutiny Committee calls it in.

6.3.4 Before the **expiry of the three working days**, the Head of Paid Service shall call-in a decision for scrutiny by an Overview & Scrutiny Committee if so requested by the Chairman or any three members of the ~~relevant~~ Overview & Scrutiny Committee. The Head of Paid Service will notify all Members of the call-in of the decision.

6.3.5 The Head of Paid Service shall call a meeting of the ~~relevant~~ Overview & Scrutiny Committee on such date as he may determine (where possible after agreement with the Chairman of the Committee) and in any case within **five working days** of the decision to call-in.

6.3.6 If, having considered the decision, the Overview & Scrutiny Committee remains concerned about it then the Committee may set out in writing the nature of its concerns and:

- refer the decision back to the relevant committee for re-consideration, or
- refer the matter to Council for determination.

If the matter is referred back to a Committee or Council, that body shall determine at the earliest practicable opportunity whether or not to amend the decision.

6.3.7 If, following a call-in of a decision, the Overview & Scrutiny Committee:

- does not meet in the period set out above, or

- does meet but does not refer the matter back to the relevant Committee or to Council)

the decision shall take effect on the date of the Overview & Scrutiny meeting or the expiry of that further five working day period, whichever is the earlier.

- 6.4 **Urgency:** The call-in procedure set out above shall not apply where the decision being taken by a committee is urgent. A decision will be urgent if any delay likely to be caused by the call-in process would seriously prejudice the Council's or the public's interest. Where the record of the decision, and notice by which it is made public, states that in the opinion of the Head of Paid Service the decision is an urgent one, it will not be subject to the call-in process.

~~7. Meetings~~

~~7.1 **Frequency:** There shall be at least five meetings of the Committee in each year. In addition, other meetings may be called in accordance with the Council's Procedure Rules as set out in Part 4 of this Constitution.~~

~~7.2 **Quorum:** The quorum for the Committee shall be four members.~~

~~7.3 **Substitution** is not permitted on the Overview & Scrutiny Committees (see Procedure Rule 10).~~

7.4 **Attendance by Others:** ~~Each~~ Overview & Scrutiny Committee may:

- (i) require Hub Members, members and Senior Officers of the Council to attend a meeting to answer questions and it is the duty of those persons to attend if so requested;
- (ii) request, but not compel, officers from partnership organisations to attend if so required;
- (iii) invite any person to attend to address the Committee or to discuss issues of local concern and/or to answer questions;
- ~~(iv) pay any person attending a reasonable fee and expenses for doing so.~~

7.5 **Party Whip:** When considering any matter in respect of which a member of the Committee is subject to a party whip, the member must declare the existence of the whip and the nature of it before the commencement of the Committee's deliberations on the matter. The declaration, and the detail of the whipping arrangements, shall be recorded in the minutes of the meeting.

7.6 **Procedure:** Each Overview & Scrutiny Committees shall consider the following business:

- (i) minutes of the last meeting;
- (ii) declarations of interest (including whipping declaration);
- (iii) the Hub Forward Plan
- (iv) consideration of any matter referred to the Committee for a decision in relation to the calling in of a decision;
- (v) responses of the committees to reports of the Overview & Scrutiny Committee; and
- (vi) the business otherwise set out on the agenda for the meeting.

Reports on policy proposals or investigations

7.6.1 The Committee may adopt its own procedures as it so chooses when carrying out a review or conducting an investigation.

7.6.2 Following any investigation or review, the Committee shall prepare a report, for submission to the relevant committee, joint committee and/or Council as appropriate.

8. Public Forum Procedures

a) General

Members of the public may raise issues and ask questions at meetings of the Overview and Scrutiny Committee. This session will last for up to fifteen minutes at the beginning of each meeting.

(b) Notice of Questions

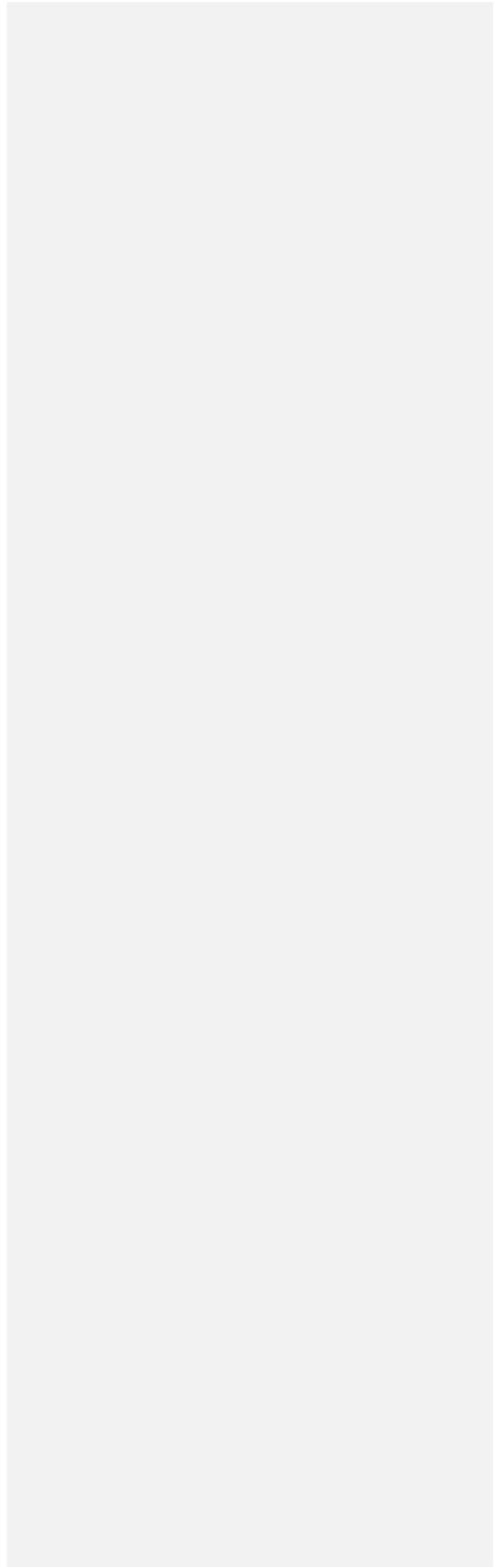
An issue or question may only be raised by a member of the public provided that they have given written notice (which may be by electronic mail) to ~~Darryl White~~ (member.servicesdarryl.white@swdevon.gov.uk) by 5.00pm on the Thursday, prior to the relevant meeting.

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(c) Scope of Questions

An issue may be rejected by the Monitoring Officer if:

- it relates to a matter within the functions of the **Development Management and Licensing Planning** & Licensing Committee;
- it is not about a matter for which the local authority has a responsibility or which affects the district
- it is offensive, frivolous or defamatory;
- it is substantially the same as a question which has previously been put in the past six months; or
- it requires the disclosure of confidential or exempt information.



4

Hub Committee Procedure Rules

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Hub Committee Procedure Rules

1. HOW DOES THE HUB COMMITTEE OPERATE?

1.1 Who may make Hub Committee decisions?

1.1.1 The role, form, and composition of the Hub Committee are as laid out in

Article 6 of the Council's Constitution.

1.1.2 Hub Committee functions may be discharged, in accordance with the Scheme of Delegation by:

- i) the Hub Committee as a whole;
- iii) a committee of the Hub Committee;
- iv) an officer; or
- v) another local authority, whether under joint arrangements or otherwise.

1.5 Conflicts of Interest

1.5.1 Where the Leader of the Council has a conflict of interest this should be dealt with as set out in the Council's Members' Code of Conduct in Part 5 of this Constitution.

~~1.5.2~~ If every Member of the Hub Committee has a conflict of interest this should be dealt with as set out in the Council's Members' Code of Conduct in Part 5 of this Constitution.

1.5.3 If the exercise of an Hub Committee function has been delegated to a committee of the Hub Committee, an individual member or an officer, and should a conflict of interest arise, then the function will be exercised in the first instance by the Hub Committee and otherwise as set out in the Council's Members' Code of Conduct in Part 5 of this Constitution.

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1.6 Hub Committee meetings

- 1.6.1 The Hub Committee will meet at least 8 times per year.
- 1.6.2 The Head of Paid Service may also call for additional meetings at his or her discretion.
- 1.6.3 The Monitoring Officer and/or the Section 151 Officer may call an additional meeting if either believes it is necessary so to do in order to fulfil their statutory duties.
- 1.6.4 In other circumstances where any of the Head of Paid Service, Section 151 Officer and Monitoring Officer are of the opinion that a meeting of the Hub Committee needs to be called to consider a matter that requires a decision he/she will have the right to call such a meeting.
- 1.6.5 The Hub Committee shall meet at the Council's main offices or another location to be agreed by the Leader of the Council.

1.7 Public or private meetings of the Hub Committee?

- 1.7.1 The Hub Committee and any sub Committee of the Hub Committee will normally meet in public in line with the principles set out in Article 11. The exception will be when considering exempt or confidential items.
- 1.7.2 It may also choose to meet on occasion in informal sessions and those sessions may be in private.

1.8 Quorum

- 1.8.1 The number of Members of the Hub Committee shall be nine including the Leader of the Council and Deputy Leader of the Council.
- 1.8.2 The quorum for a meeting of the Hub Committee shall be four.
- ~~1.8.3 In the event that both the Leader and the Deputy Leader of the Council are prevented from attending a meeting of the Hub Committee, in circumstances which any two of the statutory officers consider to be exceptional, the quorum at a meeting of the Hub Committee will be 50% plus one of the Hub Committee membership.~~
- 1.8.4 The quorum at a meeting of a sub committee of the Hub Committee shall be two members.

1.9 How are decisions to be taken by the Hub Committee?

- 1.9.1 ~~Hub Committee~~ Decisions which are to be taken by the Hub Committee as a whole will be taken at a meeting convened in accordance with the Access to Information Rules in Part 4 of the Constitution.
- 1.9.2 Where decisions are taken by a Sub Committee of the Hub Committee, the rules applying to Hub Committee decisions taken by them, shall be the same as those applying to those taken by the Hub Committee as a whole.

2. HOW ARE HUB COMMITTEE MEETINGS CONDUCTED?

2.1 Who presides?

If the Leader of the Council is present he/she will preside. In his/her absence, then the Deputy Leader of the Council shall preside. In the exceptional circumstances contemplated in paragraph 1.8 (Quorum) then a person appointed to do so by those present at the meeting will preside.

2.2 Who may attend?

- 2.2.1 All borough councillors can attend meetings of the Hub Committee or a committee of the Hub Committee.
- 2.2.2 The press and public can attend meetings of the Hub Committee or a committee of the Hub Committee subject to the Access to Information Procedure Rules.
- 2.2.3 On occasion the Hub Committee may wish to meet informally for discussion purposes only and those informal sessions ~~may~~ be held in private. Informal sessions will not constitute meetings of the Hub Committee.
- 2.2.4 The Hub Committee will actively encourage wherever possible the involvement of the specific expertise or knowledge of other borough councillors as part of the deliberations of the Hub Committee whether those deliberations are at meetings of the Hub Committee or a committee of the Hub Committee or at informal sessions.

2.3 Who may speak and vote?

2.3.1 All borough councillors can attend and speak, subject to adherence to the Council Rules of Debate. Only Hub Committee Members may vote.

2.3.2 Members of the public may speak only to ask questions at the start of the meeting in accordance with Article 3 of the Council's Constitution and the guidance currently in place.

2.4 What business?

At each meeting of the Hub Committee, the following business will be conducted:

- i) consideration of the minutes of the last meeting;
- ii) declarations of interest, if any;
- iii) public questions;
- iv) the Hub Committee Forward Plan
- v) matters referred to the Hub Committee (whether by **Overview and Scrutiny** or by the Council) for reconsideration by the Hub Committee in accordance with the provisions contained in the Overview and Scrutiny Procedure Rules or the Budget and Policy Framework Procedure Rules set out in Part 4 of this Constitution;
- vi) consideration of reports from any non-Hub Committee body of the Council; and
- vii) matters set out in the agenda for the meeting.

Commented [KT1]: This will be included on future Hub Committee agendas

2.5 Consultation

2.5.1 All reports to the Hub Committee from any Member of the Hub Committee or an officer on proposals relating to the budget and policy framework must contain details of the nature and extent of consultation with stakeholders and relevant non-Hub Committee bodies of the Council, and the outcome of that consultation. Reports about other matters will set out the details and outcome of consultation as appropriate. The level of consultation required will be appropriate to the nature of the matter under consideration.

~~2.6 Who can put items on the Hub Committee agenda?~~

~~2.6.1 The Leader of the Council will decide upon the schedule for the meetings of the Hub Committee. He/she may put on the agenda of any Hub Committee meeting any matter which he/she wishes, whether or not authority has been delegated to the Hub Committee, or officer or another local authority in respect of that matter. The Monitoring Officer will comply with the Leader of the Council's requests in this respect.~~

~~2.6 Who can put items on the Hub Committee agenda? (cont'd)~~

~~2.6.2 Any Member of the Hub Committee may require the Monitoring Officer to make sure that an item is placed on the agenda of the next available meeting of the Hub Committee for consideration. If he/she receives such a request the Monitoring Officer will comply.~~

~~2.6.3 Full Council may require any item to be placed on the agenda of the next reasonably available meeting of the Hub Committee.~~

~~2.6.5 Any Member of the Council may ask the Leader of the Council to put an item on the agenda of an Hub Committee meeting for consideration, and if the Leader of the Council agrees the item will be considered at the next reasonably available meeting of the Hub Committee. The notice of the meeting will give the name of the Councillor who asked for the item to be considered.~~

~~2.6.6 The Head of Paid Service, or any Senior Officer may include an item for consideration on the agenda of an Hub Committee meeting. In addition, the Monitoring Officer and the Section 151 Officer may put an item on the agenda if either believes it is necessary to do so to carry out his or her statutory duties.~~

Part 4
**Rules for Other Bodies of
the Council**

Rules for other Bodies of the Council

1. AUDIT COMMITTEE

1.1 Membership

The Audit Committee shall have seven Councillors.

1.2 Quorum

The Quorum shall be three Councillors.

1.3 Meetings

The Committee shall normally meet at least four times per year.

1.4 Training

- a. All Members of the Committee will be expected to attend Audit training and refresher sessions as and when they are provided;

2. DEVELOPMENT MANAGEMENT AND LICENSING COMMITTEE

DEVELOPMENT MANAGEMENT

2.1 Membership

The Development Management and Licensing Committee shall have ten Councillors.

2.2 Training

- a. All Members will be expected to attend Development Management planning and licensing training refresher sessions as and when they are provided;
- b. Newly elected Members will have to attend appropriate induction Planning and Licensing Training before they can take part in the decision making process;
- c. Repeat sessions will be held in conjunction with South Hams District Council to provide additional opportunities for Members to meet the requirement to attend the induction training;
- d. ~~If they so wish,~~ re-elected Members will be expected~~welcome~~ to attend the induction sessions.

2.3 Quorum

The Quorum shall be four councillors adjusted annually if necessary.

2. DEVELOPMENT MANAGEMENT AND LICENSING COMMITTEE (cont'd)

2.4 Rules of Debate

The Rules of Debate, as outlined under Council Procedure Rule XX, apply with one exception. The exception is as follows:-

In the event of a Member wishing to propose a motion which is contrary to the case officer recommendation, the Member must give their reasons for this proposal at the time of making it.

2.5 Voting

In view of the quasi – judicial nature of much of the business of the Committee there is a general obligation for Councillors to remain for the whole of the debate or to have participated in any previous consideration on any particular application and certainly to refrain from voting if either of these essential requirements have not been achieved. Members should refer to the Planning Code of Good Practice.

2.6 Meetings

The Development Management and Licensing Committee shall normally meet every four weeks.

Eligibility

Every Member of Council is eligible to be a Member of the Development Management and Licensing Committee. The Leader of Council cannot be Chairman of Development Management and Licensing Committee.

4. LICENSING SUB-COMMITTEES

Licensing Sub Committees will be convened to hear licensing applications in accordance with the Delegation Scheme and the Rules as set out below. Members of the Development Management and Licensing Committee will include substitute Members of that committee who will have undertaken the same training as full Committee Members.

1. Licensing Sub-Committees shall be established to hear applications under the Licensing Act 2003.

4.1 Membership

Each Licensing Sub-Committee shall have three councillors, drawn from the Development Management & Licensing Committee. Local Members will not be appointed onto a sub- committee to consider any applications which are located within their local ward.

4.2 **Quorum**

The Quorum shall be three councillors.

4.3 **Meetings**

The Licensing Sub-Committees meet as required.

2. Licensing Sub-Committees shall be established to hear applications under the Gambling Act 2005.

4.1 **Membership**

Each Licensing Sub-Committee shall have three councillors, drawn from the Development Management & Licensing Committee. Local Members will not be appointed onto a sub-committee to consider any applications which are located within their local ward.

4.2 **Quorum**

The Quorum shall be three councillors.

4.3 **Meetings**

The Licensing Sub-Committees meet as required.

3. Licensing Sub-Committees shall be established to hear applications under the Taxi Licensing Legislation.

4.1 **Membership**

Each Licensing Sub-Committee shall have three councillors, drawn from the Development Management & Licensing Committee.

4.2 **Quorum**

The Quorum shall be three councillors.

4.3 **Meetings**

The Licensing Sub-Committees meet as required.

5. **COUNCIL TAX SETTING PANEL**

5.1 **Membership**

The Council Tax Setting Panel shall consist of four Members and comprises:-

Leader of Council

Deputy Leader of the Council

Mayor of Council
Leader of the Opposition Group

5.2 **Meetings**

The Council Tax Setting Panel shall meet annually, following the Council's agreement of the budget for the forthcoming municipal year and notification from Devon County Council, the Devon and Cornwall Police Authority, Devon and Somerset Fire and Rescue Service, the Dartmoor National Park Authority and each Parish/Town Council of their individual precepting requirements.

6. **STANDARDS COMMITTEE**

The Standards Committee will have a specific role in the determination of Member Code of Conduct Complaints (including Town and Parish Council Members) in accordance with the Council's adopted procedure for dealing with Code of Conduct complaints.

4.1 **Membership**

The Standards Committee shall have five councillors.

4.2 **Quorum**

The Quorum shall be three councillors.

4.3 **Meetings**

The Standards Committee must meet at least once each year.

WEST DEVON BOROUGH COUNCIL

Members' Code of Good Practice - Planning

Introduction

- 1. Relationship to the Members' Code of Conduct**
- 2. Development Proposals and Interests under the Members' Code of Conduct**
- 3. Fettering Discretion in the Planning Process**
- 4. Contact with Applicants, Developers and Objectors**
- 5. Lobbying of Councillors**
- 6. Lobbying by Councillors**
- 7. Site Visits**
- 8. Public Speaking at Meetings**
- 9. Officers**
- 10. Decision Making**
- 11. Training**

WEST DEVON BOROUGH COUNCIL

Members' Planning Code of Good Practice

Introduction

The aim of this Code is to promote good practice: to ensure that in the planning process there are no grounds for suggesting that a decision has been biased, partial or not well founded in any way, and to set out the standards of conduct required of **all** Members in dealing with planning matters including applications, policy development and enforcement.

Your role as a Member of the Local Planning Authority: to make planning decisions openly, impartially, with a sound judgement and for justifiable reasons. You are also a democratically accountable decision taker who had been elected to provide and pursue policies. You are entitled to be predisposed to make planning decisions provided that you have considered all material considerations and have given fair consideration to relevant points raised.

When the Code of Good Practice applies: this Code applies to Members at all times when involving themselves in the planning process. (This includes, where applicable, when part of decision making meetings of the Council in exercising the functions of the Planning Authority or when involved on less formal occasions, such as meetings with officers or the public and consultative meetings). It applies as equally to planning enforcement matters or site specific policy issues as it does to planning applications.

If you have any doubts about the application of this Code to your own circumstances you should seek advice early, from the Monitoring Officer or one of his or her staff, and preferably well before any meeting takes place.

1. Relationship to the Members' Code of Conduct

- 1.1 **You should** apply the rules in the adopted Members' Code of Conduct first, which must always be complied with.
- 1.2 **You should** then apply the rules in this Planning Code of Good Practice, which seek to explain and supplement the Members' Code of Conduct for the purposes of planning. If you do not abide by this Code of Good Practice, you may put:
 - the Council at risk of legal challenge ; and
 - yourself at risk of either being named in a Code of Conduct Complaint and report made to the Standards Committee or Council, or if the failure is also likely to be a breach of the interest provisions of Localism Act 2011, a complaint being made to the police to consider criminal proceedings.

2. Development Proposals and Interests under the Members' Code

- 2.1 **You should** disclose the existence and nature of your interest as required by the Authority's Code of Conduct, at any relevant meeting, including in informal meetings or discussions with officers and other Members, so that everyone taking part in the meeting, whether it is formal or informal, is aware of your interest. Disclose your interest at the beginning of the meeting.
- 2.2 **You should not** seek or accept any preferential treatment, or place yourself in a position that could lead the public to think that you are receiving preferential treatment, because of your position as an elected Member. (This would include, where you have a personal or Disclosable Pecuniary Interest (DPI) in a proposal, using your position to discuss that proposal with officers or fellow Members when other members of the public would not have the same opportunity to do so).
- 2.3 **You should** be aware that, whilst you are not prevented from seeking to explain and justify a proposal in which you have a personal or DP Interest to an appropriate officer, in person or in writing, the Code places greater limitations on you in representing that proposal than would apply to a normal member of the public. (For example, where you have a DPI in a proposal to be put before a meeting, you will have to withdraw from the room or Chamber whilst the meeting considers it, whereas an ordinary member of the public would be able to make use of the Council's public participation scheme to address the meeting in either objection or support of the proposal and observe the meeting's consideration of it from the public gallery).
- 2.4 **You should** notify the Monitoring Officer in writing where it is clear to you that you have a DPI or personal conflict of interest, by application or objection, or for any other reason, and note that:
- You should send the notification no later than submission of that application where you can
 - **On** your own applications note that:
 - Any proposal made by or on behalf of any Member of Council will always be reported to the Committee as a main item and not dealt with by officers under delegated powers;
 - you must not get involved in the processing of the application; and
 - it is advisable that you employ an agent to act on your behalf on the proposal in dealing with officers and any public speaking at Committee.

3. Fettering Discretion in the Planning Process

- 3.1 Fettering your discretion is a specific term that means you are not approaching the decision with an open mind. You should participate in planning decision making at this Council with an open mind, and should not appear to have already made up your mind (particularly in relation to an external interest or lobby group), on how you will vote on any planning matter prior to formal consideration of the matter at the meeting of the planning authority and of your hearing the officer's presentation and evidence and arguments on both sides.

- 3.2 You should be aware that in your role as an elected Member you are entitled, and are often expected, to have expressed views on planning issues and that these comments have an added measure of protection under the Localism Act 2011.
- 3.3 You should keep at the front of your mind that when you come to make the decision, you:
- ❑ Have a duty, under planning legislation, to apply the policies of the Development Plan unless material considerations indicate otherwise;
 - ❑ Are entitled to have and to have expressed your own views on the matter, provided you are prepared to reconsider your position in the light of all the evidence and arguments;
 - ❑ Must keep an open mind and hear all of the evidence before you, both the officers presentation of the facts and their advice as well as the arguments from all sides;
 - ❑ Are not required to cast aside views on planning policy you held when seeking election or otherwise acting as a members, in giving fair consideration to points raised; and
 - ❑ Are to come to a decision after giving what you feel is the right weight to the Development Plan and relevant material considerations
- 3.4 **You should** be aware that you are likely to have ‘fettered your discretion’ where the Council is the landowner, developer or applicant and you have acted as, or could be perceived as being, a chief or major advocate for the proposal. (NB: This is more than a matter of membership of both the proposing committee and the Development Management and Licensing committee, but that through your significant personal involvement in preparing or advocating the proposal you will be, or perceived by the public as being, no longer able to act impartially or to determine the proposal purely on its planning merits)
- 3.5 **You** will be able to take part in the debate at a meeting of the Council on a proposal when acting as part of a consultee body (where you are also a member of the town or parish council, for example) provided:
- ❑ the proposal does not substantially affect the well being or financial standing of the consultee body;
 - ❑ you make it clear to the consultee body that:
 - your views are expressed only on the limited information before you at that time;
 - you can reserve judgement and the independence to make up your own mind on each separate proposal, based on your overriding duty to the whole community and not just to the people in that area, ward or parish, as and when it comes before a Committee and you hear all of the relevant information; and
 - you will not in any way commit yourself as to how you or others may vote when the proposal comes before the meeting; and
 - ❑ you disclose the personal interest regarding your membership or role when the meeting comes to consider the proposal.
- 3.6 **You should not** speak and vote on a proposal where you do not have an open mind. You do not also have to withdraw, but you may prefer to do so for the sake of appearances or abstain from voting

3.7 **You should** explain that you do not intend to speak and vote because you have or you could reasonably be perceived as having judged (or reserve the right to judge) the matter elsewhere, so that this may be recorded in the minutes.

3.8 **You should** take the opportunity to exercise your separate speaking rights as a Ward/Local Member (*where this has granted by the authority's standing orders or by the consent of the Chairman and Committee*) where you have represented your views or those of local electors and 'fettered your discretion', but do not have a personal and disclosable pecuniary interest. Where you do have a disclosable pecuniary interest:

- advise the proper officer or Chairman that you wish to speak in this capacity before commencement of the item; and
- remove yourself from the room for the duration of that item; and ensure that your actions are recorded in the published minutes of that meeting.

4. **Contact with Applicants, Developers and Objectors**

4.1 **You should** refer those who approach you for planning, procedural or technical advice to officers.

4.2 **You should not** agree to any formal meeting with applicants, developers or groups of objectors without first discussing with the planning case officer and agreeing a course of action in writing.

Where you feel that a formal meeting would be useful in clarifying the issues, unless agreed otherwise with the officer, you should not seek to arrange that meeting yourself but should request the **Planning Case Officer** to organise it. The officer(s) will then ensure that those present at the meeting are advised from the start that the discussions will not bind the authority to any particular course of action, that the meeting is properly recorded on the application file and the record of the meeting is disclosed when the application is considered by the Committee.

4.3 **You should** otherwise:

- follow the rules on lobbying (section 5);
- always make notes when contacted; and
- report in writing to the **Head of Development Management Practice** any significant contact with the applicant and other parties, explaining the nature and purpose of the contacts and your involvement in them, and ensure that this is recorded on the planning file.

In addition in respect of presentations by applicants/developers:

4.4 You are able to attend a planning presentation at a town or parish council meeting, or a public meeting. When attending public meetings, including town and parish council meetings, Councillors should take great care to maintain their impartial role as a Councillor, listen to all the points of view expressed by the speaker and public and not state a conclusive decision on any pre-application proposals and submitted planning applications.

- 4.5 **You should** ask relevant questions for the purposes of clarifying your understanding of the proposals.
- 4.6 **You should** remember that the presentation is not part of the formal process of debate and determination of any subsequent application, this will be carried out by the appropriate Committee.
- 4.7 **You should** be aware that a presentation is a form of lobbying and you must not express any strong view or indicate how you or other Members might vote.

5. Lobbying of Councillors

- 5.1 **You should** explain to those lobbying or attempting to lobby you that, whilst you can listen to what is said, to express an intention to vote one way or another, or such a firm point of view that it amounts to the same thing, prejudices your impartiality and therefore your ability to participate in the Committee's decision making.
- 5.2 **You should** remember that your overriding duty is to the whole community not just to the people in your ward/local area and, taking account of the need to make decisions impartially, that you should not improperly favour, or appear to improperly favour, any person, company, group or locality.
- 5.3 **You should not** accept gifts or hospitality from any person involved in or affected by a planning proposal.
- 5.4 **You should** copy or pass on any lobbying correspondence you receive to the **Planning Case Officer** at the earliest opportunity
- 5.5 **You should** inform the Monitoring Officer where you feel you have been exposed to undue or excessive lobbying or approaches (including inappropriate offers of gifts or hospitality), who will in turn advise the appropriate officers to follow the matter up.
- 5.6 **You should** note that, unless you have a DPI, you will not have breached this Planning Code of Good Practice through:
- ❑ listening or receiving viewpoints from residents or other interested parties;
 - ❑ making comments to residents, interested parties, other Members or appropriate officers, provided they do not consist of or amount to pre-judging the issue and you make clear you are keeping an open mind;
 - ❑ seeking information through appropriate channels; or
 - ❑ being a vehicle for the expression of opinion or speaking at the meeting as a Ward/Local Member, provided you explain your actions at the start of the meeting or item and make it clear that, having expressed the opinion or ward/local view, you have not committed yourself to vote in accordance with those views and will make up your own mind having heard all the facts and listened to the debate.

6. Lobbying by Councillors

- 6.1 **You should not** become a member of, lead or represent an organisation whose primary purpose is to lobby to promote or oppose planning proposals. If you do, you will have fettered your discretion and are likely to have a personal and disclosable pecuniary interest and have to withdraw.

- 6.2 **You can** join general interest groups which reflect your areas of interest and which concentrate on issues beyond particular planning proposals, such as the Victorian Society, Ramblers Association or a local civic society, but disclose a personal interest where that organisation has made representations on a particular proposal and make it clear to that organisation and the Committee that you have reserved judgement and the independence to make up your own mind on each separate proposal.
- 6.3 **You should not** lobby fellow councillors regarding your concerns or views nor attempt to persuade them that they should decide how to vote in advance of the meeting at which any planning decision is to be taken
- 6.4 **You should not** decide or discuss how to vote on any application at any sort of political group meeting, or lobby any other Member to do so. Political Group Meetings should never dictate how Members should vote on a planning issue.

7. Site Visits

- 7.1 Do try to attend site visits organised by the Council where possible. The Site Inspection Protocol is attached at Appendix A.
- 7.2 **You should not** enter a site which is subject to a proposal other than as part of an official site visit (either a Borough council site visit or a town/parish council site visit), even in response to an invitation, as this may give the impression of bias **unless**:
- ❑ you feel it is essential for you to visit the site other than through attending the official site visit,
 - ❑ you have first spoken to the **Head of Development Management Practice** about your intention to do so and why (which will be recorded on the file) and
 - ❑ you can ensure you will comply with these good practice rules on site visits.
- 7.3 **You should not** request a site visit unless you feel it is strictly necessary because:
- ❑ particular site factors are significant in terms of the weight attached to them relative to other factors, or the difficulty of their assessment in the absence of a site inspection; or
 - ❑ there are significant policy or precedent implications and specific site factors need to be carefully addressed.

8. Public Speaking at Meetings

- 8.1 **You should not** allow members of the public to communicate with Committee Members during the Committee's proceedings (orally or in writing) other than through the scheme for public speaking, as this may give the appearance of bias.
- 8.2 **You should** ensure that you comply with the Council's procedures in respect of public speaking at the Development Management and Licensing Committee.

9. Officers

- 9.1 **You should not** put pressure on officers to put forward a particular recommendation. (This does not prevent you from asking questions or submitting views to the **Head of Development Management Practice**, which may be incorporated into any committee report).
- 9.2 **You should** recognise that officers are part of a management structure and only discuss a proposal, outside of any arranged meeting, with the **Head of Development Management Practice** or those officers who are authorised to deal with the proposal at a Member level, ie. the appropriate **Planning Case Officer**.
- 9.3 **You should** recognise and respect that officers involved in the processing and determination of planning matters must act in accordance with the Council's Code of Conduct for Officers and their professional codes of conduct, primarily the Royal Town Planning Institute's Code of Professional Conduct. As a result, planning officers' views, opinions and recommendations will be presented on the basis of their overriding obligation of professional independence, which may on occasion be at odds with the views, opinions or decisions of the Committee or its Members.

10. Decision Making

- 10.1 **You should** ensure that, if you request a proposal to go before the Committee rather than be determined through officer delegation, that your reasons are recorded, and repeated in the report to Committee.
- 10.2 In the event of a Member referring an application to Committee, there will be an expectation for that Member (unless in exceptional circumstances) to attend the relevant Committee meeting and explain the **material planning reasons** behind their referral. This requirement applies to all Members irrespective of whether or not they are Members of the Committee.
- 10.3 **You should** come to meetings with an open mind and demonstrate that you are open-minded.
- 10.4 **You should** comply with Section 38(6) of the Planning & Compulsory Purchase Act 2004 and make decisions in accordance with the Development Plan unless material considerations indicate otherwise.
- 10.5 **You should** come to your decision only after due consideration of all of the information reasonably required upon which to base a decision. If you feel there is insufficient time to digest new information or that there is simply insufficient information before you, request that further information. If necessary, defer.
- 10.6 **You should not** vote or take part in the meeting's discussion on a proposal unless you have been present to hear the entire debate, including the officers' introduction to the matter.
- 10.7 **You should** make sure that if you are proposing, seconding or supporting a decision contrary to officer recommendations or the development plan that you clearly identify and understand the **material planning reasons** leading to this conclusion/decision. These reasons must be given prior to the vote and be recorded. Be aware that the Council may have to justify the resulting decision in the event of any challenge.
- 10.8 When taking part as a substitute at the DM&L Committee, you are entitled to come to your own view on an application, and are not bound to reflect the views of the Committee Member that you are replacing.

11. Training

- 11.1 **You will not be able to** participate in decision making at meetings dealing with planning matters if you have not attended all mandatory planning training sessions prescribed by the Council.
- 11.2 **You should** endeavour to attend any other specialised training sessions provided, since these will be designed to extend your knowledge of planning law, regulations, procedures, Codes of Practice and the Development Plans beyond the minimum referred to above and thus assist you in carrying out your role properly and effectively.
- 11.3 **You should** participate in annual refresher training and periodic reviews of samples of planning decisions and appeals to ensure that judgements have been based on proper planning considerations and sound decision making.

SITE INSPECTION PROTOCOL

DECEMBER 2016

Purpose:

The purpose of site visits is to enable Members to view particular aspects of an application in context. No decision is reached on site and there is no debate as to outcome at the site meeting.

Attendees:

In addition to the Council's officers and advisors (eg. County Highways), those who are entitled to attend and take part and who make up the Site Inspection Panel are:

- a. All Development Management and Licensing Committee Members, and
- b. The WDBC Member(s) representing the Ward in which the site is located

The applicant/agent may attend the site meeting but not participate, however, they will be expected to 'peg out' the proposed development.

Representatives of the respective Parish/Town Council may attend the site meeting but not participate.

At the discretion of the Chairman, the applicant or agent, and one representative from the Parish/Town Council, may be allowed to answer questions of clarity. Specific requests to view the proposal from a particular place (e.g. objector's home) may be accommodated at the Chairman's discretion.

Procedure on Site:

1. The site inspection will be chaired by the Chairman (or in his absence, the Vice Chairman) who will formally open the site inspection with introductions and then invite the Planning Officer to describe the application
2. The Planning Officer then describes the proposal and relevant site specific considerations, and guides the Members to appropriate vantage points which may be within and/or outside the site
3. The Chairman will invite questions from Members to seek clarification but not opinion from the Planning Officer and advisors. At the Chairman's discretion, and in exceptional circumstances, questions may be asked of the applicant/agent or one of the representatives of the Parish/Town Council

4. Any questions that the Case Officer is unable to answer will be listed and a full response given by the Case Officer at the Committee meeting the following week
5. Chairman formally closes the meeting

To request a site inspection:

The Scheme of Delegation sets out the circumstances when a Member can call an application to Committee. At that point, if the Member feels a site inspection should take place, the request should be made in writing to Head of Development Management Practice giving material planning reasons

At the DM&L Briefing meeting held the week prior to the publication of the agenda, which is attended by the Chairman, Vice Chairman, Head of Development Management Practice and Specialist Democratic Services, the Chairman and Vice Chairman will discuss with the Head of Development Management Practice which applications should be referred for site inspection

The site inspection itinerary will be prepared by the Specialist Democratic Services and circulated one week prior to the site inspections taking place. The itinerary will be included as part of the agenda

The site inspection will take place on the Thursday prior to the Committee date, and will receive their agenda papers prior to the site inspection taking place

Petitions

The Localism Act has repealed the rules on petitions, and therefore the requirement to have a petition scheme no longer applies. The Localism Act makes petitions a local issue and the Council is no longer required to:

- Make a scheme for the handling of petitions (except where other rules say so, for example, asking for a referendum on an elected mayor)
- Publish a petition scheme
- Accept petitions electronically
- Follow the current prescribed steps when it receives a petition
- Set thresholds (for example, different rules for petitions with a specific number of signatories)
- Have a right of appeal, for example, to O&S if the petitioner is not happy with the way petition has been dealt with (concerns can be instead progressed through the Council's usual complaints policy)
- Tell people what we intend to do with their petitions or place petitions on the website
- Cite the specified reason for rejecting

The Council can decide whether it wants provisions for petition and if it does what rules it wants to reasonably apply. It is recommended that in the interests of transparency that the public interests does warrant some sort of petition scheme but without any of the prescribed complications.

Suggested amended wording for CPR 21(2)

Petitions

A petition may be made to the Council provided that the petition includes:

- A clear and concise statement on the subject of the petition
- The statement should include the action that the petitioners wish the Council to take.
- Name, address and signature of any person supporting the petition (who must be persons living, working or studying in the Borough of West Devon)
- Contact details and address of the petition organiser
- A clear statement as to whether the petition organiser wishes to present the petition to a Council meeting and/or whether the petition organiser requests a Councillor to present the petition

The Council will refuse to accept a petition where the petition:

- Relates to:
 - A planning or licensing application
 - A statutory petition (for example, requesting a referendum)
 - A matter where there is an existing right of appeal
- Is considered vexatious, abusive, or otherwise inappropriate (as determined by the Monitoring Officer)
- Is substantially the same as a petition submitted in the previous 12 months

The Council may respond to the petition in one of more of the following ways:

- Taking the action requested in the petition
- Considering the petition at a Council meeting
- Undertaking research into the matter
- Holding a public meeting
- Holding a consultation
- Holding a meeting with the petitioners
- Refer the matter for consideration by the Overview & Scrutiny Committee
- Not taking any action
- The Head of Paid Service has a discretion to deal with petitions differently in the period immediately before an election or referendum (the 'purdah' period)

Further guidance on Petitions is set out on the Council's website.

At a Meeting of the **HUB COMMITTEE** held at the Council Chamber, Council Offices, Kilworthy Park, Drake Road, **TAVISTOCK** on **TUESDAY** the **19th** day of **MARCH, 2019** at **2.00 pm**

Present: Cllr P R Sanders – Chairman
Cllr L Samuel – Vice Chairman

Cllr C Edmonds	Cllr N Jory
Cllr A F Leech	Cllr C Mott
Cllr R Oxborough	Cllr A Roberts

In attendance: Chief Executive
Commissioning Manager
Head of Housing, Revenues and Benefits Practice
Head of Place Making
Head of Environment Services Practice
Interim Head of HR Practice
Specialist Democratic Services

Internal Audit Manager – Devon Audit Partnership

Other Members in attendance:

Cllrs Baldwin, Cheadle, Lamb, Moyse, Musgrave, Parker, Pearce, Sheldon and Yelland.

***HC 75 APOLOGIES**

Apologies for absence were received from Cllr R F D Sampson.

***HC 76 DECLARATIONS OF INTEREST**

Members were invited to declare any interests in the items of business to be discussed but none were made.

***HC 77 MINUTES**

The Minutes of the Hub Committee meeting held on 29 January 2019 were confirmed and signed by the Chairman as a correct record, subject to a correction to the minute numbering being made.

***HC 78 HUB COMMITTEE FORWARD PLAN**

Members were presented with the Hub Committee Forward Plan setting out items on the agenda for Hub Committee meetings for the next four months.

***HC 79 SUPPORT FOR A RURAL STRATEGY**

Members were presented with a report that detailed work undertaken by the Rural Services Network on a Rural Strategy, and sought the Council's support of such an approach.

The Lead Member for Performance and Resources introduced the report.

It was then **RESOLVED** that the Rural Services Network's Rural Strategy be supported and that support demonstrated by following the approach outlined in Section 5 of the report.

***HC 80**

ENTERPRISE STRATEGY

Members were presented with a report that set out the key objectives, actions and associated officer resourcing of the draft Enterprise Strategy for West Devon Borough Council.

The Lead Member for Economy introduced the report. In doing so, he stressed the importance dialogue with town and parish councils and stakeholders in taking the Strategy forward.

It was then **RESOLVED** that the draft Enterprise Strategy be noted and supported.

***HC 81**

CORPORATE STRATEGY

Members were presented with a report that reviewed the progress in refining the Council's service offering under each of the six corporate themes, namely: Efficient and Effective Council, Communities, Enterprise, Environment, Homes and Wellbeing.

The Leader introduced the report, and stated that the Strategy would ensure the Council was outward facing. Other Members agreed that the Strategy would ensure collaboration. Finally, Members welcomed the flexibility within the report that enabled slight differences, whilst understanding that the corporate strategy themes remained the same as those for South Hams District Council.

It was then **RESOLVED** that:

1. The progress made to date on refining the Council's service offering under each of the Council's six corporate themes be acknowledged; and
2. The approach as detailed in section 5 of the report be supported, to further embed, promote and share the Council's corporate Strategy with newly elected Members and their communities.

***HC 82**

SYRIAN VULNERABLE PERSONS SCHEME UPDATE

Members were presented with a report that outlined how four families had been supported through the scheme so far, how widespread community support for the plight of refugees had been realised in West Devon and, as a result, the Safe Haven charity group had asked the Council to expand the pledge to take more refugees.

The Lead Member for Health and Wellbeing introduced the report and the Head of Housing, Revenues and Benefits Practice responded to questions.

It was then **RESOLVED** that:

- (i) Progress on West Devon Borough Council's pledge to voluntarily participate in the Syrian Vulnerable Persons Scheme be noted; and
- (ii) Authority be delegated to the Head of Housing, Revenues and Benefits Practice, in consultation with the Lead Member for Health and Wellbeing, to extend the pledge to help Syrian Refugee Families in the circumstances set out in paragraph 5.1 of the presented report.

***HC 83 CUSTOMER SATISFACTION ACTION PROGRESS**

Members were presented with a report that detailed progress made to date in improving customer satisfaction.

The Lead Member for Customer First introduced the report. Some Members were concerned particularly in light of a recent report that stated 10% of the population did not have access to a computer. In addition, West Devon had poor connectivity to mobile and internet signals. The Lead Member for Customer First responded that measures were in place to support those without online access, and the Chief Executive confirmed that the adopted default position for the Council was for customers to access services online.

It was then **RESOLVED** that:

- (i) the progress made to date in improving customer satisfaction as detailed in section 3 of the report be noted; and
- (ii) the next steps outlined in section 5 of the report be supported.

HC 84 PEER CHALLENGE ACTION PLAN

Members were presented with a report and proposed Action Plan, following the Peer Challenge of West Devon Borough Council, jointly with South Hams District Council. The Action Plan reflected the recommendations in the Peer Challenge Report.

The Leader introduced the report. Members discussed the options presented in paragraph three of the report and agreed that progress with the Action Plan should not be delayed pending appointment to a Joint Working Group, as it was important to keep the momentum and continue with the work that had already taken place.

One Member asked that consideration be given to Members being able to Skype into meetings when Joint Briefing Sessions were held.

It was then **RESOLVED** that:

- (i) the Peer Challenge Action Plan as set out in Appendix A be implemented;
- (ii) the Local Government Association be asked to undertake a visit by the end of 2020 to follow up on progress in delivering the action plan; and
- (iii) Council be **RECOMMENDED** that a Joint Working Group be convened and the draft Terms of Reference for that group be approved as set out in Appendix B.

HC 85 NORTHERN OUTREACH

Members were presented with a report that set out the Hub Committee's preferred option for the Northern Outreach Service from a selection of options that were set out in paragraph 4 of the report. The report included an analysis of the current service, and a report to Overview and Scrutiny Committee was presented as an appendix to the report.

The Lead Member for Customer First introduced the report. Members discussed this matter at length in trying to attain the balance between equitable service provision across the Borough and available resources.

Whilst some Members considered Option 3 within the report to withdraw the service from 1 April 2019 to be the favoured option, they were minded to take the views of the Okehampton Ward Members into account and therefore favour Option 2. Members were advised that, in choosing Option 2, they would need to be confident of the direction after the monitoring period. Members also requested that monitoring take place at Tavistock, to enable understanding of the needs of the service users as a whole.

Finally, the majority of Members agreed that Option 2 would be the preferred way forward, amended to enable a report to be brought back to the Hub Committee with the results of the monitoring after a three month period.

It was then **RESOLVED** that Council be **RECOMMENDED** that the Hub Committee preferred option for the Northern Outreach Service was to reduce the service to a single day per week and monitored for a three month period and a report presented back to the Hub Committee meeting on 16 July 2019 that include the results of the monitoring, along with results of the monitoring at Tavistock, to enable a decision on the future provision of the service.

***HC 86 WEST DEVON PARKING STRATEGY GROUP**

Members were presented with a report that considered the future of the Parking Strategy Group in order to ensure that appropriate place-based solutions could be offered to communities when considering the forward planning of community services, including car parks, and town and village economies.

The Leader introduced the report, as the Lead Member for Commercial Services had given apologies for the meeting.

It was then **RESOLVED** that:

1. the work of the Parking Strategy Group to date be recognised and commended;
2. the Parking Strategy Group, in its current format is not appointed to at the Annual Council Meeting on 21 May 2019 but that its work be included within the remit of future Place Based engagement groups; and
3. in the interim period, the aims of the Strategy continue to be delivered with appropriate engagement with individual community stakeholders.

***HC 87 EMPLOYEE TERMS AND CONDITIONS OF EMPLOYMENT**

Members were presented with a report that presented the outcome of a review of options for reducing staff costs by varying terms from the Green Book from 2020/21. The report focused on two main aspects. Firstly, the current contractual situation, the presence of the national joint collective bargaining machinery and the legal considerations to be taken into account if changes in terms and conditions were proposed. Secondly, a number of options pursued by other local authorities.

The Lead Member for Resources and Performance introduced the report. The Interim Head of Human Resources Practice and the Leader responded to a number of questions of clarity

Members noted that Terms and Conditions could be an agenda item for discussion once the Joint Group is convened, as set out Agenda Item 12: Peer Challenge Action Plan, Minute HC84 refers.

It was then **RESOLVED** that:

- (i) the options available in respect of employee terms and conditions as set out in the report be noted;
- (ii) the Head of HR Practice, in consultation with the Chief Executive and Trade Union representatives –
 - a. Develop a policy for unpaid career breaks;
 - b. Review the Managing Attendance Policy and present recommendations to the Senior Leadership Team by September 2019;
 - c. Review the Essential User Car Allowance Scheme and eligibility by September 2019; and
 - d. Review the Councils Redundancy Scheme by March 2020.

*** HC 88 EXCLUSION OF PUBLIC AND PRESS**

RESOLVED

That in accordance with Section 100(A)(4) of the Local Government Act 1972, the public and press be excluded from the meeting during consideration of the following items of business as the likely disclosure of exempt information as defined in paragraph 3 of Schedule 12A to the Act is involved.

HC 89 ACCOMMODATION STRATEGY

Members were presented with a report that set out a number of recommendations regarding the future accommodation strategy at Kilworthy Park.

The Lead Member for Assets introduced the report.

It was then **RESOLVED** that Council be **RECOMMENDED**:

- 1. To agree a future accommodation strategy which will consider all alternative accommodation options and get best value for the site;
- 2. To form a Member Working Group of six Members, to be selected by the Group Leaders, to determine their terms of reference and work through options and to make recommendations to Hub Committee in July 2019; and
- 3. For the group to give consideration to each of the options outlined at paragraph 4.1 of the presented agenda report.

HC 90 READMITTANCE OF PUBLIC AND PRESS

It was then **RESOLVED** that the public and press be re-admitted to the meeting.

HC 91 INTERNAL AUDIT REVIEW OF COMMERCIAL PROPERTY PROCESS

Members were presented with a report that had been produced by the Internal Audit Manager, to review the commercial property process for West Devon Borough Council. He introduced the report and provided a summary, and then took Members through his recommendations.

A number of Members wished to record their sincere thanks to the Internal Audit Manager, and noted that he had achieved a great deal of work within a challenging timeframe.

Subject to minor comments, the recommendations were accepted by the Hub Committee. The report would also be presented to the Overview and Scrutiny Committee and full Council meeting, both to be held on 26 March 2019.

It was then **RESOLVED** that the contents and recommendations of the report and their onward consideration by the Overview and Scrutiny Committee and full Council be noted.

(The meeting terminated at 17.20 pm)

Chairman

(NOTE: THESE DECISIONS, WITH THE EXCEPTION OF HC 84 (3), HC 85 and HC 89 WHICH ARE RECOMMENDATIONS TO FULL COUNCIL ON 26 MARCH 2019, WILL BECOME EFFECTIVE FROM WEDNESDAY 27 MARCH, 2019 UNLESS CALLED IN, IN ACCORDANCE WITH SCRUTINY PROCEDURE RULE 18).

Report to: **Council**

Date: **26 March 2019**

Title: **Adoption of the Plymouth and South West Devon Joint Local Plan**

Portfolio Area: **Strategic Planning and Housing – Cllr Mott**

Wards Affected: **All**

Relevant Scrutiny Committee: **Overview and Scrutiny Committee**

Urgent Decision: **N** Approval and clearance obtained: **Y**

Date next steps can be taken: **Immediately**

Author: **Richard Grant** Role: **Strategic Planning Manager (Joint Local Plan)**

Contact: **Telephone/email: 01752 304331 / Richard.grant@plymouth.gov.uk**

RECOMMENDATIONS

That Council be RECOMMENDED that:

- 1. the Plymouth and South West Devon Joint Local Plan and Policies Map is adopted**
- 2. approval be given to the establishment of the Joint Local Plan Partnership Board in accordance with the Joint Local Plan governance arrangements set out in the Plymouth and South West Devon Joint Local Plan – Delivery and Governance Paper.**

1. Executive summary

- 1.1 The report seeks the formal adoption by Full Council of the Plymouth and South West Devon Joint Local Plan and Policies Map.
- 1.2 The Plymouth and South West Devon Joint Local Plan has been produced in collaboration with Plymouth City Council and South Hams Council. The decision to produce a joint plan was taken by Full Council on 16 February 2016 (Minute CM 51 (v) refers),

enabling all three local authorities to work together on a single development plan that could set out a consistent and clear strategy for Plymouth and South West Devon.

- 1.3 Once adopted, the Joint Local Plan (JLP) will be the single development plan for Plymouth and South West Devon, setting out a single strategy, a single set of planning policies, and a complete set of site allocations, putting in place a spatial strategy to guide development and growth up to 2034. The JLP delivers on a number of critically important objectives for all three Councils:
- It meets the need for new homes in full across the whole plan area, providing for 26,700 homes to be built between 2014 and 2034, 6,600 of which will be affordable, and ensuring that all three Councils will be able to demonstrate a 5 Year Land Supply of land for new homes.
 - It provides for 375,200 sq m of new employment space across the whole plan area, sufficient to accommodate 13,200 new jobs.
 - It sets a sustainable pattern of development across the plan area, focusing over 70% of the growth in new homes at Plymouth, and concentrating growth in the Thriving Towns and Villages of South Hams and West Devon in the most sustainable settlements of Tavistock, Okehampton, Totnes, Ivybridge, Dartmouth and Kingsbridge.
 - It sets clear and comprehensive strategic policies for sustainable development, transport, the natural environment, and infrastructure.
- 1.4 In the Thriving Towns and Villages Policy Area, the JLP:
- Provides land for at least 7,700 new homes, including 2,050 affordable homes.
 - Plans for at least 83,700 sq m of new employment space, and in addition allocates Langage as a strategic employment site serving Plymouth and South West Devon.
 - Clearly sets out infrastructure requirements for the Main Towns, providing a clear basis for the provision of facilities needed by the communities.
 - Protects the sensitive natural environments of the Policy Area, whilst providing opportunities to reinforce the sustainability of the towns and villages.
- 1.5 The JLP has been subject to formal Examination in Public by the Planning Inspectorate. The Councils have now received the Final Report from the Inspectors, which confirms that the JLP is sound

with main modifications and can proceed to adoption.

- 1.6 In addition, this report seeks the approval of the governance arrangements for the delivery of the Plymouth and South West Devon Joint Local Plan, as set out in the accompanying Paper "Plymouth and South West Devon Joint Local Plan – Delivery and Governance", and in particular the establishment of a member-led Joint Local Plan Partnership Board.

2 Background

- 2.1 On 16 February 2016 West Devon Borough Council agreed to collaborate with South Hams District Council and Plymouth City Council on the production of the Plymouth and South West Devon Joint Local Plan. Each of the Councils agreed to roll the work they had already done on their own plans into a single Local Plan covering the whole of their areas.
- 2.2 Dartmoor National Park Authority were invited to collaborate with the JLP Councils, enabling the Joint Local Plan to look at the whole of the Plymouth Housing Market Area. The National Park, however, decided that they would rather produce their own Local Plan, which would nevertheless be very closely aligned with the JLP, its strategy and its evidence base.
- 2.3 Over the course of 2016 the Councils undertook work on the JLP, including updating the key elements of the evidence base, including on housing and employment needs and sites for allocation, viability, infrastructure requirements, natural environment and green spaces, and transport. Two consultations were undertaken on the emerging strategy of the plan, and on potential site allocations. 3,317 comments were received in total over the course of the consultations, all of which were used to inform the plan making process.
- 2.4 In early 2017 the Councils had produced a draft JLP which was ready for its final round of consultation. This was approved for Publication under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations, and subsequent Submission under Regulation 20 of the Regulations, at Full Council on 28 February 2017 (Minute CM 62 refers). Consultation was undertaken during March and April 2017 attracting a total of 2,482 comments. The JLP was submitted to the Planning Inspectorate for Examination in Public on 31st July 2017.

3 The Examination in Public

- 3.1 Two Inspectors were appointed by the Planning Inspectorate to examine the JLP. In September 2017 they gave the Councils their initial set of questions and arrangements for the Examination, leading to the publication of their list of matters to be examined

during Public Hearings, and arrangements for the Hearings to take place from January to March 2018.

- 3.2 Hearings commenced on 31st January 2018, and took place over a total of four weeks during February and March, with the final session finishing on 22nd April 2018. The Inspectors finished the Hearings by stating that the JLP was a plan that could be made sound through some modifications – which was a particularly positive end to the Hearings as it indicated that the Inspectors were not going to find the JLP unsound.
- 3.3 In August 2018 the Inspectors published their Post Hearings Advice Note. This note set out the changes to the JLP that the Inspectors considered were necessary to make the JLP sound. The most significant changes for the Thriving Towns and Villages were that villages in the AONB could not be included in the settlement hierarchy as Sustainable Villages, the removal of an allocation at Stokenham and Chillington (Land at Carehouse Cross), and the decision that Settlement Boundaries should be set out in a separate Development Plan Document (which is now in production). More positively, the Inspectors did not propose any changes to some of the most important elements of the JLP – for example the overall requirement for new homes and affordable homes, the 5 Year Land Supply as set out in the plan, the fundamental strategy for a sustainable distribution of development across the plan area, the employment, transport and infrastructure policies, and the site allocations set out in the plan (with the exception of the Land at Carehouse Cross).
- 3.4 The Councils consulted on the Main Modifications to the Joint Local Plan (alongside Additional Modifications to the JLP and Policies Map that did not need to be considered by the Inspectors) between October and December 2018 – receiving a total of 1,337 comments. However, a large number of these comments were received on a limited number of modifications. For example, around 1,000 comments related to policies and allocations for housing in Dartington, many of which were not subject to Main Modifications. A further 100 comments were received in connection to changes made to the policy allocating Woolwell as a new urban extension to Plymouth.
- 3.5 All the comments received on the Main Modifications were sent to the Inspectors in December 2018. The Inspectors did not consider that any further hearings or changes to the JLP were required.

4 The Inspectors' Final Report

- 4.1 The JLP Councils received the Inspectors' Final Report on 18th March 2019 and subsequently published the report on the Councils'

websites. The Report confirms that the Inspectors find that the Plymouth and South West Devon Joint Local Plan is sound, subject to the modifications set out in Appendix One of the Report. These modifications comprise the Main Modifications that were consulted upon between October and December 2018, to which the Inspectors have added the following three further changes:

- They do not believe that we need a specific policy dealing with the process of designating Local Green Space designations, because this is set out in detail in the NPPF and the NPPG. This policy is therefore deleted.
- They have noted that Policy PLY61 includes a point referring to “Western Park and Ride (in Cornwall)”. Their conclusion is that a local plan is unable to include policy relating to another local authority, and therefore will be deleting this reference in the policy. Instead they will insert a reference to the park and ride in the supporting text to the policy with a reference to the emerging Cornwall Site Allocation DPD, which includes the park and ride.
- They have made changes to MM52 which relates to DEV29 – Green and Play Space.

4.2 These changes set out in Appendix One of the Inspectors Report have been made to the JLP, and the final adoption version of the Plymouth and South West Devon Joint Local Plan is appended to this report.

4.3 Therefore, and in accordance with the Inspectors’ findings, this report recommends that the Plymouth and South West Devon Joint Local Plan is adopted as the development plan for Plymouth City Council, South Hams District Council and West Devon Borough Council. Section 28(3) of the Planning and Compulsory Purchase Act makes clear that all of the JLP Councils must adopt the plan in order for it to come into force – hence the legal adoption of the Plymouth and South West Devon Joint Local Plan is subject to the decision to adopt being taken by all three Councils.

5. Ongoing Joint Local Plan Governance Arrangements

5.1 During the Examination in Public into the Plymouth and South West Devon Joint Local Plan, the Planning Inspectors asked questions relating to the ongoing collaboration between the JLP Councils, and the reassurance that could be given that the Councils were committed to working together to deliver the JLP strategy and commitments. In response the Councils produced the Governance Topic Paper ([TP6](#)), which set out in detail the proposed ongoing governance arrangements. This Topic Paper was revised following the Hearings into the JLP which took place between January and March 2018, to reflect discussions with the Inspectors. The Revised Governance Topic Paper ([TP6\(Rev\)](#)) was submitted to the

Inspectors in March 2018. Both of these versions of the Governance Topic Paper were approved by the Joint Local Plan Member Steering Group following consultation with the Leaders of the Councils.

- 5.2 Given that the JLP may soon be adopted by the Councils, it is timely to also formally approve the Governance arrangements that the three Councils will use to deliver the JLP. South Hams District Council and West Devon Borough Council are being asked to approve the arrangements at the Full Councils which adopt the JLP. In Plymouth, these matters have been delegated to the Audit and Governance Committee. The Governance Topic Paper has been slightly amended so that it reflects the latest position regarding the Joint Local Plan. It is appended to this Report so that Members can see the detail of the Governance Arrangements.
- 5.3 The Governance Topic Paper proposed the following Governance Arrangements for the delivery of the JLP:
- The Joint Local Plan Member Steering Group will be disbanded and replaced with a Joint Local Plan Partnership Board. This Partnership Board will be a more formal body than the existing Steering Group, with powers to review progress on the implementation of the JLP and engage with the individual Councils in addressing any delivery issues revealed by monitoring. The existing Member representation of the Steering Group would remain for the Partnership Board – ie 2 senior Members from each Council.
 - A Joint Local Plan Senior Management Team, comprising of senior managers from all three Councils to provide oversight and a strategic steer to officers working on the monitoring, delivery and review of the JLP. This joint management team is now operational.
 - A new Joint Local Plan Team be created, responsible to all three Councils, and charged with the monitoring and review of the Joint Local Plan, maintaining the evidence base, and providing advice to the three Councils on strategic planning policy matters. This team was operational from August 2018 and is overseeing the final stages of the JLP Examination and adoption.
- 5.4 These arrangements are set out in more detail in the attached paper “Plymouth and South West Devon Joint Local Plan – Delivery and Governance”, which also sets out the scope of the Joint Local Plan Team, and the Terms of Reference of the Joint Local Plan Partnership Board.
- 5.5 The Paper also sets out how the Councils will address any delivery issues which are highlighted by monitoring of the Joint Local Plan up to the first review of the plan. In particular, the Paper sets out that as a result of changes made to the National Planning Policy

Framework by the Government in July 2018, monitoring of housing delivery will take place at the whole plan level, and explains how any issues that are identified by the Councils will be handled.

6 Concluding Comments

- 6.1 Adoption of the JLP marks the end of a ground-breaking and exemplary piece of work for West Devon Borough Council. Officers were set a very challenging timetable to produce the JLP – the plan was submitted just 18 months after the decision to collaborate on the production of the JLP was taken. Evidence had to be updated, consultations held and fundamental elements of the strategy agreed between three Councils on very short timescales in order to achieve this timescale – none of which would have been possible without the help and support of the Joint Local Plan Member Steering Group which was set up to oversee the process. The JLP is the first full joint plan that has been produced for West Devon, and it has been achieved through collaboration between officers and Members of each Council at all levels, showing how local authorities can work together to achieve their aims in the most efficient and cost effective ways.
- 6.2 The JLP also represents national best practice. It is one of only three joint plans in England to include a full set of strategic policies, site allocations to ensure that needs are met in full, and development control policies to guide development. It sets out a consistent and sustainable strategy for the Plymouth Housing Market Area, setting a principle of plans being produced for meaningful functional areas. It has been produced on a particularly fast timetable – many local plans spend over three years in the Examination part of the process – the JLP has taken three years to prepare from start to finish. And finally, the JLP sets out a robust framework for delivery, ensuring that needs for homes, jobs and infrastructure will be met in full, when measured using Government standards, for the life of the plan.
- 6.3 The production of a local plan inevitably uses a significant amount of resources. Nevertheless, by collaborating on a single joint plan rather than three separate plans, West Devon and its partners have produced a ground-breaking plan – one that has achieved the aims of the three Councils; one that has produced a more coherent and sustainable strategy across the sub-region; and one that has already been recognised by RTPI South West as representing excellence in spatial planning. The adoption of the Plymouth and South West Devon therefore represents a very significant milestone for West Devon Borough Council.

Implications	Relevant to proposals Y/N	Details and proposed measures to address

Legal/Governance		The Report recommends adoption of the Plymouth and South West Devon Joint Local Plan under Section 23 of the Planning and Compulsory Purchase Act 2004. Upon adoption by the JLP Councils, the Joint Local Plan will come into force as the development plan for South Hams District Council, West Devon Borough Council and Plymouth City Council. Under Section 28(3) of the Planning and Compulsory Purchase Act 2004, the Joint Local Plan will come into force once all three JLP Councils have resolved to adopt the plan.
Financial		No new resource implications arise from this report.
Risk		The primary area of risk sits with the statutory legal challenge period, which will run for a six week period from the adoption of the Joint Local Plan.
Comprehensive Impact Assessment Implications		
Equality and Diversity		An Equality Impact Assessment of the Joint Local Plan has been carried out.
Safeguarding		No safeguarding implications
Community Safety, Crime and Disorder		The JLP provides a strategic policy framework for both people and place. The creation of sustainable communities, and the theme of providing quality of life for everyone in the city, runs through the heart of the plans, providing an effective and integrated strategic framework for addressing and responding to issues such as community safety, community cohesion, child poverty and equalities and diversity.
Health, Safety and Wellbeing		The JLP provides a strategic policy framework for both people and place. The creation of sustainable communities, and the theme of providing quality of life for everyone in the city, runs through the heart of the plans, providing an effective and integrated strategic framework for addressing and responding to issues such as community safety, community cohesion, child poverty and equalities and diversity.
Other implications		No other implications

Supporting Information

Appendices:

- A: Plymouth and South West Devon Joint Local Plan – Final Version for Adoption.
- B: JLP Final Sustainability Appraisal
- C: Plymouth and South West Devon Joint Local Plan – Delivery and Governance Paper.

Background Papers:

Report to Hub Committee 26 January 2016 – Our Plan: Local Plan Arrangements
Minutes of Council meeting 16 February 2016
Report to Council 28 February 2017 – Joint Local Plan
Inspectors Final Report (March 2019)

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Plymouth and South West Devon Joint Local Plan

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1 Introduction

What is the Plymouth and South West Devon Joint Local Plan?

1.1 The Joint Local Plan (JLP) is part of a ground-breaking strategic planning process for Plymouth and South West Devon which looks ahead to 2034. It sets a shared direction of travel for the long term future of the area, within the context of wider integrated strategic plans. In this respect it integrates with and completes work that was previously being undertaken separately on the 'Plymouth Plan' (Plymouth City Council and its strategic partners), 'West Devon: Our Plan' (West Devon Borough Council) and 'South Hams: Our Plan' (South Hams District Council).

1.2 The key purpose of the JLP is to establish an over-arching strategic framework for sustainable growth and the management of change, providing the statutory development plan for Plymouth, South Hams and West Devon.

1.3 The JLP excludes policies for Dartmoor National Park Authority. This is because the National Park Authority is preparing a separate local plan. However both plans will be based on joint evidence.

Why a joint local plan?

1.4 The Localism Act requires local planning authorities (LPAs) to cooperate closely with neighbouring authorities to identify cross boundary issues and identify solutions to those issues in their plans. This requirement is known as the 'duty to cooperate'. The LPAs of Plymouth, South Hams and West Devon see this 'duty' as an opportunity to produce a plan which for the first time sets out a strategy and key policies for the city and the wider area, bringing together the vision for the growth and transformation of Plymouth with the approach of fostering sustainable, thriving towns and villages in the surrounding rural areas. The aspirations for each area are complementary but need to be planned together in order to ensure that growth takes place in a sustainable manner.

1.5 The government supports the use of joint local plans because they enable a coherent and mutually agreed planning approach to be delivered to a wider area which bears more of a resemblance to the way people live their lives. The JLP is able to look at the requirements for homes and jobs across the whole of the Plymouth Housing Market Area and its Functional Economic Market Area, showing how the full objectively assessed need for housing and employment development can be met.

1.6 The three councils formally agreed to work together on a joint local plan through a series of council resolutions between December 2015 and February 2016.

What documents have informed the preparation of the Joint Local Plan?

1.7 Plymouth: Prior to the joint plan process being agreed, Plymouth City Council was at an advanced stage in the production of the Plymouth Plan. Plymouth Plan Part One was approved by the City Council in September 2015 following an extensive period of community engagement, setting out an overarching strategy for future change and growth in the city. Plymouth Plan Part Two was then to set out detailed

policies for different areas of Plymouth and site-specific policies for the development, improvement or conservation of land in the city. Once completed the Part Two work was to be integrated into the approved Part One Plymouth Plan and the single plan submitted to for public examination.

1.8 West Devon: Prior to the joint plan process being agreed, West Devon Borough Council was preparing its development plan separately in a document called 'West Devon: Our Plan'. The plan went through its initial engagement in May-June 2014, which sought to establish the overall content and priorities. This was followed by consultation on detailed proposals under the formal Regulation 19 stage in February 2015. This included a proposed land use strategy, housing numbers, distribution and strategic allocations. During 2015 the Borough Council reviewed the preferred way of moving forward and agreed to pursue 'West Devon: Our Plan' as a corporate document setting out community focused priorities for the area along with a delivery plan shared with South Hams District Council.

1.9 South Hams: Prior to the joint plan process being agreed, South Hams District Council was preparing its development plan separately in a document called 'South Hams: Our Plan'. The plan went through its initial engagement in May-June 2014. As with West Devon, this sought to establish the overall content and priorities for the plan. During 2015 the District Council reviewed the preferred way of moving forward and alongside West Devon agreed to adopt 'South Hams: Our Plan' as a corporate document setting out community focused priorities for the area along with a delivery plan shared with West Devon Borough Council.

1.10 Clearly all three councils have undertaken a considerable amount of work in the preparation of their respective planning documents. All of this work has been taken forward into the JLP process, and helped to inform the development of its strategy and policies. In particular, comments received during previous engagements and consultations on any of the three pre-existing plan processes have helped with the development of the JLP.

What statutory planning status will the Joint Local Plan have?

1.11 The JLP has been formally by the LPAs and is therefore their statutory development plan documents. It has replaced the following Local Development Plan Documents:

1.12 In Plymouth:

- Plymouth Core Strategy, Adopted 2007.
- North Plymstock Area Action Plan & Minerals Development Plan Document, Adopted 2007.
- Devonport Area Action Plan, Adopted 2007.
- Millbay & Stonehouse Area Action Plan, Adopted 2007.
- Waste Development Plan Document, Adopted 2008.
- Sutton Harbour Area Action Plan, Adopted 2008.

- Central Park Area Action Plan, Adopted 2008.
- City Centre & University Area Action Plan, Adopted 2010.

1.13 In West Devon:

- West Devon Local Plan Review, Adopted 2005.
- West Devon Core Strategy, Adopted 2011.

1.14 In South Hams:

- South Hams Local Plan, Adopted 1996 – Saved Policies.
- South Hams Core Strategy, Adopted 2006.
- Sherford New Community Area Action Plan, Adopted 2007.
- Affordable Housing Development Plan Document, Adopted 2008.
- Development Policies Development Plan Document, Adopted 2010.
- Dartmouth Site Allocations Development Plan Document, Adopted 2011.
- Ivybridge Site Allocations Development Plan Document, Adopted 2011.
- Kingsbridge Site Allocations Development Plan Document, Adopted 2011.
- Totnes Site Allocations Development Plan Document, Adopted 2011.
- Rural Areas Site Allocations Development Plan Document, Adopted 2011.

How the Joint Local Plan is structured?

1.15 The JLP has seven sections:

- Section 1 introduces the JLP.
- Section 2 describes the vision for the Plan Area.
- Section 3 sets out the high level spatial strategy for growth, including the overall housing and employment need that the plan needs to meet and how this is to be distributed.
- Section 4 sets out the Strategy for the Plymouth Policy Area (which includes Plymouth's administrative area and the urban fringe within South Hams), considering Plymouth's strategic role, area-specific strategies for the city's three growth areas, as well as site allocations.

- Section 5 sets out the Strategy for Thriving Towns and Villages Policy Area (which includes all of South Hams and West Devon, excluding Plymouth's urban fringe and Dartmoor National Park) - explaining how the vision will be implemented, including identifying site allocations.
- Section 6 sets out shared development policies that relate to the entire Plan Area.
- Section 7 sets out how the plan will be delivered and how its implementation will be monitored and kept on track.

1.16 The JLP also uses the following structure to explain what we are seeking to achieve (outcomes and objectives), how we will achieve it (the policies), and how we will know if the plan is succeeding (measures of success).

- **Strategic Outcomes** identify the headline changes that the JLP seeks to achieve in order to make the plan's vision a reality.
- **Strategic Objectives** set out in greater detail what the JLP is seeking to deliver and how.
- **Policies** identify specifically what the councils, and where appropriate, partners will do in order to meet the strategic objectives.
- **Measures of success**, supported by a range of indicators, identify those measures that will be monitored in order to know whether or not the specific parts of the plan are on track.

1.17 In relation to site allocation policies, it should be noted that only sites of greater than 0.25 hectares have been identified. Additionally, housing or employment floorspace numbers are only expressed where they are being counted towards the overall supply targets of the plan. The figures included are based upon assessments undertaken during the plan preparation process and are potentially subject to change through the detailed design work associated with a planning application. Where no figure is expressed this does not necessarily mean that the site allocation policy will not yield a housing or employment outcome. For some of these sites, housing or employment use is a desired or acceptable outcome as part of an overall mixed use development. However, figures are only shown where there is a high degree of confidence that there will be a housing or employment outcome and where this is able to be quantified at this time.

1.18 In addition to the JLP the LPAs will prepare supplementary planning documents (SPDs) for both the Plymouth Policy Area and the Thriving Towns and Villages Policy Area. These SPDs will build upon and provide more detailed advice or guidance on the policies in the JLP where appropriate.

What is the relationship between the Joint Local Plan, the Plymouth Plan and the Our Plan's of South Hams and West Devon?

1.19 The three councils are all committed to more integrated and holistic plan making. In this respect, the JLP is seen by each authority as the spatial expression of a wider strategy for their areas.

1.20 The 'Plymouth Plan' is the City of Plymouth's single, integrated and holistic strategic plan, owned by the City Council and its partners. It is an interactive web-based plan. Once the JLP is adopted, its policies that relate to Plymouth will be joined to the rest of the Plymouth Plan so that all policies (spatial and otherwise) that relate to the city can be read in one place.

1.21 For South Hams and West Devon, the JLP will sit alongside their 'Our Plan' corporate policy documents.

When will the plan first be reviewed?

1.22 The plan's effectiveness will be monitored on an ongoing basis, with a full review of key parts of the plan such as the development strategy to be undertaken at least once every five years. More information relating to monitoring of the plan is set out in Section 7.

How can I use the plan interactively?

1.23 The plan is published in interactive form on the following website:

1.24 www.plymswdevonplan.co.uk

1.25 The following symbols, which are identified in each policy, will be able to be used to group policies around particular themes.



1.26 Symbols are also identified to help identify which policies relate to each LPA area.



2 Vision

How Plymouth and South West Devon will be in 2034

Vision for Plymouth and South West Devon

Plymouth and South West Devon will be a highly successful sub-region, whose people and businesses benefit greatly from having both a major city and a network of high quality market towns and sustainable rural settlements, set within beautiful countryside and natural environments. It will have made the most of its economic, social, cultural, heritage and natural assets, and its settlements will play complementary and mutually beneficial roles for the urban and rural economy. Development will be delivered proactively, meeting the needs of its people for new homes, jobs and services, and will recognise the diversity in characteristics between our urban, sub-urban and rural areas. We will be a good neighbour to neighbouring areas and play a key economic and social role both in the region and beyond. In particular:

1. Plymouth will be one of Europe's most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone and where the following outcomes have been met:
 - Plymouth's strategic role is fulfilled as a regional city and a major economic driver for the heart of the south west.
 - Plymouth as a healthy city, where our people live in happy, healthy, safe and aspiring communities.
 - Plymouth as a growing city, where we have used our economic, social, environmental and cultural strengths to deliver quality and sustainable growth.
 - Plymouth as an international city, renowned as the UK's premier marine city and famous for its waterfront, maritime heritage and culture.

2. South West Devon's Thriving Towns and Villages will be thriving rural communities where the following outcomes have been met:
 - Residents are empowered to create strong communities.
 - Places are created for enterprise to thrive and business to grow.
 - Homes have been built to meet local needs.
 - The services and facilities which meet the needs of our communities have been secured.

- The built and natural environment has been protected, conserved and enhanced.
- The past is celebrated and our heritage for the future is protected.

2.1 The Plan Area covers 2,126 sq.km., nearly 55 per cent of which is in West Devon, with over 40 per cent in South Hams and just 4 per cent in Plymouth's administrative area.

2.2 In contrast Plymouth's administrative area has nearly 70 per cent of the share of the Plan Area's population of 401,567 (ONS 2015). With a population of 262,712, economic output of £5.2 billion (ONS Income Based, 2015) and 130,000 total jobs (107,800 employee jobs) (ONS 2015), it is the most significant urban area on the south west peninsula and the economic engine of the Plan Area. The market and coastal towns of West Devon and South Hams, together with a wider network of towns, villages and hamlets provide homes for 138,855 people, 54,385 in West Devon and 84,470 in South Hams. West Devon is one of the most sparsely populated local authority areas in England ranking 316th out of 326 which a population density of 47 people/km² compared to a density of 95/km² in South Hams and 3,284/km² in the city.

2.3 The population of the Plan Area is predicted to grow over the plan period from 399,914 (2014) to 434,900 (2034).

2.4 Plymouth grew from a maritime economy, with its naval heritage being a major factor in its early prosperity. Notwithstanding a reduction in employment in the defence sector and Devonport Dockyard over many years, these facilities still provide significant employment for the region. However, positively, the city's economy is becoming increasingly diverse. The city is now a centre of excellence for marine science and manufacturing, it hosts the largest science park and hospital on the south west peninsula, and has a unique set of competitive advantages upon which to build in its transition to a more competitive and thriving knowledge-based economy. Its high quality educational infrastructure, including three universities and a substantial pool of young talent, continues to grow, playing an ever increasing role in supporting economic growth initiatives.

2.5 Within rural South West Devon the economy is diverse. In 2012 the top employment sectors were retailing, public sector services, tourism, construction and manufacturing. A key issue impacting on the economy of West Devon and South Hams is the relatively low wage rates of those who work within the area, contrasting with higher resident wage rates and high skills levels amongst people who live in the area. Consequently, the Thriving Towns and Villages area experiences significant levels of out-commuting to work and below national average employment levels. It is important therefore that, within this part of the area, the plan drives opportunities to raise productivity and wage levels as well as the creation of jobs.

2.6 Whilst Plymouth forms a hub and focus for activity, employment and higher level services, Exeter also plays a significant role for the communities to the north and east of the Plan Area. But outside the cities, the plan encourages the rural towns

and villages to become more sustainable, with access to housing, employment, services and facilities that meet their needs, and which are resilient and safe and where local communities are able to make choices about their future.

2.7 The essential context for the plan's growth aspirations is its superb natural and historic environment. The Plan Area is characterised by important landscape designations, including the neighbouring Dartmoor National Park, the Tamar Valley and the South Devon and Cornwall Areas of Outstanding Natural Beauty, and heritage coast. Additionally there are number of European protected wildlife sites, designated and protected under the Conservation of Habitats and Species Regulations. These sites form part of a wider European network of sites known as Natura 2000 sites. The area's rich and diverse historic environment provides important cultural, economic and environmental benefits for the local communities. This includes over 1,100 scheduled monuments, 5,900 listed buildings and 86 conservation areas, as well as registered parks and gardens, a World Heritage Site and, in Plymouth's waters, an historic wreck. A key role of the plan is establishing and maintaining the character and distinctiveness of the area, as this plays an important role in regeneration, the local economy, leisure, recreation, tourism and community life.

2.8 Plymouth's vision to be 'one of Europe's most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone' was conceived through an extensive period of partnership working and engagement in the early part of the 2000s, during which time the so-called 'Mackay Vision' was prepared (*A Vision for Plymouth: A Past with a Future*, Report of MBM Arquitectes with AZ Studio, 2003). It was initially integrated into the city's planning policy in 2004 and then formally adopted into the Plymouth Local Development Framework Core Strategy in April 2007. Since then it has been at the heart of policy and plan-making within the city. As part of the partner and community engagement process for the Plymouth Plan during 2014, work was undertaken to amplify what this vision means for Plymouth. In addition to identifying the role of the city within its wider hinterland and the city's strategic role in the region (see Section 4 of the plan), three strategic themes were identified to capture the essence of Plymouth's future and build upon the city's unique assets of people and place:

- Plymouth as a healthy city.
- Plymouth as a growing city.
- Plymouth as an international city.

2.9 West Devon's and South Hams' vision of 'supporting Thriving Towns and Villages and enhancing the quality of life for individuals and communities' was arrived at after widespread public consultation with local communities, building upon the values of both councils and the approaches set out in their Core Strategies. The work on the 'Our Plans' for West Devon and South Hams went further in explaining how this vision applied to the communities in South West Devon, detailing how the vision would be achieved under a number of distinct aspects of life in the Thriving Towns and Villages.

2.10 Taken together, a picture is painted of a major city with an ambitious programme of growth and regeneration sitting within an extensive rural area, full of opportunity, high quality landscape and history, with a wide diversity of communities and a broad range of urban and rural issues that need to be considered and addressed. The vision therefore aspires to a mutually supportive relationship between urban and rural areas, building on the character and strengths of the local area. The prosperity of Plymouth and the rural communities are closely linked. A successful Plymouth will be beneficial to rural Devon (and indeed Cornwall too). It is equally true, though, that Plymouth's success as a regional city is dependent on the environmental, social and economic well-being of the wider rural area.

2.11 The JLP demonstrates how the vision will be turned into reality through identifying twelve Strategic Objectives, each of which is related to a series of policies as set out in the sections of the plan that follow. These Strategic Objectives are listed below;

The Strategic Objectives of the plan

1. Delivering the spatial strategy: To meet the needs of Plymouth and South West Devon for new homes, jobs and services through an integrated approach to the strategic planning of the Plan Area as part of the wider region.
2. Strengthening Plymouth's role in the region: To consolidate and strengthen Plymouth's role as the major regional city in the south west peninsula of England, enhancing its contribution to the economic and social wellbeing of the south west and providing the major commercial, service and employment centre.
3. Delivering growth in Plymouth's City Centre and Waterfront Growth Area: To realise the potential of the City Centre and Waterfront Growth Area as a regionally significant growth hub.
4. Delivering growth in Plymouth's Derriford and Northern Corridor Growth Area: To realise the potential of the Derriford and Northern Corridor Growth Area as a regionally significant growth hub.
5. Delivering growth in Plymouth's Eastern Corridor Growth Area: To realise the potential of the Eastern Corridor Growth Area as a regionally significant growth hub.
6. Delivering a prosperous and sustainable South West Devon: To reinforce and protect the settlement pattern of South West Devon as the key driver of the prosperity and sustainability of the area, set within the diverse rural economy and an outstanding natural environment.
7. Maintaining a strong network of Main Towns: To promote locally distinctive and sustainable development in the main towns, with sufficient new homes, jobs, services and infrastructure provided to improve their level of self containment and to meet local needs.

8. Maintaining vitality and viability of the smaller towns and key villages: To promote the provision of homes, jobs, services and community infrastructure sufficient to enable the smaller towns and key villages to continue to play their important role as local service centres for their surrounding areas.
9. Maintaining the viability of the many sustainable villages in the rural area: To enable the development of new homes, jobs and community infrastructure sufficient to meet the local needs of the sustainable villages identified in the area and the village networks they serve.
10. Maintaining a naturally beautiful and thriving countryside: To protect, conserve and enhance the natural beauty of South West Devon's countryside, and to avoid development in unsustainable locations.
11. Delivering high quality development: To deliver development in Plymouth and South West Devon which is sustainable and of the right type for its location and of good quality.
12. Delivering infrastructure and investment: To take a proactive and co-ordinated approach to delivering the infrastructure and investment needed to realise the plan's vision and deliver its strategic objectives and policies.

3 Spatial Strategy

What we are trying to achieve - The Spatial Strategy for Plymouth and South West Devon.

Strategic Outcome

Plymouth and South West Devon will be a vibrant, thriving and well-connected sub region, where its housing needs are met, and where there is an economy driven by both the growing city of Plymouth and by rural areas characterised by sustainable market towns and villages set in high quality natural environments.

3.1 The spatial strategy of the local plan is driven by the need to fully meet the demands for new homes, jobs and services within the Plan Area in the most sustainable manner, where Plymouth is the primary focus of growth and the sustainability and prosperity of South West Devon's towns, villages and countryside are supported.

3.2 The starting point for defining the level of need for housing and employment land is what is known as the 'Objectively Assessed Need' (OAN). This includes for the Plymouth Housing Market Area (HMA), excluding Dartmoor, between 2014 and 2034:

- An OAN for housing of at least 26,700 new dwellings.
- An OAN for employment floorspace of at least 312,700 sq.m., providing a further 13,200 jobs in uses within the B1, B2 and B8 Use Classes (Town and Country Planning Use Classes Order).

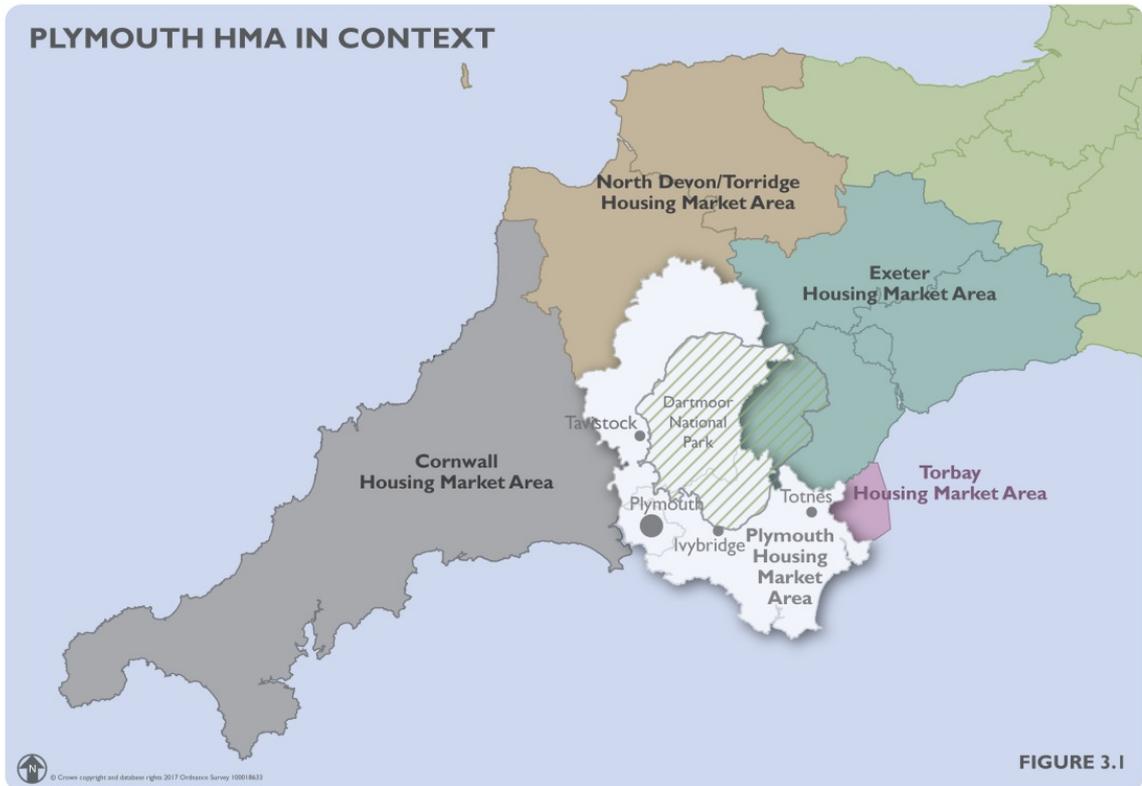
3.3 The spatial strategy operates at three different spatial levels:

1. **The Plan Area.** This includes the Plymouth HMA, which is made up of Plymouth, South Hams and West Devon local authority areas and part of the Dartmoor National Park. The Dartmoor part of the HMA is excluded from this plan, as it is being considered through the Dartmoor local plan.
2. **The Plymouth Policy Area.** This incorporates the administrative area of Plymouth along with Plymouth's urban fringe. Locations that are part of the wider urban area (e.g. Woolwell, Langage) and where major development is committed (e.g. the new community at Sherford), as well as the city's landscape setting, fall within this policy area.
3. **The Thriving Towns and Villages Policy Area.** This incorporates rural South Hams and West Devon, including its market towns, settlements and villages.

3.4 These spatial levels represent an appropriate structure for organising the plan, acknowledging the inter-relationships between Plymouth, its urban fringe and South West Devon, and the inter-relationships between the main towns, villages and rural

areas of South West Devon. These spatial levels guide key principles and policies for development that are set out through the plan, as well as providing a context for the preparation by local communities of neighbourhood plans, and the monitoring of the plan (which will also be undertaken at local authority level).

3.5 The Plan Area sits within the context of the Dartmoor National Park and four other HMAs and local plan areas. This is shown on Figure 3.1.



Strategic Objective SO1

Delivering the spatial strategy

To meet the needs of Plymouth and South West Devon for new homes, jobs and services through an integrated approach to the strategic planning of the Plan Area as part of the wider region which:

1. Maximises growth at Plymouth, recognising its position as the most sustainable location for major development, reinforcing its position as one of the main centres of growth in the South West and acknowledging the need to prioritise the use of brownfield sites and regeneration.
2. Gives priority to delivering major growth in Plymouth's primary economic nodes of the City Centre / Waterfront and Derriford / Northern Corridor, as well as the Eastern Corridor, in order to drive a step change in the economy and housing delivery and to focus growth on accessible transport corridors where genuine sustainable transport choices can be provided to support growth.

3. Focuses growth in the Thriving Towns and Villages Policy Area on the six main towns - Dartmouth, Ivybridge, Kingsbridge, Tavistock, Totnes and Okehampton - reinforcing the role of these towns as sustainable service centres serving wide rural hinterlands, providing a range of facilities and services, and enabling them to meet the needs of residents.
4. Provides for levels of development in the towns and larger rural villages sufficient to enable them to continue as important local service centres for the surrounding areas.
5. Supports new homes and jobs by delivering the infrastructure needed to provide for strong strategic connectivity to the rest of the country and to ensure that local communities have the capacity to support new development.
6. Minimises development in sensitive locations where the high quality natural environments could be harmed, and positively protects, conserves, enhances and celebrates the Plan Area's high quality natural and historic environments.



3.6 Strategic Objective 1 sets the overarching principles for meeting and distributing development and other needs within the Plan Area. It acknowledges the importance of taking a strategic and integrated approach to growth, which reduces the need for travel and places sustainable development at the heart. It describes a strategy of prioritising major growth in Plymouth, whilst also providing sufficient growth in the market towns and villages to meet their local needs, whilst protecting the special character and unique function of rural South West Devon. This is in preference to alternative strategies that might seek to locate all development in the city or which might seek to disperse growth equally across the entire HMA, as discussed and appraised in the 'Deciding upon the distribution of development Topic Paper' (November 2016).

3.7 Plymouth is the most sustainable location for significant growth within the Plan Area. As a major city it provides the most efficient place to locate major growth, providing the maximum opportunity for genuine sustainable transport choices. Plymouth is the place where the most new jobs will be created over the lifetime of the plan and also has the potential for regeneration to take place using brownfield sites.

3.8 The Plymouth Core Strategy (Adopted 2007) identified three growth areas as the spatial priorities for change and growth, namely: the City Centre / Waterfront; Derriford / Northern Corridor; and the Eastern Corridor (which includes the new community at Sherford). These were identified because of their strategic importance from an economic perspective and their great potential for change and growth, as well as being the most sustainable locations in terms of their relationship to key transport corridors and public transport accessibility. They remain the areas of Plymouth with the greatest opportunity for significant growth.

3.9 Outside of Plymouth, Ivybridge and Tavistock are key settlements with close relationships with and good public transport links to the city. These towns are identified as locations for sustainable development which will also contribute to the economic success of the city. Together with Ivybridge and Tavistock, Dartmouth, Kingsbridge, Totnes and Okehampton are important market towns which service extensive hinterlands where sustainable development can be accommodated. Such development can be located in places served by facilities, public transport and access to local jobs. Okehampton and Totnes also benefit from close links to Exeter and Torbay respectively.

3.10 Across the HMA, there are rural towns and villages which together with the market towns form a network of sustainable rural settlements. These locations can support an appropriate and proportionate level of growth over the plan period. It is anticipated that most development in these locations will come forward through the strategic allocations both within the JLP and through neighbourhood plans, as appropriate.

3.11 Within the countryside and its small settlements it is anticipated that only limited development will come forward, guided by the plan's policies. A limited amount of development will also be brought forward in Dartmoor through the Dartmoor Local Plan.

What we are going to do - our policies to deliver the spatial strategy

Policy SPT1

Delivering sustainable development

The LPAs will support growth and change that delivers a more sustainable future for Plymouth and South West Devon. Development and change will be planned for and managed in accordance with the following principles of sustainable development:

1. A sustainable economy where:
 - i. Opportunities for business growth are both encouraged and supported.
 - ii. Environmentally conscious business development takes place.
 - iii. Strategically important economic assets are protected for the purpose of economic activity.
 - iv. A low carbon economy is promoted.

2. A sustainable society where:
 - i. Neighbourhoods and communities have a mix of local services and community assets, and accessible greenspace, that meet the needs of local people.

- ii. Sustainable and health promoting transport options are available to access local education, services and jobs.
- iii. Important cultural and heritage assets are protected for the benefit of current and future generations.
- iv. Resilient communities and developments are delivered, which are able to accommodate the impacts of climate change and do not cause detrimental impacts to other communities and developments, for example through increasing flood risk.
- v. Demand for energy is reduced and opportunities for the use of renewable energy increased.
- vi. Equality of opportunities, freedom from discrimination and fair access to facilities and services are provided for all.

3. A sustainable environment where:

- i. The effective use of land is made for development through optimising reuse of previously developed sites, therefore reducing the need for greenfield development, protecting natural assets and creating opportunities for viable low carbon energy schemes.
- ii. Overall gains in biodiversity are achieved by protecting and enhancing species, habitats and geological sites.
- iii. Pollution and adverse environmental impacts of development are minimised and effectively mitigated where unavoidable.
- iv. The best and most versatile agricultural land is protected for agricultural use.
- v. Local distinctiveness and sense of place is respected, maintained and strengthened through high standards of design.



3.12 At the heart of the spatial strategy of the JLP is the need to use sustainable development as the framework for growth and change.

3.13 The United Nations General Assembly has defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy *Securing the Future* set out five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound

science responsibly. The National Planning Policy Framework (NPPF) (paragraph 7) amplifies this further by identifying three dimensions of sustainable development, and three key roles for local plans in delivering sustainable development:

- An economic role – contributing to building a strong, responsive and competitive economy;
- A social role – supporting strong, vibrant and healthy communities; and
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment, including moving to a low carbon economy.

3.14 NPPF para. 8 says 'to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.' Policy SPT1 explains how these principles of sustainable development will particularly be sought jointly and delivered through the planning process. It is set at a high level to provide a framework for the more detailed policies that are identified later in the plan. It serves to embed the principles of sustainable development in the JLP from the outset.

Policy SPT2

Sustainable linked neighbourhoods and sustainable rural communities

The LPAs will apply the following principles of sustainable linked neighbourhoods and sustainable rural communities to guide how development and growth takes place in the Plan Area. Development should support the overall spatial strategy through the creation of neighbourhoods and communities which:

1. Have reasonable access to a vibrant mixed use centre, which meets daily community needs for local services such as neighbourhood shops, health and wellbeing services and community facilities, and includes where appropriate dual uses of facilities in community hubs.
2. Provide for higher density living appropriate to the local area in the areas that are best connected to sustainable transport, services and amenities, as well as appropriate opportunities for home working, reducing the need to travel.
3. Have high levels of digital connectivity, supporting local communities and businesses and enabling data to be open, shared and used to better understand the area.
4. Have a good balance of housing types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs.
5. Promote resilience to future change by ensuring a well balanced demographic profile with equal access to housing and services.
6. Are well served by public transport, walking and cycling opportunities.

7. Have a safe, accessible, healthy and wildlife-rich local environment, with well designed public and natural spaces that are family friendly and welcoming to all.
8. Have services and facilities that promote equality and inclusion and that provide for all sectors of the local population.
9. Have the appropriate level of facilities to meet the identified needs of the local community, including provision of education and training opportunities, employment uses, health care, arts, culture, community facilities, open space, sport and recreation, and places of worship.
10. Provide a positive sense of place and identity, including through the recognition of good quality design, unique character, the role of culture, and the protection and enhancement of the natural and historic environment.
11. Explore opportunities for the use of renewable energy, including community energy schemes where appropriate, and reduce the use of energy through design and energy efficiency.
12. Provide positive outcomes in relation to the characteristics, aspirations and measurable standards set out through any supplementary planning document linked to this plan.



3.15 Sustainable communities are about creating the kinds of places where people of all ages and circumstances want to live. The JLP aims to support local communities in improving their neighbourhoods and provide avenues for direct investment so that it strengthens communities. Whilst many of our neighbourhoods and communities already provide attractive living environments with good access to local facilities, there are some areas that are more disadvantaged and where improvement is needed.

3.16 Whether or not a local community is sustainable is not a precise science and indeed will vary depending on context (for example, whether it is an urban or rural community). However, the following general characteristics of sustainable communities can be identified:

- **A sufficient number and demographic mix of people** to engender a sense of belonging, vitality and safety, as well as support the range of services that people need in their daily lives.
- **A mix of land uses** that works well together, with 'dead spaces' avoided that are a hindrance to sense of community and safety. To achieve this will mean concentrating a range of public facilities and commercial activities in the centres towns, villages and neighbourhoods, to ensure a good level of access to all residents.

- **Good accessibility and is walkable.** The centre of the community will be the most accessible location, connecting the community to the rest of the local area. Around the centre will be predominantly residential areas, as well as parks, play areas and playing fields, with facilities in walking distance along safe, accessible and convenient routes.
- **Good digital connectivity** where digital, information and communication technologies are used to enhance the quality and performance of services, reduce costs, share resources, and to engage more effectively and actively with local people and businesses.
- **Character and sense of place.** Many parts of Plymouth and South West Devon are steeped in history, containing important buildings providing character and identity, located within superb natural settings. All these elements need to be respected; they are key assets in reshaping our neighbourhoods, making places where people want to live.
- **Social inclusion** where the needs of all sections of the local population for housing, transport, employment, leisure, safety and accessibility are recognised and provided for. This includes the needs of young and older people, all race and faith groups, people with disabilities and women and men (for example, the needs of parents / carers with dependent children). People also need to be able to travel by sustainable transport between communities.

3.17 Figure 3.2 below sets out a series of measures that the LPAs will use in implementing Policy SPT2 and the other policies of the plan. The measures are aspirational, in the sense that they represent sustainability outcomes that are aspired to for an area. The measures are not intended to be applied through an inflexible 'tick box' exercise to determine the acceptability or otherwise of development, given that such an approach could restrict development that is fundamentally sustainable and makes a significant positive contribution to delivering the vision and strategy of the plan. However, the measures do contribute to the overall planning judgement, including the need for appropriate mitigation. Some of these figures will be updated during the life of the plan. The most up to date standards will always be available in the evidence base documents informing the plan and the accompanying Supplementary Planning Documents.

3.18 It should be noted that the measures in Fig 3.2 do not relate to the sustainable villages of the TTV Policy Area. This recognises the more remote rural context of such settlements, which are characterised by limited provision of physical services and amenities, and may depend on a wider networks of villages to the meet their wider service requirements. Local communities are able to produce evidence and develop local policies as part of their neighbourhood planning processes to support the delivery of sustainable development in these villages.

Figure 3.2. Measures of sustainable neighbourhoods and communities

Measure	Plymouth Policy Area	Thriving Towns & Villages Policy Area - Main Towns, Towns & Key Villages	Reason for difference in standard across Plan Area
Walking distance to nearest bus stop	400m	600m	Different levels of opportunity for public transport in urban / rural contexts
Walking distance to nearest local convenience store	800m	800m	
Walking distance to nearest primary school	800m	800m	
Walking distance to nearest local accessible natural space	400m	300m	Informed by separate open space studies
Walking distance to nearest local playable space / LEAP	400m	400m	
Walking distance to nearest neighbourhood/strategic playable space	1,000m	1,000m	
Allotments / community food growing space	0.15ha per 1,000 people	0.15ha per 1,000 people	
Urban local nature reserves	1ha per 1,000 people	n/a	Urban local nature reserves have specific role in city environment
Accessible natural greenspace	5.09ha per 1,000 people	1.91ha per 1,000 people	City standard reflects urban context and need for major greenspaces to achieve liveable city
Playing pitch standard	0.79ha per 1,000 people	1.27ha per 1,000 people	City standard reflects the greater ability to achieve more intensive use of playing pitches given population densities
Access of broadband	min 25Mbps to all premises	min 25Mbps to all premises	

Policy SPT3

Provision for new homes

The LPAs will plan, monitor and manage the delivery of housing from 2014 to 2034 in accordance with the apportionment between Policy Areas, the spatial strategy and the site allocations set out in this plan. Housing provision will be made for at least 26,700 dwellings (net) in the Plan Area during the plan period 2014 to 2034, comprising the Policy Area totals and the related market housing and affordable housing provision as follows:

1. Within the Plymouth Policy Area - at least 19,000 new homes, of which 4,550 should be affordable.
2. Within the Thriving Towns and Villages Policy Area - at least 7,700 new homes of which 2,050 should be affordable.

The Policy Area housing requirements are separate and non-transferable. Only housing proposals within each Policy Area will be considered to contribute to meeting the housing requirement for that Policy Area. Any shortfall in the supply of housing sites in a Policy Area must be made up within that Policy Area, and cannot be remedied in the other Policy Area.



3.19 The provision of new homes is one of the most important elements of the JLP. At the heart of the delivery of the plan's vision is our understanding of how the population will grow and change, and what the need for new homes will be.

3.20 The NPPF sets out that local plans must contribute to meeting the objectively assessed needs (OAN) of their HMAs in full. The starting point for calculating the OAN is to use the latest national population and household projections, which are the Office of National Statistics (ONS) latest 2014 based Sub National Population Projections (SNPP May 2016). These suggest that between 2014 and 2034, population will increase across the Plymouth HMA by 35,000 people. However, the official projections only look at short term trends which include a significant period of economic recession related to the recent global economic downturn. Furthermore, they do not take account of policy-led growth aspirations such as the established growth agenda of Plymouth. It is therefore more appropriate to examine longer term trends in population growth.

3.21 For calculating the Plymouth HMA's OAN, a 10 year trend (from 2005) is considered appropriate, helping to account for different economic cycles and also the period from when Plymouth's growth agenda had become firmly established following the 'Mackay' vision for Plymouth of 2004. The projections show a growth in population of 42,800 people between 2014 and 2034 across the HMA, which equates to 20,500 households.

3.22 In order to turn this household figure into an OAN for new homes, we have also included an allowance for second homes and vacant properties, and a market uplift to allow for the high house prices in parts of the HMA and the difference between these house prices and average incomes. These lead to an OAN for the Plymouth HMA of 27,300 new homes. Dartmoor National Park Authority has indicated that its contribution to meeting the needs of the HMA will be around 600 dwellings over the plan period, and is committed to delivering this figure through its Local Plan Review. The housing requirement for this plan is therefore 26,700 dwellings.

3.23 Full details of the OAN calculation, and the approach taken by the LPAs to meeting the need for housing, are set out in the Strategic Housing Market Needs Assessment 2017 (SHMNA) and the Revised Housing Topic Paper, January 2018 and the Addendum, October 2018.

3.24 The overall housing distribution as set out in Policy STP3 has been derived having regard to the supply of sites and the principles of the spatial strategy. As a consequence, about 71 per cent of growth is directed to the Plymouth Policy Area and 29 per cent to the Thriving Towns and Villages Policy Area, consistent with the sustainability appraisal of strategic alternatives for the plan.

3.25 The housing land supply for the JLP is set out in Figure 3.3. It includes:

- A figure for dwellings already completed during the first three years of plan period (April 2014 to April 2017), the number of dwellings under construction at April 2017 and the number of outstanding committed planning permissions not started at April 2017. This information was sourced from the councils' annual residential land availability surveys undertaken in April each year.
- Sites allocated in this local plan. This only includes sites over a 0.25 hectares threshold.
- A Sustainable Villages allowance for the Thriving Towns and Villages Policy Area, which are anticipated to be delivered primarily through neighbourhood plans. At the end March 2017, 40 neighbourhood plans were being prepared in South Hams and West Devon. Some of these plans will contain site allocations, so an assessment has been made of the potential number of new homes which could come forward through these plans over the plan period, taking account of the sustainability characteristics of the villages and available sites identified in the Strategic Housing Land Availability Assessment (SHLAA) or sites proposed in neighbourhood plans. The assessment of supply excluded sites at settlements in the AONB unless the sites had received consent or were proposed in neighbourhood plans that had reached an advanced stage.
- Windfall sites. This includes sites below the site allocation threshold of 0.25 ha. as well as unallocated sites that come forward during the plan-period. The figure has been calculated to ensure that no double counting with neighbourhood plan sites has occurred.

- An allowance for planned demolitions in the Plymouth Policy Area, where large regeneration schemes will result in demolition of existing housing stock.
- An allowance for student Houses in Multiple Occupation being released back into general housing as a result of the construction of purpose built student accommodation in Plymouth.

Figure 3.3. Overall housing supply

	Plymouth Policy Area	Thriving Towns and Villages Policy Area	Plan Area
Completions 2014-17	2,705	1,394	4,099
Under construction Apr 2017	901	371	1,272
Outstanding commitments Apr 2017	8,523	3,337	11,860
Identified supply 2017-34 (site allocations)	8,412	2,861	11,273
Sustainable Villages allowance	0	550	550
Windfall allowance	602	796	1,398
Allowance for student Houses in Multiple Occupation being released back into general housing	397	0	397
Demolitions	-872	0	-872
Total supply	20,668	9,309	29,977

3.26 Local Plans must demonstrate that a five year land supply of specific deliverable sites is available at the point of adoption of the plan, measured against their housing requirements. The JLP sets out a housing requirement figure for the Plan Area as a whole as well as for the Plymouth Policy Area and the Thriving Towns and Villages Policy Area.

3.27 Detailed information on the 5 year land supply calculations is set out in the Revised Housing Topic Paper, January 2018, and the Addendum, October 2018. The target for the five year land supplies is made up of five years worth of the annualised plan requirements, plus any shortfall, or minus any residual surplus relating to the years since the start of the plan period plus an allowance of 5 per cent or 20 per cent to take account of persistent under delivery previously. Past under delivery has resulted in a buffer of 20 per cent being applied to the Plymouth Policy Area calculations in Figure 3.4. For the Thriving Towns and Villages Policy Area, a

buffer of 5 per cent is appropriate for the calculations in Figure 3.4, as no under delivery has occurred. Figure 3.4 uses these components to set out the five year land requirements for the two policy areas at the anticipated point of plan adoption.

Figure 3.4. The five year land requirements from point of adoption (April 2019 estimate)

	Steps in five year land supply calculation (forecast for 5 year period 1 April 2019 to 31 March 2024)	Plymouth Policy Area	TTV Policy Area
A	JLP requirement	19,000	7,700
B	Annualised requirement	950	385
C	Housing completions (net) 1 April 2014- 31 March 2019	4,997	2,344
Di	Shortfall/surplus against requirement since 1 April 2014 (Bx5) - C	-247	-419
Dii	Residualised surplus for next 5 years (Surplus/Remaining years) x 5 years (Di/15)x5	-82	-140
E	Five year requirement (Bx5)	4,750	1,925
F	Five year requirement with shortfall/ surplus	4,668	1,785
G	F with 20% buffer (for Plymouth Policy Area) / 5% buffer (for TTV Policy Area)	5,601	1,874
H	Deliverable supply 1 April 2019- 31 March 2024	6,050	3,416
I	Five year land supply position (20% buffer / 5% buffer) (G/ (H divided by 5))	5.4 years	9.1 years

3.28 Figure 3.4, supported by the evidence set out in the Revised Housing Topic Paper, January 2018 and Addendum, October 2018, shows that a five year land supply of specific deliverable sites can be demonstrated across the Plan Area, and for the two policy areas at the point of adoption.

3.29 The councils have also set out in the Revised Housing Topic Paper, January 2018 and the Addendum, October 2018 detailed housing trajectories. These trajectories show that a rolling five year land supply can be demonstrated for each

policy area for the remainder of the plan period. Annex 5 provides plan-monitor-manage graphs illustrating the 2017 Monitoring Point trajectories for the whole plan and policy areas.

3.30 The analysis summarised above and set out in detail in the Revised Housing Topic Paper, January 2018 and the Addendum, October 2018 shows that:

- At the point of adoption of the JLP, five year land supplies can be demonstrated against the housing requirement targets for the Plan Area (6.1 years), the Thriving Towns and Villages Policy Area (9.1 years) and the Plymouth Policy Area (5.4 years), including a 5 per cent and 20 per cent buffer respectively.
- Trajectories setting out projected housing delivery for the plan period up to 2034 show a rolling five year land supply can be demonstrated each of the two policy areas.
- The JLP shows a total supply of 29,977 dwellings against the plan requirement of 26,700 dwellings - a surplus of 3,277 dwellings demonstrating a flexible supply which will meet the target in full. When this supply is considered against the OAN of the Plymouth HMA, and taking into account the commitment of Dartmoor National Park to deliver 600 new homes over the plan period, this demonstrates a flexible and deliverable supply of new homes which will meet the needs of the HMA in full.

3.31 The housing land supply set out above will provide a significant amount of growth which will assist in delivering a supply of affordable housing to meet needs across the Plan Area. The SHMNA also sets out that there is a need for 6,600 affordable homes across the Plan Area, which is distributed across the Plan Area, with 4,550 affordable homes in the Plymouth Policy Area and 2,050 affordable homes in the Thriving Towns and Villages Policy Area.

3.32 The LPAs will monitor housing delivery against the strategy set out in the JLP, and particularly against the five year land supply and housing trajectory calculations. These trajectories reflect information from developers and the building industry about anticipated delivery rates on a site by site basis.

3.33 The JLP's Housing Implementation Strategy: In addition to the strategy set out in the JLP, the LPAs will undertake proactive actions to assist developers to bring sites forward as effectively and efficiently as possible. For example, these could include:

- Working with house builders / landowners, to identify the main causes of supply problems and where appropriate to act on feedback received to remove obstacles to delivery.
- Production of planning briefs or site planning statements to increase certainty for developers on the progression of sites through the planning process.
- Regular meetings with stakeholders using an 'account manager' approach to drive delivery of the major developments.

- Working with developers and the councils' own viability specialists to find innovative solutions to viability issues on major sites.
- Continuing to use proactive pre-application discussions with developers, landowners and their agents to increase certainty in the development management process.
- Prioritising the use of public sector land and the proactive use of the councils' powers to acquire land, as has been done effectively in Plymouth through the Plan for Homes and One Public Estate programme.
- Seeking public sector intervention and potential funding streams through the Homes and Communities Agency.
- Maximising the use of Starter Homes funding to bring forward difficult to deliver sites.
- Ensuring the effective and efficient passage of applications through the development management process across all three LPAs.

3.34 The JLP will be reviewed every five years, enabling a regular examination of housing delivery against up to date assessments of need and updated plan targets. In addition, should monitoring reveal significant under delivery against targets, a full or partial local plan review could be triggered to bring forwards a new approach.

Policy SPT4

Provision for employment floorspace

The LPAs will provide for a net increase of at least 375,208 sq.m. of employment floorspace land within the plan period (equating to approximately 82 ha. of land) to ensure that land is available in sufficient quantity and of the right quality to drive the economic growth of the city and support the prosperity of rural South West Devon.

Within the Plymouth Policy Area provision will be made for at least:

1. B1a offices - 111,600 sq.m., with the City Centre as the primary location for new office development and Derriford as a secondary location.
2. B1/B2 industrial - 61,100 sq.m.
3. B8 storage and distribution - 118,700 sq.m.

Within the Thriving Towns and Villages Policy Area provision will be made for at least:

1. B1a offices - 28,900 sq.m., with town centres identified as the primary location for new office development.

2. B1/B2 industrial - 21,700 sq.m.
3. B8 storage and distribution - 33,100 sq.m.

Langage Strategic Employment Site will continue to play a strategic role in meeting the employment land needs of the Plan Area in relation to B1b,c, B2 and B8 employment uses.



3.35 Economic forecasts which have been prepared alongside the review of the OAN for housing and the preparation of the SHMNA suggest that around 13,200 additional jobs will be generated in B-use class industries in the period up to 2034. It should also be noted that significant numbers of jobs will also be created by businesses and organisations that are not classified as traditional industrial 'B use' classes. For example, retail and service businesses, the health sector and residential institutions will all come forward during the plan period and create jobs which will be available to people living in the area. Policy SPT4 does not make provision for these developments, but the jobs created, currently estimated at about 7,200 jobs, will clearly contribute to the growth and creation of sustainable communities across the Plan Area. In total, the plan supports the creation of an additional 20,400 jobs.

3.36 There is inevitably a level of uncertainty over such a long time period and it is possible that the level of new homes being provided may support more jobs or that the economy grows faster than expected. It is also possible that the economy will grow at a slower rate. Nevertheless, the employment forecasts show that the amount of housing being planned through the JLP enables Plymouth to continue to grow, whilst also enabling the development of local employment opportunities and the creation of sustainable rural communities in the Thriving Towns and Villages. Accommodating these jobs will require land to be allocated and the plan sets a requirement of at least 312,700 sq.m. of employment floorspace across the Plan Area.

3.37 The minimum employment floorspace requirement has been distributed between the policy areas based on the following principles:

- Ensuring that employment land is available to provide employment opportunities for people living in the new homes.
- Focusing employment growth on the Plymouth Policy Area, recognising the City's ambitions for economic transformation and growth, and that Plymouth provides the largest concentration of employment and housing growth opportunities in the HMA.
- The need to maintain the vitality and viability of and a level of self containment for the main towns and villages. In town centres this will ensure that the centres remain successful hearts for their communities, and in smaller rural

communities ensure that sites of an appropriate scale exist for employment opportunities to come forward, providing choices for people to work without travelling to the larger settlements.

3.38 Policy STP4 further breaks down the employment land targets reflecting the different characteristics and requirements of businesses in each category. In relation to B1a offices, the plan supports a centres-first approach, to optimise the wider regeneration value of office development and the support that it provides to the viability and vitality of centres. There is greater flexibility over the location of B1b and c uses given their greater compatibility with residential locations, although much of this development will be in business park formats. B2 and B8 uses tend to be best located on traditional industrial estates, and large scale uses (especially B8) often require locations with good access to transport links including the strategic trunk road network.

3.39 Figure 3.5 summarises the assumed employment land supply totals across the Plan Area. It should be noted however that Langage, which has potential to provide at least 243,000 sqm of B1b,c, B2 and B8 employment floorspace (see Policy PLY51), is not included in this table. This is in acknowledgement of the unique strategic nature of the site to the Plan Area, with the plan's primary aim for Langage being to identify and protect the opportunity for strategic employment investment. The site is considered to be in a category of its own, supporting the Plan Area as a whole rather than either particular policy area.

3.40 At face value there appears to be a surplus of potential new employment of sites, with the possible exception of B8 land in Plymouth if Langage is excluded from the calculation. However, it should be noted that many of the planning consents in the supply chain are not restricted to particular employment Use Classes, so where this is the case an equal distribution of floorspace across the categories has been assumed. This is particularly significant in relation to the planning consent for the Sherford new community, which provides for 67,000 sq.m. of employment floorspace unrestricted across the B Use Classes.

3.41 The supply side figures also need to be interpreted with caution for the following reasons.

- There is a need to allow for likely vacancies and churn in the supply, and for a supply of sites in terms of location, quality and suitability to allow for market choice.
- Much floorspace is tied up in planning consents relating to the delivery of developments which will take place over many years, including Sherford, Seaton Neighbourhood, Millbay and Saltram Meadow in the Plymouth Policy Area.
- Non-delivery of consented employment consent needs to be allowed for.
- Langage itself is a complex project to deliver needing major infrastructure investment to realise its full potential.

3.42 Careful monitoring of employment land delivery is therefore going to be of importance to ensure that employment land delivery keeps pace with demand for new sites.

Figure 3.5 - Employment Land Supply (sq m)

	Plymouth Policy Area			Thriving Towns and Villages			Plan Area
	B1a office	B1/B2	B8	B1a office	B1/B2	B8	All B uses
Completions 2014-17	5,587	4,130	15,728	1,351	6,479	4,443	29,728
Outstanding Permissions Apr 2017	35,249	82,957	26,355	2,302	12,715	4,730	164,308
Allocated Sites	96,366	38,160	9,540	28,910	64,630	56,310	293,916
Total supply	137,473	116,987	51,623	32,563	83,824	65,482	487,953

Note: To prevent double counting, any completions and outstanding permissions relating to allocated sites are included in the Allocated Sites row.

Policy SPT5

Provision for retail development

Proposals which meet compelling 'qualitative' needs for retail development will be considered favourably. In particular these types of need include:

1. In support of the principle of sustainable linked neighbourhoods and sustainable rural communities, allowing for a small scale local convenience shop in locations where there is no other such shop within a reasonable walking distance of a residential area.
2. Within the Plymouth Policy Area:
 - i. Continued improvement of the overall provision of retail floorspace within the City Centre, to protect and strengthen its regional shopping role.

- ii. New food retail and complementary non-food retail within the proposed Derriford district centre, to meet an identified gap in food shopping in the city, provide services which support the wider economic, education and health role of Derriford, and be a catalyst to the creation of a new heart and focal point for the communities in the north of Plymouth.
- iii. New food retail on the western side of the city, to meet an identified gap in food shopping in the city.

Limited objectively assessed 'quantitative' need for new retail floorspace exists within the Plan Area until after 2026. No sites are allocated in this plan to meet this limited need. Instead, applications for new retail floorspace will be considered as brought forward by the market in accordance with the provisions of policies SPT6, DEV15, 16, 17 and 18.



3.43 The findings of the Plymouth 2017 Retail Study and the South Hams and West Devon Retail and Leisure Study 2017 show a limited quantitative need for new retail floorspace across the Plan Area until after 2026. Figure 3.6 breaks the calculated quantitative need over the plan period into 5 year periods. It shows that there is either negative or limited quantitative need until 2026 for both convenience goods and comparison goods over the whole Plan Area. Quantitative need only becomes available at 2026 and is still relatively limited at that point particularly for convenience goods. (Please note that the reduction in 2021 capacity figure for Thriving Towns and Villages is due to retail commitment being factored into future years in the retail study rather than from the base 2016 figure).

3.44 Advice from the studies sets out that retail needs forecast for more than 10 years from the date of the assessments are unreliable and should not be used as a basis for planning future provision. These documents take account of population growth forecasts, detailed surveys of the retail catchments the centres and stores serve, shopping patterns, and the impacts of recent planning consents for retail development. Clearly, retail trends can change dramatically over relatively short periods of time - as has recently been seen over the past 10 years, when retail needs assessments have drastically reduced as a result of the recession and changes in the industry. Shopping patterns can also change fundamentally, as has been seen with the changes to the food retail sector and the rise of the discount operators.

3.45 The JLP does not therefore specifically allocate sites to meet these longer term, less reliable quantitative figures, but instead relies primarily on policies to assess retail proposals on their merits in accordance with the retail and other policies of the plan. Retail capacity studies will be updated every 5 years to ensure that the LPAs have an up to date understanding of needs and can respond to any changes in short term requirements at the next review of the JLP.

3.46 Consideration is also given to where there is a qualitative justification for development. This is most notably the case in relation to access to main food shopping facilities and local convenience stores, but also to ensure that wider retail and planning objectives are delivered, including most significantly protecting and strengthening the City Centre's regional shopping role as well meeting the new for a new heart for the north of Plymouth at Derriford (see also Policies SPT6 and PLY38).

3.47 Furthermore, it is important that everyone has access to good quality shopping facilities and in particular good quality food. Access to fresh food within neighbourhoods and local communities is an important determinant of health as well as contributing to sustainable patterns of movement and the creation of strong communities. A sustainable community should have good access to a local convenience store within reasonable walking distance of residents and an appropriate level of provision of shops and non-retail services.

Figure 3.6. Retail capacity (sq.m. floorspace, net)

Convenience	2016	2021	2026	2034
Plymouth	-1,220	-480	244	1,923
South Hams	250	180	380	410
West Devon	950	-270	-20	310
Total Thriving Towns and Villages	1,200	-90	360	720
Total Plan Area	-20	-570	604	2,643
Comparison	2016	2021	2026	2034
Plymouth	-16,495	-13,731	386	26,161
South Hams	1,900	1,690	3,550	6,900
West Devon	1,550	2,150	3,930	7,100
Total Thriving Towns and Villages	3,450	3,840	7,480	14,000
Total Plan Area	-13,045	-9,891	7,866	40,161

Policy SPT6

Spatial provision of retail and main town centre uses

The provision of new retail floorspace and other main town centre uses will be positively planned for having full regard to the following sequential hierarchy of centres.

1. Plymouth City Centre is a regional centre and the primary centre for the Plan Area in relation to major comparison goods shopping and town centre uses.

2. For the Plymouth Policy Area:
 - i. A new mixed use district centre proposed at Derriford - which is complementary with the role of the City Centre.
 - ii. Existing district centres - primarily main food / convenience shopping and other retail and services as appropriate to role of the centre.
 - iii. Existing and proposed local centres - primarily for top-up food shopping and local services.

3. For the Thriving Towns and Villages Policy Area:
 - i. The town centres of the Main Towns - primarily main food / convenience shopping and other retail and services as appropriate to role of the centre.
 - ii. Retail and community centres of the smaller towns and larger villages - primarily for top-up food shopping and local services.



3.48 The policy identifies a centres-first approach to retail and other town centre uses. The NPPF contains a definition of 'main town centre' uses which includes retail but which also extends to uses such as leisure, entertainment uses, offices, arts and culture and tourism development.

3.49 The starting point for locating new development is the hierarchy of centres. This does not preclude all forms of out-of-centre development, but it does set in place a strong policy direction that will help underpin the viability and vitality of centres and deliver development which is in the most sustainable and accessible locations.

3.50 The policy gives overall primacy to the regional and sub-regional shopping role of Plymouth City Centre.

3.51 Within the Plymouth Policy Area, the hierarchy is then built around district and local centres. The primary function of a district centre will be to provide a range of shopping needs to a district of the city, with provision especially for weekly shopping trips. A local centre will serve a neighbourhood or group of neighbourhoods to meet daily and top-up shopping needs. Additionally, a shopping centre will also have the function of providing a social heart for its community, where a range of facilities are provided to encourage visitors to the centre and enhance the vibrancy and vitality of the area.

3.52 The proposed new district centre at Derriford has a particular place in the retail hierarchy. This is considered to be a strategically significant shopping opportunity as part of the wider growth plan for Plymouth. It will address a gap in shopping provision,

respond to major population growth planned for in the north of the city and over trading of nearby superstores, provide important services to support existing employment uses and help attract new businesses to the Derriford area, and be a catalyst for wider regeneration to put a new heart into the north of Plymouth.

3.53 The centres which make up the retail hierarchy in the Thriving Towns and Villages follow the settlement hierarchy which is explained in more detail in Section 5. The higher level centres are the Main Towns which form the highest level of the settlement hierarchy, and these town centres include a wide range of facilities and shops which meet most needs of the residents of the towns and their hinterlands. The next level of the retail hierarchy represents the centres of the towns and larger villages, where the smaller centres still provide shops and facilities which meet day to day needs and which underpin the role and health of these settlements. Although many smaller settlements will also have village centres, and some local shops, these are not of a sufficient size to be designated as retail centres.

3.54 The retail hierarchy for the Plan Area is shown in Figures 3.7 and 3.8, while the distribution of centres across the Plymouth Policy Area is illustrated in Figure 3.9. Other policy principles for guiding the location of retail and town centre uses, including in relation to out-of-centre development, are set out in Section 6.

Figure 3.7. Retail hierarchy in Plymouth Policy Area centres

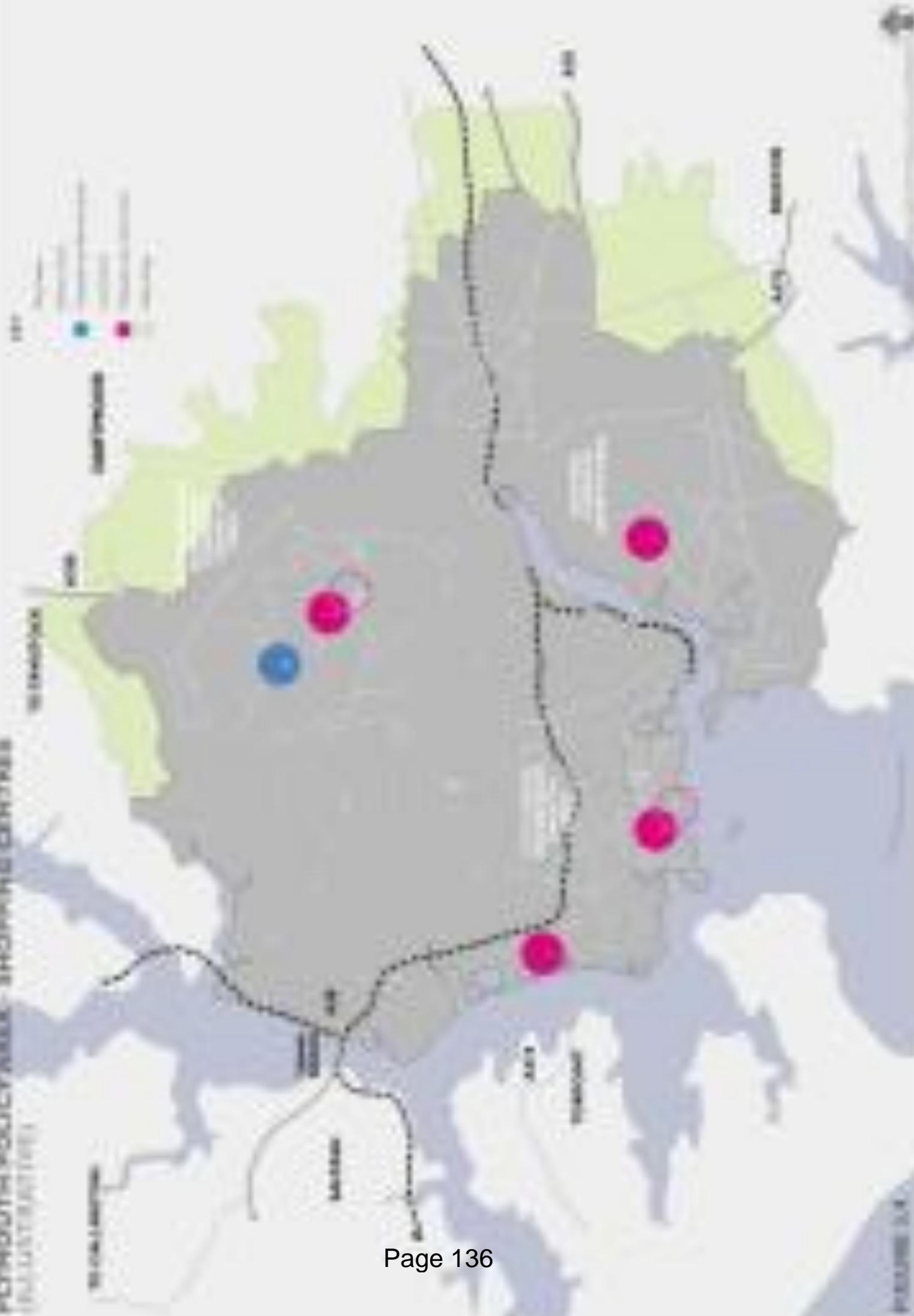
City Centre (regional / sub-regional)		
Plymouth City Centre		
District Centres (main food / convenience shopping and other retail and services as appropriate to role of the centre)		
Estover	Mutley Plain	Plympton Ridgeway
Plymstock Broadway	Roborough	St Budeaux
Transit Way	Derriford (Proposed)	Sherford town centre (proposed)
Local Centres (daily / top-up food / convenience shopping and local / neighbourhood level services)		
Albert Road	The Barbican (part of core tourism area)	Chaddlewood
Colebrook	Crownhill	Cumberland Street
Delamere Road	Ebrington Street	Efford
Elburton	Embankment Road	Ernesettle
Glenholt	Ham Green	Higher Compton
Honicknowle Green	Hooe	Hyde Park Road

Leigham	Marlborough Street	North Prospect
Oreston	Peverell Corner	Peverell Park Road
Salisbury Road	Southway	Stoke Village
Stone Barton	Tamerton Foliot	Union Street
Upland Drive	Victoria Road	West Hoe
West Park	Whitleigh Green	Wolseley Road
Seaton neighbourhood (proposed)	Woolwell	Millbay (proposed, part of core tourism area)
Plymstock Quarry (proposed)	Keyham (proposed)	Sherford local centres (x3) (proposed)

Figure 3.8 Retail hierarchy in Thriving Towns and Villages Policy Area Centres

Town centres of Main Towns (main food/convenience shopping and other retail and services as appropriate to role of the centre)		
Dartmouth	Ivybridge	Kingsbridge
Okehampton	Tavistock	Totnes
Retail and community centres of the towns and larger villages* (daily/top-up food/convenience shopping and local/neighbourhood level services)		
Bere Alston	Dartington	Hatherleigh
Modbury	North Tawton	Salcombe
Yealmpton		

*Retail and community centres of the towns and larger villages are Local Centres in the retail hierarchy



Policy SPT7

Working with neighbouring areas

The LPAs will work closely with neighbouring local authorities to ensure that opportunities for economic growth and the creation of sustainable patterns of development are realised across boundaries, and that infrastructure needs are planned for collaboratively and effectively. In particular, we will:

1. Cooperate with Cornwall Council in ensuring that the strong links between South East Cornwall and Plymouth are recognised in relation to transport and infrastructure planning, and that the towns in South East Cornwall are planned to maximise the benefits brought by the economic growth of Plymouth.
2. Cooperate with the Greater Exeter Authorities to draw out the complementary economic strengths of Plymouth and Exeter in the delivery of local plans for both areas and recognising that Okehampton is located within the Exeter Travel to Work Area.
3. Cooperate with Devon County Council to ensure strategic cross boundary issues in relation to education, transportation, minerals and waste are appropriately planned for, and to ensure the infrastructure requirements of South West Devon as reflected in the local plan are delivered.
4. Cooperate with Dartmoor National Park to ensure delivery of the needs of the HMA whilst protecting the special qualities of the National Park.
5. Cooperate with Torbay to recognise the close relationship between Totnes and Torbay, and to keep under review the potential for the future development needs of Torbay to be accommodated in parts of South Hams.
6. Enhance links with the North Devon / Torridge Joint Local Plan to ensure that any future cross boundary issues are identified.
7. Cooperate with the Marine Management Organisation to ensure that decisions affecting the marine environment have due regard to the Marine Policy Statement and the emerging Inshore and Offshore Marine Plans for the South West and South.



3.55 Plymouth and South West Devon do not exist in isolation. They have close relationships with neighbouring areas to the north, west and east. In fact, it is recognised that the definition of the HMAs of Devon and Cornwall do not always reflect some of the 'real world' relationships between places in Devon and Cornwall. For example, there are five Travel to Work Areas in the Plymouth HMA:

- Plymouth (covering the city as well as large parts of South Hams, including Ivybridge, large parts of West Devon, including Tavistock and west Dartmoor, and parts of Cornwall including the Rame Peninsula, Torpoint and Saltash);
- Exeter (covering northern parts of West Devon, including Okehampton and small parts of South Hams south-west of Newton Abbot);
- Torquay and Paignton (covering some eastern parts of South Hams, including Totnes, Marldon and Kingswear);
- Kingsbridge and Dartmouth (covering the remaining parts of South Hams, south of Totnes and between the Dart and Erme estuaries); and
- Launceston (covering some western parts of West Devon, including Lifton).

3.56 It is clear that residents living in Okehampton and surrounding areas have close links with Exeter, and that residents living to the east of Totnes have close links to Torbay. Conversely, it is also clear that there are similar close links between Plymouth and the towns and settlements of South East Cornwall, as set out in the Baseline Transport Conditions report.

3.57 Particular challenges exist in relation to links from Cornwall. Movements across the Tamar are constrained by the capacity of the bridges and the ferries. Capacity on the Tamar road bridge is managed through the use of a traffic flow system, but this means that capacity out of the city in the mornings and into the city in the evenings is sacrificed to accommodate commuter flows into Plymouth in the mornings and out of Plymouth in the evenings. The bridge is currently coping, as is the ferry link, but it and the wider strategic road network is vulnerable to incidents and increases in demand, which have implications for the role South East Cornwall is able to play in supporting sub regional growth and particularly in regards to accommodating new homes and jobs to meet the needs of the HMA. This will need continual monitoring through the strategic planning processes in Cornwall, Plymouth and South West Devon. Additionally, provision will need to be made for further transport investment on Plymouth's western approaches, including potentially new park and ride and park and rail sites and a co-ordinated sustainable transport programme in Cornwall and Plymouth which provide genuine sustainable alternatives to single occupancy car travel.

3.58 Positive engagement has taken place between the LPAs and adjoining authorities over many years, including through the Devon Structure Plan, the South West Regional Spatial Strategy, Plymouth and South East Cornwall Transport Strategy group, which continues through the Transport Strategy Working Group, and later through the local development frameworks and local plans. The JLP seeks to be supportive of the aspirations of neighbouring areas which are summarised below:

- **Dartmoor National Park** – Balance conservation of the protected environment with the provision of housing to meet local needs.
- **Cornwall** – Supporting economic development in South East Cornwall to meet the area's own needs and recognise the opportunities from the growth of Plymouth as a major urban centre.

- **Torbay** – To secure balanced economic growth and recovery, improving connectivity, protecting and enhancing the superb environment and creating sustainable communities
- **Greater Exeter Authorities (Exeter, Teignbridge, East Devon, Mid Devon)** - Coordinating the strategic planning of the Greater Exeter area and delivering the best possible outcome for the provision of homes, jobs, and infrastructure.
- **North Devon and Torrington HMA** - To enable the delivery of infrastructure, jobs, accessible local services and housing for future generations while supporting the world-class environment of the Biosphere Reserve.

3.59 Additionally, the LPAs will cooperate with the Tamar Valley and South Devon AONB Partnerships in the implementation of the plan's policies for conserving the landscape and scenic beauty of the AONBs. Furthermore, given its roles and responsibilities for planning and infrastructure in the Plan Area - especially for the TTV Policy Area and the Plymouth urban fringe within South Hams - Devon County Council has played a key role in the preparation of the plan and will continue to do so in relation to its implementation.

3.60 Given its coastal character, the LPAs will work with the Marine Management Organisation to implement the requirement under the national Marine Policy Statement to integrate marine planning and terrestrial planning in particular to support the development and delivery of the Inshore and Offshore Marine Plans for the South West and for the South. The LPAs will also work across boundaries with the MMO to ensure the delivery of the objectives of the South Devon Heritage Coast which includes areas of terrestrial coast and coastal waters out to 2km. The objectives of the South Devon Heritage Coast are set out in the South Devon AONB Management Plan.

Policy SPT8

Strategic connectivity

The quality and resilience of Plymouth and South West Devon's transport and digital connectivity to the rest of the country and to global markets will be protected and enhanced as set out below:

1. Safeguarding until the five-year review of this plan the opportunity for the potential future re-use of Plymouth airport as a general aviation airport, whilst at the same time strengthening transport links to Exeter and Bristol airports.
2. Supporting the expansion of port activities in Plymouth with modernised and accessible port infrastructure, and safeguarding the existing port infrastructure, including the mineral wharves and fishing industry facilities.

3. Supporting investment that enhances the resilience of the rail network to extreme weather events and delivers improvements to capacity, frequency and journey times from London and the rest of the country. Measures will include:
 - i. Delivering major improvements to Plymouth railway station to enhance its capacity and attractiveness as a regional hub station and gateway to the city.
 - ii. Improving connectivity and supporting the development of future rail freight opportunities between Cornwall, Plymouth, Exeter and the rest of the country.
 - iii. Supporting an additional route between Exeter and Newton Abbot that improves resilience and journey times and the re-opening of the Northern Route between Plymouth and Exeter via Tavistock and Okehampton.
 - iv. Supporting improvements to local rail connectivity and links between Tavistock and Plymouth and Okehampton and Exeter.
4. Supporting investment in the strategic road networks that connect Plymouth and South West Devon to wider markets, both to the east and to the west, into Cornwall, including in the Plan Area:
 - i. Delivering major improvements on the intersections of the city and the A38 including Deep Lane, Marsh Mills, Forder Valley, Manadon and St Budeaux.
 - ii. Ensuring the A38 is modernised to be as well designed as motorways and which is able to offer the same standard of journeys to users.
5. Building upon Plymouth and South West Devon's digital connectivity ensuring that growth and change reflects the need to create high quality and technologically advanced methods of communication for businesses and residents as well as a network of shared and open data, which enables strategic decision making and unlocks barriers to strategic connectivity with the rest of the world.



3.61 The strategic connectivity of Plymouth and South West Devon to the wider economy of the UK and indeed to global markets is vital to delivering a strong economy. A multifaceted approach is needed. This includes addressing connectivity at all levels - including air, sea, rail, road and digital.

3.62 The importance of strategic connectivity to the wider region has been highlighted by both the Heart of the South West Local Enterprise Partnership (HoSW LEP) and the Cornwall and Isles of Scilly Local Enterprise Partnership. By 2030 the HotSW LEP's Strategic Economic Plan (SEP) aims to have improved the resilience of the region's road and rail infrastructure to bad weather events, and to achieve full dualing of the A303/A30 corridor, rail journey times from London to Plymouth of less than 2 hours 30 minutes and 100 per cent coverage of superfast broadband and mobile. The strategic connectivity routes and key issues highlighted in the HotSW LEP's SEP are shown in Figure 3.10.

3.63 Aviation remains an important element of strategic connectivity looking into the future. Plymouth Airport closed in 2011, but the policy safeguards the opportunity for the re-opening of Plymouth airport for general aviation until the next plan review when the site will receive a specific land use allocation. This time limit is identified to provide sufficient time for a private-sector led business plan to be finalised and put into action to deliver aviation use at the site. This is considered a reasonable approach to such a significant strategic asset for the city and the region. Once a unique site and facility of this nature is gone, it is gone forever with no prospect of air services being restored to Plymouth in the future. It is therefore incumbent upon the City to provide the maximum opportunity to restore aviation use to the site. Current evidence provides the LPA with sufficient confidence that a deliverable proposition can be achieved, but the time limit will guard against any long term risk that the site is left unused for the entirety of the plan period. This local plan will be reviewed on a five-year cycle, providing an early opportunity to consider progress. Regardless of the final outcome, it will also be important to improve links to other regional airports - particularly Exeter, as the closest and most accessible significant airport, and Bristol, as the major regional airport for the south west.

3.64 The Port of Plymouth is comprised of four separate harbour authorities – Cattewater, Sutton Harbour, Millbay and Devonport – and collectively they represent one of the South West's and UK's largest and most diverse ports. Whilst the harbour authorities act independently they do have inter-related roles which have a significant combined impact on local, regional and national economic development and transport and, in the case of Devonport, also on national defence capability.

3.65 Plymouth's ports handled over 2.2 million tonnes of cargo in 2015, up from 2.09 million tonnes in 2014. Plymouth's fishing fleet landed more fish than any other port in England, bucking the national decline. In 2015 13,378 tonnes of fish and shellfish, worth £15.461 million was landed in Plymouth. International ferry services operate from Plymouth's Millbay Docks, with a one or two services per day to Roscoff in Northern France and a weekly service to Santander in Northern Spain. 449,000 ferry passengers travelled through Plymouth in 2015, making it the UK's eighth most important passenger ferryport,

3.66 There are three Harbour Authorities in the South Hams: South Hams District Council for the Salcombe-Kingsbridge Estuary; Dart Harbour and Navigation Authority (DHNA) for the Dart Estuary; and the The River Yealm Harbour Authority (RYHA) for the Yealm Estuary. Their jurisdictions lie within the South Devon AONB. The South Devon Heritage Coast also covers the more coastal extents of all these Harbour Authorities' jurisdictions.

3.67 The Salcombe-Kingsbridge Estuary is a Site of Special Scientific Interest and is also the Plan Area's only Marine Local Nature Reserve, which is a statutory designation. Salcombe is predominantly a leisure harbour with an active shellfishing fleet but there are no commercial shipping movements. Dart Harbour, also within the South Devon AONB, is a Trust Port used by local fishing vessels and naval shipping. It is also a stopover for smaller cruise ships and private luxury yachts. The Yealm Estuary is part of the Plymouth Sound and Estuaries Special Area of Conservation (SAC). The Yealm Harbour is predominantly a leisure harbour, although there are commercial shellfisheries interests operating in the estuary.

3.68 The need to enhance resilience of the rail network, to reduce journey times and increase capacity is a particular challenge for the entire region. Work undertaken by Network Rail predicts that the line at Dawlish will be subject to significant closure once in every four years by 2065 if no action is taken, compared with once in 10 years in 2016. In relation to journey time, mainline rail journeys to London from Plymouth are slower than to all other English cities with over 100,000 population, and clearly this is an issue for the entire Plan Area. Independent academic research by the University of Bath and verified by the University of the West of England has estimated that for every one hundred minutes of travel time from London, productivity reduces by six per cent. On that basis, a package of measures to reduce average rail journey times to the capital by 45 minutes could add about £1 billion to the peninsula economy. The value in rail investment is corroborated by Peninsula Rail Task Force research which shows that a 26 minute reduction in journey time to Penzance can realise £7.2bn in GVA and £1.1bn in direct transport benefits (over 60 years). Rail travel in the South West has seen passenger growth of over 133 per cent over the last 21 years (The Office of Rail and Road footfall data), twice the national average and consistently outstripping rail industry forecasts, meaning that future planning for capacity is inaccurate. Combined with the 32 years old (average age) rolling stock in use locally that will not meet interoperability regulations by 2020 there is a real need for investment in new trains for the region.

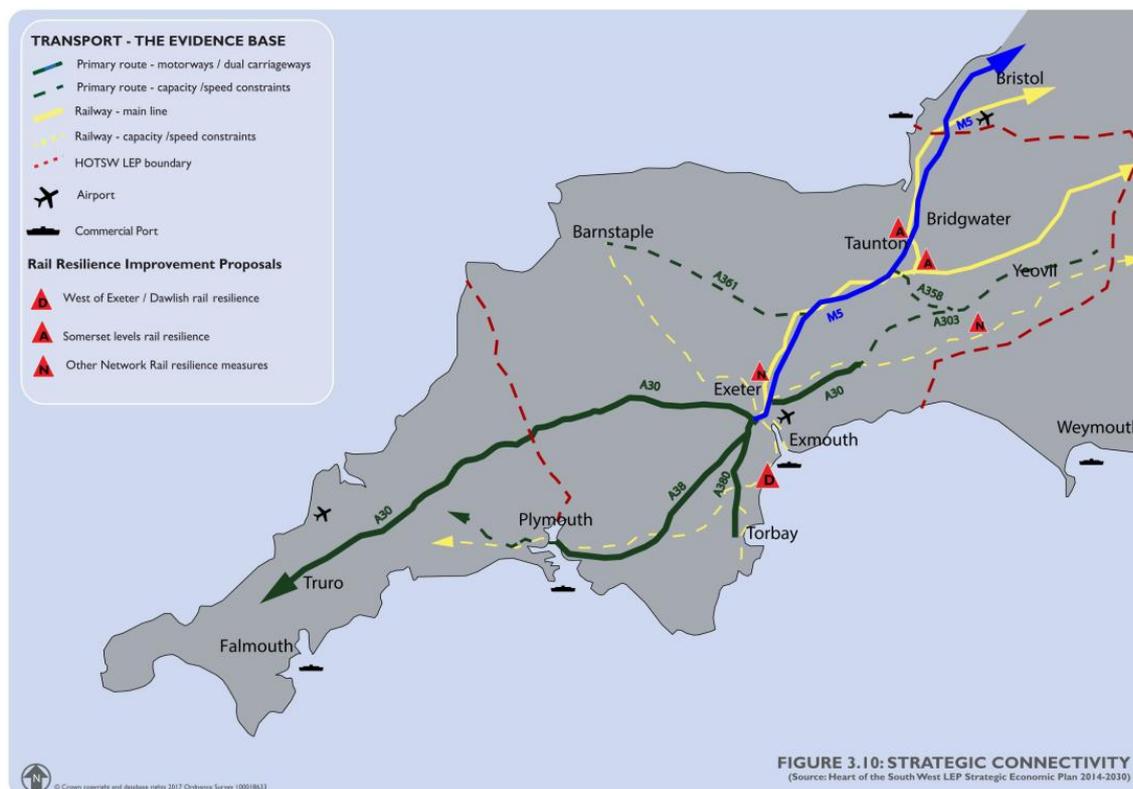
3.69 The opportunity exists to make better use of the rail networks in the sub region, through the realisation of the Plymouth Metro, with the city at its hub, within a wider Devon Metro strategy and including taking advantage of plans to re-open the local rail link to Tavistock as an initial step to reinstating the Plymouth to Exeter route via Tavistock and Okehampton. For example, a particular benefit could be a new Tavistock to Newton Abbot, via Plymouth, service, which not only mirrors the principles of the improvements seen on the comparable Devon Metro Paignton to Exmouth, via Exeter, service but also connects the two networks at Newton Abbot. These new and improved links could open up the opportunity to explore funding options for new stations both to the east and west of the city. As part of developing a Plymouth Metro service the feasibility of new stations at locations such as Plympton and East Cornwall could be assessed. Large numbers of people in the region work in Plymouth, and improving opportunities for them to travel by rail will reduce road congestion and benefit the economy of the wider area. Additionally, Cornwall Council, Cornwall & Isles of Scilly LEP and Network Rail investment in signalling and through a franchise commitment, will enable stations in Cornwall to be connected to Plymouth by two trains an hour from December 2018.

3.70 To support the planned growth of the JLP area and maintain its competitiveness both regionally and nationally there needs to be resilience in the strategic road network, a reduction in journey times and improved journey time reliability. This, however, is a challenge for the entire region.

3.71 Key to the realisation of growth, is the role of the A38, part of the strategic road network managed by Highways England, which provides a vital link for Plymouth from the rest of the country, particularly the South East the Midlands and on into Cornwall. To ensure that goods and services can be delivered efficiently and reliably, and therefore crucial to the growth of the city, the JLP seeks partnership working between all the relevant highway authorities to bring forward the modernisation of the A38 providing improved standards of performance that can be relied upon to be as well-designed as motorways and which are able to offer the same standard of journey to users. The A38 through Plymouth is the second busiest section on the route and also the least reliable in terms of journey time reliability and therefore major improvements on the interchanges within the JLP area are needed including: Deep Lane, Marsh Mills, Forder Valley, Manadon and St Budeaux.

3.72 The LPAs will support and work in partnership with the local highway authorities, and with Highways England which has a national commitment to 'support economic growth, providing the conditions that help businesses to succeed and grow, facilitating new development around the network, and supporting investment and trade. This will take place alongside maintaining a safe and efficient Strategic Road Network'. (*para. 8, Planning for the future – working with Highways England 2015*)

3.73 High speed digital connectivity has been, and will continue to be, an increasingly important facility for business and residential property occupants as well as those on the move. It is important therefore that growth and change, in the built environment in particular, fully reflects this.



Policy SPT9

Strategic principles for transport planning and strategy

The LPAs and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver an integrated approach to transport and planning, based upon the following key principles.

1. Sustainable growth as a key driver behind the transport strategy, whilst making sure that transport is delivered in the most health promoting and environmentally responsible manner.
2. Focussing major growth on accessible locations, where high quality sustainable travel can be more effectively promoted, with clear priorities for routes to and from the city's three Growth Areas to balance the competing demands for highway space.
3. Managing the need to travel, by having a balanced distribution of land use within the city and towns.
4. Seeking to reduce the impact of severance caused by transport networks, enabling more journeys by walking, cycling and public transport and providing genuine alternative ways to travel from home to work and other facilities.
5. Providing realistic sustainable transport choices and increasing the integration of transport modes so that people have genuine alternative ways to travel.
6. Getting the most out of existing transport networks, through measures that improve network efficiency and encourage behavioural change, with major infrastructure projects only where there are no better alternatives.
7. Supporting economic and housing growth with major transport infrastructure projects where there are proven benefits, so that transport links are not a barrier to planned development and pinch points on the network are alleviated.
8. Adopting a hierarchy of transport modes and routes based upon different spatial settings.
9. Delivering transport projects which provide a safe and effective transport system, as well as supporting place shaping and healthy community objectives, as guided by the hierarchy.
10. Taking local control of our transport future, embracing localism, generating independent resources to transform transport investment, and embracing changes in travel technology.
11. Partnership working, with local and regional partners, realising greater benefits over the life of the plan and beyond.



3.74 The policy recognises that transport and planning needs to be undertaken in an integrated way in order to support sustainable growth, which is not just an important local objective but is a national priority, particularly in relation to tackling the UK's major shortfall in housing delivery.

3.75 There are many detailed objectives that an area transport system should seek to satisfy, and it is important to set out in policy the overarching strategic principles that will drive the approach taken.

3.76 The policy recognises that local communities are well placed to identify transport issues and solutions for their area. One way this can be done is through neighbourhood plans. The framework established by the policy seeks to guide local communities in identification and promotion of appropriate sustainable transport options for their communities. It also seeks to ensure that development takes place in the most sustainable and efficient locations in relation to supporting sustainable transport choices, and delivers balanced growth that minimises the need to travel by providing easy access to community amenities, leisure opportunities and our high quality natural environment by sustainable transport.

3.77 Plymouth and the main towns provide the most sustainable locations for major development. They offer the greatest potential to provide genuine choice for people to travel by a range of modes. By delivering most growth in the city and towns rather than in the countryside, the overall impacts of travel are minimised by shortening the length of journeys.

3.78 The policy also gives support for a robust process to identify and protect opportunities which could be critical in developing infrastructure to widen transport choice. By prioritising focus on the provision of realistic sustainable transport, people will be given a wide range of travel choices and options which will help encourage mode shift for some journeys and will free up capacity on our existing networks, helping deliver growth, as well as facilitating access to local employment, education and training and building a strong economy. Through the JLP we will look to deliver a seamless, integrated transport network, in accordance with the Government's Door to Door Strategy, which meets the needs of the JLP community regardless of age, gender, wealth and physical mobility.

3.79 An important element of implementing the policy will be the hierarchy of transport modes, which considers the diverse transport priorities as they relate to different spatial settings. This is set out and explained below:

FIGURE 3.11: ILLUSTRATIVE HIERARCHY OF MODES



3.80 The policy also seeks to ensure that transport serves the wider sustainable growth agenda set out in the JLP through how infrastructure projects are designed, not just to deliver a viable, safe and effective transport system but also to support place shaping, sustainable communities and healthy environments. In this sense, the aim will be to achieve win-win outcomes through transport projects.

3.81 The challenge of resourcing is acknowledged. Many major projects, both behavioural change and infrastructure based, are dependent on a significant level of external funding. However, the LPAs will work with the local highway authorities and other partners to seek the most effective ways to generate local funds, including where appropriate the use of Section 106, the Community Infrastructure Levy and integrated investment planning.

Policy SPT10

Balanced transport strategy for growth and healthy and sustainable communities

The LPAs and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver a high quality transport system for the Plan Area, supporting the plan's growth strategy and the need for healthy and sustainable communities. A range of transport and planning measures will be delivered according to the hierarchy of modes in Policy SPT9, including (for people and freight where appropriate):

- Walking.

- Cycling.
- Local bus and coach services (including park and ride and Plymouth's High Quality Public Transport Bus Network).
- Regional coach services.
- Local and international ferry services.
- Local rail services.
- Community transport.
- Private car, taxis and motorcycles.

In addition to those measures identified in other policies of the plan, a balanced programme of measures, consistent with the strategic principles for transport and planning, will be set out in the delivery plans of the Plymouth and Devon local highway authorities. This will include measures that will be delivered within the first five years of the plan, as well as identifying potential medium and long term measures that will be developed to manage increased demand for travel.

The measures will seek to encourage and facilitate greater modal shift toward sustainable modes of transport, and where infrastructure investment is needed, to support the improvement of sustainable transport choices for local people and businesses.



3.82 A combination of targeted infrastructure investment and complementary behavioural change programmes is required in order to meet the growth aspirations of the plan in a sustainable way. ‘Smarter Choices’ is the umbrella term applied to such ‘soft’ transport policy initiatives. The balanced approach seeks to give better information and opportunities, aimed at helping people to choose to reduce their car use while enhancing the attractiveness of alternatives and includes activities such as: travel plans; personalised travel planning; travel awareness campaigns; public transport information and marketing; improved smart, multi operator and inter modal ticketing options; car clubs and car sharing schemes; and teleworking, teleconferencing and home shopping. Such measures will help to provide genuine modal choice.

3.83 Behavioural change programmes are most effective when delivered in combination with other measures and over a sustained period of time. Choice is paramount to their success, as no one mode meets the needs of everyone. To be successful a good level of public transport provision, walking and cycling routes and access to a comprehensive suite of smarter travel opportunities such as community transport is required. This suite of measures will be set out in the Plymouth Plan for Transport and the Devon Local Transport Plan.

3.84 The HotSW LEP also recognises the role that active travel has in supporting the local economy. Its SEP has a commitment to improving walking and cycling links, particularly in urban areas, to allow journeys for employment, education and shopping to be made by non-motorised modes. The SEP also identifies the importance of revenue support, through programmes such as the Department for Transport's Local Sustainable Transport Fund, to support the capital investment and achieve high value for money.

Policy SPT11

Strategic approach to the historic environment

The LPAs will pursue a proactive and solution-orientated approach for the conservation and, where appropriate, enhancement of the historic environment, ensuring that it is promoted as a key element of local character and distinctiveness, forms a strategic context for regeneration and development, and is conserved or enhanced as part of the area's cultural offer, including in relation to:

- Scheduled monuments (or an archaeological site of national importance), listed buildings, registered parks and gardens, conservation areas, the World Heritage Site and archaeological remains (including protected wreck sites marine archaeology).
- Non-designated heritage assets, including areas of archaeological interest, unregistered parks and gardens and landscapes positively identified as having significance in terms of the historic environment.

In particular they will support proposals for heritage-led regeneration and working with developers and investors to encourage them to see historic and culturally led regeneration as the first choice method to achieve a quality legacy. In this respect, development should make a positive contribution to local character and the enhancement of local distinctiveness.



3.85 The historic environment is part of our everyday lives. It gives us a sense of place, wellbeing and cultural identity. The way we value and nurture our historic environment has the potential to bring economic, social and environmental benefits to Plymouth and South West Devon.

3.86 The plan seeks to celebrate and strengthen the unique quality and inherent value that heritage assets and culture offer, as well as sharing and communicating the content contained within those assets. It is important to understand the significance of the quality of the historic environment so that its additional and ancillary benefits are fully considered in decisions that affect, and are supported by, heritage assets. Heritage assets might also include intangible assets (e.g. memories), portable assets (e.g. film, photos and objects) and future assets (e.g. tomorrow's heritage).

3.87 In implementing this policy, encouragement will be given to communities to embrace their local heritage assets in terms of understanding their significance and valuing their contribution to local distinctiveness. The LPAs will also seek to ensure that the owners and those responsible for the management of all heritage assets are

aware of their responsibilities in terms of caring for the assets, including keeping them well maintained and, where appropriate, using them for the benefit of the community.

Policy SPT12

Strategic approach to the natural environment

The distinctive characteristics, special qualities and important features of the natural environment of the Plan Area will be protected, conserved and enhanced. This will be through a strategic approach which protects the hierarchy of international, national and locally designated sites, commensurate with their status, and takes account of the natural infrastructure functions of different sites, habitats and features. Key principles include:

1. Avoiding harmful impacts on existing features as a first principle, and where harmful impacts are unavoidable, to ensure that such impacts are adequately and proportionately mitigated or as a last resort fully compensated.
2. Protecting sites of European significance for biodiversity and conservation. These include existing and potential Special Protection Areas, existing possible and candidate Special Areas of Conservation, existing and proposed Ramsar sites and sites identified, or required, as compensatory measures for harmful impacts on European sites.
3. Protecting sites of national significance for biodiversity and conservation. These include Sites of Special Scientific Interest, National Nature Reserves, Ancient Woodlands and Marine Conservation Zones.
4. Conserving and enhancing the landscape and scenic beauty of the South Devon and the Tamar Valley Areas of Outstanding Natural Beauty, and the adjacent Dartmoor National Park.
5. Protecting and enhancing the distinctive landscapes of the Undeveloped Coast, particularly within the South Devon Heritage Coast, with support for improvements to public access to and enjoyment of the coast.
6. Safeguarding the landscape setting of the Cornwall and West Devon Mining Landscape World Heritage Site.
7. Supporting innovative and sustainable solutions within the North Devon Biosphere Transition Zone in accordance with the Biosphere Strategy for Sustainable Development.
8. Conserving and enhancing a functional network across the Plan Area of greenspace and geodiversity sites that meets the needs of communities and wildlife.
9. Improving links to and along regional and national walking and cycling routes, including the South West Coast Path national trail and the National Cycle Network.
10. Protecting and extending the Public Rights of Way and bridleway network as an essential element of the enjoyment of the natural environment.



3.88 The quality of the natural environment is one of the strongest assets in the south west. It is a unique selling point which draws millions of visitors to the region every year. Rightly, the LEPs have given safeguarding the environment a central place in their SEPs, understanding that the environment has huge potential to attract high quality inward investment and support business growth. A healthy natural environment is also an important part of enhancing the health and wellbeing of communities, and plays an important role in protecting water quality and managing flood risk.

3.89 The policy identifies a strategic approach for protecting and enhancing the natural environment, based upon a hierarchical approach that acknowledges the different legal and national policy status that different types of site hold.

3.90 At the top of the hierarchy are those sites identified in the policy which have an international designation, followed by national designations.

3.91 European sites include:

- Special Protection Areas (SPAs);
- Special Areas of Conservation (SACs);
- Possible or candidate SACs or potential or proposed SPAs;
- Sites which have been adopted by the European Commission but not yet formally designated by the government, known as Sites of Community Importance (SCI); and
- Sites identified, or required as compensatory measures for adverse effects on European Sites.

3.92 European Sites designated as SAC or SPA in the Plan Area include:

- Plymouth Sound and Estuaries SAC;
- Start Point to Plymouth Sound and Eddystone SAC;
- South Dartmoor Woods SAC;
- Dartmoor SAC;
- Blackstone Point SAC;
- Lyme Bay and Torbay SAC;
- South Hams SAC;
- Culm Grasslands SAC;
- South Devon Shore Dock SAC;
- Tamar Estuaries Complex SPA.

3.93 The Plan Area area also includes many sites that are nationally protected. These designations include:

- National Nature Reserves (NNRs).
- Sites of Special Site of Scientific Interest (SSSI).
- Ancient Woodlands.
- Marine Conservation Zones.

3.94 The protection and enhancement of these sites is a key priority in delivering the biodiversity network that crosses the Plan Area.

3.95 The natural beauty, landscape character, scenic beauty and cultural heritage of sites are also recognised as requiring protection. These designations and policy protections include the Tamar Valley and South Devon Areas of Outstanding Natural Beauty (AONBs) and Dartmoor National Park as protected landscape areas which receive the highest degree of protection owing to their national significance, and the South Devon Heritage Coast and undeveloped coast. AONBs and National Parks are International Union for Conservation of Nature (IUCN) protected landscapes. The Cornwall and West Devon Mining Landscape World Heritage Site (WHS) is designated by UNESCO for its international landscape significance. In respect of the National Park, although the park lies entirely outside of the boundary of the Plan Area, it is important that decisions taken within the Plan Area take account of its special status.

3.96 Policies relating to local environmental designations and the wider network of green spaces are covered in Section 6 of the plan (see particularly Policies DEV4-5 and DEV23-DEV28).

3.97 Map 1 (Statutory Designated Sites) shows all of the statutorily designated sites that lie wholly or partly within the Plan Area.

3.98 Map 2 (Biodiversity Network) shows the network of sites that will be protected for wildlife across the Plan Area.

Policy SPT13

Strategic infrastructure measures to deliver the spatial strategy

The LPAs will work in partnership with key funding partners and investors in order to ensure that the infrastructure needed to deliver the spatial strategy is delivered. Any land required to deliver these infrastructure measures will be safeguarded. Investment will be guided towards these priorities to ensure their timely delivery, and where schemes need to be delivered in advance of development, financial contributions will be sought retrospectively through the Section 106 process where appropriate. This includes strategic infrastructure measures to unlock the sustainable growth potential of Plymouth's three Growth

Areas and the Thriving Towns and Villages, as identified in other policies of this plan and listed in the schedule in Annex 1 of this plan. Infrastructure categories provided for include:

1. Strategic transport improvements for all modes of transport, alongside complementary transport behaviour programmes.
2. Strategic economic infrastructure.
3. Strategic public realm improvements.
4. Strategic sports sites and specific sports and local facilities that meet the sporting needs of the of the area.
5. Strategic green infrastructure sites and a functional network of greenspaces which meet the needs of local communities and help to avoid recreational impacts on European Sites and enhance the natural environment.
6. Community, education and health infrastructure.
7. Strategic drainage and flood defence.
8. Utilities infrastructure.
9. Burials and cremation services.



3.99 The successful delivery of the spatial and growth strategy set out in the plan will to a large extent be dependent on significant improvements to and investments in infrastructure, some of which will be required in any case to meet statutory obligations (for example, in relation to helping avoid recreational impacts to European Sites). The measures and projects set out in the JLP have been identified in tandem with the preparation of the plan.

3.100 Although much can be achieved through making more efficient use of existing infrastructure such as transport systems and schools, the plan's potential to deliver economic growth and quality of life improvements will be constrained without the delivery of some targeted programmes and projects. The policy focuses on the key strategic interventions that need to be delivered by different agencies over the plan period in order to realise the spatial strategy. These will be in addition to many smaller scale interventions which will often take place at a neighbourhood and village level which help drive quality of life improvements.

Policy SPT14

European Sites – mitigation of recreational impacts from development

Mitigation measures for recreational impacts on European Sites will be required where development is proposed within the identified zones of influence around those European Sites that are vulnerable to adverse recreational impacts. Residential development, student and tourist accommodation within these zones of influence will be required to provide for appropriate management, mitigation and monitoring on site, and/or financial contributions towards off site mitigation and management. This will need to be agreed and secured prior to approval of the development. Mitigation measures will include:

1. On-site access and management.
2. Off-site provision of suitable alternative recreational facilities.



3.101 Map 1 shows all of the statutorily designated sites that lie wholly or partly within the Plan Area. Of these sites, the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA have been identified to have potential risk of significant effects from recreational pressure. Each has an agreed Management Plan in place.

3.102 Visitor surveys elsewhere indicate that large coastal (particularly estuarine) sites tend to have considerably larger catchments than inland sites, and that typically at least 50 per cent of the visitors to coastal or estuarine sites live within 10km of the site, whilst 50 per cent of visitors to inland sites live within 5km of the site.

3.103 A recreational impacts study has been undertaken to assess access, types of use, qualifying features and visitor survey data in order to establish an up to date baseline confirming levels of recreational use and to identify where regular users travel from in order to define a local zone of influence. This has been used to inform the necessary mitigation strategies including visitor management, developer contributions and greenspace requirements in new development. These studies commenced in 2015 and initial findings have led to a refinement of these nationally derived zones of influence.

3.104 The means of delivering the required mitigation for the two European sites, including the required levels of contributions, will be identified in the Plymouth Policy Area and Thriving Towns and Villages Policy Area Supplementary Planning Documents.

3.105 All applications within the zone of influence will be screened for Likely Significant Effects. A contribution to management is likely to be required for all European sites listed above, but the study will update the final zones of influence and the types of mitigation required.

3.106 Mitigation measures could potentially include:

- On-site management of recreational infrastructure, visitor access and visitor management.
- Coordination of different activities which have the potential to impact on the features of the European sites.

3.107 Delivery will be through the Tamar Estuaries Consultative Forum, as the existing management structure that effectively brings together the competent bodies for the waters of Plymouth Sound and the Tamar Estuaries, to which the local authorities of the Plan Area contribute.

3.108 Monitoring of the policy will be aimed at assessing the impacts of new development on the European sites to establish a better evidence base to inform future refinement of existing Management Plans and mitigation measures.

How we will know we have been successful - our measures of success for the spatial strategy

- A. Distribution of growth is concentrated in sustainable locations.
- B. Meeting the housing and employment numbers.
- C. Increases in the options available for widening travel choice, and increases in the use of active and sustainable options.
- D. Improvements to the quality and resilience of the area's transport and digital connectivity.
- E. The area's stunning setting, maritime heritage, quality environment and natural assets continue to be protected and enhanced.

4 Strategy for Plymouth Policy Area

a. Plymouth's strategic role

What we are trying to achieve - our strategic objective for Plymouth's strategic role

Strategic Outcome

Plymouth will be fulfilling its role as a regional city and a major economic driver for the Heart of the South West, building on its rich cultural, natural and built assets. It will be stimulating growth to the benefit of the city and its wider sub region and providing the focus for culture, specialist health care, education, shopping, leisure attractions and hospitality services for the wider area.

4.1 Plymouth plays a key strategic role in providing essential services and facilities at both a sub-regional and regional scale. This role of the city is key to the success of that area.

4.2 Plymouth is part of the Heart of the South West Local Enterprise Partnership (HotSW LEP). The HotSW LEP has developed its Strategic Economic Plan (SEP) 2014-2030 and its European Union Structural and Investment Funds Strategy 2014 - 2020, which aspire to deliver strong and transformational levels of economic growth across the HotSW by focusing on 'People,' 'Place' and 'Business' initiatives.

4.3 The SEP aspires to deliver transformational levels of growth by focusing on:

- Creating the conditions for growth, e.g. through provision of transport infrastructure.
- Maximising productivity and employment, e.g. through stimulating jobs.
- Capitalising on our distinctive assets, e.g. through transformational opportunities.

4.4 The HotSW partnership of Devon and Somerset local councils, National Parks, the LEP and health partners are developing an overarching Productivity Plan that will replace the SEP in 2017.

4.5 This JLP aligns well with the LEP's priorities for growth, particularly around 'place', such as strategic connectivity, housing growth and specialist infrastructure needed for higher value growth. The SEP highlights four key 'transformational opportunities' for the LEP area - nuclear, aerospace, environmental futures and marine. Of particular relevance is the marine opportunity, given the strength of the sector in Plymouth, delivery of new naval requirements (eg. in respect of activity related to the new dreadnought submarines), and the opportunity to develop the Marine Industries Production Campus through the Plymouth and South West Peninsula City Deal. The LEP has been successful in securing considerable Government investment through the Growth Deal process. Growth Deals 1 and 2 have secured investment in a number of transport and infrastructure projects in the

city and the LEP has also secured a number of investments that have wider benefit for the whole Plan Area, such as the development of a 'Growth Hub' to create a more favourable business support environment.

4.6 In recent years the UK's cities have taken on more control over their fortunes through devolution deals negotiated with Government. These deals have seen a transfer of powers and funding for infrastructure and economic growth to cities and their sub regions. Under the 2016 Cities and Local Government Devolution Act, the Government can transfer powers to any area provided that strong and accountable governance is in place. This encourages areas to work together around natural economic geographies. Plymouth is a key player in both leading and significantly contributing to collaborative working across the region.

Strategic Objective SO2

Strengthening Plymouth's role in the region

To consolidate and strengthen Plymouth's role as the major regional city in the south west peninsula of England, enhancing its contribution to the economic and social wellbeing of the south west and providing the major commercial, service and employment centre. This will be achieved through:

1. Strengthening the role of Plymouth City Centre, the Waterfront and Derriford as regional hubs and economic drivers of primary importance within the south west.
2. Supporting further investment in strategic services for the region, including the city's regional health, higher and further education, strategic sports, attractions, hospitality, and cultural facilities.
3. Unlocking the regional growth potential of Plymouth's City Centre and Waterfront, Derriford and the city's northern and eastern corridors.
4. Ensuring that strategic development proposals within the sub-region support and complement Plymouth's role as a sub-regional driver.
5. Working with partners in the region to deliver the Plymouth and South West Peninsula City Deal, including driving forward the growth of the marine sector across the whole peninsula.
6. Safeguarding the strategic defence role that Plymouth plays for the UK's security and optimising the benefits this brings to the regional economy.
7. Working with partners to protect the region's mineral resources.
8. Protecting and enhancing the quality and resilience of Plymouth's transport and digital connectivity to the rest of the country and to global markets.



What we are going to do - our policies for Plymouth's strategic role

Policy PLY1

Enhancing Plymouth's strategic role

Plymouth's strategic role as a centre and hub for regional services, culture and the visitor economy will be strengthened through partnership working and a positive planning environment which encourages new investment in facilities and infrastructure.

Plymouth City Centre will be seen as the primary location for major comparison goods shopping development, commercial leisure and office development within the city, in order to maintain and strengthen its status as a regional centre, as well as a strategic location for higher / further education services.

Plymouth's waterfront will continue to be promoted and strengthened as a major regional hub in its own right for the economy, culture, tourism and leisure, and heritage.

The Derriford area will continue to be promoted and strengthened as a primary provider of regionally significant health, economic, educational and sports services.



4.7 Plymouth's influence extends far beyond its boundaries. It plays a major role in how the Housing Market Area and the Functional Economic Market Area function. A key challenge for the city and its partners will be to continue to strengthen its role and to ensure that the benefits of a growing city are fully recognised in Devon, Cornwall and the wider south west.

4.8 Many of the institutions based in Plymouth already play a key regional role. For example:

- Derriford Hospital provides health care for patients across Devon and Cornwall and is the designated Major Trauma Centre for the peninsula – one of two Major Trauma Centres (with Frenchay in Bristol) in the west country.
- Plymouth's three universities and its further education colleges provide a range of educational opportunities for students in Devon and Cornwall, as well as attracting students from the rest of the UK and overseas.
- Plymouth's employment opportunities attract people from an area reaching well beyond Ivybridge in the east, Tavistock in the north and Liskeard in the west.

- Plymouth also has a regionally significant sports complex (Plymouth Life Centre), accommodates three sporting teams competing in national leagues, with loyal followings in the region (Plymouth Raiders basketball team, Plymouth Albion Rugby Union team and Plymouth Argyle Football Club), and hosts national and international sailing events (eg. Fastnet).
- Plymouth hosts major regional attractions such as Theatre Royal Plymouth and the National Marine Aquarium, and will shortly see the opening of a major new attraction in the Plymouth History Centre.

4.9 Plymouth has a significant role in driving the sub regional tourism economy through events, attractions, heritage and its hospitality and accommodation sectors.

4.10 Plymouth also has a pivotal arts and cultural role in the south west and leads on regional initiatives for culture to maximise investment, working in partnership across the peninsula. Plymouth has the ability through the growth of the creative industries and its size as a city to become a regional hub for creativity and culture specifically as a gateway for international practice and development.

4.11 The role of Plymouth City Centre, the waterfront and the Derriford area is of particular importance to the city's strategic role, providing retail, cultural, tourism, leisure, transport, health, further / higher education and employment services to the entire sub region and beyond.

Policy PLY2

Unlocking Plymouth's regional growth potential

A regionally significant scale of growth in new jobs and new homes will be delivered in the City Centre and Waterfront Growth Area, the Derriford and the Northern Corridor Growth Area, and the Eastern Corridor Growth Area. This will be through a co-ordinated approach to economic development, spatial planning and infrastructure planning.

Development proposals within and outside of the Plan Area which would put at risk the fulfilment of Plymouth's strategic role and regional growth potential will be resisted.



4.12 The HotSW LEP's SEP sets out a balanced approach to growth, recognising the need to address barriers (such as transport, connectivity, skills), as well as seizing opportunities for transformational growth through high value sectors (such as marine). The growth aspirations set out and modelled in the SEP highlight the link between higher growth rates, job creation and resulting population increases and housing demand. Whilst the SEP is not a spatial strategy for the area, there is clearly an

important role for urban areas like Plymouth in delivering the growth aspirations of the SEP. In Plymouth these opportunities exist particularly but not exclusively in three Growth Areas:

- The City Centre and Waterfront;
- Derriford and the Northern Corridor; and
- The Eastern Corridor.

4.13 The nature and scale of the opportunity is considered in more detail in Section 4b of this plan. The role of Policy PLY2 is to acknowledge the City's commitment to working in partnership in order to ensure that its regional growth potential is realised.

Policy PLY3

Utilising Plymouth's regional economic assets

The City will work with the HotSW LEP, Plymouth and South West Peninsula City Deal and the universities and colleges to strengthen its higher value industries, including its marine, advanced manufacturing, medical and health care and knowledge based economic sectors, optimising the benefits that these assets bring to the city and regional economy, including support for satellite facilities in the Thriving Towns and Villages Policy Area.



4.14 Plymouth is the largest urban area in the LEP and is recognised as a key location for growth. The strategy set out in this plan reflects and supports a regional agenda for the city. It builds on its potential for economic growth, capitalising on the success of the Plymouth and South West Peninsula City Deal as well as the opportunities its maritime location and environment bring for pioneering research and development. The City Deal was agreed with the Government in 2013 and sets out initiatives to drive the growth of the marine sector across the peninsula. Much of the focus of the City Deal is on Plymouth, as the regional hub for marine industries but also in terms of the city being the location for the Marine Industries Production Campus, called 'Oceansgate', at South Yard. The City Deal places Plymouth at the centre of a web of initiatives spanning the far south west, covering investment in business and infrastructure and also in skills and the development of the workforce of which Plymouth's universities and colleges also play a key role.

Policy PLY4

Protecting and strengthening Devonport Naval Base and Dockyard's strategic role

The Plymouth LPA will work with partners to support and actively promote the safeguarding and strengthening of Her Majesty's Naval Base (HMNB) Devonport and the Dockyard as a major component of the UK's strategic defence capability, as well as the consolidation of Plymouth as a base for Royal Marines and Royal Artillery, including at HMNB Devonport and HMS Raleigh. It will seek to optimise the benefits that it brings to the wider regional economy through supply chain development and knowledge transfer in order to help diversify the economy. Government commitment to support the future of HMNB Devonport and Dockyard over the lifetime of this plan will continue to be sought, to ensure the base porting of Type 26 frigates as replacements to the city's base porting of Type 23 frigates, and to seek long term commitments about the strategic role of Devonport as one of the UK's three Naval Bases.

Where Ministry of Defence land is surplus to the strategic defence requirement, priority will be sought for uses which help to deliver the plan's growth objectives and meet neighbourhood needs for new community spaces and facilities in accordance with a planned and coordinated programme of land release. Any proposals for land release will be carefully considered for the possible impacts they could have on the special designations in the Plan Area.



4.15 Devonport's Naval Base is the largest Naval Base in Western Europe and the primary UK location for deep maintenance of surface ships and submarines with world class infrastructure and a highly skilled workforce. The Dockyard and Naval Base accommodate recently upgraded facilities for highly specialised engineering work including the refuelling of nuclear submarines with further development planned. HMNB Devonport therefore plays a key, and likely growing, role in the Plymouth and wider sub regional economy. It directly supports 11 per cent (11,750) of Plymouth's full time equivalent employment and 16.5 per cent (£656m) of the value of its economic output. It will therefore continue to be vitally important to the local and regional economy and our overall marine offer.

4.16 Recent announcements of a major contract commitment that guarantees the work programme of the dockyard until 2020 are welcomed. This commitment underlines the strategic importance of the Dockyard and Naval Base.

4.17 The Ministry of Defence (MoD) owned waterfront provides a full range of support services to Royal Navy and foreign visiting vessels. The MoD continually seeks to optimise its land holding at the waterfront in accordance with Devonport being a core site for defence. If MoD land is shown to be surplus to requirements, it should be made available to support the growth of Plymouth or to meet wider community aspirations.

4.18 The MoD published its strategic review of defence estate, 'A Better Defence Estate', in November 2016. Amongst its proposals are the disposal of Royal Marines Stonehouse and The Royal Citadel on The Hoe, with the Royal Marine and Royal Artillery regiments being consolidated in the Plymouth and Torpoint areas by 2023 and 2024, at HMNB Devonport and HMS Raleigh. The policy supports this consolidation within Plymouth.

Policy PLY5

Sustainable use of Plymouth's mineral resources

The Plymouth LPA working together with adjoining local minerals authorities will help to support and facilitate the sustainable use of mineral reserves of national and local importance, subject also to safeguarding the City's growth agenda, its environmental quality and the quality of life of local people. This will be achieved by:

1. As far as practicable, prioritising the use of recycled and secondary aggregates, including those derived from construction and demolition waste, before the quarrying of primary aggregates.
2. Identifying Mineral Safeguarding Areas in mineral resource areas so that the long term minerals are not needlessly sterilised.
3. Safeguarding key minerals related infrastructure and facilities needed to support the handling, processing and distribution of mineral resources.
4. The use of planning conditions and legal obligations to ensure the timely high quality restoration and aftercare of mineral sites once they have been worked out. The restoration will be required to make a positive contribution to geo- and biodiversity, native woodland, the historic environment and recreation, and, where possible, recreate and/or restore wildlife habitats.
5. Permitting small scale quarrying for conservation and heritage asset restorations where it can be demonstrated that there are no alternative workable resources and where amenity and environmental considerations can be met.
6. Ensuring that environmental controls and mitigation measures, as appropriate, are put in place in relation to each operation to ensure that development does not give rise to significant loss of amenity or unacceptable harmful impacts on the environment. Open cast mining and other minerals operations that cannot be achieved without causing unacceptable environmental and amenity impacts will not be supported.



4.19 The policy provides a strategic framework for the use and extraction of minerals resources within the city boundary. Outside of the city boundary, the Minerals Planning Authority is Devon County Council, and the Devon Minerals Plan 2011-2031 was adopted in February 2017. In this respect, Policy PLY5 will help to shape representations the councils make in relation to minerals developments within the Devon Minerals Plan area. The starting principle for the policy is to prioritise the use of recycled and secondary aggregates as far as practicable. However, Plymouth's growth will increase demand for primary aggregates to supply construction projects.

4.20 There are no minerals of national importance within Plymouth itself, although within close proximity (and covered by the Devon Minerals Plan) there are nationally important reserves of china clay at Lee Moor and tungsten at Drakelands. The EU has defined tungsten as a critical raw material, and the British Geological Survey have placed tungsten close to the top of its global risk list due to its scarcity and risk to supply. Decisions made within Plymouth therefore need to have regard to these wider interests, whilst also recognising the complementary role of Devon Minerals Plan in safeguarding the city, its residents and its overall landscape setting from damaging environmental, amenity and transport impacts of these open cast operations. In this respect, the Plymouth Minerals Planning Authority would seek appropriate planning conditions and agreements in relation to minerals extraction outside of the city boundary which impacts on the city's environment and local communities. This should include where appropriate the development of a comprehensive access strategy which takes construction and other heavy goods traffic more directly to the A38, avoiding Plympton's urban road network.

4.21 Plymouth's limestone reserves in Plymstock are of local and regional importance. Plymouth contains the farthest south western exposure of workable limestone in England. It provides an important resource for the local and regional economy, providing a valuable supply of building stone as well as a source of primary aggregate which supports the construction industry. Whilst there are other areas in Devon where limestone is quarried, their value as an alternative is limited because of constrained expansion opportunities and increased transport costs.

4.22 Limestone has been extracted and processed at Moorcroft Quarry in Plymstock since the 1800s. Its extraction is now from Hazeldene Quarry, which was granted consent in 1994, with processing still taking place in Moorcroft Quarry. Additional limestone reserves have been proven to the east and north of Hazeldene. While the location of the proposed new community at Sherford in South Hams will result in the loss of the reserves to the east, the limestone resource to the north has the potential capacity, subject to planning permission, to supply the local economy well into the next century. Proposals for major extraction of limestone from former and abandoned quarries to the south and west of Plymstock are not likely to come forward in the foreseeable future. However, there may remain opportunities for small scale quarrying for conservation and heritage purposes.

4.23 A Minerals Safeguarding Area is identified on the Policies Map to ensure that the city's minerals reserves are not needlessly sterilised. It is also important to ensure that the infrastructure required for minerals purposes is protected. This includes for example minerals wharves at Pomphlett and Cattedown as well as processing plants at key sites in the city.

4.24 Minerals extraction needs to be managed very carefully in order to safeguard residential amenity and the local environment. It is essential that the impacts on both existing and future residents from all operations are carefully considered and effective mitigation and controls are provided to minimise impacts to an acceptable level. This could include restrictions on the hours of operation, noise and dust monitoring, requiring tree planting and landscape bunds to provide screening, securing net gain in biodiversity and monitoring of the environment to ensure that any impacts are carefully controlled.

4.25 Once minerals have been worked it is important that land is reclaimed at the earliest opportunity. High quality restoration and aftercare on mineral sites will need to take account of geodiversity, biodiversity, native woodland, the historic environment and recreation. Planning conditions, and where appropriate legally binding obligations, may be used to ensure that these are delivered as soon as possible once operations have finished.

4.26 The City Council will continue to plan for a steady and adequate supply of aggregates through supporting Devon County Council in preparing the Local Aggregate Assessment.

4.27 In addition to providing for and safeguarding minerals extraction, the policy also protects key infrastructure relating to the handling, processing and distribution of minerals. This includes key marine infrastructure in the Cattedown Harbour area, with Cattedown Wharf, Pomphlett Wharf, Corporation Wharf and Victoria Wharf all providing important facilities.

How we will know we have been successful - our measures of success of Plymouth's strategic role

- A. Plymouth recognised as a key regional economic driver.
- B. High quality strategic services and facilities that serve the people of Plymouth and the sub region.
- C. Safeguarding and strengthening of Plymouth's strategic defence role.

b. Plymouth's Growth Areas

Plymouth's Growth Areas and its spatial priorities

4.28 Plymouth's spatial priorities are illustrated in Figure 4.1.

PLYMOUTH POLICY AREA - SPATIAL PRIORITIES (ILLUSTRATIVE)

KEY

	Hospital		Community Park
	Sports hub		European Marine Site
	Improving health inequalities		District heating
	Port		Housing
	Transport capacity		Ocean City
	Sustainable transport		City Centre
	Train Station		District Centre
	Coach Station		Strengthening communities
	Park and Ride		Visitor economy
	Transport quality gateway		Minerals
	Transport connectivity		Distribution
	University		Business/energy park
	Primary school		Marine Industries
	Dockyard		Offices
	Knowledge industries		Medical sector
	Utilities infrastructure		Heritage assets
	Cultural hub		Events
	Waste recycling		Local Centre
	Community safety		Urban fringe

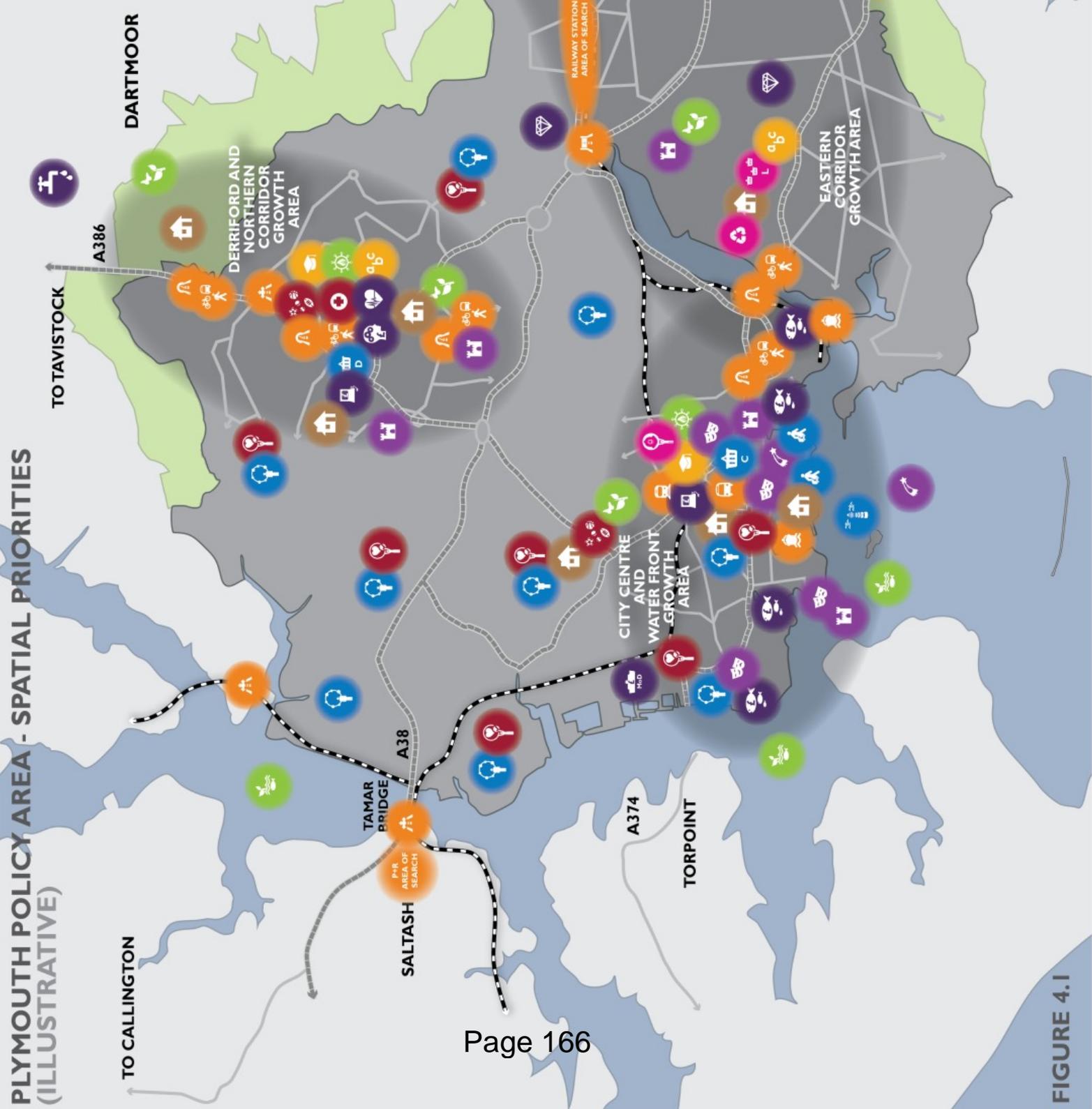


FIGURE 4.1

4.29 The city's three Growth Areas are the primary focus and these are considered in detail in Sub-Sections 4b(i), 4b(ii) and 4b(iii) below. Three areas have been identified as key to delivering major growth in housing, employment and associated infrastructure to drive Plymouth's growth. These three Growth Areas are:

- The City Centre and Waterfront Growth Area.
- The Derriford and Northern Corridor Growth Area.
- The Eastern Corridor Growth Area.

4.30 Clearly not all growth and change will take place in the Growth Areas, and Section 4c identifies policies and allocations relating to small sites and other parts of the city.

i. The City Centre and Waterfront Growth Area

What we are trying to achieve - our strategic objective for the City Centre and Waterfront Growth Area

Strategic Outcome

The City Centre and Waterfront Growth Area will have been transformed through major investment and community-led improvement, delivering a vibrant mixed-use regional shopping centre, an attractive visitor destination, high quality jobs and places to live, and a cherished natural and historic environment.

4.31 The City Centre and Waterfront has been prioritised as a Growth Area because of its economic and cultural importance and potential for regionally significant change and sustainable growth in jobs and homes.

4.32 Strengthening the City Centre as a regional mixed-use destination is a key objective. It is the primary location for major comparison shopping in the Plan Area as well as being a location for high density living, offices, culture and leisure. It also hosts two major educational institutions, Plymouth University and Plymouth College of Art and is well-placed to support their continued growth.

4.33 This Growth Area is strategically important in terms of improving Plymouth's visitor offer, leisure, hotels and tourism. Sutton Harbour, The Hoe, Millbay and Royal William Yard are key waterfront areas identified for recreation and tourism. Opportunities will be sought to enhance this by creating vibrant areas which make full use of their historic features.

4.34 The waterfront provides Plymouth's port function and infrastructure, fishing fleet, deep water berths and land to support marine employment, including marine leisure, naval and defence uses. Plymouth has the largest naval base in Western Europe and the area plays a strategic defence role for UK security. The Oceansgate Enterprise Zone at South Yard is driving growth of Plymouth's commercial marine science / technology sector. Protecting and improving access points along the waterfront for marine-related activities is critical.

4.35 The waterfront setting and natural beauty makes the area an attractive place to live, work and visit. It is important that this opportunity to drive investment and regeneration inland is capitalised upon to generate community value.

Strategic Objective SO3

Delivering growth in Plymouth's City Centre and Waterfront Growth Area

To realise the potential of the City Centre and Waterfront Growth Area as a regionally significant growth hub through:

1. Establishing and reinforcing the City Centre's role as a regional centre for shopping, employment, leisure, a university centre, a strategic transport hub and a sustainable community in its own right.
2. Utilising the City Centre and waterfront's economic assets, including its waterfront infrastructure, to drive economic growth in the area.
3. Improving sustainable transport facilities and connections throughout the area, and particularly between the City Centre and the waterfront at Millbay, The Hoe and Sutton Harbour.
4. Protecting and making best use of the unique historic environment and landscape of the City Centre and waterfront, in particular Devonport waterfront, Royal William Yard and Devil's Point, The Hoe and The Barbican.
5. Capitalising on the potential of the City Centre and waterfront to deliver a world class cultural and visitor offer, with well connected destinations, high quality visitor accommodation, facilities to deliver major events and improved public realm and waterfront access.
6. Delivering new residential-led mixed-use developments that integrate successfully with existing communities and enhance community cohesion.
7. Improving city gateways, arrival points and key transport routes and delivering high quality architecture and urban design.
8. Delivering improved public access to and along the waterfront as well as enhancements to key public spaces and heritage assets.
9. Delivering water transport improvements and integration with other transport modes that will improve access to key locations including The Barbican Mount Batten, Sutton Harbour, Millbay, Royal William Yard, Devonport and Mount Edgcumbe.
10. Safeguarding and enhancing the environmental status of the Plymouth Sound and estuaries, including the European Marine Sites, and making the City Centre and waterfront communities more resilient to the effects of climate change.



4.36 The achievement of this Strategic Outcome and Objective will require a number of actions to be taken. These include:

1. Giving priority to delivering the key projects that have been highlighted in the City Centre and Waterfront masterplans.
2. Allocation of the key sites. Relevant site allocations can be found within this section below.
3. Pursuing transport programmes and interventions which prioritise place making and sustainable movement and improve the attractiveness of the City Centre and waterfront environment.
4. Actively engaging with international, national, regional and local programmes and investors to deliver funding for the Growth Area projects.
5. Preparing, implementing and keeping under close review a 'Plan for the City Centre and Waterfront Growth Area' which will be a delivery plan and programme for the Growth Area.

4.37 The strategy for the City Centre and Waterfront Growth Area is illustrated on the Area Vision diagram at Figure 4.2.

FIGURE 4.2



CITY CENTRE AND WATERFRONT GROWTH AREA VISION DIAGRAM

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What we are going to do - our policies for the City Centre and Waterfront Growth Area

The City Centre

Policy PLY6

Improving Plymouth's city centre

Plymouth City Centre will be renewed and enhanced through a combination of major new developments, proactive management of change and support for community and trader led initiatives. This will deliver a modern, high quality, vibrant, accessible and adaptable centre that reflects its status alongside the waterfront as the showcase of Plymouth. This will be achieved through making sure that development and change:

1. Capitalises on and strengthens the City Centre's role as a regional centre.
2. Respects and celebrates the centre's mid-twentieth century built heritage, including the Beaux Arts grid of the 1943 Abercrombie Plan and the highest and good quality non-designated assets identified in the City Centre Masterplan.
3. Recognises the importance of reinforcing the primacy of Armada Way as the principal thoroughfare from the station to the Hoe. This will be achieved by focusing larger development - building heights of six to eight storeys - on the Armada Way frontage to provide enclosure to the space and to maintain a degree of consistency to these increased building heights to respect the Abercrombie Plan's form and historic context.
4. Supports the intensification and diversification of uses through redevelopment of City Centre blocks, with specific sites identified where tall buildings will be acceptable in principle.
5. Addresses the size and need for a clearer focus of the retail area, through prioritising the prime retail role to the east of Armada Way and through diversification of uses for the centre as a whole.
6. Strengthens the role of the West End as an Independent Quarter, anchored by the City Market, which supports independent traders, niche retail and food shopping to serve the nearby residential communities, and provides for the introduction of alternative higher value business uses, cultural uses, community uses and creative business clusters.
7. Delivers a vibrant mix of uses to diversify the centre including, in addition to retail:
 - i. Regionally significant office uses and the coordination of public sector investment as a catalyst for transformational change.

- ii. A vibrant destination, with leisure, culture, visitor accommodation and food and drink uses, especially making best use of key assets such as the Armada Way boulevard and piazza, and creating greater synergy with the cultural hubs at Royal Parade, The Hoe and historic waterfront, and North Hill / Tavistock Place.
 - iii. A new residential community, through development and environmental changes which provide high quality urban living environments.
 - iv. Education and community uses, optimising the benefits from the proximity of Plymouth University and Plymouth College of Art, and the potential for a more vibrant mix of uses especially along Armada Way and to its west.
 - v. Student accommodation, but only where it is targeted to support prioritised regeneration opportunities, and delivers new housing and/or office accommodation and ground floor active uses as part of mixed use development.
8. Supports a diverse and active evening and night time economy catering for a wide cross section of the public.
 9. Delivers high quality public car parks in strategic locations around the edge of the centre with excellent pedestrian connections to key attractions.
 10. Facilitates easier movement in and around the City Centre for all modes of transport, including reconnecting the City Centre with its neighbouring areas - which include Millbay, Sutton Harbour and the Hoe – by high quality walking and cycling links.
 11. Supports the delivery of a coordinated programme of investment in the public realm, and delivers structured environmental improvements, creating a safe accessible and attractive environment for the community and visitors alike, and exploring opportunities for weather protected spaces.
 12. Delivers proposals that are resilient and respond to the challenges of climate change and protect the Plymouth Sound and Estuaries European Marine Site from pollution, providing where appropriate improvements to flood management infrastructure, surface water drainage systems, and future connection to critical drainage infrastructure and district heat networks relevant to the site.



4.38 The City Centre is not only the heart of the city and a place where people live, but is also Plymouth's shop window, the commercial and cultural centre driving the economy and attracting visitors.

4.39 The City Centre is underpinned by its role as the primary destination for comparison goods shopping in the sub region. Retailing has been through a period of decline since the economic crisis of 2008, but is now showing signs of recovering. The prime role the centre plays as the destination for non-food shopping trips over a wide geographical area provides a strong basis for investment as can be seen by British Land's acquisition of Drake Circus.

4.40 Nevertheless, there is a need for the centre to keep adapting and modernising to continue to maintain its key strategic role into the future. The Plymouth City Centre Strategic Masterplan (2016) highlights the opportunity to celebrate the 'Mid Century Modern' heritage of the City Centre. The Abercrombie Plan of 1943 may not have been implemented in full, but it remains as one of the most complete and important examples of post war planning and rebuilding in the country, and it is recommended that this legacy is promoted as a unique selling point of the City Centre.

4.41 The Masterplan identifies five priority themes for the City Centre to achieve its potential:

- Intensifying the City Centre: optimising the population, density and diversity, to deliver a vibrant, healthy City Centre and safeguarding and enhancing retail floor space.
- City Centre Living: creating a critical mass of new housing and attractive living environments.
- Re-connecting the City Centre with its neighbours: creating safe, convenient, direct and attractive pedestrian and cycle connections across the ring road.
- Re-animating the Public Realm: creating a hierarchy of high quality public streets and spaces, with an enhanced Armada Way as the top priority.
- The Smart and Adaptable City: building flexibility and adaptability into the City Centre and making best use of smart technology - including for example with traffic management and flexible work and community space.

4.42 The Masterplan identifies key opportunity sites and six priority major Interventions capable of delivering landmark projects which can introduce new land uses, change perceptions of the City Centre and act as a catalyst for further regeneration. The projects and interventions have informed the more detailed site allocations in the plan and Policy PLY6 sets out the framework within which these initiatives will take place.

Policy PLY7

Colin Campbell Court

Land at Colin Campbell Court is allocated for high-quality residential led mixed use development which will transform the western approach to the City Centre and establish a new residential community. Provision is made for in the order of 300 new homes as part of this mix.

Development should provide for the following:

1. A positive first impression of the city from Western Approach.
2. A more intensive form of development with strong street frontages and a range of active ground floor uses, including retail.
3. Ground floor uses which create activity throughout the day and into the evening.
4. A more urban scale of development with an average building height of between 5 to 6 storeys with accented and landmark buildings on key corners.
5. Alignment of development blocks to the city grid pattern with a network of streets which provide improved connectivity between City Centre and the proposed Millbay Boulevard.
6. The retention and refurbishment of the Art Deco Colin Campbell House, where it is practicable and viable to do so.
7. High quality public realm throughout the site and maximising opportunities to create an accessible public space as a focal point for the community.
8. Improvements to the pedestrian / cycling crossing point across Western Approach.
9. Public parking to support the West End, provided in way which does not dominate the street scene.
10. Consideration of the potential to open up Frankfort Gate for vehicular access.
11. Opportunity to better connect the west end of the City Centre with Millbay as part of a scheme to improve the junction of Union Street and Western Approach.



4.43 Colin Campbell Court is a large site in the West End currently providing a range of small scale retail units, residential and other town centre uses, and significant surface level car parking. It is a prominent site on one of the City Centre's main junctions with active frontages along Western Approach, Union Street, New George Street, Frankfort Gate and Market Avenue.

4.44 The redevelopment of the site offers significant potential to improve the West End and create a new residential location., with the opportunity for a range of homes including flats, townhouses, self-build (custom/self-finish units) as part of the mix of tenures and types provided for in redevelopment proposals. The City Centre Masterplan (2016) identifies the redevelopment of Colin Campbell Court as a 'major intervention' for this reason.

4.45 The site is capable of accommodating significant massing and taller buildings which help define the edge of the City Centre. It offers an important opportunity to improve the environment and arrival to the city from the west and its relationship to Western Approach.

4.46 The site's location at the western edge is also key to delivering the 'Millbay Boulevard' which will provide improved links between the City Centre and Millbay's waterfront.

4.47 Car parking will be required to help serve the needs of the West End traders and the new occupants but in a way which does not over dominate the street scene, allowing a strong public realm approach.

4.48 A finer grain of urban development should be achieved which responds to the 1943 Abercrombie and Watson plan. A grid pattern of development with new streets and urban blocks will create this desired character. This will also result in better legibility and choice of routes for pedestrians and cyclists. Retention of the Art Deco Colin Campbell House will be sought, with demolition only considered where there is no reasonable alternative.

Policy PLY8

Land at Royal Parade (between Armada Way and Old Town Street)

The buildings fronting Old Town Street and Royal Parade (East of Armada Way) should be refurbished sensitively to update and expand the retail spaces and attract new complementary uses to the upper floors. Expansion of existing spaces will be enabled by internal reconfiguration, extension of the buildings to the rear and/or the sensitive inclusion of additional floors.

Development should provide for the following:

1. Recognition of the high heritage and architectural value of the buildings and the protection and enhancement of these in any partial demolitions and external alterations.
2. Possible additional building storeys, up to a maximum building height of eight storeys, where these can be accommodated set-back from the building line and subordinate in appearance to the main elevation.
3. Respect for the strong building lines on Old Town Street, New George Street, Armada Way and Royal Parade.
4. Enhancement of shopfronts and existing canopies to better reflect the qualities of the upper floors.
5. Active ground floor frontage to all public streets and spaces including Bedford Way.

6. Servicing to the rear of the buildings with access controlled to out-of-hours.
7. Conserving and enhancing the significance and settings of designated and non-designated heritage assets along Royal Parade.



4.49 The two Royal Parade blocks are amongst some of the highest quality in the City Centre, and are acknowledged for their high heritage value and architectural quality in the Strategic Masterplan and supporting evidence base documents. Any development of the blocks must be sensitive to these special qualities and preserve or enhance the buildings appearance and heritage value.

4.50 The blocks occupy an important position within the City Centre and include major retail anchors including Debenhams, House of Fraser and TK Maxx. The blocks have recently been acquired by British Land who also own and manage the Drakes Centre and are behind the Drake Leisure Complex proposal on the former Bretonside Bus Station Site.

Policy PLY9

Mayflower Street East, City Centre

Land at Mayflower Street East is allocated for an office led mixed use development, with active ground floor uses (retail / food and drink) and student accommodation as enabling development. Provision is made for in the order of 34,000 sq.m. of B1 offices.

Development should provide for the following:

1. High quality, building design, particularly to the site's prominent Armada Way, Mayflower Street and Cobourg Street frontages.
2. Buildings of between 5 to 6 storeys in height (6 to 8 storeys along Armada Way frontage) with opportunity for taller landmark buildings at the corner of Mayflower Street and Cobourg Street.
3. Active ground floor uses with high proportions of clear glazing to the streets.
4. Entrances to office and other upper floor uses to be prominently located on a principal elevation and designed to include generous lobby space and canopies.
5. New enhanced and redesigned public realm on and around the site, including at Armada Way in accordance with established City Centre public realm design principles and materials pallets.

6. Innovative solutions to minimise the visual impact of car parking and maximise secure cycle parking.
7. Tree planting on the site's street frontages where appropriate.



4.51 Office accommodation is an essential ingredient for the long-term success and vibrancy of the City Centre. The site was identified by the City Centre Strategic Masterplan for its close proximity to the train station, its convenient vehicular accessibility, its links to the Plymouth University campus, its presence on Armada Way and its proximity to supporting facilities such as hotel and conference facilities.

4.52 The economic viability challenge of delivering new build office accommodation in the City Centre is recognised, despite there being demand for such use. For this reason a mix of higher value uses, such as student accommodation, will be considered to enable delivery of this office provision where this does not result in an over-concentration of student accommodation in the vicinity.

4.53 A mix of active uses ground floor uses will be required to appropriately activate City Centre street frontages. Active uses in this respect need not be exclusively retail. The intent is to secure uses at ground floor which enable high proportions of clear glazing to be integrated into ground-floor building facades without issues of privacy being compromised. Uses may include retail, food and beverage, leisure, office, lobbies and other town centre uses.

Policy PLY10

Cornwall Street East, City Centre

Land at Cornwall Street East is allocated for retail led mixed use, including multi-storey car parking and housing on upper floors. Provision is made for in the order of 92 homes.

Development should provide for the following:

1. High quality design to replace poorer quality buildings and deliver a greater level of activity, floor-space and diversity of land uses.
2. Buildings of between 5-6 storeys in height, with 6-8 storeys along Armada Way, to reinforce the primacy of this principal thoroughfare from Plymouth Railway Station to the Hoe.
3. An enhanced arrival point to the City Centre, providing for high quality public car parking in a multi-storey format with vehicular access direct from Mayflower Street and seamless pedestrian connections into Cornwall Street.

4. An attractive new north / south pedestrian route which links Cornwall Street to Mayflower Street.
5. Active ground floor uses on all public frontages with high proportions of clear glazing to the streets.
6. New enhanced and redesigned public realm on and around the site, including at Armada Way in accordance with established City Centre public realm design principles and materials pallets.
7. Innovative solutions to minimise the visual impact of car parking and maximise secure cycle parking.
8. Tree planting on the site's street frontages where appropriate.



4.54 The City Centre evidence base identifies the need for more modern larger footprint retail space some of which could be provided for here through a mix of new build and sensitive refurbishment / enhancement of the best quality buildings on Armada Way.

4.55 The site accommodates the Mayflower East multi-storey car park. As such it is a key gateway into the City Centre. Despite being well used the car park does not offer the quality of arrival experience that the centre deserves and gives a poor first impression. Opportunity exists to significantly enhance and/or expand the car park through refurbishment or redevelopment as part of a comprehensive scheme for the wider site. Any new car parking should be well screened from the street frontages with active ground floor uses integrated into the design.

4.56 The site also provides the opportunity to integrate new residential and/or office accommodation on upper floors with allocated residential car parking provided for within the multi-storey car park and entrance lobbies prominently located on Armada Way or other key frontages.

Policy PLY11

Cornwall Street West, City Centre

Land at Cornwall Street West is allocated for mixed use, including commercial and housing, retention of coach station and new multi-storey car parks accessed from Mayflower Street. Provision is made for in the order of 79 homes.

Development should provide for the following:

1. High quality design to replace poorer quality developments and deliver a greater level of activity, floorspace and diversity of land uses.

2. Buildings of between 5-6 storeys in height.
3. An enhanced arrival point to the City Centre providing for high quality public car parking in a multi-storey format with vehicular access direct from Mayflower Street and seamless pedestrian connections into Cornwall Street.
4. A north / south connection through the block which provides smaller scale spaces in the City Centre to support a greater range of land uses.
5. Enhanced setting of the coach station with new build frontage and improved direct pedestrian and cycle access to the car park and to all surrounding streets.
6. Further enhancements as required to support a high quality of environment and facilities at the coach station.



4.57 The site currently accommodates a number of buildings of poor architectural quality and which are vacant or under used. It also accommodates a surface-level public car park adjacent to the new coach station.

4.58 The site has the potential to be significantly enhanced with new development providing for enhanced and expanded public car parking in a multi-storey format or with development over new active ground floor uses to surrounding street and new residential accommodation on upper floors. This should be planned for comprehensively but may be delivered in phases as vacancies occur. Buildings should be designed to consider frontage to and overlooking of the coach station and be designed and finished in a way which mitigates any impact on residential amenity from the coach station.

Policy PLY12

New George Street West, City Centre

Land at New George Street West is allocated for retail led mixed use through sensitive refurbishment and extension of the existing buildings of high quality, including housing on upper floors. Provision is made for in the order of 30 homes. Expansion of existing spaces will be enabled by internal reconfiguration, extension of the buildings to the rear and/or the sensitive inclusion of additional floors.

Development should provide for the following:

1. Recognition of the high heritage and architectural value of the buildings and the protection and enhancement of these in any external alterations.

2. Possible additional building storeys, up to a maximum building height of 8 storeys to Armada Way and 6 storeys to other streets, where these can be accommodated set back from the building and subordinate in appearance to the main elevation.
3. Respect for the strong building lines on Armada Way, New George Street and Cornwall Street.
4. Enhancements of shop fronts and canopies to better reflect the qualities of the upper floors.
5. Active ground floor frontage to all public streets and spaces.
6. Servicing to the rear of the building.



4.59 The site occupies frontage onto the three key retailing streets in the City Centre. Opportunity exists to enable larger footprint retail units to meet the demand for modern retail space by extending the building to the rear and making better use of the surface car parks in the rear courtyards. It is envisaged that car parking lost from the site would be better provided for in strategic car parks around the edge of the City Centre. A residential presence can be achieved by extending the height of the building.

4.60 The buildings assessed as being of good quality contribute to the continuity of frontage to Armada Way. The external appearance of the buildings should be improved. As this site occupies a central position within the Abercrombie estate, maximum buildings heights will be carefully controlled in accordance with the guidance set out in the City Centre Masterplan and range from six to eight storeys in height.

Policy PLY13

Royal Assurance site, Armada Way, City Centre

Land at Armada Way is allocated for retail led mixed use through sensitive refurbishment and extension of the existing buildings of high quality, including housing on upper floors. Provision is made for in the order of 110 homes. Expansion of existing spaces will be enabled by internal reconfiguration, extension of the buildings to the rear and/or the sensitive inclusion of additional floors.

Development should provide for the following:

1. Recognition of the high heritage and architectural value of the buildings and the protection and enhancement of these in any external alterations.

2. Possible additional building storeys, up to a maximum building height of 8 storeys to Armada Way and 6 storeys to other streets, where these can be accommodated set-back from the building line and subordinate in appearance to the main elevation.
3. Respect for the strong building lines on Armada Way, Royal Parade and New George Street.
4. Enhancements of shop fronts and existing canopies to better reflect the qualities of the upper floors.
5. Active ground floor frontage to all public streets and spaces.
6. Servicing to the rear of the buildings.



4.61 The Pearl Assurance Building occupies prominent frontage to Armada Way, Royal Parade and New George Street. The building is already well occupied for retail at ground-floor and student accommodation occupying the upper floors. Opportunity exists to enable larger footprint retail units to meet the demand for modern retail space by extending the building to the rear and making better use of the surface car parks in the rear courtyards. It is envisaged that car parking lost from the site would be better provided for in strategic car parks around the edge of the City Centre. Opportunity also exists to establish a residential presence on the site by extending the height of the building.

4.62 The buildings assessed as being of highest quality contribute to the continuity of frontage to Armada Way and Royal Parade. The external appearance of the buildings should be improved. As this site occupies a central position within the Abercrombie estate, maximum buildings heights will be carefully controlled in accordance with the guidance set out in the City Centre Masterplan and range from six to eight storeys in height.

Policy PLY14

Land at 19 The Crescent, Derry's Cross, City Centre

Land at The Crescent, Derry's Cross is allocated for mixed use development which could support a range of uses including small scale retail, leisure, a quality hotel, offices and a range of housing. Provision is made for in the order of 120 homes.

Development should provide for the following:

1. High quality layout and building design that appropriately responds to the local context, including the significance and setting of the listed Crescent.

2. Buildings of at least 6 storeys in height with opportunity for taller buildings where these can be appropriately accommodated and where the impacts on neighbouring buildings and spaces are assessed and mitigated as far as possible.
3. An attractive new pedestrian / cycling priority street through the site, linking Derry's Cross towards Millbay Road.
4. Active ground floor uses on all public frontages with entrance lobbies to residential accommodation prominently located and designed.
5. High quality public realm within and around the site.
6. Innovative solutions to minimise the visual impact of car parking and maximise secure cycle parking.
7. Tree planting on the site's street frontages where appropriate.



4.63 This major site that has been vacant and in a derelict state for some years. The site has previously benefited from planning permissions for mixed use development but due to viability issues, these consents have not been implemented. Part of the site is currently being used as a temporary car park but is undesirable for this use to continue in the long-term.

4.64 The site is identified for high quality mixed use development incorporating uses on the ground floor that can activate the surrounding streets and spaces. Ground floor uses should be public facing wherever possible and include extensive glazing. A wide mix of other uses is considered appropriate for upper floors including office and a substantial proportion of residential.

4.65 The site is located within a 'Zone of Opportunity for Tall Buildings' and previous consents have been granted for a 31 storey tower. Taller building proposals will need to be considered in relation to their impacts on neighbouring buildings and spaces, including micro-climate impacts, on the setting of the nearby listed Crescent, and on views. Tall buildings must be of the highest quality design to justify their landmark status.

Policy PLY15

Civic Centre and Council House site

The Civic Centre and Council House site will continue to play a key role in the civic life of Plymouth as well as providing new opportunities, through the retention of civic functions, the reuse of the existing buildings, and the delivery of new development on the existing surface level car park. New uses which will

be acceptable include residential, offices, hotel, restaurants, bars, leisure and cultural uses. Provision is made for in the order of 248 new homes as part of the mix of uses.

Development should provide for the following:

1. The reuse and enhancement of the listed Civic Centre and Council House.
2. Enhancement of the Civic Square, a registered park and garden.
3. The retention of civic functions within the existing Council House building.
4. Active ground floor frontages to Armada Way, Royal Parade, Princess Street, Old George Street, The Bank and Theatre Royal.
5. New build development on the existing surface level car park which optimises the use of the site but conserves and where appropriate enhances the historic and architectural interest and setting of the Civic Centre and Council House, Plymouth Theatre Royal and The Bank.



4.66 The Civic Centre is one of the most iconic 20th Century buildings in the city. It is strongly associated with Plymouth's resurgence from the Blitz during the Second World War and housed Plymouth's municipal offices. It is Grade II listed and occupies a prominent position in the local skyline. The site allocated in the plan comprises the former Civic Centre, the Council House and the Civic Square, a registered park and garden at the site's Armada Way frontage, together with the large area of and the surface level car parking to the west of the Civic Centre tower. The main building has been empty vacant since 2013, when it was vacated by the City Council and sold to the developer Urban Splash. The Council House is still used for City Council meetings.

4.67 This prime site is allocated for a mixed use redevelopment. Key to the success of the site is the necessity to provide uses at ground floor which create a level of activity and which results in accessible space.

Policy PLY16

Railway station

Land at the Railway Station is allocated for a mixed-use regeneration scheme that delivers a high quality gateway and arrival point to the city and increases the capacity of the station to accommodate increasing numbers of passengers. Uses which will be supported include offices, education facilities, commercial,

hotel, small-scale retail development, residential and student accommodation. Provision is made in the order of 4,800 sq.m. of B1a offices as part of the mix of uses.

Development should provide for the following:

1. A more intensive form of development which makes better use of vacant and underused space, with retention and refurbishment of Intercity House or its replacement with a high quality landmark building.
2. Use of landmark buildings to provide a widely visible presence to the station.
3. A high quality and attractive station entrance, including the creation of a new public space, with a direct public route on foot and by bicycle from Armada Way.
4. Uses which create activity around the station.
5. Clear information regarding connecting bus services and good access for bus passengers.
6. Opportunities to support the introduction of sustainable transport choices such as cycle hire, car clubs and electric vehicle charge points.
7. Replacement of the existing multi-storey car park, with high quality parking provided as an integral part of the scheme.
8. Pedestrian and cycle links to Central Park.



4.68 The railway station and its surrounding environment currently acts as a poor gateway and arrival point into Plymouth. The area is dominated by car traffic and a large multi-storey car park. Intercity House is prominent in the local landscape but is under-utilised and in need of modernisation and refurbishment. Routes to the City Centre are not clear for pedestrians, cyclists or public transport users. The need to improve this first impression of the city when arriving by train is widely recognised, and most recently is identified as a ‘major intervention’ in the City Centre Masterplan (2016).

4.69 The station is at the northern end of Armada Way, the city’s public realm centrepiece boulevard extending to the Hoe Park waterfront. It is therefore crucial that the connectivity between the station and Armada Way is improved. The benefits are two-fold through providing a visual presence from the City Centre to the station and as a direct link to the waterfront upon arrival into Plymouth. The split-level nature of the site should be utilised to enhance the prominence of the site. Caprera Terrace

on the upper level offers the opportunity for a landmark building as well as providing accessibility to the lower levels and platforms. It will be important for the scheme to provide enhanced pedestrian and cycle connections towards Central Park.

4.70 Plymouth is the busiest station in Heart of the South West Local Enterprise Partnership's area. The station has seen passenger footfall grow by 4 per cent per annum since 2004 and now stands at 2.5 million per annum with an expected further growth in passenger footfall of 4 per cent per annum over the next 10 years, in response to key drivers including planned rail service improvements and population growth in the city. This equates to an additional 1 million passenger movements per annum within the next 10 years. The number of passenger movements is forecast to double over the next 25 years. As a regional hub, the station is an important gateway for visitors to the whole region. Sustainable access to the station as well as the visibility of public transport is of great importance.

Policy PLY17

Plymouth University and Plymouth College of Art

Plymouth University and Plymouth College of Art should continue to evolve as high quality education-led mixed-use campuses, including arts and cultural uses, incubator units / managed workspace for start-up businesses and creative industries, and other complementary uses. Purpose built student accommodation will be permitted where fully justified by evidence of need and targeted to deliver regeneration benefits, as provided for in Policies PLY6 and DEV12.

Development should provide for the following:

1. Masterplan-led development which demonstrates successful integration with the City Centre and surrounding neighbourhoods.
2. Safeguarding and enhancing the campuses as vibrant, distinctive and diverse areas, taking into consideration the needs and requirements of the local community.
3. High quality architecture, including landmark buildings.
4. High quality public realm, including green spaces.
5. Active ground floor frontages which create a safe and vibrant street scene.
6. Pedestrian and cyclist priority on campus and secure cycle storage.
7. Conservation and enhancement of the best historic buildings.
8. Enhanced connections between the campuses, the City Centre, the History Centre, Railway Station and neighbouring areas of the city.
9. Tree planting and greening of the campuses to enhance the environment and absorb air pollution.

10. Sustainable energy strategies, including the delivery of district heating opportunities.



4.71 Since the adoption of the Core Strategy (2007), one of the most significant changes in the area is the ongoing consolidation and development of the Plymouth University campus. Years of partnership working with Plymouth University resulted in shared objectives which were embedded into the University's Development Strategy (2006) and the City Centre & University Area Action Plan (2010). This supported the delivery of a high quality education campus including lecture space, library, teaching space, cultural and performing arts uses and specialist facilities such as the Marine Building.

4.72 Plymouth College of Art has also had a successful history of working in partnership with the City Council, including through the production of an Urban Design Framework for the site in 2004. This partnership working has supported the College in undertaking significant development on its site, including through the completion of its new landmark crafts building at Charles Street.

4.73 The policy seeks to support the ongoing enhancement of these universities and their integration with the History Centre as part of the North Hill / Tavistock Place cultural quarter (see Policies PLY18 and PLY22) and to strengthen their physical connections to the City Centre, the Railway Station, surrounding neighbourhoods and the waterfront.

Policy PLY18

Plymouth History Centre and land at Tavistock Place / Chapel Street

Land at North Hill and Tavistock Place is allocated for a History Centre, together with a higher education and/or business-led mixed use development on Tavistock Place / Chapel Street with enabling student housing development in cluster flat format. The History Centre will be a major new visitor attraction and unique historic archive and learning space for the city which will support the regeneration of the North Hill / Tavistock Plan cultural quarter. It will bring together the existing City Museum collections with new exhibition space, including the conversion of the former St Luke's Church, together with a landmark modern archive space for the City's historic archives. Tavistock Place will be closed to through traffic to form a public piazza, with new pedestrian and cycling links through to North Hill and Chapel Street.

Development should provide for the following:

1. The conversion of the listed museum and library buildings and former St Luke's Church to provide high quality exhibition spaces.

2. Demolition of the rear of the library and construction of a new extension to provide a café, exhibition space, learning space and landmark 'archive box'.
3. Construction of a storage and delivery store adjacent to St Luke's Church.
4. Soft landscaping to include new street trees and green wall together with shrub planting.
5. Creation of new pedestrian and cycling links to improve the permeability of the area for pedestrians and cyclists between Chapel Street and North Hill.
6. High quality street frontages and active ground floor uses.
7. A development which respects the site's heritage assets and context, as informed by a heritage character assessment to be undertaken for the proposal.



4.74 This landmark project for the city will regenerate the North Hill / Tavistock Place cultural quarter, providing a high quality landmark and visitor destination, located between the University and College of Art. It will secure the future of the listed museum and library buildings and the former St Luke's Church, as well as create a high quality public space within Tavistock Place that will bring life to this part of the city. The new archive box will bring together the following major collections under one roof: the West Devon Record Office; the Local Studies Library Collection; the SW Film and Television Archive; the South West Image Bank and the Naval Heritage Collection from Devonport.

4.75 The policy includes adjacent land on Tavistock Place / Chapel Street in order to deliver a more comprehensive regeneration outcome for the area taking advantage of its location in relation to Plymouth University and Plymouth College of Art. To help enable use of this part of the site for university / education purposes, student accommodation in the form of cluster flats is supported.

Policy PLY19

Central Park - Strategic Green Space Site

Central Park will be a premier park for the people of Plymouth. It will become an outstanding venue of regional and national significance for active recreation and formal sport, culture, art and the natural environment. As part of the growth of the city significant improvements will be delivered to enhance the recreational and sporting facilities as well as increasing the wildlife and community value of the park. This will ensure the park provides significant health and well-being

benefits for communities, a vibrant and diverse hub for formal sport and recreational activities, and a space where people can access nature. This will be achieved by:

1. Creating a park with high quality, vibrant spaces that encourage a diversity of uses and is accessible to communities across Plymouth and beyond.
2. Enhancing existing and creating new sporting facilities that develop the park's role as a key sporting facility for the city and region whilst being sensitive to the park's natural and historic features.
3. Strengthening the links between the Life Centre and the sporting facilities within the park to deliver the highest quality sporting and recreational offer, catering for people of all abilities.
4. Protecting and enhancing the park's importance for wildlife and as a key green corridor. Ensuring that trees continue to have a key role in the park landscape by delivering a strategic tree management and replacement programme.
5. Encouraging and expanding food growing opportunities within the park to complement the existing allotment provision.
6. Development of new high quality park facilities including cafés, performance space, children's play spaces, landscape features, public toilets and new entrance features to complement and add value to the attractiveness and use of the park.
7. Developing and implementing a strategic water management solution for the park that resolves historic flooding issues through innovative Sustainable Urban Drainage solutions including new water features that will be designed to add value to the park's landscape and deliver benefits for wildlife.
8. Protecting and enhancing the park's historic features integrating them sensitively into the enhancement plans and where applicable identifying uses for features that are complementary to the park's outcomes and ensure their long term sustainability.
9. Creating a well-connected park for pedestrians and cyclists that links to surrounding neighbourhoods and the City Centre encouraging active travel to and through the park.
10. Ensuring any developments around the periphery of the park are sensitive to the purpose of the park and the natural and built assets it contains.



4.76 Central Park is a highly valued environmental asset for the people of Plymouth. The parkland was originally acquired in the late 1920s by the then Ministry of Health which at the time widely promoted the link between public health and recreation.

4.77 The park design was originally conducted by Thomas Mawson and his family practice of landscape architects who were commissioned to conceive a design that would promote active recreation and sport. A comprehensive plan was drafted and approved in 1928. Many elements of the original design were never implemented. However in enhancing the park to meet the current and future needs of communities the theme of encouraging health and well-being through access to a high quality greenspace will be at the heart of the plans.

4.78 The park already has some outstanding natural qualities and heritage features but there is a need to enhance many areas of the park.

4.79 Sports and recreational facilities within the park require upgrading to deal with issues such as drainage, and new facilities developed to ensure the sport and recreational offer in the park is outstanding. Other facilities will also be developed within the park to complement its purpose, such as cafés and play areas. Any new facilities will be in-keeping with the purpose of the park and sensitive to it's natural and heritage features.

4.80 Currently access to and around the park is not of a sufficiently good quality to encourage people to ability to access the space and enjoy its benefits. This will be resolved through upgrades to the footpath network linked to enhanced entrance points into the park to enable better connections to the surrounding neighbourhoods. The park will need to integrate more fully with the city to deliver the maximum benefits and this will be achieved through better connections from areas such as the City Centre.

4.81 The park forms part of a network of greenspaces that cross the city and out into the wider countryside and therefore performs an important role as a wildlife corridor and this function will be enhanced through the improvement works. As part of a series of 'Strategic Green Spaces' identified within and around the city, a pro-active enhancement of Central Park's function and facilities will be a priority element of the growth agenda.

The Waterfront

Policy PLY20

Managing and enhancing Plymouth's waterfront

Plymouth's waterfront will be renewed, enhanced and maintained as Plymouth's showcase and as a unique, sustainable and vibrant asset that drives the city's economic, cultural, social and environmental wellbeing. This will be achieved by:

1. Adopting an integrated coastal management approach that considers the land-sea planning interface, has regard for the range of activities in the coastal zone, gives priority to development that requires close proximity to

the sea, improves connectivity, delivers community benefits, and protects and enhances the high quality marine environment and seascape. In the longer term, the City will work with the Marine Management Organisation and its Tamar Estuaries Consultative Forum partners to shape the South West Inshore Marine Plan to ensure it delivers integrated marine and terrestrial planning for Plymouth.

2. Improving key waterfront destinations, assets and opportunities, through a strategic approach which ensures that the waterfront's potential is fulfilled as the centrepiece of the Mayflower 400 celebrations, a regional visitor economy hub and a high quality place for the local community to enjoy. This includes:
 - i. Strengthening the role of The Barbican and Sutton Harbour as a unique and vibrant historic city quarter, with a focus on high quality mixed use and heritage-led regeneration, a prime location for the fishing industry as well as water based leisure and events, and high quality urban living and employment.
 - ii. Protecting and enhancing The Hoe's unique man-made and natural heritage and using development and public realm measures proactively to repair damaged environments, re-use historic buildings and enhance the overall enjoyment of the area by visitors and residents.
 - iii. Enhancing Millbay as an attractive international gateway and cultural destination, incorporating space for marine events, a new cruise ship terminal and European ferry link, with major waterfront regeneration.
 - iv. Supporting the continued regeneration and restoration of Royal William Yard as a vibrant heritage-led residential community and cultural destination.
 - v. Delivering major improvements to the connecting routes for all modes of transport between the City Centre and waterfront, including through Bretonside and along Armada Way, and a new boulevard to Millbay.

3. Delivering distinctive, high quality and accessible places along the waterfront through:
 - i. Delivering high quality and integrated public realm improvements, including public art, as well as making good use of waterfront public spaces, cultural events and festivals.
 - ii. Ensuring that waterfront development is of high quality design, safeguards the waterfront's primary functions, improves use of and access to underused waterfront sites, and supports the regeneration of waterfront communities.
 - iii. Ensuring opportunities to enable high quality public access to the water for formal sport and active recreation are identified and delivered.

- iv. Safeguarding and providing opportunities for improved access to water transport along Plymouth's waterfront.
 - v. Protecting iconic and historic landscapes and green space sites that enable a visual and physical connection to the water environment, and seascapes and views that define the city, whilst enhancing the relationship between Plymouth and the surrounding landscapes that provide its enviable setting.
 - vi. Safeguarding and further enhancing public access to and along the waterfront and water access points, providing increased opportunity for enjoyment of the marine environment for residents and visitors alike.
4. Safeguarding and enhancing the natural environment including the delivery of the conservation objectives for the Plymouth Sound and Estuaries European Marine Site.
 5. Conserving and realising greater benefits from the waterfront's history, including the city's naval heritage and its marine archaeology.
 6. Safeguarding the port functions and the area's key role in providing key infrastructure and land to support the priority marine employment sector, particularly for those sites with deep water berths. This will include defence, port, fishing, marine industries and research, and marine recreation.
 7. Using development and technological solutions through the planning process in order to minimise the risk of hazardous installations at Cattedown port and to increase the opportunity for new economic and other development in the Cattedown area.
 8. Ensuring that development is resilient, responds to the challenges of climate change and protects the Plymouth Sound and Estuaries European Marine Site from pollution. This will be achieved through providing where appropriate to the site, improvements to surface water drainage systems, future connection to critical drainage infrastructure and district heat networks relevant to the site, delivering flood protection measures, and/or contributing proportionately to strategic flood risk management measures in line with local strategies where they exist.



4.82 Plymouth's coastal setting includes 30 miles of waterfront (accounting for inlets). This is one of the city's most valuable assets and is the reason why the city has developed in the way it has. Whilst not all of this waterfront is within the City Centre and Waterfront Growth Area, given the inter-connectedness of Plymouth's waterfront, Policy PLY20 relates to its entire length. The heart of the city's historic

waterfront has been given more detailed consideration in the Plymouth Waterfront Strategic Masterplan (2016), which is both a supporting document and a delivery framework for the JLP.

4.83 The Port of Plymouth is a complex and dynamic area which encompasses Plymouth Sound and extends up the rivers of the Tamar, Tavy, Lynher and Plym. It is the largest estuarine system in south west England and supports a diversity and richness of wildlife as well as a landscape and heritage recognised through national and international designations including the Plymouth Sound and Estuaries Special Area of Conservation and the Tamar Estuaries Complex Special Protection Area. It is the setting for the Growth Area and forms the backdrop to many of the views out over the city.

4.84 Plymouth's waterfront is home to the Royal Navy, whilst also providing commercial ports, an international ferry terminal, a large fishing fleet and various marinas and other marine-related uses. It is a focus for leisure and tourism, it includes key historic parts of the city, and is a highly desirable location for housing. There are beaches and some of the country's finest sailing waters hosting numerous sailing events.

4.85 Whilst the waterfront has become a desirable place to live and socialise, parts of it lack the levels of activity normally expected for a vibrant waterfront city. Even The Hoe, which is very well used during special events and the summer, can feel quite empty during the colder months. Some waterfront areas are very vibrant, such as The Barbican and Sutton Harbour, with its working fishing fleet, marina, café and bar culture, galleries and antique shops, as well as major tourist attractions, such as the Mayflower Steps and National Marine Aquarium. The historic Royal William Yard has also become a vibrant mixed-use waterfront destination.

4.86 A separate 'Vision for Sutton Harbour' has been published by Sutton Harbour Holdings, setting out a series of aims relating to the area's potential as a location for tourism, leisure and recreation and events, employment and living. The provisions of Policy PLY20 broadly support the aims of Sutton Harbour's Vision, although there are particular outcomes that this plan seeks to emphasise. For instance, it will be important that the proposals safeguard and enhance the operational requirements of the harbour's fishing industry and do not compromise its sustainability.

4.87 Sutton Harbour's Vision document identifies development aspirations for twelve different sites, some of which are further advanced than for others. as well as identifying potential improvements to the waterfront walkway, public realm and viewpoints around the harbour. Some of these sites are given specific site allocation policies below. Others have not been identified due to their small site area or concerns about deliverability. However, these proposals could still be brought forward through the planning application process.

4.88 Transforming the marine economy is an issue of strategic importance. As part of this it will be important to protect waterfront marine employment land from being lost, particularly land which is adjacent to deep-water berths or critical port related infrastructure. Also, development and research / testing activity will require careful consideration of its impacts on the marine environment to ensure that its conservation status is safeguarded.

4.89 Public access to the waterfront has improved considerably in the last 20 years (including the enhanced strategic leisure routes such as the South West Coast Path, National Cycle Network and local routes such as the Sutton Harbour Heritage Trail). However, public access to and along the waterfront is fragmented in places, in part due to land uses, gated developments and topography. Access has to be restricted in the dockyard and port areas, for example, and former military developments can present access challenges because of their historic walls. Nevertheless, it will be important to take opportunities to improve public access to and along the waterfront as they arise.

4.90 Public access to the water for formal sport and active recreation is in need of improvement. Current public facilities are limited and lack the infrastructure required to support their role in enabling access to the water. Opportunities to upgrade these facilities will be sought.

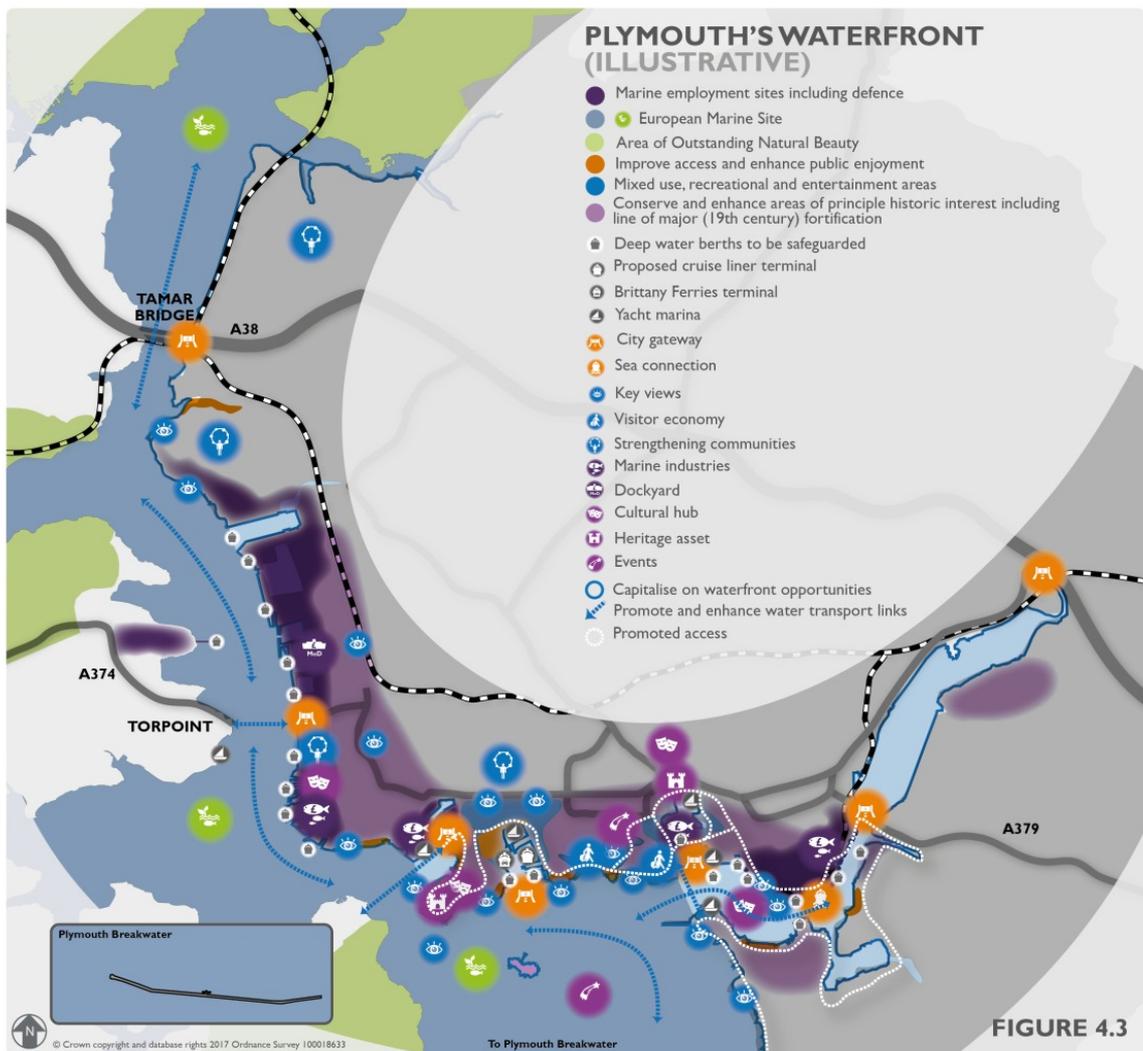
4.91 Good connectivity between the sea and land based transport is needed for the waterfront to function effectively. Strategic transport corridors allow goods and vehicles to pass through the ports and clear marked routes, including a new boulevard connecting the City Centre to Millbay, will enable residents and visitors to create footfall and deliver a vibrant waterfront and a high quality network of quays, pontoons and slipways will enable recreational users to step from land to water. The South West Coast Path and National Cycle Network provides a route along the waterfront but there are still sections which could be improved. Opportunities will be sought to deliver water transport improvements, including improved integration with other transport modes, and waterfront city gateways will deliver an enhanced visitor experience.

4.92 The operational control over the Port area comes with the Dockyard Port Regulation Act of 1865 which charges the Queen's Harbour Master with protection of the port. However, the City Council shares a responsibility for managing this area, along with the other statutory and bye-law making authorities bordering the Tamar Estuaries. The cross border nature of coastal planning means there is mutual interest to work in partnership, ensuring the sustainable use of Plymouth's coastal assets.

4.93 An integrated coastal management approach will seek to balance the competing demands on the waterfront and adjacent marine area. The Marine Management Organisation is responsible for all aspects of marine planning and licensing below the high water mark and the City Council along with the Tamar Estuaries Consultative Forum will continue to work together to deliver this function along with other partners. Any proposed developments which require both marine and terrestrial planning consents will be dealt with under the Coastal Concordat which will ensure a coordinated approach between the local planning authority, the Marine Management Organisation and Environment Agency.

4.94 The Environment Agency's 'hold-the-line' policy for Plymouth's developed waterfront provides the basis for continued maintenance and improvement of coastal defences against erosion and flooding, and thus the protection of existing infrastructure and the development of coastal sites. The councils will continue to work with the Environment Agency and other stakeholders to develop suitable strategies for the management of coastal flood risk. Developments will be expected to contribute to the costs of new and improved defences.

4.95 These key principles are illustrated in Figure 4.3.



Policy PLY21

Supporting the visitor economy

Support will be given for proposals which protect and deliver growth for Plymouth's visitor economy in its core tourism area. This area includes the waterfront stretching from Sutton Harbour / The Barbican to Royal William Yard, including the Hoe and Millbay as well as the City Centre. Specific provisions are as follows:

1. Strategic opportunities for new high quality hotels will be protected, especially on sites which reinforce Plymouth's unique assets such as its waterfront, heritage and culture, including offering views over Plymouth Sound.
2. Proposals which deliver visitor accommodation on appropriate sites, including small hotels, bed and breakfast and self-catering accommodation, will be supported.

3. Proposals which help enhance Plymouth as a destination for all seasons, including the effective use of the waterfront and the City Centre for events, and which support business tourism and tourist related business development, will be supported.
4. Development proposals which result in the loss of important facilities for the visitor economy, including visitor accommodation, will not be permitted unless:
 - i. There are over-riding sustainability and regeneration benefits from the proposal.
 - ii. The existing use is demonstrated to be unviable and with no reasonable prospect of becoming viable.



4.96 The visitor economy attracts significant numbers of visitors annually. In 2014, five million visitors visited the city and contributed £311 million to the economy. However, current hotel occupancy levels in the city are running at 78 per cent which is one of the highest in any city outside of London, demonstrating a capacity constraint.

4.97 The core city area has approximately 24 hotels providing 1,746 rooms of predominantly 3 star and below. Due to the seasonal nature of tourism in the city many accommodation providers are at full capacity between June and the end of September and this is stifling the opportunity to further grow the staying and overseas visitor markets which are a key to overall economic growth and additional jobs. Yet approximately 200 beds have been lost to the city since 2013 through the closure of the Quality Inn on The Hoe and the Legacy hotel at Marsh Mills.

Policy PLY22

Cultural quarters

Support will be given for cultural development proposals and proposal which protect existing cultural facilities within the city's three cultural hubs:

- Royal Parade, The Hoe and historic waterfront (to include Royal William Yard, Millbay and The Barbican / Sutton Harbour)
- North Hill / Tavistock Place (including the area around Plymouth University, College of Art, Museum and proposed History Centre).
- Devonport (centred around Devonport Guildhall, Market building, and Plymouth Music Zone and Music Hub)

The cultural hubs and the places that connect the hubs will be locations where it will be easier for people to occupy temporarily vacant spaces for artistic and cultural ventures.



4.98 The plan seeks to support cultural activities and experiences in communities across the whole of Plymouth through a ‘hub and spoke’ concept. The policy sets out proposals for establishing three cultural hubs in the locations of Royal Parade, The Hoe and historic waterfront; North Hill/Tavistock Place; and Devonport which build on existing community activity, assets and infrastructure. Investment in the three hubs will seek to stimulate further cultural opportunities across the city that gives greater local accessibility to cultural activities.

4.99 Developing a distinctive and dynamic cultural sector in Plymouth that will unlock the potential of the city’s arts, creative sector and cultural heritage will help raise the profile of Plymouth and support the visitor economy. It will also provide opportunities for local communities and attract those seeking to relocate for business offering a lifestyle that cannot be found elsewhere, with arts, music, drama, comedy and entertainment forming a unique city identity that supports growth.

Policy PLY23

Plymouth Fruit Sales site, Sutton Road, Sutton Harbour

Land at Plymouth Fruit Sales, Sutton Road, Sutton Harbour is allocated for mixed use development, including housing. Other potential uses include small scale retail, offices, hotel, restaurant and leisure related use as part of housing led mix. Provision is made for in the order of 200 homes.

Development should provide for the following:

1. A development which respects the site's heritage assets and context, as informed by a detailed heritage character assessment to be undertaken for the proposal.
2. High quality architecture that responds positively to the site's heritage and Sutton Harbour's historic character and distinctiveness.
3. Active ground floor frontages to enliven all public streets and spaces - particularly along the site's waterfront and Sutton Road frontages.
4. Protects the opportunity for a high quality tall building on the axis of Barbican Approach and Lockyer's Quay, relating to a major new waterfront public square and acting as a positive, memorable and widely visible landmark for the Sutton Harbour East area, Coxside.

5. Public access to and along the site's waterfront and a new pedestrian route linking from Sutton Road to the quayside.
6. High quality public realm including new quayside public open space and a proportionate contribution to the Sutton Harbour Heritage Trail, public art and heritage interpretation.
7. Innovative car parking solutions to reduce the visual impact on vehicles on the public realm.
8. Safeguarding of the fishing industry use of adjacent wharves and pontoons, taking into account the proximity of the fish quay and market through the design and mix of uses.
9. Flood resistant and resilient design and contributions towards the upgrade and improvement of existing flood defences, as set out in line with Environment Agency advice.



4.100 This prominent site includes a major section of Shepherd Wharf on the east quayside of Sutton Harbour, together with a parcel of land fronting Sutton Road. It is an attractive waterfront location close to the City Centre. However, this vacant piece of land has been left derelict for a number of years and previous planning consent given for residential-led mixed use development – a landmark tall building scheme inspired by the twin towers shown in the 'Mackay Vision' for Plymouth - was unfortunately never implemented. Notwithstanding this, the site has potential for a landmark mixed-use residential-led scheme which contributes positively to the existing high quality building styles that give Sutton Harbour and the Barbican its locally distinctive character.

Policy PLY24

Sutton Road west, Sutton Harbour

Land at Sutton Road west, Sutton Harbour is allocated for residential-led mixed use development, providing opportunities for offices, hotel, leisure and small scale retail uses. Provision is made for in the order of 194 homes.

Development should provide for the following:

1. A development which respects the site's heritage assets and context, as informed by a detailed heritage character assessment to be undertaken for the proposal.

2. High quality architecture that responds positively to the site's heritage and Sutton Harbour's historic character and distinctiveness as well as creating a positive first impression of Plymouth on the Exeter Street frontage.
3. Active ground floor frontages to enliven all public streets and spaces – including on the quayside, Exeter Street and Sutton Road.
4. Public access to and along the site's waterfront and a new pedestrian route linking from Exeter Street/Sutton Road to the quayside – providing a framed view of the waterfront from Exeter Street.
5. High quality public realm including new quayside public open space and a proportionate contribution to the Sutton Harbour Heritage Trail, public art and heritage interpretation.
6. Innovative car parking solutions to reduce the visual impact of vehicles on the public realm.
7. Flood resistant and resilient design and contributions towards the upgrade and improvement of existing flood defences, as set out in line with Environment Agency advice.



4.101 The site occupies an attractive and prominent location on Sutton Harbour's east quayside, close to the City Centre, public transport and amenities. Its quayside forms part of the Sutton Harbour Heritage Trail – the publicly accessible waterfront walkway looping around the quayside. Exeter Street, the major strategic transport route to the City Centre from the east, forms the site's north boundary.

4.102 The last fifteen years have seen the completion of major residential and office mixed-use development on the site's formerly derelict industrial waterfront. Despite this, and the site's central waterfront location, much of it remains under-used and dominated by large, low-density commercial uses. Some of these detract from the appearance of Sutton Harbour, Sutton Road and importantly, the Exeter Street approach to the City Centre, contributing towards a poor first impression of the area. These uses also shut down at night – leaving large parts of the site without evening activity and consequently feeling unsafe.

4.103 There is an important opportunity to make better use of the site, such that it contributes to Sutton Harbour as a sustainable community and a waterfront destination. Introducing a more diverse mixture of uses will help create a more vibrant, safe and welcoming area with a sensitive balance of day, evening and weekend activity.

Policy PLY25

Sugar House, Sutton Harbour

Land at Sugar House, Sutton Harbour is allocated for residential-led mixed use development. Provision is made for in the order of 160 homes.

Development should provide for the following:

1. A development which respects the site's heritage assets and context, as informed by a detailed heritage character assessment to be undertaken for the proposal.
2. High quality architecture that responds positively to the site's heritage and Sutton Harbour's historic character and distinctiveness.
3. Active ground floor frontages to enliven all public streets and spaces – including on the quayside and Sutton Road.
4. Public access to and along the site's waterfront and a new pedestrian routes linking from Sutton Road to the quayside – providing a framed view from the waterfront to St John's Church.
5. High quality public realm including new quayside public open space and a proportionate contribution to the Sutton Harbour Heritage Trail, public art and heritage interpretation.
6. Opportunities for water access for leisure.
7. Innovative car parking solutions to reduce the visual impact of vehicles on the public realm.
8. Flood resistant and resilient design and contributions towards the upgrade and improvement of existing flood defences, as set out in line with Environment Agency advice.



4.104 The site holds a prestigious location on the waterfront at Sutton Harbour's east quayside. Various planning consents were granted in the 2000s for mixed-use development here, and although pile foundations were put in place, none of the consent schemes were built, due to the downturn in the economic climate. Therefore, this former boatyard land has been used as a car park since 2009. A series of temporary consents have been granted to allow this use to continue. However, the site retains its major development potential and is considered strategically important in terms of Sutton Harbour's wider regeneration.

4.105 The east side of Sutton Harbour has relatively very little activity, compared to the Barbican to the west, for example, contributing to the perception that this area is remote from the City Centre despite it being in relatively easy walking distance for most people. The development of this site should include active ground floor uses to attract people around the quayside, encourage pedestrian footfall and improve the area's vibrancy.

Policy PLY26

Sutton Harbour Fish Quay

Land at Fish Quay, Sutton Harbour is allocated for the enhancement of the existing fish quay and market, with complementary retail, education and leisure related uses.

Development should provide for the following:

1. All development must support or be complementary to the primary function of the site for the fishing industry.
2. Uses which result in an adverse impact on the operation of the fish quay will not be supported.
3. Improved public access to create a safe route from Lockyer's Quay to the National Marine Aquarium west plaza, without compromising the fish market's operational needs or health and safety requirements.
4. High quality public realm and building design.
5. A proportionate contribution to the Sutton Harbour Heritage Trail, public art and heritage interpretation.
6. A development which respects the site's heritage assets and context, as informed by a detailed heritage character assessment to be undertaken for the proposal.
7. Flood resistant and resilient design and contributions towards the upgrade and improvement of existing flood defences, as set out in line with Environment Agency advice.



4.106 Plymouth is a nationally significant fishing port, providing the largest 2015 tonnage of fish handling in England and hosting a major fish market. Sutton Harbour's fishing fleet is a fundamental part of its economy and character and therefore should be protected and improved. The Plymouth LPA will therefore seek to resist any development or uses which could be harmful to the operation of the Fish Quay.

4.107 There is however, significant scope to improve the site, including its Lockyer's Quay frontage, to create a welcoming, positive first impression for people approaching the site and the National Marine Aquarium (NMA) from the east. This policy seeks to optimise Fish Quay's public fish-retail, education and tourism potential in a way that draws from best practice in similar successful facilities in other cities.

4.108 Given health and safety concerns, the fish market currently forms a gap in public access along the quayside walkway, forcing pedestrians to detour inland along the route to the rear of the NMA. The policy seeks an innovative means of providing a safe pedestrian route from Lockyer's Quay to the National Marine Aquarium west plaza, without compromising both the health and safety and statutory harbour operational needs of the fish market.

Policy PLY27

Register office, Lockyer Street, The Hoe

Land at Lockyer Street, The Hoe, is allocated for mixed use development, including a quality hotel and housing. Provision is made for in the order of 52 homes.

Development should provide for the following:

1. High quality architecture that maximises the site's redevelopment potential and the site's role as a strategic gateway to Armada Way. The design should be informed by a detailed heritage character assessment to be undertaken for the proposal and should conserve and where appropriate enhance the character or appearance of the Hoe Conservation Area and Registered Park and Garden.
2. Active ground floor frontages to be encouraged to enliven all public streets and spaces – Armada Way and Citadel Road in particular.
3. Improved east / west public access along the site's north boundary, linking Armada Way to Lockyer Street.
4. High quality public realm including enhancement of Armada Way.
5. Innovative car parking solutions to reduce the visual impact of vehicles on the public realm.
6. Relocation of the register office function.



4.109 This is a major opportunity site within the Hoe Conservation Area. It sits at the southern gateway from Plymouth's major waterfront park to Armada Way: the grand Abercrombie-designed boulevard which links the Hoe to the City Centre and continues north to Plymouth's Central Railway Station.

4.110 The site is currently occupied by a late 20th Century two storey brown brick building housing Plymouth's Register Office. The building is identified as being of 'neutral quality' by the Hoe Conservation Area Appraisal and Management Plan. It does not respond positively to its context in terms of its footprint, massing, design and materials and contributes little to the street scene. Redevelopment of the site will therefore be supported to create high quality architecture including a major new hotel use and an environment worthy of the site's gateway location. The Waterfront Strategic Masterplan highlights the opportunity this site presents for a landmark development.

4.111 Any proposal will be expected to address the site's frontages and have active ground floors, whilst being sensitive to the Hoe Conservation Area context and adjacent listed buildings. There is an opportunity to have a tall building in this location, given its position on the strategic approach to the waterfront along Armada Way from the City Centre. However, the height, massing and orientation of development on the site must have full regard to impacts on the Conservation Area, with a positive relationship with the scale of adjacent streets, spaces and buildings. Architectural competitions will be encouraged, as will the integration of artists within the design process.

4.112 It is expected that public realm adjacent the site will be enhanced and redesigned as part of the site's regeneration.

Policy PLY28

Land north of Cliff Road, The Hoe

Land north of Cliff Road, The Hoe, is allocated for hotel led mixed use regeneration, including housing and potentially complementary uses which supports the tourist function of area. Provision is made for in the order of 88 homes.

Development should provide for the following:

1. A development which conserves and where appropriate enhances the character and appearance of the Hoe Conservation Area and Registered Park and Garden as informed by a detailed heritage character assessment to be undertaken for the proposal.
2. High quality, memorable building design will be sought, given the site's relationship with the Hoe Conservation Area, and wide prominence, including from the sea and coastline.
3. Publicly accessible active ground floor uses to be encouraged.

4. A new pedestrian / cycle link between Walker Terrace and Leigham Street at the site's northern boundary.
5. New enhanced and redesigned public realm on and around the site, including removal of the covered walkway against the retaining wall forming the site's southern boundary, and strong pedestrian and cycle links to the Hoe Park.
6. Innovative solutions to minimise the visual impact of car parking and maximise secure cycle parking.
7. An innovative lighting scheme.
8. Tree planting on the site's street frontages and open spaces.



4.113 This site is on the prominent high ground at the western corner of Hoe Park and is highly visible from Plymouth Sound on the approach to the city by sea. The site lies just outside the Hoe Conservation Area boundary.

4.114 The site was formerly occupied by a ten storey 1970s concrete hotel (The Quality Inn) in the Brutalist style. This building has recently been demolished and the site is currently vacant. A high quality hotel use should be provided on the site, as part of a mixed-use scheme where a hotel use is a significant part of the scheme. Residential accommodation should also be provided. Active uses, which support the tourism role of the area, should be delivered on the ground floor. Other uses as part of the overall proposal could include conference space, office, cafes and small-scale retail uses.

4.115 This prestigious location presents the opportunity for a high quality, innovative building of significant height. However, the height should be reduced to the west and north to follow the topography of the site and respond to the scale of adjacent residential buildings.

4.116 Development should deliver an attractive new east-west pedestrian / cycle link along the site's northern boundary - connecting Leigham Street and Walker Terrace. This will deliver an important public connection to the Hoe area from Millbay and improve wider walking and cycling routes

4.117 Innovative solutions to the provision of car parking will be encouraged, to screen vehicles from public view. A podium approach would hide car parking and maximise useable area on the site, although the primary frontages to surrounding streets should be animated to provide positive frontages.

Policy PLY29

Millbay waterfront

The Plymouth LPA supports the implementation of the existing planning permissions and strategic masterplan relating to the strategic development proposals for Millbay waterfront. Development will create a new sustainable mixed use neighbourhood which meets the needs of the new community as well as acting as a major destination and attractive international gateway. The proposals provide for 742 new homes, including extra care homes, 12,500 sq.m. B1 offices, as well as small-scale retail, food and drink uses, leisure, hotel, marine related uses and facilities for marine and other events and a multi-storey car park. Any significant changes to the approved schemes will need to be supported by a revised strategic masterplan.

Development should provide for the following:

1. Delivery of a high quality boulevard link from the City Centre to Millbay's quayside, including strategic crossings across Bath Street and to the City Centre.
2. High quality public realm with public access to and along the quayside walkways around the harbour, including connections to the South West Coast Path and the National Cycle Network with new public access to West Hoe and the Stonehouse Peninsula, as well as major new open space for marine and other events.
3. High quality architecture, with tall buildings at appropriate positions such as the key corners and landmark locations, including an iconic building at Millbay pier.
4. Active uses at ground floor level.
5. Public leisure access to the water.
6. Safeguarding the operation of the adjacent working port.
7. Water taxi service from Clyde Quay.
8. Conserving and enhancing the setting of the listed RNLi building and Grand Parade at Millbay Marina.
9. Safeguarding marine-related uses and deep water berthing facilities.
10. Measures to ensure resistance and resilience to coastal flooding and improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.



4.118 Millbay is a neighbourhood undergoing major regeneration. Over 400 homes, 2,000sqm of commercial floor space, a new marina and the landmark Plymouth School of Creative Arts have been delivered to date and a new community is starting to form. During this time a number of applications have been consented, including an outline application and more recently reserved matter applications for an Extra Care scheme and 137 residential units under planning reference 14/01448/OUT and 142 units at Millbay Marina under planning reference 14/01103/FUL.

4.119 The vision is for Millbay to become a major city destination – enhanced as Plymouth’s international ferryport and potential cruise liner terminal – as well as a vibrant, sustainable mixed-use neighbourhood. Proposals for a new hotel and more commercial uses are in the pipeline. It will be important that development supports the continued operation of the working port of Millbay.

4.120 The regeneration of the area has been driven by a partnership involving the Homes and Communities Agency, English Cities Fund and Plymouth City Council.

4.121 The regeneration of the Millbay area is a key part of the vision for the waterfront and is identified as such in the Plymouth Waterfront Strategic Masterplan (2016). This identifies the need to create stronger links between the City Centre and the waterfront and carries forward the Mackay Vision idea to create a new boulevard linking the two areas. The south section of the boulevard has already been laid out (with an interim finish) and this will need to be completed to a high quality final finish in the last phase of the development. The boulevard route is planned to extend along Bath Street to Union Street, flanked with substantial new development on both sides. A clear, direct and accessible route is key in the growth and regeneration of this area of the city.

4.122 The proposed boulevard will provide a major new pedestrian and cycle priority route connecting Millbay’s waterfront to the City Centre via Bath Street and providing strategic crossings, including at Millbay Road. Development fronting the boulevard will be expected to provide active ground floor frontages. Trinity Pier and Clyde Quay are identified in the Masterplan as important opportunities for open space for marine and cultural events, public-facing marine technology or arts space - potentially offering new flexible exhibition and studio space as a major new attraction - making Millbay more of a destination. Trinity Pier has an important deep water berth and access to this should be safeguarded for marine-related use.

Policy PLY30

Bath Street west

Land at Bath Street West is allocated for a comprehensive residential led mixed-use redevelopment. Uses which will be supported include residential, offices, small scale retail, cultural and community uses. Provision is made for 300 new homes.

Development should provide for the following:

1. Delivery of high quality public realm in order to create the Millbay Boulevard in a comprehensive and integrated manner.

2. Uses which create activity at ground floor level, particularly along the boulevard and other key routes.
3. High quality design which conserves and where appropriate enhances the setting of the adjacent listed buildings and Union Street Conservation Area, informed by a detailed heritage character assessment to be undertaken for the proposal.
4. East / West public linkages through the site to provide better connections through the area.
5. High quality design which preserves and enhances the setting of the adjacent listed buildings and Union Street Conservation Area.
6. A scale of development appropriate to create an urban character. Taller landmark buildings on key corners will be sought to mark the entryway to the Millbay Boulevard.
7. Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.



4.123 This policy is considered below, alongside the site allocation policy for Bath Street east. Together (and also including the commitment sites at Millbay waterfront) they will deliver the Millbay Boulevard.

Policy PLY31

Bath Street east

Land at Bath Street East is allocated for a comprehensive mixed-use redevelopment. Uses which will be supported include residential, arena facilities, offices, small scale retail, hotel, leisure, cultural and community uses. Provision is made for 323 new homes.

Development should provide for the following:

1. Delivery of high quality public realm in order to create the Millbay Boulevard in a comprehensive and integrated manner.
2. Re-provision or refurbishment of arena facilities with the primary pedestrian arena access from the boulevard.
3. Uses which create activity at ground floor level, particularly along the boulevard and other key routes.

4. High quality design which conserves and where appropriate enhances the setting of the adjacent listed buildings and Union Street Conservation Area, informed by a detailed heritage character assessment to be undertaken for the proposal.
5. A scale of development appropriate to create an urban character. Taller landmark buildings on key corners will be sought to mark the entryway to the Millbay Boulevard.
6. Removal of the pedestrian footbridge, stair tower and associated infrastructure over Union Street.
7. East / West public linkages through the site to provide better connections through the area.
8. Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.



4.124 Bath Street in the Millbay area is identified as a major strategic regeneration opportunity in the Waterfront Masterplan (2016). Its location is also central to the delivery of a high quality strategic boulevard connection linking the City Centre to the Millbay waterfront – a key aspiration for Plymouth since the 'Mackay Vision' form Plymouth. The site is currently occupied by a small scale employment uses, including car repair workshops, warehouses and offices, surface level car parking and the Plymouth Pavilions Arena and Ice Rink.

4.125 Proposals for Bath Street contribute to the wider regeneration aspirations for the Millbay area which has already seen significant development. The site is considered to be able to support a range of uses, including residential, commercial, and retail, community and cultural uses alongside improved arena facilities. It will be crucial for the successful regeneration of the area that active ground floor uses are provided along key routes, particularly the Millbay Boulevard. This will help to create a vibrant, mixed community with a strong evening economy.

4.126 The Pavilions is Plymouth's largest concert venue, as well as a mixed use arena providing conference and expo facilities. Redevelopment proposals should include a high quality refurbishment of the existing arena or the re-provision of new arena facilities within the eastern part of the site at the Western Approach junction. Primary access to the arena should be from the boulevard.

4.127 There is currently a pedestrian footbridge over Union Street connecting the Western Approach Car Park and the Pavilions. The bridge has fallen into disrepair and its defunct lift tower acts as a barrier which blocks views to and from Bath Street. It should therefore be removed, along with any associated infrastructure, to open up the area and to provide safer and more attractive ground-level pedestrian and cycle connections between the two areas.

4.128 Buildings along the site's Union Street frontage form part of the Union Street Conservation Area. The buildings have seen considerable alterations which have detracted from their prime historic condition.

Policy PLY32

Stonehouse Barracks

Land at Stonehouse Barracks is allocated for a mixed use development, the final nature, form and scale of which is determined following the completion of a detailed assessment of the site's heritage assets and the preparation of a masterplan. Subject to confirmation through this process, provision is made for 400 new homes. Other uses to be provided as part of the mix include appropriate local facilities to support the new and existing residents and to enhance the sustainability of the existing area, with opportunity also to provide a high quality hotel with facilities to support local businesses and event, and small scale retail and office uses.

Development should provide for the following:

1. A development which respects the site's heritage assets and context, as informed by a detailed heritage character assessment to be undertaken for the proposal.
2. High quality sensitive restoration and reuse of the site's historic buildings, including retention and restoration of the Globe Theatre as a community facility.
3. New build development which positively responds to and complements the historic character of the Barracks.
4. Retention of the artificial grass pitch for community use.
5. Retention of key infrastructure on the site relating to the management of Plymouth's waters.
6. Measures to ensure the improvement of surface water management to protect Plymouth's waters and the safeguarding of the waterfront from coastal flooding.
7. Retention of the harbour and the site's slipways and marine recreational facilities.
8. Enhancing the natural spaces of the site, and protecting the city and coastal views from the site, for the enjoyment of both local people and visitors.
9. Design and juxtaposition of uses that responds to the continued and expanded operation of the ferry port, with appropriate noise mitigation measures provided in development.
10. Comprehensive high quality public realm enhancements.

11. Appropriate measures to celebrate the military heritage of the site.
12. Delivery of an access strategy to ensure that the transport impacts of the development are appropriately managed and mitigated.
13. A good quality pedestrian and cycling access route as close to the waterfront perimeter of the site as practicable, linking to and enabling the extension of the South West Coast Path and National Cycle Network Route 27.
14. An appropriate Design Code, to be agreed prior to any development being approved.



4.129 The MoD intends to sell the historic Stonehouse Barracks complex as part of its review of defence estate. The site, which has been occupied by the Royal Marines since 1760, is one of three purpose built barracks for the Marines in the UK, the others being at Chatham and Portsmouth. The site contains important groups of Grade II and Grade II* historic buildings as well as a scheduled monument.

4.130 Stonehouse Barracks is a site and location of exceptional quality and opportunity. Its re-use will need to be very carefully appraised, especially in light of its substantial heritage value, and a masterplan will be of critical importance to ensure that this happens well. However, the outcome should be a high quality, sensitive mixed use area which provides quality homes, sports, cultural and commercial opportunities, also achieving strategic connections for public access to and from the Millbay waterfront quayside trail, South West Coast Path and National Cycle Network Route 27.

Policy PLY33

Oceansgate

The Plymouth LPA supports the implementation of the existing planning permissions and strategic masterplan relating to the strategic development proposals for the Oceansgate project at South Yard. Any significant changes to the approved schemes will need to be supported by a revised strategic masterplan and historic character assessment. Development will need to be sensitive to the re-use of historic buildings and respect the character of the site, whilst recognising there is a need to modernise and adapt the site for twenty-first century use.

Provision is made for a Marine Industries Production Campus comprising employment and café use redevelopment of 5.88ha of South Yard (Areas 1 and 5) comprising demolition of some existing buildings, retention and reuse of other existing buildings for A3, B1 (a), (b) and (c), B2 and B8 Class uses and erection of new buildings and ancillary development.

The following key principles should be continued in any later revisions to the approved schemes:

1. Delivery of high quality design which preserves and enhances the setting of the adjacent listing buildings.
2. Public art and other appropriate measures to celebrate the military heritage of the site.
3. Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.



4.131 South Yard is currently undergoing major regeneration. The whole of South Yard (35ha) has been designated an Enterprise Zone, branded 'Oceansgate', which is a 25 year designation offering marine businesses financial incentives to invest in growth. The Oceansgate Enterprise Zone comprises three separate land ownerships: the MoD, Princess Yachts International and Plymouth City Council.

4.132 Planning permission has been approved for the retention and conversion of existing buildings to include:

- Approximately 275m² of A3 (café) use (in building SO35 Porters Lodge) and 1,380m² of B1 (a) in Area 1 and 8,669m² of B1 (a), (b) and (c), B2 and B8 or mixed class B uses in Area 5.
- New B1, B2, B8 or mixed class B buildings comprising up to 9,375m² of B1 in Area 1 and 6,155 m² of B2, B8 or mixed B2/B8 in Area 5 and a multi storey car park in Area 5.
- Other development including surface car parking in Area 1 and 5, provision of security fencing, security infrastructure to provide secure route for MOD through Area 5, infrastructure to facilitate development and landscaping works (under planning references 14/02269/OUT and 16/01125/REM).

4.133 The MoD has contracted to release some land within South Yard to the City Council for the development of a Marine Industries Production Campus. The site is home to three disused dry docks and contains an important groups of Grade II and Grade 11* historic buildings. High quality, sensitive development of the site will be supported.

4.134 Should further land releases take place within South Yard, the City Council will seek to extend the marine employment opportunities, as well as any related cultural opportunities, given the potential this land provides to enhance Plymouth's standing as a major national and international marine centre.

Policy PLY34

Union Street

The role of Union Street will be promoted as an urban street connecting the west of the city and linking the communities of north and south of Stonehouse. It will provide a mix of uses along its length, with high quality building design and associated public realm improvements. Development proposals should provide for:

1. The preservation and enhancement of the historic character of the Union Street Conservation Area.
2. Opportunities to improve connections from the areas north of Union Street to the areas south of the street.
3. Between the Palace Theatre and Stonehouse Bridge:
 - i. A more urban scale to the western end of Union Street with building heights at between 3 and 5 storeys along the street frontage.
 - ii. Continuity of street frontage along the length of the street.
 - iii. A range of uses, including residential, community uses, commercial, leisure and offices, with active ground floors and residential or other uses above.
 - iv. Supporting the viability and vitality of the existing local centre.
4. Between the Palace Theatre and the junction with Western Approach
 - i. The introduction of other uses such as commercial, offices, retail, leisure and residential to encourage increased daytime activity in the street.
 - ii. A limit to more late night uses so that there is no increase in the number of, or floorspace, for nightclub uses.
 - iii. A high quality restoration of the Palace Theatre, appropriate to the special architectural and historic character of the building that provides daytime as well as night time activity.
5. Safeguarding of development and people from coastal flooding.



4.135 Union Street is an important historic and strategic linkage from the City Centre to Devonport, Stonehouse, Millbay and the south west of Plymouth.

4.136 Union Street currently has two distinct parts – the area between Western Approach and the Palace Theatre and Palace Theatre to Stonehouse Bridge. Each part has a very distinctive character. Western Approach to the Palace Theatre is more dense and urban in character with more historic character, some of which is in poor condition. Buildings are generally three to four storeys in height and located at the back of pavement particularly on the southern side of the road. Evening uses are predominant in the area with takeaways, nightclubs, pubs and bars. However, there are residential flats on the north side of the street.

4.137 Most of the area south of Union Street is what remains of Abercrombie’s planned industrial area. The area is still home to many small businesses that provide valuable employment opportunities. Although they are important to the local economy, many of the premises are of poor quality. There is a high level of social deprivation locally. Parts of the area have benefitted from regeneration – e.g. new developments north of the Millbay masterplan, like the award-winning Cargo mixed-use housing development and the striking new Plymouth School of Creative Arts. Inland at George Place there is a new award-winning hostel for homeless people and KARST - an artist-led gallery and workspace that is exhibiting international-level work.

4.138 Third-sector and community-led initiatives are now positively shaping the character of the place with organisations like Stonehouse Action creating Union Corner through restoring a derelict Victoria shop unit as a community space and the Millfields Community Economic Development Trust providing new managed work space at their Genesis development at Union Street.

4.139 Other development opportunities along the length of the street should offer the potential to rebuild a more coherent Union Street with a balance of uses and activity at all times of the day, giving it a busy urban feel, and providing better linkages from north Stonehouse to the waterfront area.

Policy PLY35

Drakes Island

Land at Drakes Island is allocated for heritage-led regeneration compatible with the natural and built heritage of the site, including the provision of a new hotel and associated visitor facilities and marine/natural environment-related research and development.

Development should provide for the following:

1. Ensure no significant impact on the European Marine Site (EMS) through the provision of on site and off site mitigation measures designed to protect the EMS interest features and which is supported by a robust Habitats Regulation Assessment.
2. A development which respects the site's heritage assets and context, as informed by a detailed heritage character assessment to be undertaken for the proposal.
3. Beneficial renovation of the scheduled monuments and listed buildings.

4. Safeguarding and enhancement of the island's features of historic, architectural and nature conservation interest.
5. Managed public access together with the provision of historic and natural environment interpretation and a public heritage trail.
6. Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.



4.140 Drake's Island is located in Plymouth Sound, about 600 metres south of the Hoe. Formerly known as St Nicholas Island, its strategic position led to it being fortified from at least the 16th century. Its military use continued until after World War II. From 1963 to 1989, Plymouth City Council leased it from the Crown and ran a youth adventure centre there. The current owner bought the island from the Crown in 1995. Since then the island buildings have been unused, and have fallen into disrepair. The island is currently inaccessible to people, yet there is a strong desire for its restoration and for public access. The history and prominence of the island mean that it is strongly linked to the image of Plymouth. This policy seeks its sensitive re-use and the safeguarding and enhancement of its historic and natural environment features.

4.141 A large proportion of the island, including the casemated gun battery at the west of the island, is a scheduled monument. The group of four principal buildings at the north-west end of the island are Grade II listed. These comprise the 18th and 19th century former Barracks, Ablution Blocks, Commanding Officer's House and Guardhouse. The range of remains and fortifications, and the prominent location of Drake's Island, make it a heritage site of the greatest importance.

4.142 Drake's Island also has significant wildlife interest and is located within the Plymouth Sound and Estuaries European Marine Site. It will be critical that any development demonstrates that it will not have an adverse impact on the SAC/SPA, supported by a robust Habitat Regulations Assessment.

Policy PLY36

Other site allocations in the City Centre and Waterfront Growth Area

The following additional sites in the City Centre / Waterfront Growth Area are allocated for development.

	Site	Proposal	Est. Of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Melville Building, Royal William Yard	Mixed use development - hotel and complementary commercial uses to heritage and visitor use of yard, potential for housing as part of mix of uses	3,000 sq.m. B1 office	<ul style="list-style-type: none"> a. Quality hotel to form a key part of site. b. Parking to be removed from courtyard. c. Sensitive conversion. d. Accessible active ground floor uses. e. Enhancement to Devils Point greenspace.
2	Mount Wise, Devonport - Area A	Housing	145 homes	<ul style="list-style-type: none"> a. Site is within a conservation area therefore design will need to conserve and where appropriate enhance the significance including the contribution made by the setting of the heritage assets. b. In the event that the World War II/Cold War bunkers are removed, then a full photographic and historic analysis of this structure must be produced by a qualified archaeological contractor prior to their demotion. c. Vehicular, pedestrian and cycle access from Richmond Walk to be agreed
3	Mount Wise, Devonport - Area D	Housing	73 homes	<ul style="list-style-type: none"> a. Site is within a conservation area therefore design will need to conserve and where appropriate enhance the significance including the contribution made by the setting of the heritage assets. b. Careful consideration will need to be made to the quality of design, height, use of materials and massing, in order to avoid some detrimental harm to heritage assets. c. The retention of the boundary walls to the north of the site. d. Development to avoid the course of the historic Devonport Dock Lines.
4	Millfields Trust, 278 Union Street	Mixed use community hub for Stonehouse, including employment and office use, community space, health and wellbeing and residential	62 homes 2,566 sq.m. B1 offices	<ul style="list-style-type: none"> a. Development which is sympathetic to the setting of the non-designated heritage assets nearby. b. Pedestrian and cycle links through the site and public realm improvements needed. c. Improved connectivity across Union Street. d. Improves street frontage along Union Street and East Street.

	Site	Proposal	Est. Of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
5	Broadreach site, Richmond Walk	Housing	60 homes	<ul style="list-style-type: none"> a. Relocation of existing outreach facility. b. Design needs to deal with the cliff edge constraint. c. Flood mitigation measures required.
6	Brickfields Recreation Ground, Devonport	Key Multi-Sport Hub	n/a	<ul style="list-style-type: none"> a. A masterplan to be developed to demonstrate a clear strategic approach to protecting and enhancing the site's sporting facilities within the context of the overall sporting offer of the city. b. Enabling development may be acceptable if can be delivered: <ul style="list-style-type: none"> i. Without compromising the sporting provision within the site, ii. Supports the site's role as a key strategic multi-sport site; and iii. Has a demonstrable benefit to the delivery of the masterplan.



4.143 Policy PLY36 identifies six further sites for development within the plan period. These sites are expressed in table format as the key requirements relating to each proposal can at this stage be expressed in a relatively few points. However, each proposal is significant in terms of the contribution that it makes to the overall vision of the plan and meeting the strategic outcome set out for the City Centre and Waterfront Growth Area.

4.144 Taken together the City Centre and Waterfront Growth Area site allocations provide for 3,778 new homes and 82,445 sq.m. of employment floorspace, as well as strategic retail, cultural, tourist, leisure and sports related uses.

Policy PLY37

Strategic infrastructure measures for the City Centre and Waterfront Growth Area

The following key strategic infrastructure measures will be provided during the plan period, in addition to proposals identified in other policies of this plan, in order to support the delivery of the strategy for the City Centre and Waterfront Growth Area:

1. City Centre public realm and transport improvements to improve circulation and encourage investment, including:
 - i. Capacity increases, including bus priority improvements, to the A374, A379 (Exeter Street) and the A386 including North Cross roundabout, Charles Cross, Western Approach, Union Street, St Andrews Cross and Derrys Cross and Drake Circus junction improvements.
 - ii. Armada Way public realm; incorporating City Centre Strategic Cycle Network and walking improvements
 - iii. Improvements to Royal Parade to ensure a positive sense of arrival and sufficient capacity for buses.
2. Millbay Boulevard and related public realm and transport improvements to enhance the link between the City Centre and waterfront.
3. Improvements to international ferry facilities and a new cruise liner terminal, and associated local road network improvements.
4. Other City Centre and waterfront public realm and transport improvements to support Mayflower 400.
5. New coach station at Mayflower Street.
6. New and improved public car parking in the City Centre.
7. Strategic drainage improvements.
8. City Centre / Waterfront Strategic Cycling and Walking network improvements.
9. Upgrading of flood defences, maritime and harbourside infrastructure including:
 - i. Replacement of Sutton Harbour Lock Gate and Bridge.
 - ii. Improvements to West Pier.
 - iii. Completion of flood defences around Millbay.

- iv. Monitoring the condition of the breakwaters and other structures within Plymouth Sound and, in case of deterioration, identifying strategies to ensure the current benefits provided at the coast during coastal storms are retained.

10. New primary school in the City Centre area (site still to be identified).



4.145 The priority infrastructure interventions needed to support growth in the City Centre and waterfront are set out in Policy PLY37. Transport and public realm improvements, together with infrastructure related to drainage and flood defence are of key importance to this particular Growth Agenda, given its particular characteristics and role.

4.146 Ensuring effective circulation around and into the City Centre and improving the parking offer are all essential to enable it to fulfil its potential as a regional centre and for it to diversify its uses and extend its hours of use. Public realm improvements, as demonstrated in other cities, are critical to encouraging further investment in the retail offer and to promote residential, office and other desired forms of development.

4.147 Connecting the City Centre to the waterfront has been a long held objective of the city, and these improvements will help to open up the new developments in the Millbay area as well as improving the links between this area and the City Centre. In addition, the ability to berth larger cruise ships will bring additional spending power to benefit city businesses, including those in the City Centre. These and the wider waterfront improvements will enable the city to accommodate and gain maximum benefit from the Mayflower 400 celebrations.

4.148 Drainage and flood defence infrastructure is required to address existing known deficiencies as well as to accommodate new development.

Opportunity sites within the City Centre and Waterfront Growth Area

The following sites are identified as having significant potential for supporting the delivery of the Strategic Outcome and Objective for this Growth Area. They are however not allocated in the plan because there is insufficient evidence at the current time of their deliverability within the plan period.

- The Royal Citadel - identified in November 2016 as surplus for MoD purposes, but too late to be tested for inclusion in the plan. Much work is now needed to identify its appropriate use and it is anticipated that this site will be allocated when the JLP is reviewed in five years.

- Mayflower Street West / Armada Centre - this is seen as a long term opportunity for major redevelopment, which could include a mix of retail, residential, leisure, office and hotel uses.
- Commercial, Elphinstone & Phoenix Wharfs - the site is considered to have potential for mixed use opportunities for water sports, maritime events and leisure and tourism and leisure, including complementary enabling commercial uses. However, given site constraints and legal issues, including the Plymouth City Council Act 1987, there is insufficient certainty about a deliverable proposal to support allocating the site at this time.
- Land to the east of Sutton Road, Coxside - the LPA has had a long standing aspiration to the see area comprehensively development. The potential exists to deliver a significant mixed use residential community, which will transform the area and also deliver major improvements to the Exeter Street approach to the City Centre. However, there are many land owners involved and it this stage there is no clear delivery strategy in place.

4.149 Opportunity sites are not formally allocated in the plan and therefore are not shown on the Policies Map. However, the LPA is supportive in principle of development of these sites if key constraints can be overcome in an acceptable way and a deliverable proposal can be identified. Each of the sites identified has considerable potential to support the achievement of the plan's vision, and so the LPA is hopeful that by the time of the next plan review they may be able to be included as positive allocations.

How we will know we have been successful - our measures of success for the City Centre and Waterfront Growth Area

- A. City Centre is renewed and enhanced.
- B. Waterfront has been transformed.

ii. The Derriford and Northern Corridor Growth Area

What we are trying to achieve - our strategic objective for the Derriford and Northern Corridor Growth Area

Strategic Outcome

The Derriford and Northern Corridor Growth Area will have been transformed through community-led improvements and major investment, with its high value economy, high quality medical and healthcare facilities, and existing residential neighbourhoods consolidated around a new commercial centre in Derriford to create a high quality, distinctive, and vibrant mixed-use heart for the north of

Plymouth. Radical improvements to transport and facilities, including natural infrastructure, will have been delivered alongside significant additional jobs and homes, including the major residential extension to Woolwell.

4.150 Derriford and the Northern Corridor has been prioritised as a Growth Area because of its potential to deliver a regionally significant scale of growth in new jobs and new homes.

4.151 The growth potential of Derriford and Plymouth's northern corridor came particularly to the fore in the early-mid 2000s through a series of strategic studies of the Plymouth sub-region and of the city's economic opportunity. This led to the Local Economic Strategy, 2006, and the Core Strategy, adopted 2007, identifying the Derriford area as a major plank of the city's growth strategy, providing a new heart for the north of the city. The JLP continues this approach. The expansion of focus beyond Derriford to incorporate other strategic opportunities along the northern corridor reflects the importance of the corridor as a whole. The wider area includes for example strategically important sites and opportunities such as at Woolwell on the edge of Plymouth and the airport site, which the LPAs see as an important element of its approach to strategic connectivity.

4.152 The Derriford area has a particularly significant role to play in providing a new heart for the north of Plymouth. The area includes several major employment areas that provide high value jobs in the healthcare, medical and advanced engineering fields, as well as the Hospital Campus and The University of St Mark and St John (Marjons), with thriving commercial communities within the Plymouth International Medical and Technology Park (PIMTP) and the Plymouth Science Park. Derriford is the ideal location to establish the new heart given its strategic location in relation to public transport routes (it is the city's second most accessible location by bus, after the City Centre) and the geography and topography of the city. Its low density urban form and disparate use of land, its existing high value and regionally / sub regionally significant health, education, and employment facilities, and its relationship to important natural spaces and heritage provide a unique opportunity to deliver a transformational scale of growth and regeneration which will be significant at a regional level. Furthermore, many of the residential communities that surround the area (including Derriford, Whiteleigh, Southway, Widewell, and Glenholt) have poor access to shops and services, and the area occupies a gateway location when entering the city from the north. Evidence underpinning the local plan identifies this location as the 'hole' at the heart of the north of Plymouth.

4.153 The challenging topography of the area and its construction during the post-war period has resulted in a number of issues that need to be addressed through how new investment and development is provided for, particularly in the Derriford area. The A386 is a vital route into the city from the communities to the north. Whilst accessibility along the main A386 corridor within Plymouth itself is good (including by public transport), there has been an over-reliance on travel by car creating traffic congestion at peak hours. Furthermore, the historic incremental, site-by-site development of the area has meant that neighbourhoods, commercial, and other areas are poorly linked to one another. Historically, development has also been designed with little recognition of the area's landscape character or historic assets. As a result the area lacks distinctiveness, identity and a clear focus. Most buildings

turn their backs on the steep green valleys leaving them difficult to access and under utilised. Many uses make inefficient use of land, with large areas of wasted space and surface-level car parking. The availability of land, however, offers a significant opportunity to transform the area by introducing new development which generates a new focus and coherence for the area.

Strategic Objective SO4

Delivering growth in the Derriford and Northern Corridor Growth Area

To realise the potential of the Derriford and Northern Corridor Growth Area as a regionally significant growth hub through:

1. Delivering new development which supports and consolidates the Derriford area's regionally significant economic, health care and learning infrastructure to create a high quality, distinctive, and vibrant mixed-use heart for the north of Plymouth at Derriford, centered around a new mixed use commercial and district centre which is complementary to the role of the City Centre.
2. Delivering major new growth in housing throughout the area, especially at and near to Derriford and through a new sustainable urban extension at Woolwell.
3. Delivering the infrastructure needed to support this growth, including major transport improvements, two new community parks and the enhancement of the Plym Valley.
4. Creating balanced and well-connected communities, with an appropriate mix of housing types, sizes and tenures to meet the specific needs of the area, including within the Derriford area purpose built accommodation for students and for staff at the hospital.
5. Using the opportunity for major development at Derriford to achieve a key gateway to the city, marked with significant high quality buildings, with a greater intensity of uses to create a walking and cycling environment with safer and more engaging streets and public spaces.
6. Enhancing the Growth Area as a major location for employment and research, including medical and hi-tech industries and advanced manufacturing, as well as more traditional industries.
7. Facilitating improvements and expansion to Derriford Hospital to optimise its role in providing city and peninsula-wide medical excellence and maximising its benefit to the economy.
8. Supporting the growth of the University of St Mark and St John through improving its campus and better integrating it with the commercial centre, the facilities of which will contribute to creating an environment attractive to students.

9. Protecting the area's role in supporting the strategic connectivity of Plymouth through the safeguarding of land at Plymouth airport for general aviation purposes.
10. Utilising the area's natural and historic environmental assets, including the Palmerston Forts and the area's valleys, woodlands, greenspaces, and rights of way, to support the achievement of healthy and vibrant communities in the north of the city.



4.154 The achievement of this Strategic Outcome and Objective will require a number of actions to be taken. These include:

1. Giving priority to delivering catalyst interventions needed to unlock the wider growth potential of the Growth Area. These include:
 - a. The new mixed-use commercial centre (including district centre shopping alongside other main town centres uses) which is well located in relation to the area's centre of gravity (between Derriford hospital and Plymouth International Medical and Technology Park). A strategic masterplan will guide the delivery of this centre.
 - b. Strategic transport improvements, including supporting the safe and efficient operation of the A386 and A38 and re-opening of the Tavistock to Plymouth rail link.
 - c. Careful coordination of the delivery of development throughout the Growth Area in order to ensure that the regeneration opportunities of the Derriford area are realised as early as possible within the plan period.
2. Allocation of the key sites in the JLP that support delivery of these objectives. Relevant site allocations can be found within this section below.
3. Pursuing transport programmes and interventions, including travel planning, which provide genuine high quality sustainable alternatives to driving and promote travel behaviour change. This needs to include measures to the north of the city, given the role that the A386 plays in supporting rural commuters from a wider area.
4. Actively engaging with international, national, regional and local programmes and investors to deliver funding for the Growth Area projects.
5. Preparing, implementing and keeping under close review a 'Plan for Derriford and the Northern Corridor Growth Area' which will be a delivery plan and programme for the Growth Area.

4.155 The strategy for Derriford and the Northern Corridor Growth Area is illustrated on the Area Vision diagram at Figure 4.4.

DERRIFORD AND NORTHERN CORRIDOR GROWTH AREA VISION DIAGRAM

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Key

- Green space
- Hospital
- Park and Ride
- Safeguarded airport
- Public transport interchange
- University
- New primary school
- Community park hub
- District Centres
- Mixed use
- Employment uses
- Heritage led regeneration/improvements
- Local Centres
- Housing
- High quality gateway
- Junction improvements
- Walking and cycling links
- Highway network
- Improvements to strategic public transport corridor
- Strategic public realm improvements
- New road and public transport/sustainable transport corridor
- Strategic green links



FIGURE 4.4

What we are going to do - our policies for the Derriford and Northern Corridor Growth Area

Policy PLY38

Derriford commercial centre

Land situated between Derriford hospital and William Prance Road, and incorporating the North West Quadrant site, Derriford Business Park and the former Seaton Barracks Parade Ground is allocated for a mix of uses comprising new commercial floorspace in the form of retail, medical / health related uses, B1 offices and workshops, leisure and community uses, education, and residential. The overall balance of uses will be influenced over time by market conditions. However, the site should deliver a genuinely mixed use development of urban scale and intensity. The site comprises land in different ownerships and will be developed over time in accordance with a strategic masterplan that sets out an overall framework for delivery and identifies key infrastructure fixes. Specific provisions are as follows:

1. The commercial centre will have the status of a district centre in Plymouth's retail hierarchy. The role of the centre's retailing function is to fill a gap in main food shopping provision in the north of Plymouth and to provide retail facilities to serve those who work, study and visit the area's facilities and services. It will also provide a catalyst for the wider regeneration and development of the Derriford area, helping to create a new heart for the north of Plymouth. Food retailing shall be provided at a level which anchors other retail facilities in the centre and meets the need for main food and convenience shopping facilities for local communities. Non-food shopping and leisure floorspace should be limited to a scale and type which will not result in the centre having a significant adverse impact (including when assessed cumulatively) on the vitality and viability of, and investment in, the City Centre, nor on the ability of other centres in the retail hierarchy to perform effectively their primary role for their local communities. All proposals which form part of the development of the commercial centre or future changes to it which include retail floorspace will be determined and controlled in accordance with the application of the sequential and impact tests as provided for in Policy DEV16.
2. A mix of residential development should be provided throughout the scheme. The site is considered suitable for higher density forms of home, homes above commercial units, homes for the elderly (including extra care), student housing and homes for staff at the hospital. Provision is made for in the order of 664 homes.
3. Office accommodation should be provided throughout the scheme, representing Derriford's role as the secondary location for office development in the city. Provision is made for in the order of 34,000 sq.m. (net).
4. The northern part of the site, focused around the North West Quadrant site, will be most intensively developed, including:

- i. New health care and community facilities, offices, and multi-storey car parking in the areas closest to the hospital to support its operation by enabling non-acute and wider 'wellbeing' care to be separated from the acute care provided in the main hospital buildings.
 - ii. Smaller retail and food and drink uses designed to support the visiting and working communities of the immediate surroundings as well as a significant new residential population to the north of the site.
 - iii. Small to medium sized retail units suitable for food retailing in the highly prominent parts of the North West Quadrant site closer to the Derriford roundabout, along with the Derriford Gate office site, with separate access.
5. The southern part of the site focused around the former Seaton Barracks parade ground will be developed to include:
- i. Office and business park development.
 - ii. Potential for larger format retail for which there is insufficient space in the northern part of the site.
 - iii. Other uses that specifically support the business park and support place-making objectives for the centre, including limited scale food and drink and leisure uses.
 - iv. Residential uses, where these can be successfully mixed with commercial uses by for example, being located above commercial uses, wrapping buildings to animate otherwise dead frontages, or by being located discretely in a manner that creates an attractive residential environment.
 - v. Further residential development in the eastern area where there are excellent east-facing views, including on parts of the Territorial Army site (should these become available) where east-west links across the site to the Derriford Community Park can be created.
6. The Derriford Business Park provides a longer term opportunity for connecting the northern and southern areas with a range of town centre type uses mixed with residential.
7. Applications for development within the site will be expected to accord with the strategic masterplan, and to contribute towards the delivery of the network of on-site streets and other infrastructure essential to deliver the centre. Essential infrastructure includes:
- i. The creation of a strong, legible pedestrian and cycling route from the hospital entrance and public transport interchange to the junction of Morlaix Drive with Brest Road ('The Seaton Arc').

- ii. Improved bus and staff car parking access for the hospital site via Morlaix Drive.
 - iii. An extension of the Future Inn access road through to Brest Road, to provide the opportunity for buses to travel northbound through the site.
 - iv. A new/improved junction linking the access road to Brest Road and Morlaix Drive junction.
 - v. A new junction with William Prance Road and vehicle access route along the eastern boundary of the former Seaton Barracks Parade Ground site.
 - vi. The inclusion of green links throughout the area including, a new east-west linear park along the existing tree line providing street access to new development as well as a footpath and cycling route linking the Sendall's Way crossing of the A386 directly to Brest Road and good connection to Derriford Community Park.
 - vii. Space should be provided to create a high quality pedestrian and cycling bridge link across the A386 in the future, depending on the future development of the Glacis park site on the west side of the road.
 - viii. A communal surface water sustainable urban drainage scheme that is designed to deliver landscape, biodiversity and amenity benefits.
 - ix. Providing for future connection to district heating networks.
8. Development should provide proportionate contributions to strategic transport improvements and programmes.



4.156 The policy sets out the overall role of and framework for the delivery of the new commercial and district centre. The district centre has been an aspiration since the 2007 Core Strategy, which then provided for delivery of the centre by 2016. Clearly this has not been achieved, this in part being a consequence of significant investor interest in alternative sites and a highly contended planning process. However, the case for delivery of a new district centre remains strong, and it is important to set in place a policy as to how this aspiration can best be brought forward.

4.157 Development will need to respond to the particular context and opportunities that the Derriford area provides. However, to give maximum opportunity for deliverable proposals and creative solutions to come forward, the Plymouth LPA does not wish to be over-prescriptive in determining the format the new centre should take. This plan therefore proposes a mixed use commercial centre (incorporating a district centre) which should:

- Be located at or close to the centre of gravity of the Derriford area, which is Derriford hospital. The key opportunity sites in this respect cover an area from the North West Quadrant, the Derriford Business Park and former Seaton Barracks parade ground. There are other sites on the west of the A386, but these are further from this centre of gravity and the A386 is a considerable barrier to pedestrian movement from this area.
- Contain retail and other 'Main Town Centre Uses' that serve the residential communities immediately surrounding the Derriford area, as well as those who are already working, studying in or visiting the area, rather than having a city-wide (or larger) catchment which draws people to the centre from a wider area.
- Be designed to sit within and as part of a higher density urban environment, and not like an out-of-centre retail park. Development should be delivered in accordance with a strategic masterplan of the area, which would provide a fix on key infrastructure and promote the creation of a grid of streets which provide flexible development blocks and incorporate quality public spaces at key locations. In this way, the uses that comprise the overall centre might be spread over a wider area in a vibrant mix with other uses, such as healthcare and community, housing, and B1 office and employment space. Such an approach has distinct advantages, including achieving good connectivity within the centre and to surrounding areas, creating a vibrant, welcoming location throughout the day and into the evenings, and setting a pattern which enables the centre to be developed in stages.
- Help fill a qualitative gap in food shopping provision (including main food shopping) as supported consistently by retail studies since the Core Strategy was prepared.
- Incorporate other retail and non-retail units, where their provision does not have an unacceptable adverse impact on the City Centre, nor adversely effect the ability of other centres in the retail hierarchy to effectively perform their primary role in their local communities.
- Provide good accessibility by bus, walking, and cycling, and an integrated approach to car parking, to minimise its impact on traffic congestion and ensure that it integrates with surrounding communities.
- Become a catalyst for the creation of a wider heart for the north of Plymouth. After the City Centre, Derriford is the preferred location for further new main town centre uses.

4.158 The introduction of other uses within and immediately around the mixed use commercial centre to generate high levels of activity (including offices and higher density residential uses as part of a wider mix of housing types) will be important to support the district centre and enable it to serve as a true focus for the north, providing more than shopping facilities.

4.159 A strategic masterplan framework for the commercial centre is shown in Figure 4.5. This will support further engagement with the landowners and developers to put detailed flesh on the guidance set out in the policy and on the framework

diagram. The purpose is to guide the delivery of the centre and to ensure that key infrastructure needs and place shaping objectives are identified at the outset, so that earlier development is future proofed against the longer term aspiration. The diagram illustrates how a series of flexible development plots can be created, around a street grid with a key fix on a central route with high quality public realm. Whereas the precise developments to come forward will be substantially market-driven, it is anticipated that each part of the area will have different characters with:

- The northern area (focused around the North West Quadrant site) responding more to its proximity to the hospital, and therefore being more intensely developed with a vibrant mix of use, including health, smaller retail units and potentially a food store, food and drink uses, community and housing.
- The southern area (focused around the Seaton Barracks parade ground site) responding more to the business park uses of PIMTP, incorporating further business park development but also allowing for some larger format retail, residential and uses that specifically support the business park including food and drink and leisure.
- The eastern area (focused around the TA site, should this become available) where residential may be the preferred predominant use given the excellent east facing perspective.
- The central area (focused around Derriford Business Park) which provides a longer term opportunity for connecting the northern and southern area with a range of 'town centre' type uses mixed with residential.



Policy PLY39

Glacis Park, Derriford

Land to the south of Crownhill retail park and west of the A386 (Glacis Park) is allocated for mixed use development, including incorporating residential uses and also providing for a range of other uses, including the potential for offices, particularly along the frontage to the A386, and education / community uses. Specific provisions are as follows:

1. Office accommodation is supported on the eastern section of the sites, particularly along the frontage of the A386. Provision is made for in the order of 18,000 sq.m. (net).
2. Development will not be permitted which prejudices the viability and vitality of other centres in the retail hierarchy including the City Centre or the deliverability, viability and vitality of the proposed district centre provided for in Policy PLY38. Small scale convenience retail that supports the new residential community at Glacis Park may be acceptable subject to meeting this test.
3. A mix of housing types, sizes and tenures should be provided. Provision is made for in the order of 638 homes.
4. Applications for development within the site will be expected to be supported by a strategic masterplan that will be prepared and consulted upon in advance of the consideration of any planning application. The masterplan will:
 - i. Identify the design philosophy and phasing of the development.
 - ii. Include an historic environment assessment to ensure it does not harm the setting of the Crownhill Fort Scheduled Monument (including consideration of views from the fort), as well as protecting and enhancing its glacis and the Drakes Leat as assets for the area.
 - iii. Include a detailed access strategy and design code.
 - iv. Set out how the development fits within its broader context including delivering walking and cycling connectivity to neighbouring areas. This should include detailed analysis of the demands the development creates for walking and cycling to the district centre on the east side of the A386, the delivery of appropriate levels of connectivity across the A386 (including potentially a high quality pedestrian and cycling bridge) and links to the south and west.
 - v. Demonstrate how the development will support the delivery of the Glacis Park Green Corridor, which will provide public access and a wildlife corridor, connecting to a wider green corridor to the east and west.
5. The development shall provide for:
 - i. A surface water sustainable urban drainage scheme that is designed to deliver landscape, biodiversity and amenity benefits.
 - ii. Long term management arrangements for green spaces in the development including the Glacis Park Green Corridor.
 - iii. Future connection to district heating networks.
 - iv. Contributions to strategic transport improvements and programmes.



4.160 This site is covered by a number of land ownerships. It is a significant strategic opportunity for delivering a mixed use development that delivers new homes, offices and potentially new education floorspace, with limited retail development where this does not undermine the Derriford commercial centre proposal on the east side of the A386 or the City Centre (whether on its own or cumulatively).

4.161 However, it is an extremely challenging site. The site currently accommodates the city's drinking water treatment works, along with some industrial and open storage uses and inaccessible, unmanaged greenspace. The majority of the water treatment works facilities will be relocated to Roborough, although the large covered reservoir close to the front of the site is to be retained. The site is located at the head of a wooded valley which extends to the northwest to Tamerton Lake and the River Tamar. There is a need to retain some South West Water infrastructure and build around complex levels in an environmentally sensitive location. There is also a need to secure high quality frontage to the A386 to provide enclosure and help create a sense of arrival on this busy route, and help address future pedestrian and cyclist connectivity across the road into the proposed district centre. As there is no clear solution to these issues at the present time the site is not anticipated to come forward until later in the plan period. However, it is important to allocate the site positively for development as much of the land is available or will become so in the plan period.

4.162 By making a green link between the site and tree line within the proposed commercial centre, there is the potential to link the strategic green infrastructure assets of the Tamar and Plym river valley systems. The western end of the site (which is at risk of flooding) is almost 40m below the level of the A386, and whereas the slope separating the site from the fort and Christian Mill Business Park slopes steeply, several large plateaus have been created on the site itself. It is possible that elements of this landscape were created through the forming of the Crownhill Fort, although the degree to which this is the case is not clear. What is clear is that any development on the site will need to be sensitive to the setting of the Crownhill Fort Scheduled Monument, including its impact on views from the Fort. The monument itself includes significant areas of the Glacis around the fort, which would have historically been clear of planting but now feature many semi-mature trees. Removal of some planting is therefore likely to be beneficial, although the wider benefits of planting will need to be balanced against the desire to restore and better reveal this historic asset. Historic England will therefore be closely involved in any development proposals as well as the Landmark Trust as owners of the Fort.

Policy PLY40

Seaton Neighbourhood

The LPA supports the implementation of the existing planning permissions and strategic masterplan relating to the strategic development proposals for Seaton Neighbourhood, including a western extension of the site adjacent to Charlton

Crescent. Development will create a new sustainable mixed use neighbourhood, located either side of the new Forder Valley Link Road, as part of the new heart for the north of Plymouth. The proposals provide for 933 new homes together with a new local centre to serve the neighbourhood and employment opportunities in the form of 8,000 sq.m. B1 business space. Any significant changes to the approved schemes will need to be supported by a revised strategic masterplan.

The following key principles should be continued in any later revisions to the approved schemes, including the westward extension:

1. The section of the Forder Valley Link Road through the site must be fully completed before December 2019 to enable timely completion of the full Forder Valley Link Road which creates sufficient highway capacity to enable development to be built out in full.
2. Delivery of the Seaton Local Centre offering a mix of uses, including shops and services. The amount of retail floorspace in the local centre should be limited to that required only to meet the day-to-day needs of the development, given the proximity to the proposed Derriford Commercial Centre.
3. Delivery of business space along the William Prance Road frontage to ensure the creation of a mixed use environment integrated with the Plymouth International Medical and Technology Park and the Seaton Local Centre which provides local employment opportunities and an active street frontage.
4. Review of access arrangements in relation to the westward extension site adjacent to Charlton Crescent.
5. Financial contribution to meeting the strategic transport infrastructure needs of the development.
6. Good connections into and sensitive boundaries with the Community Park.
7. The need for provision of open space and effective landscaping treating having regard to the site's prominent position in the landscape setting of the area.



4.163 This policy relates to outline permission 12/02027/OUT which included a strategic masterplan for the site.

4.164 Seaton Neighbourhood received outline planning permission in 2013 and is under construction. 873 homes were permitted under the original consent, of which 35 homes were delivered between 2014 - 2016. A further 60 homes are provided for in the policy for a westward extension on land adjacent to Charlton Crescent.

4.165 The new neighbourhood will provide a mix of house types and sizes, with higher density housing provided in the north, adjacent to and integrated with employment uses and the new local centre. The new local centre will serve the day to day needs of local residents as well as the adjoining employment areas.

4.166 The proposed Forder Valley Link Road is a strategic new road that received outline planning permission in 2013 and will provide an important gateway to the north of the city from Forder Valley.

Policy PLY41

Derriford Community Park Strategic Greenspace

Derriford Community Park will become a highly valued environmental, social and educational asset, a resource for the people of Plymouth and a regional destination for environmental learning. This will be achieved through:

1. Delivery of a high quality, accessible, natural green space, which retains and enhances the areas unique character, safeguards landscape features and the farmsteads that are historically significant and capitalises on key views.
2. Delivery of the Environmental Learning Hub at the heart of the park, next to the new school building north of the new Seaton Neighbourhood. The learning hub will include:
 - i. Classrooms, meeting rooms and offices that will support a diverse range of environmentally focused learning and social enterprise opportunities and the management of the wider park.
 - ii. An animal park that will support learning outcomes and enable communities to have hands on experiences with large and small animals. This will include indoor facilities and grazing paddocks.
 - iii. Will provide a focal and arrival point for the Park and include outdoor facilities such as growing areas, orchards and play spaces.
 - iv. The building itself will be designed to the highest environmental standards and be an exemplar of sustainable design.
 - v. The hub will provide a focus for outdoor learning, with an emphasis on wildlife, food production and farming.
3. The Establishment of a network of pedestrian and cycle routes throughout the park connected to new and existing communities through the creation of entrance ways and access points. The routes through the Park will enhance connectivity between adjoining communities and facilities in Derriford and form part of the city's strategic networks for walking and cycling.

4. Enable the continuation of farming within the city. Grazing by livestock will play a crucial role in managing the park and increasing the wildlife value of the grasslands. The park will need to retain facilities for operational farm activities and access. The park will also provide focus for community food growing and processing facilities that support wider community led social enterprise opportunities.
5. Enable landscape scale restoration of wildlife habitats which will include the incorporation of mitigation measures and surface water attenuation for adjoining developments. The wildlife restoration will include the enhancement of flower rich grasslands, the planting of new and enhancement of existing woodland, new/enhanced hedgerows, enhancement of stream habitat and new wetland areas and the creation of new features for bats, birds, reptiles and insects.
6. Enable a good relationship with the adjacent Seaton Neighbourhood ensure sensitive boundaries and connections are achieved.



4.167 The new Derriford Community Park will cement Plymouth's reputation as one of the UK's greenest cities. At more than twice the size of the city's Central Park, this will be one of the largest new parks to have been created in the UK for many decades. The new park will offer a generous and beautiful large-scale publicly accessible landscape. Traditional farm management practices will meet the 21st century culture of health and fitness, leisure, play, cultivation, education, and ecology, creating a unique place of large-scale interaction with the land.

4.168 The park, which will sit within the beautiful Forder, Seaton and Bircham Valleys, will educate and inspire a wide range of users and visitors with an interest in the local environment, sustainable living, wildlife, outdoor recreation, food production, gardening and farming. With over fifteen kilometers of new footpaths and cycle routes the park will be a destination for walkers, joggers, and cyclists. It will be rich in wildlife with newly created habitats complementing and enhancing the two existing Local Nature Reserves. It will also become a productive space for food growing with a community garden, and orchard providing healthy food produce.

4.169 The park will cover over 137 hectares and will include woodlands, farmland and a series of streams. It will link the Forder, Bircham and Seaton valleys and become a focus not just for the new communities of Derriford but also will provide a resource for the whole city with close links with the existing communities and a regional resource for environmental learning. The new Forder Valley Link Road will run through the park connecting the Derriford area to the Forder Valley.

4.170 At the heart of the park will be the new environmental learning hub. It will be a purpose built hub for environmental learning and community activity which will be designed to the highest sustainability standards and will fit seamlessly within the natural landscape of the park.

4.171 The park forms part of a network of greenspaces that cross the city and out into the wider countryside and therefore performs an important role as a wildlife corridor and this function will be enhanced through the improvement works. As part of a series of 'Strategic Green Spaces' identified within and around the city, a pro-active enhancement of Derriford Community Park's function and facilities will be a priority element of the sustainable growth agenda.

Policy PLY42

Plymouth airport

The Plymouth airport site is safeguarded for aviation uses until next review of this plan. Development proposals which come forward within the period until this review will be considered in accordance with the following provisions:

1. Any development at the airport site itself, or on nearby sites, which will prejudice the future resumption of aviation use of the site will not be permitted.
2. Proposals that remove key airport infrastructure will not be permitted. This includes:
 - i. Main Terminal Building.
 - ii. Runway 13/31 (asphalt), within Code 2 grassed runway strip and RESAs.
 - iii. Airport Apron (situated between the main terminal building and taxiway Charlie).
 - iv. Maintenance Hangar.
 - v. Engine Testing Bay.
 - vi. Fire Station.
 - vii. Fire Training Facility.
 - viii. Control Tower.
 - ix. Fuel Storage Facility.
 - x. Navigation and Visual Aids.
 - xi. Approach Lighting (both within and outside of the airport boundary).
 - xii. The runway and areas for aircraft to taxi.

3. Uses of a temporary nature and which do not prejudice the future resumption of aviation use of the site will be permitted subject to compliance with the policies of this plan.
4. Works to deliver environmental improvements to the perimeters of the site, pending the re-establishment of active use of the site, will be encouraged.



4.172 Policy SPT8 sets out that the Plymouth Airport site will be safeguarded for general aviation uses until the first review of the JLP, as part of the suite of measures to improve strategic connectivity between Plymouth and South West Devon, and the rest of the UK. Policy PLY42 sets out specific considerations that will be applied in relation to planning applications that may come forward in the meantime, including in relation to airport infrastructure that should be safeguarded.

4.173 The site of Plymouth airport is one of the area's most strategic assets. The airport has not been operational since 2011 when it was closed on grounds of non-viability. However, the LPAs believe that for an asset as unique and strategic as an airport, a longer view needs to be taken. Whilst the site has potential to accommodate alternative uses which could deliver benefits, the opportunity for the city to have an airport again, with its associated strategic connectivity and wider benefits, would be entirely lost.

4.174 Evidence prepared by Arup has shown that there are opportunities for general aviation operations to be reinstated on the airport site, enabling Plymouth and the wider area to have flights to other UK airport destinations. It should be noted too that the Government recognises the importance of general aviation airfields, and of a national network of general aviation airfields as part of the National General Aviation Strategy (March 2015).

Policy PLY43

University of St Mark and St John

The improvement and expansion of the Marjon campus will be supported to enable the University to realise its ambitions for growth and to deliver the key strategic sports hub in the north of Plymouth. Development proposed on the campus should:

1. Be subject to site-wide masterplanning to ensure a co-ordinated approach to development.
2. Facilitate a reconfiguration of the campus to improve its relationship to Derriford Commercial Centre, and help to deliver improved links to this proposed centre of activity, as well as improving links to adjacent residential and commercial uses such as Plymouth Science Park.

3. Take opportunities to improve the campus's relationship with the Derriford Community Park, and preserve existing ecological and landscape assets on the campus wherever possible.
4. Increase community use of the campus facilities through, for example, public engagement with its performing arts functions, as well as its sporting facilities.
5. Allow for the creation of small shops and related services on campus that are necessary to serve the day-to-day needs of its users, but are of a limited scale and nature such that they are not harmful to the retail hierarchy.
6. Provide for future connections to a district heating network.
7. Develop a site-wide Sustainable Drainage Strategy to ensure that the flood risk and drainage requirements associated with the site's location within a critical drainage area can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.



4.175 The University of St Mark and St John ('Marjon') forms a single campus for an academic community of approximately 5,000 people, including student accommodation on site. It plays a vital role in supporting the city's continued growth and long term economic prosperity through the provision of further education.

4.176 The University of St Mark and St John has been identified in the Strategic Sports Facilities Plan as a 'Key Strategic Sport Site' delivering facilities for the north of the city as part of network of multi-sport sites that will meet the sports needs of the area as it grows. As part of its role as a strategic sports site facilities will be enhanced and expanded and the community use will be increased.

4.177 Whilst encouraging the development of the campus as set out in the policy, any opportunities for the provision of University functions, including related requirements such as student accommodation, on other sites within the Derriford area will be supported where these contribute positively to the wider area vision and support the growth and integration of the University. In particular, it is considered that opportunities may exist for university functions within the Derriford commercial centre and Glacis Park site allocations.

Policy PLY44

Woolwell sustainable urban extension and community park

Land at Woolwell is allocated for comprehensive residential led mixed use development to provide a sustainable urban extension and a defined edge to the north of the city, including a new community park. Provision is made for in the order of 2,000 new homes (about 1,560 of which are anticipated to come forward within the plan period). Development should provide for the following:

1. Delivery in accordance with a strategic masterplan and design code that should be prepared for the site and consulted upon in advance of the consideration of any planning application. This masterplan will:
 - i. Identify the design philosophy and phasing of the development.
 - ii. Include a detailed transport and access strategy which establishes key road, walking and cycling routes and public transport, maximising the permeability of the site by all forms of sustainable transport, both within the development and to connecting routes in the vicinity.
 - iii. Set out a landscape strategy that responds to the sites location and relationship with Dartmoor National Park.
2. The main access arrangements are to be agreed prior to the commencement of development and delivered commensurately with the associated phase of the development. Additionally, there should be no occupation of new homes until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network.
3. A form of development which utilises natural features with appropriate strategic landscaping that is sensitive to its location and relationship with the Dartmoor National Park resulting in a clearly defined edge of the city.
4. Delivery of a new Community Park that will form part of the network of Strategic Greenspace sites. It will therefore need to be of a sufficient scale, design and quality and must be multi-functional in nature. The park must:
 - i. Meet the recreational needs of the new community to prevent an unacceptable impact on South Dartmoor Woods European Protected Site.
 - ii. Provide a minimum of a 40m landscape buffer between the edge of development and the Plym Valley Strategic Green Space and setting of Dartmoor National Park.
 - iii. Deliver high quality accessible greenspace that incorporates areas for active recreation and play in line with local standards.
 - iv. Provide a high quality network of walking, cycling and horse riding routes through the Park that link into the adjacent Plym Valley Strategic Green Space.
 - v. Incorporate elements of the Sustainable Urban Drainage system that must be designed to fit within the landscape setting of the Park and provide wildlife and amenity benefits.

- vi. Incorporate new playing pitches in line with local standards and associated infrastructure, such as changing rooms, required to support the new community. Facilities will be located in an appropriate area that does not conflict with the other functions of the park.
 - vii. Mitigate the impacts of the development on biodiversity and incorporate biodiversity enhancement measures.
 - viii. Utilise the old tramway for pedestrian and cycle connections through the development and providing the opportunity for onward links to the Plym Valley Strategic Green Space.
5. Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the area, including a new primary school and appropriate contributions to mitigate the development on secondary schools in Plymouth.
 6. A second road access to Woolwell which is capable of accommodating traffic from the existing community and planned new development, with due consideration to the needs of public transport accessibility, and which leads to improved traffic flow around the area and which reduces the impact of the development on the key transport corridor and routes.
 7. Contributions to strategic highway improvements and programmes.
 8. Provision of opportunities and plots for self or custom build homes.
 9. Maximise opportunities for on-site energy generation.



4.178 The key strategic residential opportunity to the north of the city is for an urban extension at Woolwell. The potential for development around Woolwell has been identified in previous studies as a potentially suitable location for a sustainable urban extension. As such, this plan identifies Woolwell as a strategic site capable of delivering significant numbers of new homes, improved infrastructure, local services and facilities. To ensure that Woolwell becomes a sustainable linked neighbourhood, it will be vital that appropriate investment in infrastructure, services and facilities are delivered in a timely manner, making sure that new development provides a positive relationship with the existing community.

4.179 Woolwell acts as a gateway between the city and Dartmoor National Park. This presents both opportunities and challenges. The extent and design of any extension to Woolwell will need to have careful regard to its impact on the National Park, including the need to ensure that it provides a high quality edge to the city. Development should also serve to create a high quality point of arrival into and departure from the city, especially in the context of its relationship to the A386.

4.180 It is acknowledged that there are current constraints in relation to the transport infrastructure in the area and its ability to accommodate significant development. As such, the plan sets out the measures required to address these issues. In particular, the Woolwell to the George Junction transport scheme should be implemented prior to the occupation of development. Additionally, it will be important to deliver the main access to the scheme as a first phase of development so that there is adequate access for construction traffic and to protect the amenity of the existing community.

4.181 The development will also need to provide for a range of facilities for both existing and new residents. These include improved neighbourhood shopping and community facilities, a new primary school, an enlarged and enhanced sports hub, public access to large areas of open space (linking the Plym Valley to open countryside), and a new Community Park which will help to reduce the recreational pressure on the protected landscape of Dartmoor National Park and the European Marine Site. The potential recreational impacts of the development on Dartmoor National Park and the European Marine Site will need to be assessed and a strategy for their mitigation produced that addresses the identified issues.

Policy PLY45

Plym Valley Strategic Greenspace

The Plym Valley forms an important landscape, wildlife and recreation site on the edge of the city. Its functions will be protected and improved to enhance the sites ability to support the growth of the Plymouth Policy Area by:

1. The delivery of a strategic access network across the site which encourages active recreation in a manner which is sensitive to the sites natural and historic assets and the working landscape.
2. Providing new and improved connections to adjacent communities and enhanced walking and cycling links to encourage visits by sustainable means.
3. Delivering landscape scale biodiversity enhancement across the site.
4. Ensuring the landscape value of the site is protected and enhanced and the site continues to provide a strong natural edge and attractive setting for Plymouth.
5. Protecting and enhancing the wealth of historic assets within the valley as part of the sites development ensuring people have the opportunity to appreciate and learn about the heritage of the area.
6. Supporting the development and enhancement of facilities to support the visitor experience across the valley in locations and with a design and form that is sensitive to the special qualities of the site and support the long term sustainable management of the valley.

7. Supporting the continuation of forestry and farming as a sustainable way of maintaining the function and value of the site but ensuring the practises take full account and support the special values of the site.
8. Supporting the development of appropriate recreational activities within the valley providing they are sensitive to the functions and values of the site.



4.182 The Plym Valley covers an extensive area to the north west of the city and is already a significant natural resource and recreational area for residents and visitors. The site includes ancient woodland, managed forestry, areas that are actively farmed, formal sporting facilities, wildlife projects, formal and informal recreation routes and the River Plym flows through its centre. The land ownership through the Valley is mixed with areas that are publicly accessible, including land owned by the National Trust and Forestry Commission and land in private ownership. The landscape value of the Plym Strategic Greenspace is substantial as it provides an attractive setting to the edge of the city and provides an effective buffer between the urban environment and the wider countryside.

4.183 The proactive delivery of the Plym Valley as a Strategic Greenspace will help to mitigate the recreational impacts of the future growth of the area on European Protected Sites by providing high quality recreation greenspace directly adjacent to new and existing communities.

Policy PLY46

Other sites allocations in the Derriford and Northern Corridor Growth Area

The following additional sites in the Derriford / Northern Corridor Growth Area are allocated for development.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Plymouth International Medical and Technology Park - Plot A	Employment - B1b,c & B2	8,200 sq.m. B1/B2 industrial	a. Contribution to strategic transport infrastructure / programme needs.
2	Plymouth International Medical and Technology Park - Plot F	Employment - B1b,c & B2	840 sq.m. B1/B2 industrial	
3	Plymouth International Medical and Technology Park - Plot G	Employment - B1b,c & B2	2,200 sq.m. B1/B2 industrial	a. Contribution to strategic transport infrastructure / programme needs.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
4	The Ship site, Plymouth International Medical and Technology Park	Employment - B1a office / leisure	no net increase in floorspace	a. Safeguard the listed building and its setting.
5	Plymouth Science Park Phase 6, Derriford	Employment - B1b,c	7,840 sq.m. B1b,c industrial	a. Contribution to strategic transport infrastructure / programme needs.
6	Island Farmhouse, Plymbridge Lane, Derriford	Housing	11 homes	
7	Land at Tamerton Foliot Road	Housing (this the site is considered particularly suitable for executive housing)	18 homes	a. Protection of trees covered by group TPO. b. Avoid northern boundary due to flood risk. c. Establish public access through site and to main green corridor. d. Contribution to strategic transport infrastructure/ programme needs.
8	BT Depot, Tamerton Foliot Road	Housing	87 homes	a. Public access over remaining land to north of water pipe at Quarry Fields. b. Improvements to connectivity to wider area for walking and cycling. c. Retain green corridor to north of site to provide links to Glacis Park. d. Contribution to strategic transport infrastructure / programme needs.
9	Land adjacent to Plumer Road, Crownhill	Housing	61 homes	a. Contribution to strategic transport infrastructure / programme needs.
10	Land south west of Belliver Way, Belliver industrial estate	Employment - B1b,c, B2, B8	5,840 sq.m. - industrial / B8	a. Relocation of sport pitch to be provided for.
11	Land at Broadley Park industrial estate, Roborough	Employment - B1b,c, B2, B8	10,080 sq.m. - industrial / B8	a. Strategic landscaping to northern boundary.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
12	Land north of Tamerton Road and south of Roborough House, Roborough	Employment - B1b,c, B2, B8 and sports pitches	2,260 sq.m. - industrial / B8	a. Retention of the existing playing pitches, or re-provision to an equivalent or higher standard within the overall site.












4.184 Policy PLY46 identified twelve further sites for development within the plan period. These sites are expressed in table format as the key requirements relating to each proposal can, at this stage, be expressed in a relatively few points. However, each proposal is significant in terms of the contribution that it makes to the overall vision of the plan and meeting the strategic outcome set out for the Derriford and Northern Corridor Growth Area.

4.185 Taken together the Derriford and Northern Corridor Growth Area provides for 3,972 new homes, 97,260 sq.m. of employment floorspace, together with strategic green space and a safeguarded airport.

Policy PLY47

Strategic infrastructure measures for the Derriford and Northern Corridor Growth Area.

The following key strategic infrastructure measures will be provided during the plan period, in addition to proposals identified in other policies of this plan, in order to support the delivery of the strategy for the Derriford and Northern Corridor Growth Area:

1. A386 and B3250 capacity and bus priority improvements including the Derriford Transport Scheme and Woolwell Roundabout to the George Junction scheme. A386 improvements to be considered as part of a wider study of the A386 corridor up to Tavistock, considering all transport modes.
2. Forder Valley Link Road, with associated capacity and bus priority improvements on the A38 at Forder Valley Interchange and Marsh Mills roundabout.
3. Marjon link road.
4. Capacity and bus priority upgrades to the A38 Manadon junction including improvements to the A38 Trunk Road, the B3250 Mannamead Road and the A386 Outland Road.

5. Strategic public transport measures to support increased use in the Derriford area including the Marjon Link Road and Derriford Hospital Interchange schemes, the widening of Morlaix Drive and improvements to Brest Road.
6. Improved Northern Corridor Park and Ride sites and services.
7. Reopening the rail link between Tavistock and Plymouth, providing sustainable alternative travel for the entire A386 corridor from Tavistock to Plymouth through the Growth Area.
8. New public car park at Derriford, which incorporates sufficient secure cycle parking, and parking management controls for the Derriford area.
9. Northern Corridor Strategic Cycling and Walking network improvements.
10. New primary school at Derriford.
11. A new waterworks at Roborough to meet the long term water supply needs for Plymouth and the surrounding areas., facilitating development of Glacis Park.



4.186 The priority infrastructure interventions needed to support growth in the Derriford and the north of the city are set out in Policy PLY47. Major investment in the northern corridor transport infrastructure is of critical importance to unlocking the growth potential of this area. This includes facilities to improve capacity and ease congestion, as well as measures to support public transport, including rail, and cycling and walking, and to improve parking.

4.187 Opportunity sites are not formally allocated in the plan and therefore are not shown on the Policies Map. However, the LPA is supportive in principle of development of these sites if key constraints can be overcome in an acceptable way and a deliverable proposal can be identified.

How we will know we have been successful - our measures of success for the Derriford and Northern Corridor Growth Area

A. Derriford district centre delivered providing the catalyst for a new heart in the north of Plymouth.

B. Major northern corridor transport infrastructure has been delivered to unlock growth potential of the area.

iii. The Eastern Corridor Growth Area

What we are trying to achieve - our strategic objective for the Eastern Corridor Growth Area

Strategic Outcome

The Eastern Corridor will have benefited from high quality and locally distinctive growth which delivers Sherford and other strategic sites within and at the edge of Plymouth as part of the city's network of sustainable linked neighbourhoods. Saltram Countryside Park will act as a green lung, providing a high quality natural resource for the city. These developments have been well integrated with established neighbourhoods providing a range of homes, jobs, recreation opportunities, services and facilities to meet daily needs and which increase the wider permeability of the area. Significant infrastructure improvements will have increased the connectivity and accessibility within the Growth Area and to the rest of the city, the A38 and beyond.

4.188 The Eastern Corridor has been prioritised as a Growth Area because of its potential to deliver a regionally significant scale of growth in new jobs, new homes and supporting infrastructure.

4.189 The Eastern Corridor of the city has long been identified as a key location for future growth given the major opportunities that it provides for supporting the long term prosperity of the city and the wider region. Work on the Devon Structure Plan during the 1990s identified the great potential of the Sherford area, and then in the early 2000s further studies and policy development took place, articulating a wider strategy for growth focusing primarily on Langage, Sherford and the North Plymstock areas.

4.190 The North Plymstock and Sherford Area Action Plans, adopted in 2007, provided for a new community at Sherford and a mixed-use neighbourhood within the former Plymstock Quarry, now called Saltram Meadow, both of which are now in the process of being constructed. These new developments contribute significantly to the growth of the city. A proposal for a new Countryside Park focused on Saltram is also currently moving forward. As a result, considerable investment has been made in transport and other infrastructure and this will continue to be the case as the area continues to grow. This is essential not just for the Growth Area itself, but also for the wider growth of the city, given the key role of the A38 and connections to it.

4.191 The Growth Area encompasses key strategic opportunities including Sherford and Saltram Meadow, sites in Plympton and the urban fringe, the Marsh Mills and Forder Valley junctions and development opportunities around Laira Bridge. This

acknowledges the need in the eastern area and urban fringe of the city for a wider strategic approach to growth and importantly the infrastructure requirements to support growth.

4.192 The natural environment will have a particularly important role in this Growth Area in terms of providing for appropriate greenspace in the urban environment, safeguarding its biodiversity and providing high quality informal recreation opportunities. This is important to help ease the potential recreational pressures of a growing city on Dartmoor National Park and other protected landscapes and to accommodate the needs generated by new development and its residents.

Strategic Objective SO5

Delivering growth in Plymouth's Eastern Corridor Growth Area

To realise the potential of the Eastern Corridor Growth Area as a regionally significant growth hub through:

1. Completing the delivery of Sherford as a unique sustainable neighbourhood with a distinctive character providing a range of quality homes and job opportunities, educational, community, recreational and leisure facilities including a new community park, a thriving town centre and local centres meeting people's day to day needs.
2. Securing the future potential growth west of Sherford to deliver a new neighbourhood which retain the distinct character of Sherford providing mixed use development and green connections and a sympathetic relationship to Saltram Countryside Park.
3. Supporting development of the Langage strategic employment site, with improved links to Plympton and enhanced connections to the A38 through a new southern access route.
4. Ensuring that key gateways sites are defined by quality development which enhances the setting and character of the area, and that development on the urban fringes creates a clear and well-designed edge to the city.
5. Delivering a strategic public transport corridor, including a new Park & Ride site providing easy access off Deep Lane Junction on the A38 for both buses and Park and Ride customers, and major improvements to increase the capacity of Deep Lane Junction.
6. Delivering Saltram Countryside Park as a green lung of the city, a high quality natural resource for recreation, healthy lifestyles, learning, and biodiversity as well as being an important heritage asset.
7. Improving connectivity within the Growth Area and ensuring new development integrates into existing communities and rectifies existing deficiencies to creating more permeable neighbourhoods.

8. Securing improvements to key junctions which provide connections to the city and the A38 to maintain movement of public transport and vehicles which serve the Growth Area and wider needs of the city.
9. Safeguarding mineral reserves in the area to meet current and future needs.
10. Ensuring that the longer term growth potential to the east of Plymouth is comprehensively planned.



4.193 The achievement of this Strategic Outcome and Objective will require a number of actions to be taken. These include:

1. Delivering strategic transport improvements / programmes to improve the management of vehicles and support sustainable transport choices. Priority will be given to:
 - a. Delivery of transport programmes and interventions on the strategic corridors from Langage and Sherford into the City Centre and to the Derriford area, focused on improvements to key junctions, delivering an efficient public transport network and infrastructure for increased travel by pedestrians and cyclists.
 - b. Enhanced connections from Langage and growth on the eastern edge of Plympton to Deep Lane junction and on into the city.
 - c. Improvements to Marsh Mills and Forder Valley junctions and the A38 trunk road which increase capacity to both the northern and eastern parts of the city and support the safe and efficient movement of vehicles on the A38 and in to the City Centre.
2. Allocation of the key sites in the JLP. Relevant site allocations can be found within this section below.
3. Using the opportunities presented by new developments to repair parts of the city which do not work well in terms of their relationship to the wider landscape or the availability of local services and facilities for the existing population.
4. Coordinating the delivery of Saltram Countryside Park and the connecting green network including Sherford Community Park and the Plym Valley as multifunctional greenspaces as a focus for recreation and leisure.
5. Taking a cross border approach to coordinating infrastructure provision alongside planned and future growth in the eastern corridor and the urban fringe to enable substantial long term growth to take place.

6. Actively engaging with international, regional and local programmes and investors to deliver funding for the Growth Area projects.
7. Preparing, implementing and keeping under close review a 'Plan for the Eastern Corridor Growth Area' as the delivery plan and programme for the Growth Area.

4.194 The strategy for the Eastern Corridor Growth Area is illustrated on the Area Vision diagram at Figure 4.6.



EASTERN CORRIDOR GROWTH AREA VISION DIAGRAM

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FIGURE 4.6

Key

	Green space		Waste recycling
	Health infrastructure		Housing
	Sports hub		Potential future growth of Sherford
	Cemetery		Minerals
	Park and Ride		Minerals expansion
	New primary school		Strategic public realm improvements
	New secondary school		High quality gateway
	District Centres		Highway network
	Mixed use - regeneration		Junction improvements
	Heritage led regeneration/improvements		Improvements to strategic public transport corridor
	Employment uses		Walking and cycling links
	Local Centres		New strategic cycle link
			New road and public transport/sustainable transport corridor
			Strategic green links

What we are going to do - our policies for the Eastern Corridor Growth Area

Policy PLY48

Sherford new community

The LPAs support the implementation of the existing planning permissions and strategic masterplan relating to the strategic development proposals for the Sherford new community. Provision is made for 5,500 new homes (4,254 of which are anticipated to be delivered within the plan period) and 67,000 sq.m. of employment floorspace. Any significant changes to the approved schemes will need to be supported by a revised strategic masterplan. The following key principles should be continued in the delivery of the new community and in any later revisions to the approved schemes:

1. The development should meet the following key outcomes:
 - i. A sustainable development delivering an excellent quality of life, within a well designed high quality environment.
 - ii. A strong and healthy community.
 - iii. A high quality, good locally distinctive design.
 - iv. A mix of uses prioritising affordable homes, local job opportunities, and a full range of community facilities.
 - v. Safe and convenient movement, incorporating a high quality public transport system alongside high quality facilities for pedestrians and cyclists.
 - vi. High quality public spaces throughout the development, including a large scale community park forming the eastern boundary.
 - vii. A response to the challenges of 'climate change' and the need for maximising the opportunities for sustainable lifestyles.
2. Delivery of an appropriate scale and range of retail facilities including:
 - i. A new district centre in the heart of the community including a full range of facilities and services to meet the needs of this major new residential community.
 - ii. Three local centres to meet the local neighbourhoods day to day needs.
3. Delivery of 200 hectares of Community Park (including 70 hectares of tree planting), as provided for in Policy PLY49.

4. Delivery of a new Park and Ride facility near Deep Lane junction with convenient access to A38.
5. Delivery of a central route through Sherford that can function as part of the strategic public transport corridor along the Eastern Corridor.
6. Designed to allow the long term growth at Sherford to be in a westerly direction.
7. Delivery of the following community infrastructure:
 - i. Educational facilities including a secondary school and three primary schools.
 - ii. Health and community facilities, including a town hall, library, youth centre and multi-faith building / places of worship.
 - iii. Sports recreation facilities, including an indoor sports facility and swimming pool and approximately 31ha of outdoor playing pitches and courts.
 - iv. A network of green spaces including public open space, outdoor areas of play and allotments, appropriately connected by pedestrian and cycling routes.
8. Provision of sustainable urban drainage systems and blue/green corridors to ensure the control of pollution and the management of flood risk.



4.195 This policy relates to outline permissions 06/02036/OUT (PCC) and 49_7/2426/06/O (SHDC) which included a strategic masterplan for the site.

4.196 The Sherford new community will deliver a real change to the area. The planning of the new community has been extensive and includes a new town centre, several smaller local centres, schools, leisure, other community infrastructure, employment opportunities and an extensive Community Park providing a strategic recreational resource alongside the major residential development. It is crucial that Sherford delivers a quality new environment and unique character of its own as well as offering a range of transport options for travel into the city and the wider area. The further expansion of Sherford to the west offers scope for more limited growth of the residential element of the neighbourhood adjoining the existing Sherford new community, given the constraints on the site and road network. A more sensitive mix of uses will be provided including formal and informal green space with pedestrian, cycling and green links through from Sherford to Saltram Countryside Park. Any development at the western edge will also be required to be sympathetic to and enhance the setting of the Stag Lodge entrance and wider setting of the Countryside Park through the provision of a green buffer.

Policy PLY49

Sherford Community Park Strategic Greenspace

Sherford Community Park will provide a new high quality multi-functional green space for the residents of the new community and the surrounding neighbourhoods. Any significant changes to the approved boundary will need to be supported by a revised Sherford strategic masterplan as provided for in Policy PLY48. It will be a minimum of 200ha and will reinforce the eastern boundary for the new community, meet the recreational needs of the new community, mitigate for the impacts of the development, and provide a mechanism for ensuring the new community has a positive impact on the natural environment. The park will achieve this by:

1. Delivery of significant wildlife restoration and enhancements to mitigate for the impacts of the development and ensure a net gain for biodiversity is achieved. This will include:
 - i. 70 ha of new woodland planting.
 - ii. New hedgerow planting and enhancement of existing hedgerows.
 - iii. Grassland restoration.
 - iv. Delivery of features to support key species particularly bats.
 - v. New water features designed to maximise wildlife benefit.
2. Delivery of diverse opportunities to meet the recreational needs of the new community to ensure the development does not have a negative impact on European protected sites. This will include delivery of new multi-user recreation routes through the Park that link to existing strategic networks, including the National Cycle Network, and new routes through the development.
3. Inclusion of community facilities within the Park to support a high quality visitor experience, the aims of the Park and support a high quality of life for new residents. This will include cafes, play areas, growing space and memorial gardens.
4. Inclusion of elements of the Sustainable Urban Drainage system for the development that will be designed to deliver wildlife, landscape and amenity benefits.
5. Maintain and enhance the productive landscape through the delivery of a community organic farm that will support the management of the park.

6. Delivery of significant outdoor formal sports facilities including football, rugby, hockey, cricket, tennis, Multi Use Games Areas (MUGAs) and a skatepark. These will be located at the eastern and western edges of the community park. They will include supporting infrastructure such as changing rooms and will be designed to fit sensitively into the Park setting.
7. Delivery of the Park will be phased with the development and delivered in a strategic manner led by a Natural Environment Vision Statement that will be regularly reviewed.



4.197 The need for a Community Park to support the new Sherford Community was first identified through the ‘Enquiry by Design’ process that was used to look at the opportunities and constraints of development in the Sherford area and determine the appropriate location, scale and initial design for the development. The process identified the need for the development to have a clear east-ward boundary along the Sherford valley, reinforced by a Community Park. The Park would provide the new community with opportunities for passive and active recreation and enhance the biodiversity and landscape value of the site.

4.198 The park has been fully integrated into the approved planning permission for the Sherford New Community and the park’s delivery detail and phasing is provided in the Natural Environment Vision Statement which was submitted and approved prior to commencement of development and will be reviewed at regular points in the developments progress.

4.199 The park forms part of a network of greenspaces that cross the city and out into the wider countryside and therefore performs an important role as a wildlife corridor and this function will be enhanced through the improvement works. As part of a series of ‘Strategic Green Spaces’ identified within and around the city, a pro-active enhancement of Sherford Community Park’s function and facilities will be a priority element the delivery of the new Community.

Policy PLY50

Saltram Meadow, Plymstock

The LPA supports the implementation of the existing planning permissions and strategic masterplan relating to the strategic development proposals for the Saltram Meadow. Development will create a high quality a mixed use neighbourhood which delivers significant new housing alongside a new local centre, education and sports facilities and employment opportunities which meet the daily needs of the new residents and employees. The proposals provide for 1,682 new homes and 11,325 sq.m. of employment floorspace. Any significant changes to the approved schemes will need to be supported by a revised strategic masterplan.

The following key principles should be continued in any later revisions to the approved schemes:

1. Delivery towards off-site transport infrastructure to mitigate against the impact of the development, including a public transport interchange.
2. Integration of a redeveloped Pomphlett Industrial Estate as a functional part of the neighbourhood.
3. Delivery of the following community infrastructure:
 - i. A local centre including a small - medium sized supermarket with complementary local facilities including a GP Surgery/ Medical Centre.
 - ii. Playing pitches.
 - iii. A new primary school.
 - iv. A 3g playing pitch and a Multi Use Games Area (MUGA) including provision of community changing facilities.



4.200 This policy relates to outline permission 07/01094/OUT which included a strategic masterplan for the site.

4.201 Further growth in Plymstock will focus on Saltram Meadow which is already under construction in the former Plymstock Quarry. The total development is 1,684 dwellings of which two were completed prior to the base date of the plan, and 210 new homes were completed between 2014 - 2016. The integration of this new neighbourhood into the community will be critically important to become a functioning part of the wider area providing new homes, jobs, a school and community facilities for its residents and the local area. Further opportunities exist to include Pomphlett Industrial Estate into the Saltram Meadow community improving the entrance and connectivity to the wider area. This will help connect the development to the wider area and improve the entrance to this new neighbourhood.

Policy PLY51

Langage

Land at Langage is allocated for employment development in Use Classes B1b & c, B2 (industrial) and B8 (warehousing and distribution), as an extension to the existing strategic employment site. Provision is made for about 243,000 sq.m. of employment floorspace.

Development should provide for the following:

1. Creation of a high quality environment for the business park commensurate with its status as a strategic employment location for attracting inward investment, including a street frontage presence which helps to create attractive environments for walking and cycling.
2. Ancillary office functions which are orientated to the street frontage.
3. Maximum use of plot space through efficient design and layout arrangements where parking provision does not dominate the site.
4. Enhancements to pedestrian, cycling and public transport links to the City Centre, Plympton, Sherford and Deep Lane Park and Ride which also facilitates links to locations east of the city.
5. Sensitive planting and screening for outward facing sites to the surrounding areas.
6. Contributes to and allows for the delivery a new southern access road.
7. Preserves the future operation of the Energy Park.



4.202 Langage is a strategically important employment location that has long been identified in former local and regional plans as an opportunity for a Strategic Employment Site of regional significance, providing a specific offer which cannot be replicated in the city itself. Considerable investment has taken place in the last decade, including the construction of a power station and the compulsory purchase of land in 2016 to bring much of the site identified in PLY51 under a single landowner.

4.203 Langage provides a unique offer for the Plan Area by virtue of its scale, its location in relation to the strategic highway network and at the eastern edge of Plymouth, and the potential synergies with other uses, providing an opportunity that other sites cannot match for strategic employment uses and large footprint employment developments.

4.204 The allocation is important not just to provide the opportunity for major employment investment during the plan period which builds greater resilience into the economy of the city and wider sub-region but also to position the Plan Area for the type of employment investments that could deliver a step change in the long-term performance of the Plan Area's economy.

4.205 Realisation of the full potential of Langage is likely to go beyond the end of the plan period and will require significant investment in infrastructure in terms of its physical accessibility and connections to the A38, a new southern access road, and

improved connections for walking, cycling and public transport to the City Centre, Plympton, Sherford and Deep Lane Junction Park and Ride. However, the policy plays a vital role in securing this as a long term strategic employment opportunity.

Policy PLY52

Land at West Park Hill, Newnham

Land at West Park Hill, Newnham is allocated for residential led development and a new primary school. Provision is made for in the order of 400 new homes.

Development should provide for the following:

1. Appropriate local facilities to support the new residents and to enhance the sustainability of the existing area.
2. Pedestrian and cycle connections to the existing residential area connecting through Stoggy Lane.
3. Sensitive design to the wider landscape character of the area.
4. Proportionate contribution to the delivery of the Boringdon sports hub.
5. Public transport infrastructure and services linking the development with Plympton and the City Centre.



4.206 Residential development on the eastern edge of Plympton will be required to appropriately integrate into the existing fabric of the area. The site is considered a good location for executive housing.

4.207 Development should ensure improved connectivity, particularly for pedestrians and cyclists to the wider residential areas, with new and improved connections providing links through Stoggy Lane to Upper Ridding, Highglen Drive and also to Chaddlewood. Development should also be designed in away which is sensitive to the rural setting on the urban fringe and contribute to the wider landscapes setting.

4.208 Development will include a new primary school to meet the growing needs in the Plympton area. The provision of a new school to serve the new neighbourhood and wider area is a key requirement of the allocation and should be provided on site. Should alternative provision be secured in the local area by the Local Education Authority and as such a primary school not be required as part of the development then a proportionate financial contribution should be provided.

Policy PLY53

Former China Clay dryer complex, Coypool

Land at the former China Clay dryer complex at Coypool is allocated for a comprehensive residential redevelopment. Provision is made for in the order of 400 new homes.

Development should provide for the following requirements:

1. Delivery in accordance with a strategic masterplan for the entire site.
2. Principal vehicle access off Coypool Road, with secondary access into the Woodford estate, and improvements along Plymouth Road.
3. Provision of access to the proposed Boringdon Park sports hub.
4. Enhanced pedestrian and cycle links to the Strategic Cycle Network including the Plym Valley trail, the Coypool Park and Ride facility and surrounding residential areas, with the need for enhancements to the Coypool Park and Ride facility being assessed and provided for.
5. Provision of both formal and informal public amenity space.
6. Retention of the significant tree belts close to the boundary of the site with provision of managed public access.
7. A form of development which visually makes a positive contribution to the wider historic landscape setting and the setting of the designated Boringdon Arch.
8. A management strategy for the restoration and aftercare of the former clay dryer complex to ensure that the site is properly managed pending its future comprehensive redevelopment.
9. Proportion contribution to the delivery of the Boringdon sports hub.
10. Support the continued development of the Plym Valley railway.
11. Contributions towards strategic transport infrastructure / programmes on the Eastern Corridor.
12. Contributions towards health and education infrastructure in the locality.



4.209 Growth in Plympton will include development of the former China Clay dryer complex and growth to the east of Plympton. Redevelopment of the complex will require a comprehensive approach to the site which delivers a new residential

neighbourhood within an enhanced landscaped setting, whilst providing connections for walking and cycling into the surrounding residential area and connections into the Plym Valley.

4.210 The site is mainly vacant and derelict. It is located on the edge of the Plym Valley and lies within a mixed use area where there is no single dominant use. Woodford to the east is a post war residential development with bulky goods retailing, leisure railway line and a park and ride facility to the south of the site. The site is well located with direct links to the A38 and City Centre via Marsh Mills.

4.211 The site was previously allocated/identified in the North Plymstock AAP (2007) for waste management uses. Following the development of the Energy from Waste facility at Barne Barton, the site at Coypool is no longer needed for such uses. The Plymouth LPA has therefore taken the opportunity to look at the site in its entirety as an opportunity to create a comprehensive new residential neighbourhood along with the significant opportunities for formal and informal recreation and connections to the Plym Valley. The topography of the site means that it is very visible from the upper valley slopes to the east and west and there are panoramic views into the site from the existing residential areas of Leigham and Mainstone. A strong woodland belt defines the edge of the site and this strong landscape setting should be retained and enhanced as part of any proposals.

4.212 Vehicular access should be achieved via Coypool Road so as to limit the impact of increased traffic as a result of the new development on the existing residents of Woodford.

Policy PLY54

Saltram Countryside Park Strategic Greenspace

Saltram Countryside Park will provide a regionally significant recreational resource on the eastern edge of Plymouth in a manner that is sensitive to, and enhances, the area's exceptional biodiversity, landscape, historic assets and productive farmland. The development of this proposal will be sensitive to the unique historic value of the Saltram Estate, it will protect this resource and conserve and promote the wider setting. The Countryside Park will achieve this by:

1. Enhancing and protecting the historic character and national importance of Saltram House, Gardens and Parkland and other sensitive features within the Estate through the development of new infrastructure to manage increased visitor numbers. This will include:
 - i. The creation of a second visitor entrance to the National Trust Saltram property within the South East area of the estate, near Stag Lodge.

- ii. Addressing inadequate visitor car parking by developing a new, purpose-designed visitor car park and developing high quality sustainable transport links to the park.
 - iii. Providing new visitor arrival facilities and enhanced interpretation of the designed landscape to encourage exploration of the historic parkland and wider landscape.
2. Enhanced connectivity to and through the Countyside Park. This will be delivered through a series of sensitively designed footpaths, cycleways and bridleway routes and circuits throughout the Park area providing better connections to the existing and new communities. Improved access to the park through sustainable means will also be encouraged.
 3. Significant enhancement to the wildlife value of the site and its key role as a green corridor linking with the network of greenspace that run through Plymouth and out into the wider countryside.
 4. The safeguarding of land to meet the current and future burial needs of Plymouth. New burial, memorial and associated facilities will be designed to fit sensitively into the Countryside Park's landscape.
 5. Fully integrating the restored Chelson Meadow into the Countryside Park, allowing landscape and biodiversity enhancements that will complement the park and the adjacent Registered Park and Garden, and in the longer term integrate public access routes.
 6. Identifying opportunities to support the Countryside Park with complementary commercial recreation activities where appropriate to the character of the area, such as cycle hire, horse riding or similar facilities. These will provide both recreational and economic benefits, where the individual impact is compatible with the countryside park activities.



4.213 The Growth Area provides a unique opportunity to develop the green infrastructure of the city with the enhancement of Saltram Countryside Park at the heart of this strategy with green connections to Plym Valley and Sherford Community Park. The development of this network will provide recreational benefits for the local area and the wider city and provide a significant benefit to the environmental enhancement and biodiversity of the area as a truly multifunctional network of green spaces.

4.214 The Countryside Park will cover over 600 hectares and will reach from the Plym Estuary to Plympton St Maurice, incorporating the existing historic Saltram Estate (Grade I listed building and Registered Park and Garden) and a wider area

of land stretching east of Hays Road. The Park currently incorporates a range of land uses, including agriculture, a cemetery, allotments, a landfill site currently being restored, the historic Saltram Estate, Hardwick Woods and the Plym Estuary.

4.215 The proposal for a Countryside Park on the eastern edge of Plymouth was developed following a study, funded by Countryside Agency in 2005. This generated the vision and broad objectives for a Countryside Park that would help to protect the eastern corridor's natural and historic assets whilst providing for the recreational needs of the existing communities, the proposed communities at Plymstock Quarry and Sherford and population growth within the wider area. The delivery of the Park is now regarded as a key requirement to support the growth of the Eastern Corridor area.

4.216 The Historic assets of the Park centre on the Saltram Estate and Hardwick Woods. Saltram is already a significant tourist and local recreation destination. The Countryside Park also incorporates areas of high wildlife value and a diverse range of habitats including mud flats, species rich grasslands, ancient woodland, and a network of hedgerows. The landscape of the Countryside Park includes a number of key views that will be enhanced within the park; these include views north to Dartmoor, and views of the city from the A38 that are framed by the Park.

4.217 Delivery of the Park will need to be sensitive to the existing landscape, wildlife and historic assets and ensure they are sensitively integrated into the development of the Countryside Park.

4.218 With an increasing recreational demand arising from new development in the area and changes in recreational habitats, the Countryside Park's delivery will proactively manage these new recreational demands through new infrastructure to support visitor management and the delivery of enhanced and new recreational routes and focal points. The park has a significant role in enhancing the health and well-being of communities within the eastern corridor and wider city. The park will therefore be delivered in a manner that enables the park to accommodate more visitors without negatively affecting the sites natural and historic value.

4.219 Currently many areas within the Countryside Park are inaccessible to the general public. A network of high quality routes will be delivered through this area starting from a number of new access points. A recreational spine will run through the park from Laira Bridge linking to the western edge of the proposed Sherford development. These recreation routes will also link with existing strategic routes such as the National Cycle Network to encourage people to access the park by sustainable methods.

Policy PLY55

Hazeldene Quarry Minerals Safeguarding Area and buffer zone

Land at and to the north of the existing Hazeldene Quarry shall be safeguarded for the extraction of limestone aggregate, which shall include the area of known mineral reserve and a buffer zone to protect both the future extraction of the mineral and potential urban development to its north. Proposals for extraction of aggregate should provide for:

1. A working plan and proposed quarry operation which will be compatible with the future development of the area, to balance the extent of future mineral extraction and the maximisation of the future potential urban extension land to the north.
2. The provision of a landscaped environmental bund within the potential extension area to protect the amenity of future development.
3. A strip of land along the northern part of the site, which could form part of the environmental bund and will form the 'green link', including a pedestrian and cycle link, between Sherford and Saltram. This will also form part of the mineral extraction safeguarding buffer zone of 125m width.
4. Mitigation measures to address impacts as and where appropriate of mineral extraction on the natural and planned built environments, amenity, heritage, ecology and landscape and provision of suitable monitoring.
5. An appropriate method of monitoring and review of the development's long term environmental impacts, which may otherwise be unforeseeable. This will be achieved either through only consenting development proposals for individual phases, the impacts of which are more reasonable to predict, or through a scheme of phasing and environmental review periods to monitor and manage potential environmental impacts which can not be predicted at the time of granting consent.
6. Any future extraction should ensure satisfactory restoration and after care proposals following the completion of mineral extraction.



4.220 Minerals are a limited resource and they can only be worked where they exist. While the reserves are limited within the city the minerals which are there are a vital resource for society, there must be an adequate supply maintained. This is to ensure that the raw material for building, infrastructure and goods are available. The limestone reserves north of the existing Hazeldene quarry is of significant importance to the local building industry and it will be a vital resource for the building of the developments proposed in Plymouth.

4.221 Minerals extraction has the significant potential for environmental and visual impacts as well as impacting on residential amenity. The impact of extraction on future growth west of Sherford needs to be fully examined in considering future proposals. It is therefore important that while future extraction is supported it takes place in a sensitive way considering its surrounding and the long term future growth and sustainability of the Eastern Corridor Growth Area.

4.222 The policy boundary includes the 125m minerals buffer zone. The buffer zone overlaps small parts of both PLY48 (Sherford) and PLY54 (Saltram Countryside Park), and therefore imposes a policy constraint which will need to be managed in the delivery of those proposals.

Policy PLY56

Other sites allocations in the Eastern Corridor Growth Area

The following additional sites in the Eastern Corridor Growth Area are allocated for development.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Former nursery site, Haye Road	Housing (this site is considered suitable for executive housing)	9 homes	a. Cycleway / pedestrian link.
2	Pomphlett Industrial Estate	Mixed use - housing / retail	44 homes	<p>a. Development should provide for a high quality entrance to Saltram Meadow which creates a positive sense of arrival and which integrates into the existing development.</p> <p>b. Removal of narrow strip of rock belt between the site and Saltram Meadow with the creation of compatible levels.</p> <p>c. Relocation of existing occupiers of the site to premises made available in Saltram Meadow, or other appropriate location in the city.</p> <p>d. Potential opportunity to relocate the local centre from Saltram Meadow to provide active road frontages.</p>
3	Chelson Meadow	Waste management uses		<p>a. No adverse impact on the conservation value of the Plym Estuary.</p> <p>b. Appropriate landscape screening and design so there is no adverse impact on the setting of Saltram Countryside Park and on the adjacent national cycle route and nearby residential areas.</p> <p>c. The integrity of the landfill environmental protection measures to be protected.</p> <p>d. Mitigation measures to address the potential impacts that flooding events would have on access to the site.</p> <p>e. Access improvements on The Ride.</p>

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
4	Former Western National bus depot site	Mixed use incorporating commercial uses (potentially small scale local retail, leisure and/or hotel).		<ul style="list-style-type: none"> a. High quality design befitting the gateway location b. Improved pedestrian connections to the local area c. Retail provision, if included, should be limited to meet the needs of the surrounding local area. d. Flood mitigation measures to ensure development is safe and does not increase flood risk elsewhere. e. Highway access to be from Embankment Lane link road. f. Investigation and remediation of contaminated land.
5	Prince Rock playing pitch site	Mixed use development, potentially incorporating public house / restaurant and hotel with potential also for leisure related retail and cycle hire facilities exploiting waterfront location and cycle links.		<ul style="list-style-type: none"> a. Development to take advantage of the site's locational assets. b. High quality design befitting the gateway location. c. Flood mitigation measures to ensure development is safe and does not increase flood risk elsewhere. d. Delivery of alternative playing pitch facilities. e. Highway access to be from Embankment Lane link road. f. Investigation and remediation of contaminated land.
6	Land at Moorcroft Quarry	Waste management uses for the recycling and recovery of construction and demolition waste (inert waste), including storage of imported and processed construction and demolition waste.		<ul style="list-style-type: none"> a. A high standard of site design and management to avoid the risk of water pollution, and to reduce the risk of noise, dust and air pollution. b. The need to protect the amenity of nearby residents from unreasonable adverse impact arising from processing activity and transport movements. c. Arrangements for HGV access to be identified.



4.223 Policy PLY56 identifies six further sites for development within the plan period. These sites are expressed in table format as the key requirements relating to each proposal can at this stage be expressed in a relatively few points. However, each proposal is significant in terms of the contribution that it makes to the overall vision of the plan and meeting the strategic outcome set out for the Eastern Corridor Growth Area.

4.224 Taken together the Eastern Corridor Growth Area provides for 6,789 new homes, 321,325 sq.m. of employment floorspace, as well as strategic facilities such as parks, minerals and waste uses.

Policy PLY57

Strategic infrastructure measures for the Eastern Corridor Growth Area.

The following key strategic infrastructure measures will be provided during the plan period, in addition to proposals identified in other policies of this plan, in order to support the delivery of the strategy for the Eastern Corridor Growth Area:

1. Langage southern access road.
2. Eastern corridor transport improvements / programmes to support growth and improve access, including the following schemes:
 - i. A379, A374, B3416 capacity and bus priority improvements including at Cattedown Roundabout, Pomphlett Roundabout and Stanborough Cross.
 - ii. Capacity upgrades to the A38 and its junctions at Deep Lane and Marsh Mills, Forder Valley, Manadon and St Budeaux interchange.
 - iii. New and enhanced park and ride sites and services, including at Deep Lane.
 - iv. Junction improvements to the A374 / B3416 Plymouth Road and key junctions in Plymstock.
 - v. Eastern Corridor Strategic Cycling and Walking network improvements.
3. New cemetery and crematorium facilities to address capacity issues arising from the growth of Plymouth (in the vicinity of Saltram countryside park, specific site to be identified).



4.225 The priority infrastructure interventions needed to support growth in the east of the city are set out in Policy PLY57. Transport infrastructure is key to unlocking the growth potential of the eastern corridor, and a new cemetery and crematorium will also be provided as a facility to support Plymouth's overall growth agenda.

Opportunity sites within the Eastern Corridor Growth Area

The following sites are identified as having significant potential for supporting the delivery of the Strategic Outcome and Objective for this Growth Area. They are however not allocated in the plan because there is insufficient evidence at the current time of their deliverability within the plan period.

- Wakehams Quarry and Sugar Mill, Pomphlett - which should they become available would provide a significant opportunity to deliver mixed use housing led regeneration, with commercial uses on the frontage, also delivering improved pedestrian connections to Saltram Meadow and the eastern corridor strategic cycle network.

4.226 Opportunity sites are not formally allocated in the plan and therefore are not shown on the Policies Map. However, the LPA is supportive in principle of development of these sites if key constraints can be overcome in an acceptable way and a deliverable proposal can be identified.

How we will know we have been successful - our measures of success for the Eastern Corridor Growth Area

- All of the area's strategic housing sites have significantly progressed to completion.
- The area's strategic greenspace projects are delivered.

c. Other areas and sites

What we are going to do - our policies for the rest of Plymouth

4.227 Within the Plymouth Policy Area and in addition to the strategic allocations identified in the Growth Areas, further sites have been identified as being suitable for development for a range of uses including residential, employment, sports, retail and community use. The development of these sites will support the vision and objectives of the JLP and demonstrate how the LPAs are meeting their development requirements over the plan period. Taken together they deliver 1,703 new homes and 10,440 sq.m. new employment floorspace. Additionally, there are significant areas of greenspace around the edge of the city which play an important role in the relationship of the city to the surrounding countryside and require careful management in terms of future land use and development.

4.228 The allocations and policies that follow should be read alongside and considered against the other policies in the JLP.

South Plymouth

4.229 The south area of Plymouth covers all of the neighbourhoods to the south of the A38 and west of the Plym Estuary. The City Centre and Waterfront Growth Area section of this plan has already considered a significant part of the area. This section of the plan considers the smaller / less strategic sites within the Growth Area and the wider south Plymouth area.

4.230 The focus of development in this area is about supporting the needs of the existing neighbourhoods through appropriate small scale development in areas which are well related to the City Centre, commercial areas of the city and established transport networks.

4.231 Central Park provides a crucial recreational resource for the local population and wider city at the heart of the area, including the Life Centre which is the premier leisure facility in the city. Its long term future and enhancements is vital to providing a quality recreational offer for the city.

4.232 The site allocations set out below provide opportunities which support the development of sustainable linked neighbourhoods.

Policy PLY58

Site allocations in the south of Plymouth

The following sites are allocated for development in south Plymouth:

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Land at St Levan Gate, Keyham	Medium sized food retail store		<ul style="list-style-type: none"> a. Upgrading of traffic signals. b. Scale of development to not have a significant adverse impact on existing district and local centres. c. Car parking to meet the needs of the store and the new local centre. d. Improve pedestrian and cycling connections from surrounding streets.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
2	Home Park	Completion of stadium improvements and appropriate ancillary uses		<p>a. Access improvements to be delivered in accordance with transport assessment for the proposal.</p> <p>b. Enabling uses could be acceptable provided that they are of a scale and nature that complement but do not prejudice the sporting use of Home Park and the wider recreational use of Central Park.</p>
3	Coombe Way & Kings Tamerton Road	Housing	40 homes	a. Convenient pedestrian and cycle access to the adjacent Local Nature Reserve.
4	Tamar Valley School, Barne Barton	Housing	44 homes	
5	North Prospect re-development phase 4	Housing	182 homes (a net increase of 42 homes)	a. Delivery in accordance with North Prospect masterplan.
6	North Prospect re-development phase 5	Housing	143 homes (a net increase of 45 homes)	a. Delivery in accordance with North Prospect masterplan.
7	Douglass House, Efford	Health hub with housing	5 homes	
8	Land at Windsor Road, Compton	Housing	26 homes	
9	Former Gas Works Site, St Levan Road, Keyham	Housing	57 homes	<p>a. Access to be achieved from St Levan Road.</p> <p>b. Investigation and remediation of contaminated land.</p>
10	Ham Drive, Pennycross	Housing	25 homes	a. Access to be achieved from existing development site.
11	Duke Street, Devonport	Car parking for strategic events		a. Landscape enhancements to be delivered.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
12	Land at Stuart Road/Victoria Park, Stoke	Housing	46 homes	<ul style="list-style-type: none"> a. Retention and enhancement of the heritage and visible assets on site from former railway bridge. b. Delivery of a sustainable urban drainage solution to provide an improvement to surface run off to and from the site.
13	MDEC, Central Park Avenue, Pennycomequick	Housing	141 homes	<ul style="list-style-type: none"> a. Access should be achieved from Central Park Avenue. b. Conversion of existing buildings. c. Delivery of a sustainable urban drainage solution to provide an improvement to surface run off rates from the site. d. Flood resistant and resilient design to address existing surface water issues.
14	Open space near Manadon junction	Enhanced playing pitch provision		<ul style="list-style-type: none"> a. Development of strategic football facility such as a full size AGP or grass pitch(es).
15	Savage Road, Barne Barton	Housing	226 homes (net increase of 0)	
16	Bull Point Barracks	Mixed use refurbishment to provide new homes and employment / training space for local community	13 homes	<ul style="list-style-type: none"> a. A development which respects the site's heritage assets and context, as informed by a detailed heritage character assessment to be undertaken for the proposal. b. Retention and enhancement of designated heritage assets, associated non-designated buildings and features (including historic surfaces) and their settings. c. The site should be fully understood and recorded prior to any acceptable changes to historic structures. d. Any approved development should also include improved public access to, understanding and enjoyment of the buildings and their setting.
17	Seventrees, Baring Street, Greenbank	Housing	80 homes	<ul style="list-style-type: none"> a. Re-provision of dental practice.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
18	Weston Mill sports pitches and car park	Re-provision and enhancement of sports facilities on site with new food retail store as enabling development.		<p>a. Protection and enhancements to the existing sports provision and associated sports and community facilities. The re-provision and enhancement of the playing pitches and associated infrastructure must be secured as part of the planning consent for the retail store and completed prior to the opening of the store.</p> <p>b. Development including any cemetery expansion land shall not to be commenced until its replacement is secured, in accordance with other policies of the plan.</p> <p>c. Scale of development to not have a significant adverse impact on existing district and local centres.</p> <p>d. Retention of the tree belt fronting the St Budeaux Bypass</p> <p>e. Delivers a comprehensive strategy to access the site and ensures the free flow of movement on the wider transport network.</p>
19	Peverell Park	Enhanced playing pitch provision.		<p>a. Re-provision and enhancement of a cricket pitch.</p>
20	Land at Efford Pathway (west)	Enhanced playing pitch provision.		<p>a. Delivery of new and enhanced football pitch provision and associated buildings and infrastructure.</p>
21	Land at Efford Pathway (east)	Enhanced playing pitch provision		<p>a. Delivery of new and enhanced football pitch provision and associated buildings and infrastructure.</p>



North Plymouth

4.233 This area covers all neighbourhoods to the north of the A38 and west of the Plym Valley, including parts of the urban fringe. The Derriford and Northern Corridor Growth Area section of this plan has already considered a significant part of the north area and the significant growth it will deliver. This section of the plan considers the smaller / less strategic sites within the Growth Area as well as the wider north area.

4.234 There are a number of neighbourhoods in the north of the city. Development in this area is characterised by distinct areas separated by the green valleys which have shaped the growth of this part of the city.

4.235 The A386 which runs through the centre of the northern area is the main road connection into the City Centre and the strategic road network along the A38. To the north it is the key gateway for people coming in from West Devon, South Hams and the Dartmoor National Park. There are many successful employment areas in the north of the city in addition to those identified in the Growth Area including Estover, Ernesettle and Burrington.

4.236 The site allocations set out below provide opportunities which support the development of sustainable linked neighbourhoods.

Policy PLY59

Site allocations in the north of Plymouth

The following sites are allocated for development in the north of Plymouth:

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Former Woodlands School Site, Whiteleigh	Housing	72 homes	
2	Land either side of Clifford Road, Southway	Mixed use - housing with small/medium sized food store	108 homes	<ul style="list-style-type: none"> a. Local retail facilities of a scale relevant to enhancing the provision at the Southway local centre where it can be demonstrated that it would not impact on investment in higher order retail centres. b. Improved connectivity to the local centre. c. Development fronting the streets. d. Access strategy to be provided.
3	Clifford Road, Southway	Housing	21 homes	<ul style="list-style-type: none"> a. Access strategy to be provided.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
4	Former Southway Primary School	Housing	95 homes	a. Improved access to be achieved from Bampfylde Way.
5	Stirling House, Honicknowle Green	Housing	20 homes	
6	Land south of Langley Crescent, Southway	Housing	14 homes	
7	Land off Tamar Way, West Park	Housing	13 homes	
8	Southway Campus, Skerries Road	Housing	67 homes	
9	Woodvale Nurseries, Truro Drive, Whiteleigh	Housing	31 homes	
10	Land west of Ernesettle Lane, Ernesettle	Enhancement and delivery of new playing pitch facilities		<p>a. Development of enhanced playing pitch facilities including the potential of full size AGP(s).</p> <p>b. A sensitively designed landscape scheme to minimise the impact of nearby highly graded heritage assets.</p>
11	Fields to north of St Budeaux A38 junction	Housing	94 homes	<p>a. Conservation or enhancement of the area's historic environment, as supported by a detailed heritage and visual landscape assessment, including:</p> <ul style="list-style-type: none"> i. Retaining and where possible opening up key views and partial views of heritage assets, from outside and within the site, including St Budeaux parish church and embankment and Agaton Fort. ii. Taking account of existing built boundaries and following existing lines so as to not impact on the setting of the church or encroach onto land within its settings. iii. Taking account of the presence of Ernesettle Battery so as not to impact upon its setting or encroach on to land within its setting. <p>b. Protection and maintenance of historic hedgerows.</p>

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
				<p>c. Transport assessment and mitigation in relation to Victoria interchange</p> <p>d. Development must include delivery of high quality publicly accessible greenspace to mitigate for the loss of greenspace and provide for enjoyment of the historic environment.</p> <p>e. Delivery of a Sustainable Urban Drainage system to manage surface water that is also designed to deliver wildlife and amenity benefits.</p>
12	Land behind Maret Road, St Budeaux	Commercial or mixed use opportunity		a. Sensitively designed and well landscaped scheme, providing adequate off street parking, acknowledging its prominent location, proximity to heritage assets and access and parking constraints in the locality.
13	Land north of Clifford Road, Southway	Housing	9 homes	
14	Southway Football Hub (Bond Street)	Enhance playing pitch facilities		a. Delivery of new football hub, including new and enhanced pitch provision and associated buildings and infrastructure.
15	Land between 140 and 150 Dunraven Drive, Derriford	Housing (this site is considered suitable for executive housing)	6 homes	a. Improved public access to the adjacent greenspace designated as Southway Woods Local Green Space.
16	Whitleigh Community Centre	Housing	27 homes	
17	Chaucer Way school site	Housing	137 homes	a. Retention of existing playing pitch.
18	Former Lakeside residential home	Housing	15 homes	



Plympton and Plymstock

4.237 The east area of the city includes Plympton and Plymstock as well as parts of the urban fringe. The Eastern Corridor Growth Area section of this plan has already considered a significant part of the area, including the new communities at Sherford and Saltram Meadow, and establishes the role of Saltram as a key recreational resource for the rest of the city. This section of the plan considers the smaller / less strategic sites within the Growth Area as well as the wider eastern area.

4.238 Plympton and Plymstock are largely characterised by semi-detached and detached housing at relatively low density when compared to other areas of the city although much of the residential areas lack local character and identity. There are areas of historic importance and designated Conservation Areas to protect this heritage and special character in places such as Plympton St Maurice and Turnchapel.

4.239 The main hub for shopping, services and facilities is the Ridgeway in Plympton and Broadway in Plymstock. Other local centres support the wider area and ensure daily needs are met and new facilities are planned as part of the Sherford and Saltram Meadow developments. The area is well served by employment areas including Newnham, Valley Road and the strategic employment area of Lantage.

4.240 There is good provision of greenspace in the east of the city from small neighbourhood greenspaces to strategic greenspace areas such as the Plym Valley and the new Sherford Community Park and to the south the area borders the South Devon Area of Outstanding Natural Beauty (AONB).

4.241 The site allocations set out below provide opportunities which support the development of sustainable linked neighbourhoods.

Policy PLY60

Site allocations in Plympton and Plymstock

The following sites are allocated for development in Plympton and Plymstock:

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Land at Redwood Drive, Chaddlewood	Housing	190 homes	a. Delivery of off site highways works. b. Delivery of a new high quality park adjacent to the development to mitigate for the loss of the greenspace.
2	Downham School	Housing	28 homes	a. Provision of safe pedestrian access / egress route in times of flooding.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
3	Former Plympton Hospital	Housing	54 homes	
4	Land at Staddiscombe Road/Goosewell Road, Staddiscombe	New playing pitch		a. New grass football pitch.
5	Land at 60 Vinery Lane, Plymstock	Housing (this site is considered suitable for executive housing)	5 homes	
6	Former MoD site Turnchapel Wharves, Turnchapel	Marine employment uses (B1b,c; B2, B8)	8,440 sq.m. employment floorspace	a. Wharves and slipways to be retained for marine use purposes. b. Measures to ensure development is safe and does not increase flood risk elsewhere.
7	Land between Undercliff Road and Barton Road, Turnchapel	Housing	7 homes	a. Trees protected by TPOs on site to be retained within the development site. b. Measures to ensure development is safe and does not increase flood risk elsewhere.
8	Errill Retail Park, Plymouth Road, Plympton	Housing	60 homes	a. Access improvements. b. Measures to ensure development is safe and does not increase flood risk elsewhere.
9	Land at Plympton House, Plympton	Housing with improved access to open space	14 homes	a. Open space improvements and access to Registered Park and Garden.
10	Land off Newnham Road, Colebrook	Housing	52 homes	a. Comprehensive re-development of site. b. Support given to provide for the relocation of the existing businesses elsewhere within the city. c. Development not to commence until measures agreed to ensure that there is a net improvement in both on- and off-site flood risks.
11	Boringdon Park	Playing pitch hub and cycling facilities (closed loop cycle track)		a. Development to take place in a manner which does not harm and instead enhances the setting of the nearby heritage assets, including the

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
				<p>Boringdon Arch as demonstrated by appropriate environmental and heritage assessments.</p> <ul style="list-style-type: none"> b. Provision of adequate off-street parking. c. Landscaping scheme to implemented as integral part of the proposal including new planting adjacent to the Plym Valley to buffer areas of the woodland. d. Good connections to the adjacent Coypool development (PLY53), the Plym Valley cycleway and adjacent strategic greenspace areas to be provided. e. Enabling development will be acceptable to facilitate the delivery of the sports facilities and the other provisions of this policy, provided that it is well related to the Coypool development, and it respects the urban fringe character of the site and does not break the skyline when the site is viewed from off-site locations to the south.
12	Land at Bell Close, Plympton	Employment - B1b,c, B2 & B8	2,000 sq,m, employment floorspace	<ul style="list-style-type: none"> a. Mitigation to be provided for the loss of publicly accessible greenspace. b. The development design to create a good relationship with the adjacent land designated as local greenspace. c. Delivery of a Sustainable Urban Drainage system to manage surface water that is also designed to deliver wildlife and amenity benefits.



Development in Plymouth's urban fringe

Policy PLY61

Development in Plymouth's urban fringe

The LPAs will protect the special characteristics and role of the urban fringe countryside as identified on the Policies Map. The following provisions will apply to the consideration of development proposals in the urban fringe:

1. Development will only be permitted where:
 - i. The form, scale and design is not visually intrusive and is well integrated into the landscape.
 - ii. The development, either individually or cumulatively does not significantly harm the open character, key characteristics, valued attributes, or sensitive features of the area or important views.
 - iii. The proposal does not result in significant intrusion into the open countryside or contribute to the coalescence of separate settlements.
 - iv. The setting, individual character and identity of adjoining settlements is not significantly harmed.
 - v. The proposed development is linked to an existing appropriate use and does not conflict with the above criteria.

2. Development proposals should, where appropriate:
 - i. Protect and improve public rights of way and bridleways.
 - ii. Re-use traditional buildings that are structurally sound enough for renovation without significant enhancement or alteration.
 - iii. Be complementary to and not prejudice any viable agricultural operations on a farm and other existing viable uses.
 - iv. Respond to a proven agricultural, forestry and other occupational need that requires a countryside location.
 - v. Avoid the use of Best and Most Versatile Agricultural Land.

3. Development for the purposes of agriculture, forestry, public access and enjoyment of the countryside, or community facilities that meet the objectively assessed needs of the local community will be supported if it meets the above provisions.



4.242 The countryside within Plymouth's urban fringe makes a vital contribution to the setting and character of the city and adjacent nationally protected landscapes and provides a valuable environmental resource. It is therefore of great importance that development pressure in the urban fringe is carefully managed in order to ensure prevent harm to the urban/rural interface and associated negative impacts on the natural environment. The city is bounded to the south and north by nationally protected landscapes; the South Devon Area of Outstanding Natural Beauty (AONB), the Tamar Valley AONB and Dartmoor National Park. Proximity to these designated landscapes creates areas of greater sensitivity where it is important to ensure that development does not individually or cumulatively harm these protected landscapes. It is also important to promote the conservation, restoration and enhancement of ecological networks within the urban fringe. This policy seeks to protect these designated areas from the sprawl of the city and ensure that only development that is appropriate for these sensitive locations is permitted. Development proposals within the urban fringe will need to supported by Landscape Visual Impact Assessments and landscaping schemes, in accordance with the provisions of Policy DEV23.6.

Infrastructure and Opportunity Sites

Policy PLY62

Strategic infrastructure measures

The following key strategic infrastructure measures will be provided during the plan period, in addition to proposals identified in other policies of this plan, in order to support the delivery of sustainable growth in Plymouth:

1. Improvements to the A38 trunk road and its main junctions.
2. Capacity increases, including bus priority improvements, to the A3064 St Budeaux Bypass and Wolseley Road, including Camels Head junction.
3. Western Corridor Strategic Cycling and Walking network improvements.



4.243 Policy PLY62 identifies priority infrastructure interventions that are not specific to the three growth areas, but are still need to support the plan's overall growth strategy for the Plymouth Policy Area. The A38 trunk road through Plymouth will remain a significant priority given its wider function as a national and regional route. Other transport measures are needed to address the approaches to the city from

the west. For example, the councils are working closely with Cornwall Council to secure funding and delivery of a Western Park and Ride facility in Saltash, as set out in the emerging Cornwall Site Allocations Development Plan Document.

Opportunity sites

The following sites are identified as having significant potential for supporting the delivery of the plan. They are however not allocated in the plan because there is insufficient evidence at the current time of their deliverability within the plan period.

- Mount Gould Hospital - which has potential for a mix of health, community and residential development to make better use of the site.

4.244 Opportunity sites are not formally allocated in the plan and therefore are not shown on the Policies Map. However, the LPA is supportive in principle of development of these sites if key constraints can be overcome in an acceptable way and a deliverable proposal can be identified.

5 Strategy for Thriving Towns and Villages Policy Area

a. Strategic policies

What we are trying to achieve - our strategic approach to development in South West Devon

Strategic Outcome

South West Devon's towns, villages and countryside communities will have contributed to achieving a prosperous and sustainable sub-region with a diverse rural economy, housing stock and rural services that meet the needs of its population. The integrity of South West Devon's rural and urban landscapes will remain intact, with strong rural communities that reflect the traditions of the historic landscape. The rural and urban landscapes will continue to enjoy national recognition and contribute to a thriving rural economy through investment in traditional industries and innovative diversification.

5.1 The characteristics of the Thriving Towns and Villages Policy Area are very different from the urban area of Plymouth. There are specific opportunities and challenges that arise in the rural areas and the approach to addressing these issues are explained in this section.

5.2 The need to deliver a significant number of new, high quality homes and jobs is shared across the JLP area. By increasing the supply of homes in sustainable locations, and by providing a housing mix that responds positively to identified housing needs, greater housing equality can be achieved by rural communities which for a number of years have suffered from a rapidly increasing affordability gap. The social implications of house price rises that far outstrip wage increases have seen a disproportionate amount of young people and working age families leave South Hams and West Devon for more affordable areas within cities such as Plymouth, Torquay and Exeter, or further afield. This has a negative impact on community cohesion and resilience in our rural settlements, which have previously been characterised by strong family networks and a continuity of local population. A demographic imbalance towards older age groups has been a feature of South Hams and West Devon over the last two census periods, and is projected to continue throughout the plan period.

5.3 Economic opportunities will arise through coordinated planning with Plymouth City Council and other neighbouring authorities, as well as investment in the local distinctiveness of South West Devon, creating a resilient environment for our traditional industries and employers. The Plymouth and Peninsula City Deal will provide a catalyst for ongoing investment in the marine industries that are well established in many of the coastal areas of South Devon, with further investment in local supply chains offering potential benefits throughout the wider sub-region. The Heart of the South West Local Enterprise Partnership (LEP) recognises the strength of the region's marine industry and businesses in South Hams and West Devon have the opportunity to benefit from this investment. The LEP also identifies three core aims that underpin a balanced approach to growth throughout the South West, and one of these is 'Building on our Local Distinctiveness'. This leads to a priority of the LEP to 'Maximise

our Environmental Assets', of which the designated landscapes of the South Devon AONB, Tamar Valley AONB, the Cornwall and West Devon Mining Landscape World Heritage Site and Dartmoor National Park are key components.

Strategic Objective SO6

Delivering a prosperous and sustainable South West Devon

To reinforce and protect the settlement pattern of South West Devon as the key driver of the prosperity and sustainability of the area, set within the diverse rural economy and an outstanding natural environment. This will be achieved through:

1. Prioritising growth through a hierarchy of settlements.
2. Enabling bottom-up planning processes in local communities by supporting the delivery of neighbourhood plans.
3. Prioritising equitable access to homes and jobs that meet the needs of all people living in the towns and villages of South West Devon.
4. Enabling a resilient mix of age groups throughout all rural communities.
5. Promoting school, health, and recreation facilities of a high quality in order to reinforce strong communities.
6. Improving transport infrastructure and services, helping to reduce the need to travel and provide more sustainable transport options.
7. Delivering digital connectivity that supports diversity and innovation in the rural economy.
8. Protecting, conserving and enhancing the natural beauty of south west Devon's countryside, protecting the countryside from inappropriate development, and maximising our environmental assets.
9. Celebrating our heritage assets and protecting them for future generations.



What we are going to do - the development strategy for The Thriving Towns and Villages

Policy TTV1

Prioritising growth through a hierarchy of sustainable settlements

The LPAs will distribute growth and development delivering homes and jobs in accordance with the following hierarchy of settlements, enabling each town and village to play its role within the rural area:

1. The Main Towns - which will be prioritised for growth to enable them to continue to thrive, achieve strong levels of self-containment, and provide a broad range of services for the wider area.
2. Smaller Towns and Key Villages - which will receive support for growth commensurate with their roles in supporting the small villages and hamlets.
3. Sustainable Villages - where development to meet locally identified needs and to sustain limited services and amenities will be supported.
4. Smaller villages, Hamlets and the Countryside - where development will be permitted only if it can be demonstrated to support the principles of sustainable development and sustainable communities (Policies SPT1 and 2) including as provided for in Policies TTV26 and TTV27.



5.4 Policy TTV1 sets out the principles to be used to distribute new employment and housing across the Thriving Towns and Villages Policy Area. The distribution is based upon an understanding of the settlement pattern within the rural areas, the role of each of the settlements within this pattern, and how they relate to each other and to the wider Plymouth Housing Market Area (HMA).

5.5 The plan does not define settlement boundaries. However, development outside built up areas will be considered in the context of Policy TTV26 (development in the countryside). Neighbourhood plans may choose to identify settlement boundaries for their towns and villages. A consistent approach will be encouraged through the use of overarching principles for the drawing of settlement boundaries established by the LPAs. These principles, which were published in the JLP Settlement Boundaries Topic Paper, will be incorporated in the Thriving Towns and Villages SPD.

5.6 It is also necessary to recognise the relationships that some of our settlements have with Exeter, Torquay, Cornwall and Newton Abbot. Alongside understanding the settlement pattern it is also important to ensure that the strategic landscape designations, including Dartmoor National Park, the Tamar Valley AONB and the

South Devon AONB are carefully considered. The settlement hierarchy for South West Devon has been established to provide a clear framework for delivering sustainable development, reflecting the presumption in favour of sustainable development in para 14 of the NPPF, and a successful vibrant sub-region which supports the wider regional economy.

5.7 The approach for Thriving Towns and Villages, covered in more detail in the following sections, can be summarised as follows:

5.8 Strengthening the role of the six Main Towns and recognising that, after Plymouth, these are the most suitable locations for sustainable growth. These towns not only have a high level of services and amenities within the towns, but also support large rural hinterlands that take in a number of other settlements. The Main Towns are Dartmouth, Ivybridge, Kingsbridge, Okehampton, Tavistock and Totnes.

5.9 The Smaller Towns and Key Villages provide a more limited range of services than the Main Towns, but nevertheless they play an important role in supporting the dispersed villages and hamlets that are located throughout the rural areas, and which sustain a large number of rural communities. In order to maintain their function, a proportionate amount of new growth is appropriate to ensure that services and facilities are not lost, but can be sustained and enhanced where appropriate. The Smaller Towns and Key Villages are Bere Alston, Chillington, Dartington, Hatherleigh, Lifton, Modbury, North Tawton, Salcombe, Stokenham, and Yealmpton.

5.10 At the next level of the settlement hierarchy are sustainable villages that have a limited but vital provision of services and amenities. The JLP envisages growth in these sustainable villages to meet local needs, and encourages communities to identify sites to meet these needs through neighbourhood plans. The Sustainable Villages are Berry Pomeroy, Blackawton, Bratton Clovelly, Bridestowe, Broadwoodkelly, East Allington, Ermington, Exbourne, Folly Gate, Halwell, Harberton, Harbertonford, Highampton, Inwardleigh, Lamerton, Lee Mill, Lee Moor, Lewdown, Marldon, Milton Abbot, Monkokehampton, Morleigh, Northlew, Rattery, Sampford Courtenay, Sparkwell, Spreyton, Staverton, Stowford, Ugborough, Woolston Green and Wotter.

5.11 Outside of the settlements and in the wider rural area, it is significantly more challenging to meet the requirements of sustainable development. Paragraph 55 of the NPPF highlights that isolated homes in the countryside should be avoided, and only allowed where there are special circumstances. This is considered further in Policy TTV25.

5.12 Figure 5.1 identifies how site allocations have been distributed across the settlement hierarchy set out in Policy TTV1. The rest of this chapter sets out individual objectives for each level of the settlement hierarchy in more detail, and the development allocations for new housing and employment to deliver the objectives set out in SO6. In the Sustainable Villages the JLP does not specifically allocate sites for development. In these villages, it is anticipated that housing will be provided for in the following ways:

- through neighbourhood plans which come forward throughout the plan period;

- through the application of development management policies where there is no neighbourhood plan;
- though the possibility of separate planning studies which identify new sites, and which will be an evidence base input to the next review of the JLP.

5.13 A 'Sustainable Villages' allowance for these sites has been included in the housing land supply for the whole plan period, taking account of the sustainability of each village and the availability of sites in the SHLAA. It should be noted that whilst this allowance counts against the 5 year land supply for the Thriving Towns and Villages, and forms part of the housing trajectory for the policy area, the trajectory assumes that this source contributes to supply only in the later stages of the plan period, unless and until monitoring identifies actual commitments and completions. This approach avoids the risk of the JLP predetermining the outcome of the neighbourhood plan making process.

Figure 5.1. Site allocation totals by settlement type

Settlement Type	New Homes 2014 - 2034	New Employment Space 2014 - 2034
Main Towns	4,417	103,070 sq m
Smaller Towns and Key Villages	911	46,780 sq m
Sustainable Villages	550	0

Note: This table refers only to sites allocated by the Joint Local Plan policies plus the allowance for potential supply at Sustainable Villages - see paragraph 5.12. Completions 2014 to 2016 and commitments (permissions) as at March 2016 are additional to the allowance for the potential supply at Sustainable Villages.

Policy TTV2

Delivering sustainable development in the Thriving Towns and Villages Policy Area

The LPAs will support development proposals in the Thriving Towns and Villages Policy Area which reinforce the sustainable settlement hierarchy and which deliver a prosperous and sustainable pattern of development. In addition to the provisions of Policies SPT1 and SPT2, specific objectives of rural sustainability to be supported through development include:

1. The location of housing where it will enhance or maintain the vitality of rural communities.
2. The delivery of affordable homes that enable rural communities to remain vibrant.

3. The growth and expansion of rural businesses and enterprise.
4. The development and diversification of agricultural and other land-based rural businesses.
5. The delivery of sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and respect the character of the countryside and historic settlements.
6. The retention and enhancement of important rural services and community facilities.
7. The provision of sustainable transport accessibility appropriate to the specific context of the proposal.
8. The delivery of natural infrastructure, where appropriate, alongside new development.



5.14 Policies SPT1 and SPT2 in the Spatial Strategy set out the approach taken by the JLP to sustainable development in Plymouth and South West Devon. Policy TTV2 builds on these principles by highlighting particular aspects of rural sustainability that should be supported through the development process.

5.15 Defining what can be considered sustainable in rural areas is not a straightforward exercise, and often relies upon the balance of benefits and impacts presented by a planning proposal. The JLP supports the delivery of more homes that meet local needs, and supplying a housing mix that adds diversity and affordability to the housing stock within the rural areas. The JLP also supports greater diversity within the rural economy, recognising that greater sustainability and resilience is achieved through encouraging a broader base of jobs than has traditionally been accessible in rural areas.

5.16 The ability of our rural communities to connect with each other and the wider world is seen as a critical component of what we consider 'sustainable' to mean in the 21st century. Rural facilities that foster and maintain social interactions were given the highest priority by rural communities when consulted, along with the quality of broadband signal, which not only keeps people connected socially, but also helps support the diversification and innovations of rural businesses.

5.17 Being able to travel on public transport from the rural areas to larger settlements to access services and employment continues to present challenges, with the viability of many rural services difficult to achieve. With the proportion of rural communities aged over 65 increasing, reliance on public and community transport is expected to increase accordingly. Any reduction in service provision will have serious implications for health and well-being. As such, proposals that contribute to securing rural public transport services will be encouraged, with developer contributions sought where appropriate.

How we will know we have been successful - our measures of success of South West Devon's strategic role

- A. The housing and employment requirement for the Thriving Towns and Villages Policy Area is provided for in accordance with the settlement hierarchy.
- B. Each of the Main Towns has sustained and strengthened their role in providing a broad range of services for the wider rural area.
- C. Neighbourhood plans have driven the delivery of sustainable and thriving rural communities.

b. Main Towns

What we are trying to achieve - our strategic objective for the Main Towns

Strategic Outcome

South West Devon's Main Towns will be thriving, prosperous and resilient centres with a strong degree of self-containment, and providing a diverse mix of services and amenities that support a number of surrounding rural communities. The towns will have developed and benefitted from strong strategic links with larger towns and cities.

5.18 There is a clearly distinct role for the Main Towns in the Thriving Towns and Village policy area. The vitality of the settlement pattern that characterises the Thriving Towns and Villages Policy Area depends upon the long-term resilience of the towns at the top of the settlement hierarchy. The JLP responds to this critical need by providing a strong framework that will allocate sites for new homes and jobs, and policies that will encourage effective and appropriate levels of investment in infrastructure, services and amenities.

Strategic Objective SO7

Maintaining a strong network of Main Towns

To promote locally distinctive and sustainable development in the main towns, with sufficient new homes, jobs, services and infrastructure provided to improve their level of self-containment and to meet local needs. This will be achieved through:

1. Delivering a quantity and mix of new homes that responds positively to local housing needs.

2. Ensuring appropriate infrastructure needs are identified and met to enable new growth.
3. Building self-sufficiency and resilience of the local employment market that meets local needs and attracts new sectors and investment.
4. Protecting and enhancing local distinctiveness and historic character of the Main Towns.
5. Maintaining the transport services and infrastructure that make the Main Towns a hub between rural communities and larger settlements.
6. Enhancing the links between the Main Towns and the surrounding countryside to support healthy communities.



5.19 The towns of Tavistock and Ivybridge have strong links to Plymouth by virtue of geographic proximity and established transport networks. Opportunities to enhance the distinctive identities and thriving economies of these towns will be pursued, alongside building stronger economic and social connections with Plymouth.

5.20 Okehampton, Totnes, Kingsbridge and Dartmouth are self sufficient, independent towns which celebrate their identities and their place within South West Devon. These towns have functional relationships with other settlements such as Exeter, Torbay and Newton Abbot, and this offers a diversity of economic and social opportunities that can contribute to community resilience and enable these towns to adapt to changing circumstances throughout the plan period and beyond.

5.21 The distribution of development and service provision in the Thriving Towns and villages is, therefore, based on the principles of sustainable development. This means that the majority of new development will be located in places where people can most easily access jobs, health, leisure, education, shops and community facilities including by foot, bicycle or public transport. By seeking the highest levels of growth in the six main towns, housing can be provided in places where there is the greatest opportunity for people to access jobs, facilities and services. This will also support the towns as thriving service centres that are able to meet the needs of the population of the whole of the area.

5.22 Each of the main towns have environments in which enterprise can thrive and businesses can grow, and this plan seeks to ensure that sufficient opportunities exist to ensure that each of these towns can retain current employers as well as attracting future investment.

Policy TTV3

Strategic infrastructure measures for the Main Towns

The following key strategic measures and infrastructure projects will be provided during the plan period in order to support the delivery of the strategy for the Main Towns.

1. Road linking Crediton Road to Exeter Road in Okehampton.
2. A386 improvements between Tavistock and Plymouth (subject to a further study to identify key interventions, all modes to be considered, and including consideration to cycle route and public transport measures).
3. Improvements to rail infrastructure in Okehampton and Tavistock.
4. Connectivity across and along the River Dart will be improved by increasing the number of ferry services and their frequency.
5. Expansion of early year places, primary school and secondary school provision where required.
6. Expansion of special educational needs places.
7. Totnes flood defence scheme.
8. Victoria Road, Dartmouth, flood alleviation scheme.
9. Kingsbridge flood alleviation scheme.



5.23 The plan directs the majority of development to the most sustainable locations, which are the six Main Towns. There are a number of strategic infrastructure projects, identified in Policy TTV3, that are necessary to ensure that development does not have an adverse impact on the qualities that make those towns vibrant places to live and to consolidate their self sufficiency. Transport infrastructure is a key element and the projects identified will maintain links between the towns and between them and the lower order settlements. There is a need for highway, public transport, cycling and walking measures, particularly in the towns of Ivybridge, Tavistock, Totnes and Okehampton, to alleviate congestion and encourage greater use of alternatives modes of transport to the private car.

5.24 The policy also identifies other important infrastructure including education and flood risk management.

5.25 More detail on these and other infrastructure needs are set out in the Infrastructure Needs Assessment.

i. Dartmouth

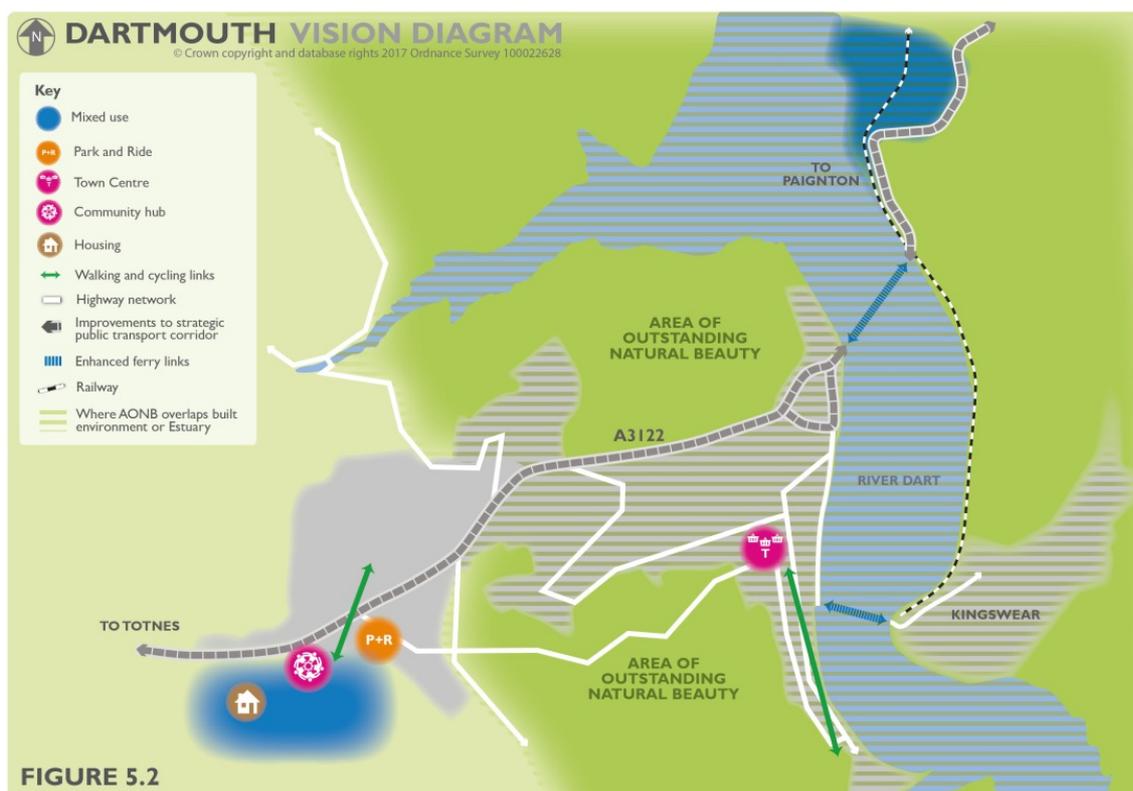
What we are going to do - our policies for Dartmouth

5.26 Dartmouth is an attractive small coastal town, sited on a steep hillside on the west bank of the Dart Estuary, with a long and distinguished maritime history. It has a population of about 6,822 (including Kingswear and Townstal). The town plays an important role in providing services and facilities for the surrounding area. Most of the town and the surrounding rural hinterland which it serves lie within the South Devon Area of Outstanding Natural Beauty (AONB) which is an important consideration when considering future growth opportunities.

5.27 Dartmouth has a rich marine tradition that is well known nationally and internationally, contributing to its popularity as a tourist destination. The Dart Estuary has characteristics sufficient to support cruise ships, and the local economy differs from the other towns within the TTV Policy Area because of the extent of marine activity.

5.28 The town itself is spatially constrained, and has experienced expansion, predominantly to the south-west of the historic town centre. The topography of the land in this location has led to a feeling of separation and distinction between the historic core of Dartmouth and that of Townstal where the largest recent expansion of the town has taken place.

5.29 Although the town is distant from the strategic transport networks and as such is likely to experience limited growth and investment, opportunities do present themselves due to the proximity of the town to Torbay. In order to support additional development in Dartmouth, the LPA will look to identify future opportunities to secure enhanced ferry services.



Spatial Priority SP1

Spatial priorities for development in Dartmouth

The plan seeks to enhance the vibrancy and sustainability of Dartmouth. This will include:

1. Providing for mixed use development to help meet local housing need and increase employment opportunities to support the long term resilience of the town.
2. Maintaining and strengthening the town's traditional marine industry and recreational / leisure offer.
3. Recognising and enhancing the relationship with the surrounding AONB.
4. Conserving and enhancing the town's historic and maritime character.
5. Maintaining the existing retail offer, protecting the integrity of the town centre and enhancing its character.
6. Identify the opportunities to invest in enhanced connections between Dartmouth town centre and Townstal.
7. Identify opportunities to secure and enhance ferry links across the River Dart.

8. Ensuring appropriate infrastructure is delivered alongside new development.
9. Working with relevant authorities to look for appropriate solutions to manage traffic flow in and around the town.



5.30 Dartmouth benefits from a high quality built and natural environment, and a local employment market that makes the most of its riverside location and maritime history. The town is constrained topographically, with very few sites within the lower town suitable for the delivery of new homes or jobs. As such, growth to support the future needs of the town will continue to the south-west of the town.

5.31 The success of creating new communities in this area will depend upon the quality of connections between the lower town and Townstal, and how the new development relates to the AONB landscapes. In this respect, the protection of the AONB including its setting, in accordance with Policy DEV25, is a key priority for the area.

5.32 Development in Dartmouth benefits from the co-location of some key services and facilities, including the park and ride, the Dartmouth Academy and a range of retail and leisure options. The delivery of new homes and jobs will be mutually beneficial to the long term sustainability of these services, which will also make a valuable contribution to the long term resilience of the town.

Policy TTV4

Land at Cotton

Land at Cotton is allocated for residential led mixed-use development. Provision is made for in the order of 450 new homes and 10,800 m of employment floorspace (Use Classes B1).

Development should provide for the following:

1. A local community hub.
2. Retention of the existing sports pitches with any re-ordering only acceptable if it would result in enhancement of the facility.
3. Provision of both formal and informal open space.
4. Strategic landscaping, open space, and tree planting to address the scale and prominence of the site, to help mitigate any adverse visual impact on the AONB, and to soften the edges of the development onto the undeveloped countryside.

5. A scale, density, design and southern extent of development which is not overly prominent when viewed from the surrounding countryside.
6. Positive frontages onto the adjoining road network, especially the main road.
7. Delivery of enhanced connectivity with the lower town for public transport, pedestrians and cyclists.
8. A lighting strategy, which minimises the impact of light spill to the surrounding countryside.



5.33 With limited scope for expansion, given landscape restrictions, this site represents an opportunity to provide residential development in close proximity to existing services and facilities at Townstal. Part of the site, which sits within the adjoining Parish of Stoke Fleming, already benefits from planning permission under planning reference 51/1710/14/O.

5.34 The provision of a community hub together with cycle and footpaths will facilitate the creation of a high quality, distinct community that also benefits from links to services in Dartmouth. A strategic approach to landscaping will also be a key requirement to ensure a high quality development.

Policy TTV5

Noss on Dart

Land at Noss-on-Dart is allocated for mixed-use development including employment (Use Classes B1, B2 and B8), commercial, education, a hotel, retail and enabling residential development. Provision is made for in the order of 126 new homes. A comprehensive redevelopment scheme should provide for the following:

1. Improved marina services and facilities.
2. Retention and improved provision of existing educational facilities.
3. Improved connectivity across the River Dart including improved ferry services.
4. Improved connectivity with local footpaths and improved access through the northern part of the site.
5. Improvements to site access at the junction with the A379 Bridge Road.

6. High quality design, which must take account of the location, wooded character, scale, massing, lighting and the site's sensitive setting in the AONB, especially in views from the River Dart, the Dart Valley Trail, the Greenway Estate, public rights of way, from the main road and railway line.
7. Careful consideration and investigation of opportunities to retain un-designated heritage assets on site, and ensure that the Scheduled Ancient Monument and its setting is conserved or enhanced.
8. Remediation of land.
9. A site specific mitigation plan to ensure all new development does not have any adverse effects on the greater horseshoe bats and their strategic flyways within the South Hams SAC Landscape Connectivity Zone.
10. A sequential approach to the layout and design of development and incorporation of flood resistance and resilience measures for any development that has to be located in a flood zone.
11. Water quality management measures to protect the surrounding estuary.
12. Avoiding the loss of inter-tidal habitat; where loss cannot be avoided, it must be fully mitigated and/or compensated.



5.35 Noss on Dart Marina is a locally important employment site that lies within the Parish of Kingswear. The focus of the development of this site is to deliver an improved marina, services and facilities to provide a stimulus to marine education and employment that will support the objective of strengthening the town's traditional marine industry. Although the site is located within the AONB, it is considered that the redevelopment and reconfiguration of the existing marina, services and facilities and the re-provision of employment and retail uses will provide opportunities to enhance this location and improve the character and special qualities of the AONB.

In order for this to happen it is accepted that this site for housing development in the order of 126 dwellings is appropriate to ensure that the wider community benefits from redevelopment in this location can be realised. It is expected that the scale and form of the development proposed will be guided by a design code. Limited accessibility of the site is noted, although conversely redevelopment provides an opportunity to enhance ferry links between Dartmouth and Kingswear.

5.36 Redevelopment will entail site clearance and ground preparation works, including raising of the ground level within the proposed new boatyard area. It is proposed to construct a new boatyard comprising lifting services, commercial property, a dry stack facility, and potential public slipway for small boats. A new marina would provide up to 250 berths. The development will need to demonstrate detailed and careful consideration with respect to the impact on the marine environment and in the context of the South Devon AONB; as well as consideration of the need to extend and refurbish the existing sea wall.

5.37 Improved accessibility may include work to the site access junction on A379 Bridge Road, widening of the existing car park and creation of a new visitor car park on the other side of the access road within an area of existing unmanaged woodland; and the replacement of the existing pontoons. The latter would accommodate an improved ferry service / connection running between the proposed site and Dartmouth.

5.38 In addition to landscape sensitivities it will be essential to demonstrate that the layout, scale, mass and design of development will avoid any adverse effects on the South Hams Special Area of Conservation. A site specific greater horseshoe bat mitigation plan must be submitted and approved before planning permission will be granted. The plan must demonstrate how the proposed development will retain continued ecological functionality for greater horseshoe bat use associated with the South Hams SAC, and that the development will not have an adverse effect on the SAC.

5.39 The specific requirements identified are additional to the generic requirements of other policies. The allocations should, therefore, be read alongside and considered against the other policies in the JLP.

5.40 Taken together, Dartmouth and Noss provide for 576 new homes and 10,800 sqm of new employment floorspace.

ii. Ivybridge

What we are going to do - our policies for Ivybridge

5.41 Ivybridge is the largest town in South Hams with a population of 12,425. Traditionally a mill town located on the southern edge of Dartmoor, Ivybridge was the focus of major expansion in the second half of the 20th century in part as a result of its good location to the east of Plymouth. The town benefits from proximity to the A38, but traffic flow through the town is constrained at peak times, making it difficult to make the most of its strategically favourable location. The town benefits from being located on the main Plymouth to London rail line, although the train station's platform length restricts the number of services that serve the town. The town has distinct characteristics, thanks in part to being well located to access Dartmoor, and also the high percentage of independent shops within the town centre.

5.42 The level of growth proposed for Ivybridge represents an expansion to what can be considered the extent of its natural boundaries, which are constrained by Dartmoor to the north and the A38 to the south. The proposed developments will contribute to the delivery of an alternative road access to the A38 from the east of Ivybridge and improved connectivity to the town and Filham Park by cycling and walking. These measures are important given the existence of an Air Quality Management Area (AQMA) at Western Road. The location of development to the east also seeks to maximise the potential to support enhanced rail services given its close proximity to the railway station.



Spatial Priority SP2

Spatial priorities for development in Ivybridge

The plan seeks to enhance the vibrancy and sustainability of Ivybridge. This will include:

1. Providing for mixed use development to help meet local housing need and increase employment opportunities to support the long term resilience of the town.
2. Delivering investment which enhances the identity and economy of the town alongside building stronger economic and social connections with Plymouth.
3. Improvements to the existing road connections and junctions to the south of Ivybridge, working with relevant authorities to look for appropriate solutions to manage traffic flow in and around the town, including new and improved access to the A38 from the east of the town.
4. Improving the existing retail offer, protecting the integrity of the town centre and enhancing its character.
5. Maximising the potential of the A38, and identifying opportunities to invest in rail connections to Plymouth and Exeter.
6. Building on the opportunities presented by proximity to Dartmoor National Park and ensuring development recognises this sensitive location.

7. Ensuring that all development, singularly or cumulatively, will not negatively impact on the ability of the relevant authorities to improve air quality within the Western Road AQMA.
8. Ensuring appropriate infrastructure is delivered alongside new development, including community facilities identified in Policy INP5 of the Ivybridge Neighbourhood Plan.



5.43 The proximity to the A38 offers economic opportunities for Ivybridge, and has attracted business to the town in the past. The A38 also presents something of a challenge for the vitality of Ivybridge town centre, as connectivity to Lee Mill and Plymouth in particular provides ready access to a more diverse retail offer. Ivybridge town centre has built a reputation for local distinctiveness and a high proportion of independent stores. A key challenge within the next plan period is to nurture this distinctiveness, and to maintain the vitality and viability of the town centre whilst also maximising the benefits that come from being well connected to Plymouth by both road and rail.

5.44 Ivybridge serves as a gateway to the southern edge of Dartmoor National Park. This presents leisure and recreation opportunities that enhance the attractiveness of Ivybridge as a destination and brings long term benefits for the health and wellbeing of the residents of the town and the surrounding areas. The requirement for development to enhance connectivity within and around Ivybridge through walking, cycling and public transport will consolidate the attractiveness of the town as a place to live, work and visit.

5.45 Allocated sites to the east and west of the town will continue to deliver long term housing and employment growth that meets many of the identified needs of the town, although other smaller sites will also be needed to increase the diversity of housing sizes and types.

Policy TTV6

East of Ivybridge

Land to the east of Ivybridge is allocated for a residential led mixed-use development. Provision is made for in the order of 540 new homes and 4,600 sq m of employment space (Use Classes B1). Development should provide for the following:

1. Appropriate local facilities to support new residents and to enhance the sustainability of the local area, including local convenience retailing facilities of a scale and format where it can be demonstrated that there will be no significant adverse impact on the existing town centre.

2. The continued and enhanced operation of the railway station and associated park and ride, including high quality design and layout which maximises opportunities for natural surveillance.
3. A landscape strategy which addresses the site's scale and prominence and the edges of the development, and to mitigate any adverse visual impact on Dartmoor National Park.
4. The retention of Ivybridge Rugby Club, with any reordering of land-uses only acceptable if it is beneficial to the operation of the club.
5. A quality form of development which integrates with the existing housing, and provides a design and density that is not prominent when viewed from the Dartmoor National Park.
6. Safe and attractive pedestrian and cycle connections for residents to access local facilities and services, including the station and local schools.
7. An appropriate strategy to mitigate for any impact on the Western Road AQMA, including proportionate contributions as appropriate to any relevant Air Quality Action Plan and traffic management schemes.
8. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.



5.46 This allocation comprises three separate areas, one of which benefits from planning permission under planning reference 27_57/1347/15/F. The site spans both sides of the B3213 and is adjacent to the Ivybridge train station Park and Ride. The proposal aims to improve the sustainability and self-sufficiency of Ivybridge through a large scale development incorporating new homes, employment land and local facilities. The site will improve connectivity with the town centre through the provision of enhanced walking and cycling routes, as well as measures to address its impact on the Air Quality Management Area which has been designated on Western Road.

Policy TTV7

Land at Filham

Land to the east of Ivybridge, at Filham, is allocated for housing. Provision is made for in the order of 200 new homes. Development should provide for the following:

1. A quality form of development which integrates with the existing housing.

2. Safe and attractive pedestrian and cycle connections for residents to access local facilities and services, including the station and local schools.
3. An appropriate strategy to mitigate for any impact on the Western Road AQMA, including proportionate contributions as appropriate to any relevant Air Quality Action Plan and traffic management schemes.
4. Strategic landscaping to the site boundaries, and the creation of a landscape framework throughout the site. The scale, character, density and design of development should ensure that it is not overly prominent when viewed from the surrounding countryside, paying particular regard to views towards and from Dartmoor.
5. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.



5.47 This allocation seeks to deliver a further 200 dwellings at the east of Ivybridge. This development along with TTV6 will ensure that Ivybridge can deliver its spatial priorities by providing long term housing and employment growth. Whilst connectivity benefits are recognised, this additional growth is likely to have an impact on traffic congestion in the centre of Ivybridge. It is essential, therefore, that development contributes to public transport, cycling and walking routes as well as measures to address the Western Road AQMA.

Policy TTV8

Land at Stibb Lane

Land at Stibb Lane is allocated for housing. Provision is made for in the order of 100 new homes. Development should provide for the following:

1. A quality form of development which integrates with the existing housing.
2. Safe and attractive pedestrian and cycle connections for residents to access local facilities and services, including the station and local schools.
3. An appropriate strategy to mitigate for any impact on the Western Road Air Quality Management Area.
4. Strategic landscaping to the site boundaries to soften the edges of the development onto the undeveloped countryside and provide visual containment of the development in views from Dartmoor National Park. The scale, design, density, and the northern and western extents of development should ensure that it is not overly prominent when viewed from the surrounding countryside, paying particular regard to views from Dartmoor.

5. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.



5.48 This allocation is for an additional 100 dwellings on land adjacent to the development permitted at Woodland Road. The site will need to provide for strategic landscape to ensure that the development integrates well to the surrounding countryside. Connectivity benefits are recognised in terms of accessibility to the centre of Ivybridge. It is essential, therefore, that development contributes to public transport, cycling and walking routes in order to address potential impacts on the Western Road AQMA.

5.49 Within the Ivybridge area, four further sites are identified as being suitable for development (two of which have planning permission) for a range of uses including residential and employment. The development of these sites will support the vision and objectives of the JLP and the spatial priorities for Ivybridge.

5.50 The allocations should be read alongside and considered against the other policies in the JLP.

Policy TTV9

Other site allocations at Ivybridge

The following additional sites at Ivybridge are allocated for development.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Stowford Mill	Mixed Use - including housing, employment use (B1a), hotel and food and drink uses	97 homes; 2,330 sq.m. employment floorspace (no net increase)	<ul style="list-style-type: none"> a. Conserve and where appropriate enhance the significance of the heritage assets, delivering it's renovation and reuse. b. Necessary remediation of on-site contamination. c. Mitigation of highway impacts, including safety and congestion. d. Mitigation of impacts on the Western Road Air Quality Management Area.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
				<ul style="list-style-type: none"> e. Flood resistant and resilient design, without increasing flood risk elsewhere. f. Leat Management Plan to ensure the proper maintenance of the leat and mill pool, to manage flood risks and protect fish species.
2	Woodland Road	Housing	74 homes	<ul style="list-style-type: none"> a. Strategic landscaping. b. Provision and maintenance of a surface water drainage scheme. c. Mitigation of highway impacts, including safety and congestion. d. Mitigation of impacts on the Western Road Air Quality Management Area.
3	Cornwood Road	Housing	37 homes	<ul style="list-style-type: none"> a. Provision and maintenance of a surface water drainage scheme. b. Mitigation of highway impacts, including safety and congestion. c. Mitigation of impacts on the Western Road Air Quality Management Area.
4	Land at Dame Hannah Rogers School	Housing	30 homes	<ul style="list-style-type: none"> a. Provision and maintenance of a surface water drainage scheme. b. Mitigation of highway impacts, including safety and congestion. c. Mitigation of impacts on the Western Road Air Quality Management Area.



5.51 Taken together Iybridge provides for in the order of 1,078 new homes and 4,600 sq.m. of employment floorspace.

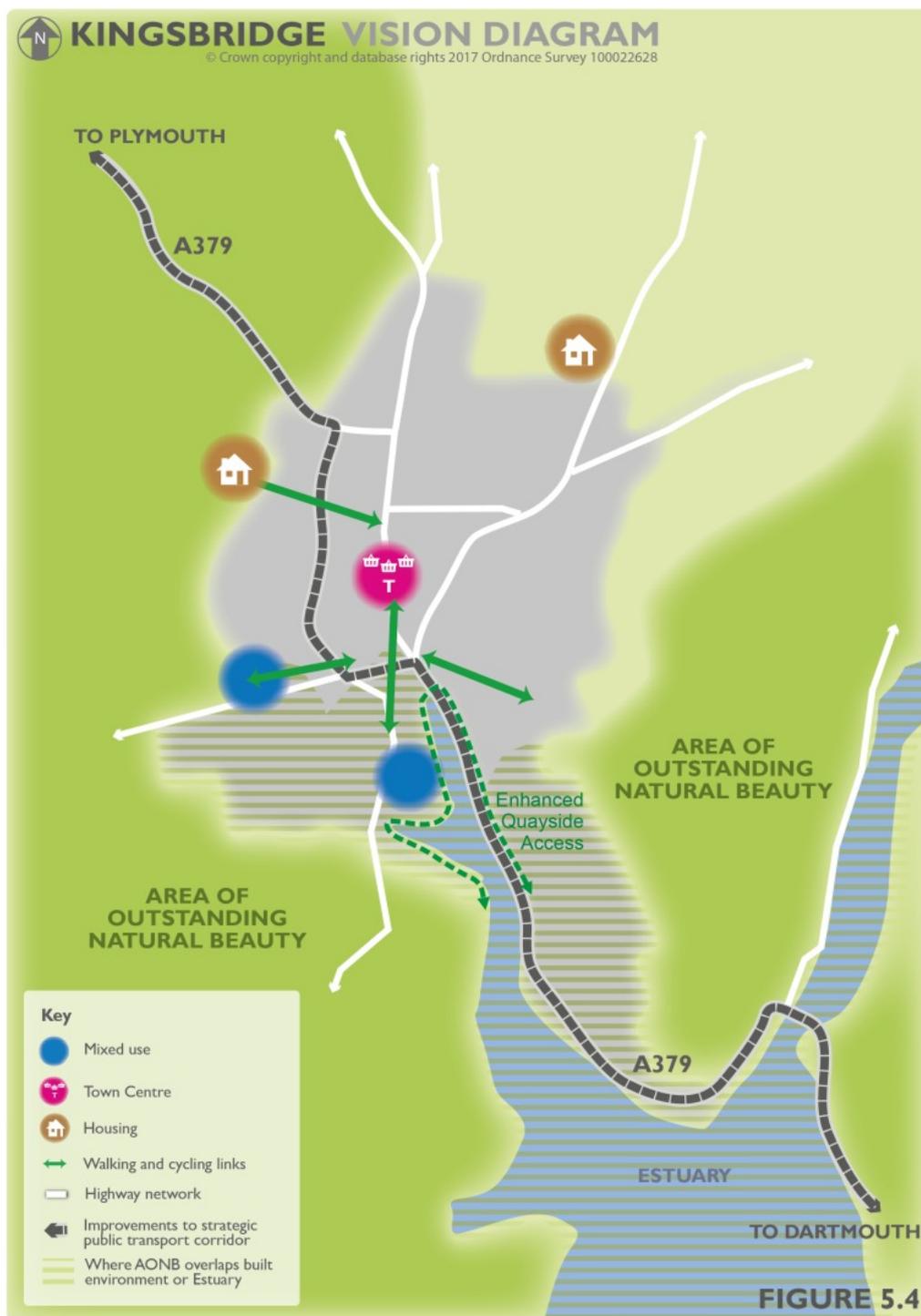
iii. Kingsbridge

What we are going to do - our policies for Kingsbridge

5.52 Kingsbridge is an historic market town at the head of a large estuary. It has a population of 6,116 and serves a large rural hinterland of numerous smaller rural settlements. The town benefits from a strong local character, and is located deep

in the heart of the South Hams with a large part of the town within the South Devon AONB. The town is accessible via the main road network of the A379 and A381 but is some distance in relation to the strategic transport networks. This contributes to its local distinctiveness, and along with the towns location in and adjacent to the AONB also serves to limit the potential for significant expansion and investment.

5.53 It is important for the future self-sufficiency of Kingsbridge that appropriate levels of residential and employment growth are provided for within the town. It is fully recognised that the town has a close relationship with the AONB, and it is considered that the sites allocated within Kingsbridge provide the best opportunities to meet the future needs of the town whilst having the least impact on the special qualities and character of the AONB. Development within Kingsbridge will need to ensure that water quality issues within the Salcombe to Kingsbridge SSSI are not exacerbated.



Spatial Priority SP3

Spatial priorities for development in Kingsbridge

The plan seeks to enhance the vibrancy and sustainability of Kingsbridge. This will include:

1. Providing for mixed use development to help meet local housing need and increase employment opportunities to support the Spatial Priority

2. long term resilience of the town.
3. Recognising and enhancing the relationship with the surrounding AONB.
4. Conserving and enhancing the town's historic character.
5. Maintaining the existing retail offer, protecting the integrity of the town centre and enhancing its character.
6. Enhancing the central area and quayside through sensitive regeneration and development.
7. Improvements to public realm, including access to the estuary.
8. Ensuring appropriate infrastructure is delivered alongside new development.
9. Working with relevant authorities to look for appropriate solutions to manage traffic flow and car parking in and around the town.
10. Retention and enhancement of leisure facilities.
11. Recognising the important role of key road links and the need to maintain and improve public transport provision.



5.54 Although Kingsbridge is distant from the strategic road network, there are opportunities to provide land for development within the town. There is potential for brownfield regeneration that would make better use of a key site within the town but beyond this there are limited other brownfield opportunities and therefore in order to provide homes and jobs to meet the needs of the town, greenfield sites on the edge of the town have been carefully selected.

Policy TTV10

The Quayside

Land at The Quayside is allocated for mixed-use re-development, including employment, commercial, residential and community uses. Provision is made for in the order of 60 new homes and 200 sq.m. of employment floorspace (Use Classes B1). Development should provide for the following:

1. Delivery in accordance with a masterplan for the site that should be prepared and consulted upon in advance of the consideration of any planning application.

2. A high quality design for this estuary gateway site which conserves and enhances the natural beauty of the South Devon AONB and provides for enhanced public realm and better connectivity for pedestrians and cyclists to the town centre and estuary.
3. Retention of public car parking to a level sufficient to support the town's shopping and tourism roles, and which is appropriately located to those roles and sensitively incorporated into the design of new development ensuring that car parking does not dominate the street scene.
4. Appropriate flood risk mitigation measures.
5. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site without exacerbating water quality issues within the Salcombe to Kingsbridge SSSI and are designed to deliver landscape, biodiversity and amenity benefits.
6. Sufficient space to allow the retention of a tree canopy within and surrounding the site to conserve the green character of Kingsbridge in this area.
7. Investigation and remediation of contaminated land.



5.55 The Quayside area is a naturally beautiful setting at the head of the Kingsbridge estuary, providing a setting to heritage assets with informal open space and a focal point for residents and tourists alike. The local community has a long held aspiration for regeneration of the Quayside area. It is considered this can be best achieved by a mixed-use scheme incorporating a range of uses, including the retention of the leisure centre. A well designed comprehensive redevelopment scheme should provide a focus for the estuary, accessibility and links to the rest of the town. Maintaining mature trees and restricting height of new buildings to below tree level could help to mitigate against potential harm to heritage assets.

5.56 The allocation area incorporates land used as a car park, buildings with a variety of uses and landscaped areas. It is proposed to redevelop the site through a Masterplanning process that will include extensive engagement with the local community. The key objectives are to meet need for affordable housing; maintain sufficient car parking, informed by a town wide capacity assessment; employment uses; and improved public realm, through better connectivity with the bus station and Fore Street and improvements to the slipway along with other marine infrastructure. Redevelopment offers the opportunity to promote positive regeneration of the town centre, increasing its appeal to visitors.

5.57 The majority of the Quayside car park is located within Flood Zone 3a. Development of the area will need to consider carefully how safe access and egress routes can be achieved. This should be done through the masterplanning process.

Policy TTV11

West of Belle Hill

Land at Belle Hill is allocated for housing. Provision is made for in the order of 96 new homes. Development should provide for the following:

1. High quality design which reflects the quality and character in the context of the setting of the AONB.
2. Strategic landscaping within the site boundaries and the creation of a landscape framework throughout the site. The scale, design, density and northern extents of development should ensure that development is congruous with the adjacent settlement edge when viewed from the surrounding countryside.
3. Enhanced provision for pedestrians and cyclists, including enhanced connectivity with the town centre.
4. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site without exacerbating water quality issues within the Salcombe to Kingsbridge SSSI and are designed to deliver landscape, biodiversity and amenity benefits.
5. A lighting strategy, which minimises the impact of light spill to the surrounding countryside.



5.58 Situated to the north of the town, the site provides the opportunity to deliver new housing and enhanced connectivity by walking, cycling and contributions to public transport. Although the site is not within the AONB, it is important that it is sensitively designed so as to mitigate for any impact on the setting of the AONB.

5.59 Within Kingsbridge, a further two sites are identified as being suitable for development, (both of which have planning permission) for residential and employment uses. The development of these sites will support the vision and objectives of the JLP and the spatial priorities for Kingsbridge.

5.60 The specific requirements identified are additional to the generic requirements of other policies. The allocations should, therefore, be read alongside and considered against the other policies in the JLP.

Policy TTV12

Other site allocations at Kingsbridge

The following additional sites at Kingsbridge are allocated for development.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	North West of Kingsbridge	Housing	111 homes	<ul style="list-style-type: none"> a. Open space and strategic landscaping to the western edge of the site and the creation of a landscape framework throughout the development. b. Provision and maintenance of a surface water drainage scheme. c. Mitigation of highway impacts, including safety and congestion. d. No development in Flood Zone 2 or Flood Zone 3. e. Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts. f. No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.



5.61 Taken together Kingsbridge provides for 267 new homes and 200 sq.m. of employment floorspace.

iv. Okehampton

What we are going to do - our policies for Okehampton

5.62 Okehampton is the second largest market town in West Devon situated in the north of the Borough. The town has a close relationship with the neighbouring Okehampton Hamlets parish where much of the growth to the east of the town will take place. These two areas combined have a collective population of 7,792. Lying on the northern boundary of Dartmoor National Park, Okehampton is an important gateway to the moor and the town’s setting is heavily influenced by this green and expansive landscape. The town provides important services and facilities for many of its surrounding rural communities.

5.63 Okehampton is very well located for easy access to the A30 strategic road network, connecting the town with the city of Exeter and the M5. Its location enables good opportunities for business and commercial development, as well as tourism, and the town can usefully promote itself in this way. Plans to introduce regular passenger services to the town’s rail network and open a new station in the east of the town will further boost the attractiveness of the town for visitors and inward investment.



Spatial Priority SP4

Spatial priorities for development in Okehampton

The plan seeks to enhance the vibrancy and sustainability of Okehampton. This will include:

1. Providing for mixed use development to help meet local housing need and increase employment opportunities to support the long term resilience of the town.
2. Fully recognising the strategic location of Okehampton for employment growth.
3. Maximising the potential of the A30, and identifying opportunities to invest in rail and bus connections to Exeter.
4. Enhancing the historic character and vitality of the town.
5. Using opportunities to build community infrastructure related to new housing developments.
6. Maintaining and enhancing strong physical and visual connections between the town and the surrounding countryside, including Dartmoor National Park.

7. The delivery of a new primary school in the east of the town and the relocation of the post 16 provision at Okehampton College, and the expansion of existing schools in the town.
8. Ensuring that all development, singularly or cumulatively, will not negatively impact on the ability of the relevant authorities to improve air quality within the town centre.
9. Working with relevant authorities to look for appropriate solutions to manage traffic flow in and around the town, including exploring opportunities to deliver a town centre access road, and delivery of a link road between Exeter Road and Crediton Road.
10. Ensuring appropriate infrastructure is delivered alongside new development.
11. Ensuring that development on the edges of the town is designed sensitively to respond to the changing character from urban to rural.



5.64 The key long-term challenge for Okehampton is to provide sufficient levels of growth that the town needs, whilst ensuring that the town functions effectively and efficiently, even at peak times, to attract people to the town centre.

5.65 The historic arrangement of roads and continued growth of the town has led to increasing congestion, particularly as the town's only primary school and three supermarkets are all accessed from the key town centre junction of West Street / Fore Street. This limits the potential for further growth and improvement. The sites allocated for development have been part of a longer term strategy for the town for some time, first adopted in the Core Strategy in 2011. These allocations are considered to be the best locations to deliver Okehampton's future growth requirements which support the delivery of the spatial priorities for the town.

5.66 The development will facilitate a link road that will join Crediton Road and Exeter Road to help alleviate the impact of additional traffic in the town centre. Other infrastructure measures include a primary school in the east to help reduce traffic movements through the town centre and contributions towards the delivery of a railway station and/or improved bus services.

5.67 Allocated sites to the east of the town will continue to deliver long term housing and employment growth, although other smaller sites will also be needed to increase the diversity of housing sizes and types.

5.68 Devon County Council has identified the need to relocate the post 16 provision at Okehampton College and opportunities are being considered to relocate this provision.

Policy TTV13

Land at Exeter Road, Okehampton

Land at Exeter Road is allocated for employment use. Provision is made for in the order of 35,000 sqm of B1b,c, B2 and B8 employment floorspace. Development should provide for the following:

1. Strategic and structural landscaping within and surrounding the site, a site layout and building design to help mitigate any adverse visual impact on the Dartmoor National Park.
2. Delivery of an access strategy to ensure that the transport impacts of the development are appropriately managed and mitigated.
3. A well defined and high quality frontage along Exeter Road.
4. Support and not prejudice the provision of a new railway station and associated facilities in the east of the town and the potential to reintroduce a full rail passenger service from Okehampton.
5. Enable the relocation and/or expansion of existing businesses from Okehampton and the surrounding area.
6. Support high value, high productivity sectors.
7. Support and not prejudice the delivery of an access road to the east to land at Stockley.
8. An appropriate strategy to mitigate for any impact on air quality within the town centre.



5.69 This allocation is strategically important and seeks to provide a key location for employment opportunities. The site benefits from planning permission under planning reference 00868/2014. The location on the east side of the town will maximise connectivity with Exeter, which would be further enhanced by improvements to rail and bus links. The site is partially developed and provides an opportunity for a mix of business uses. A key aspiration is to deliver a range of employment uses which supports local business growth, increases job opportunities and promotes high quality employment uses and which do not have an adverse impact on the town centre.

5.70 The design and delivery framework for this policy is amplified in the Okehampton Masterplan Supplementary Planning Document.

Policy TTV14

East of Okehampton

Land to the east of Okehampton is allocated for residential development. Provision is made for in the order of 775 new homes. Development should provide for the following:

1. Strategic landscaping and open space within and surrounding the site to address the site's scale and prominence to mitigate any adverse visual impact on the Dartmoor National Park, and to soften the development edges. The scale, materials, design and extents of development should ensure that it is not overly prominent when viewed from the surrounding countryside, improving the eastern edge of Okehampton.
2. Develop a site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site and are designed to deliver landscape, biodiversity and amenity benefits.
3. No development in Flood Zone 2 or Flood Zone 3 and appropriate flood risk mitigation measures.
4. The link road between Crediton Road and Exeter Road.
5. Appropriate local facilities to support the new residents and to enhance the sustainability of the existing area, including a new primary school, local retailing facilities of a scale and format to meet local retailing needs where it can be demonstrated that there will be no significant adverse impact on the existing town centre which act as a focal point for local community interaction.
6. Contributions to enhance public transport.
7. Safe and attractive cycling and walking routes linking to the town.
8. Contributions to playing pitches and the provision of formal and informal open space.
9. Delivery of Stockley Valley Park providing open and recreational space for nearby residents, businesses and visitors to enjoy.
10. A design and layout which conserves and where appropriate enhances the significance of the scheduled monument and the contribution made by its setting to the north west of the site and the layout of the Roman Road running across the site which should be incorporated as part of the public realm.
11. An appropriate strategy to mitigate for any impact on air quality within the town centre.



5.71 The land allocated to the east of Okehampton benefits from planning permissions that make provision for in the order of 775 dwellings under planning references 01089/2013 and 2731/15/OPA. As an urban extension in a sensitive landscape, the delivery of a strong landscape strategy with plentiful and accessible informal open space is essential. Parts of the wider allocation are within areas at risk from flooding and therefore it is important that development is directed away from these areas and the proposal looks at opportunities to not increase drainage or flooding elsewhere on site through the requirement for a Sustainable Drainage Strategy.

5.72 The allocation covers a large area to the east of Okehampton. Along with housing land, the allocation includes provision for other uses, including the link road linking Exeter and Crediton Roads, a primary school, some small neighbourhood retailing, public open space and cycling and walking links to the town centre. Improvements to public transport are also necessary and a contribution would need to be made to bus and / or rail services. The road linking Exeter Road and Crediton Road should be delivered ahead of the majority of the development being occupied.

5.73 The design and delivery framework for this policy is amplified in the Okehampton Masterplan Supplementary Planning Document.

Policy TTV15

Land at Stockley

Land at Stockley is allocated for employment / employment-led mixed use. Provision is made for in the order of 42,700 sqm of B1b,c, B2 and B8 employment floorspace. Development should provide for the following:

1. Strategic landscaping within and bounding the site to help mitigate any adverse visual impact on the Dartmoor National Park. The layout, design, scale and materials should recognise the rural character of the site.
2. Delivery of an access strategy to ensure that the transport impacts of the development are appropriately managed and mitigated.
3. Enable the relocation and/or expansion of existing businesses from Okehampton and the surrounding area.
4. An appropriate strategy to mitigate for any impact on air quality within the town centre.
5. Access preferably to be achieved from the existing highway spur to the south east of Okehampton Business Centre.



5.74 This site is mainly in agricultural use for grazing. In the south western corner of the site is the existing Farmer Luxtons Farm Shop and parking area. This site surrounds the settlement of Stockley Hamlets giving the site a particularly rural character which lends itself less well to heavy industry, larger business and those that require and/or generate significant lorry/HGV movements. It is considered that some lower impact, employment uses can be accommodated within this area in a way which is most compatible with the rural nature of the site.

5.75 Access already exists through the site. However, this is a narrow rural lane which forms part of the Devonshire Heartlands Way. This route has a reduced traffic role, serving the hamlets and existing farmsteads in the area. Devon County Council has advised that access can be achieved to the development off this lane but that access points should be located at the western end of the site to reduce the distance which vehicles travel along this highway. This will maintain the character and quality of the lane. Opportunities should also be explored to provide internal highway access between the development at Exeter Road and this site using the existing spur at the eastern end of the access road east of Higher Stockley Mead.

5.76 The design and delivery framework for this policy is amplified in the Okehampton Masterplan Supplementary Planning Document.

5.77 The specific requirements identified are additional to the generic requirements of other policies. The allocations should, therefore, be read alongside and considered against the other policies in the JLP.

5.78 Taken together Okehampton provides for 775 new homes and 77,700 sqm of employment floorspace.

v. Tavistock

What we are going to do - our policies for Tavistock

5.79 Tavistock is the largest town in West Devon with a population of around 12,450 people. A lively and attractive town, Tavistock is well known for its Pannier and food markets, and attracts visitors from a wide area to see these and explore the many other unique shops, restaurants and attractions the town has to offer.

5.80 The town is largely contained within the valley of the River Tavy and is surrounded on all sides by a distinct and valued countryside. Dartmoor National Park to the east of the town and the Tamar Valley Area of Outstanding Natural Beauty (AONB) to the south are both part of this landscape and form a dramatic backdrop to the town.

5.81 The local architectural and historic interest also adds to Tavistock's charm and lends itself to the town's appeal as a popular tourist destination. The built environment is characteristic of its mining past and is celebrated as a key part of the West Devon and Cornwall Mining Landscape World Heritage Site (WHS).

5.82 As a local market town, Tavistock plays an important role in supporting both its local residents and the communities of its surrounding rural areas. Those living and working in these places look to Tavistock for many basic and essential facilities as well as for its more diverse collection of entertainment, leisure and cultural activities.

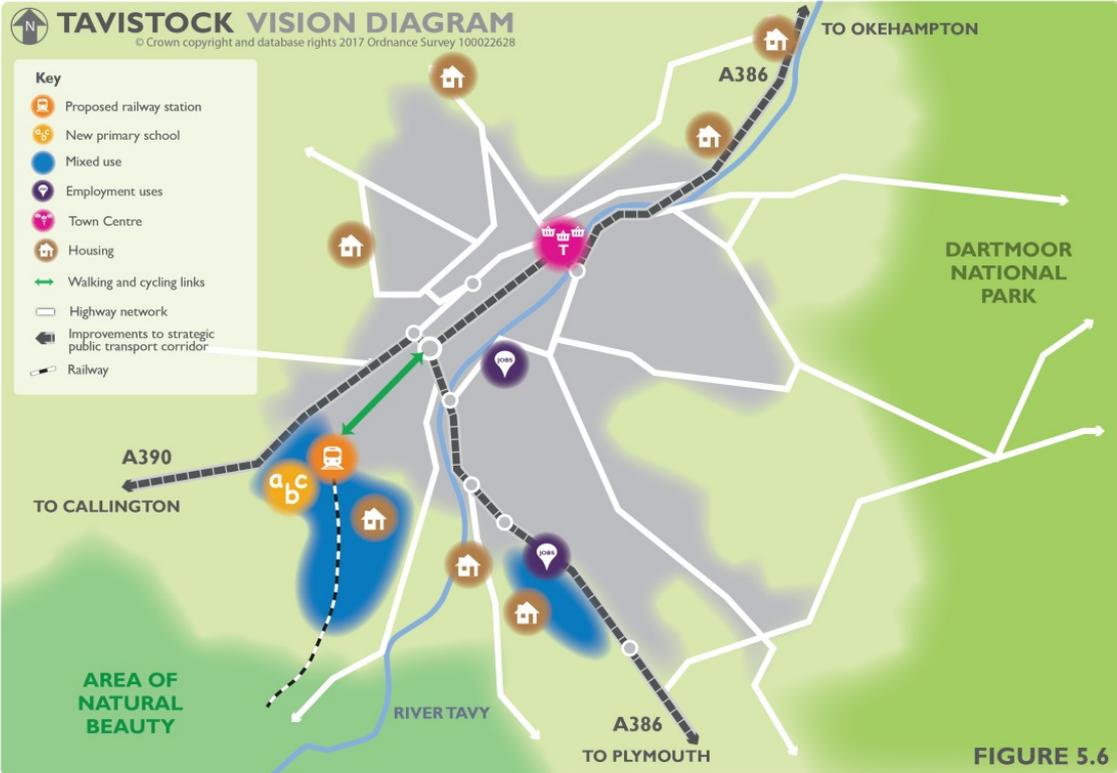


FIGURE 5.6

Spatial Priority SP5

Spatial priorities for development in Tavistock

The plan seeks to enhance to enhance the vibrancy and sustainability of Tavistock. This will include:

1. Providing for mixed use development to help meet local housing need and increase employment opportunities to support the long term resilience of the town.
2. Maintaining and improving key road links between Tavistock and Plymouth.
3. Reinstating the former rail link between Tavistock and Bere Alston, alongside improvements to bus services, to provide a high quality sustainable transport alternative for journeys into and from Plymouth.
4. Delivering improvements to secondary school facilities in Tavistock.
5. The delivery of a new primary school in the west of the town and expansion of existing schools.

6. Having regard to the impact of development on the Tamar Valley AONB, Dartmoor National Park, World Heritage Site and areas of conservation and archaeological importance.
7. Protecting, enhancing and promoting the heritage of the town, particularly the World Heritage Site.
8. Delivering an extra care facility.
9. Working with relevant authorities to look for appropriate solutions to manage traffic flow in and around the town.



5.83 There is a strong economic relationship with the city of Plymouth and a significant amount of residents from Tavistock commute to Plymouth on a daily basis. With further development planned for the town, there is a need to provide more attractive and realistic alternatives to the private car for journeys between Tavistock and Plymouth, whilst also continuing to maintain and improve the A386 as a vital transport route. This will help develop the role of the town as a gateway to the moor and to the World Heritage Site, whilst helping to attract more business and industry to the town.

5.84 The long term management of traffic movement through Tavistock will benefit from the introduction of a rail service to Plymouth via the Tamar Valley Line, providing opportunities for people to travel into Plymouth for work and for those visiting Tavistock for tourism and leisure. Maintaining existing business and retail uses and providing for new opportunities is essential to preserve and enhance the vitality of Tavistock.

Policy TTV16

Callington Road, Tavistock

Land at Callington Road is allocated for a residential led development. Provision is made for in the order of 600 new homes. Development should provide for the following:

1. A railway station and related development including car parking to support the re-opening of the railway from Tavistock to Bere Alston.
2. Contributions towards the re-instatement of the railway line.
3. Appropriate local facilities to support new residents and to enhance the sustainability of the local area, including a new primary school and local retailing facilities of a scale and format to meet local retailing needs where

it can be demonstrated that there will be no significant adverse impact on the existing town centre which act as a focal point for local community interaction.

4. High quality design and layout that conserves and enhances the natural beauty of Tamar Valley Area of Outstanding Natural Beauty and Dartmoor National Park, the Outstanding Universal Value of the Cornwall and West Devon Mining Landscape World Heritage Site, and preserve, or where opportunities arise, enhance the setting of the Tavistock Conservation Area.
5. Strategic landscaping and open space to address the site's scale and prominence, to help mitigate any adverse visual impact on the AONB, and to soften the edges of the development onto the undeveloped countryside. The scale, density, design, materials and southern and western extents of development should ensure that it is not overly prominent when viewed from the town and surrounding countryside, and the World Heritage Site and Dartmoor National Park.
6. Positive frontages onto the adjoining road network, especially the main road and also onto Drake's Walk.
7. Safe and attractive connections for pedestrians and cyclists into the town centre and onto the National Cycle Network.
8. Off-site highway works to Drakes Statue, Drakes Store and Pixon Lane roundabout to accommodate increased traffic and to improve local traffic flow.
9. Suitable access arrangements to the eastern part of the site so as not to compromise the re-opening of the railway line.
10. A lighting strategy, which minimises the impact of light spill to the surrounding countryside.



5.85 The Callington Road site benefits from an outline planning permission that requires a minimum of 600 dwellings and a contribution towards the re-instatement of the Tavistock to Plymouth railway line (under planning application 00554/2013/O). The provision of a primary school and local convenience store, together with links to local footpaths will facilitate the creation of a high quality, distinct community that also benefits from good links to services in Tavistock.

5.86 The site lies near to the World Heritage Site and adjacent to the AONB. The development must demonstrate how scale, layout, design and materials will be compatible with these designations. Strategic landscaping will also be a critical element in ensuring the form of development is appropriate to this sensitive location.

5.87 The Peninsula Rail Task Force, a consortium of partners that includes Devon County Council and Network Rail, is working to assemble the land and funding for the re-instatement of the rail line. This forms part of a wider objective of the Task Force, which is a phased development of rail links serving Exeter and Okehampton, Plymouth and Tavistock that will deliver improved travel to work connectivity with added tourism benefits for Dartmoor National Park. The Task Force is also exploring the potential for the full re-opening of the 'northern' route from Exeter to Plymouth via Okehampton.

5.88 The design and delivery framework for this policy is amplified in the Tavistock Masterplan Supplementary Planning Document.

Policy TTV17

Plymouth Road, Tavistock

Land at Plymouth Road is allocated for a mixed-use development. Provision is made for in the order of 300 new homes and 18,600 sq.m. of employment (Use Class B1). Development should provide for the following:

1. A strategic landscaping buffer along the west of the site, to be informed by a Landscape and Visual Assessment, in order to address the site's scale and prominence, to help mitigate any adverse visual impact on the AONB, and to soften the edges of the development onto the undeveloped countryside. The scale, density materials, design and southern extents of development should ensure that it is not overly prominent when viewed from the town and surrounding countryside
2. High quality design including positive frontages onto the adjoining road network, especially the main road, marking the arrival into the town from the south east.
3. Provision of suitable access arrangements, including exploring opportunities for a second access to help local traffic flow.
4. Contributions towards the re-instatement of the railway line.
5. The retention of the Public Right of Way which runs across the site to provide access to the wider countryside and to the National Cycle Network.
6. A lighting strategy, which minimises the impact of light spill to the surrounding countryside.



5.89 The site is currently in use mainly as pastoral farmland and paddocks. The site is generally sloping from higher ground on the south western edge of the site, down towards Plymouth Road on its eastern boundary. A narrow lane separates the allocation and is bounded either side by high Devon banks.

5.90 This allocation supports balanced growth in Tavistock. The sites location on the eastern edge of the town means that it is the most suitable site for new employment-related uses as it benefits from the most convenient access to Plymouth and the major road network in the wider area. It also provides the opportunity to create a strong built frontage to the A386 as the main gateway to the town from the east.

5.91 The land to the north of the lane which bisects the allocation adjoins an existing commercial area on Plymouth Road and is suitable principally for new employment uses, predominantly Use Class B1. The land to the south of the lane which bisects the allocation is the most suitable for the housing. Other commercial uses can also be considered as part of a mixed use development for the site. The councils will work proactively with the landowner and developers to deliver the development objectives set out in the policy, including proactive measures as necessary facilitate the efficient provision of infrastructure and to secure funding streams for development of the employment element.

Policy TTV18

Pixon Lane Employment Area, Tavistock

Pixon Lane employment area will be protected as a location for employment uses within Use Classes B1b,c, B2 and B8, given its vital role for supporting business investment and growth in the town. Changes of use resulting in the loss of land or premises from employment use will not be permitted.



5.92 Pixon Lane is an important local employment area in Tavistock and is home to a range of businesses. This area provides much needed employment land that needs to be protected from changes of use.

5.93 Within Tavistock, a further five sites are identified as being suitable for development, (of which three have planning permission) for residential use. The development of these sites will support the vision and objectives of the JLP and the spatial priorities for Tavistock.

5.94 The specific requirements identified are additional to the generic requirements of other policies. The allocations should, therefore, be read alongside and considered against the other policies in the JLP.

Policy TTV19

Other site allocations in Tavistock

The following additional sites at Tavistock are allocated for development.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	New Launceston Road	Housing	148 homes	<ul style="list-style-type: none"> a. A new highway access from New Launceston Road. b. Contributions to improved public transport provision. c. Contributions towards the re-instatement of the railway line. d. Open space and strategic landscaping to the west of the site and the creation of a landscape framework throughout the development. e. Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.
2	Butcher Park Hill	Housing	110 homes	<ul style="list-style-type: none"> a. Strategic landscaping to the northern site boundaries and the retention and enhancement of existing hedgerows throughout the site. b. Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts. c. Safe and convenient pedestrian and cycle links to the town centre. d. Contributions towards the re-instatement of the railway line.
3	Brook Lane	Housing	23 homes	<ul style="list-style-type: none"> a. Contributions to improved public transport provision to the town centre.
4	The Trendle	Housing	12 homes	<ul style="list-style-type: none"> a. Sensitive and high quality design which conserves and enhances the heritage assets. b. Contributions to improved public transport provision to the town centre.



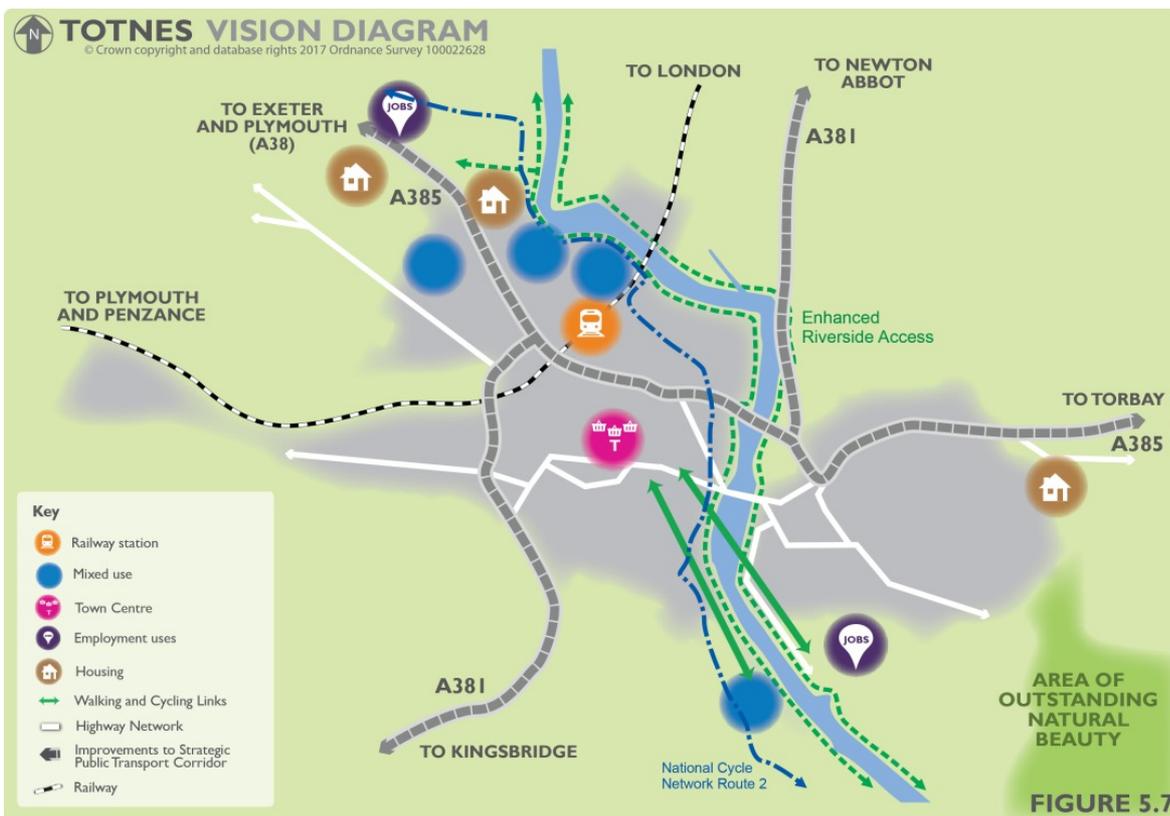
5.95 Taken together Tavistock provides for 1,203 new homes and 18,600 sqm of employment land.

vi. Totnes

What we are going to do - our policies for Totnes

5.96 Totnes has a recognisable character and reputation that reaches far beyond what would normally be expected of an equivalent sized market town. The town has long been associated with alternative therapies and counter-culture, which attracts visitors and residents alike. The town benefits greatly from the mainline train service that links Plymouth and London, although such connectivity has also resulted in some inflation of property and land prices in relation to other towns. The A38 can also be reasonably accessed, and along with the proximity of Torbay, Totnes can be considered to be well connected within the sub-region.

5.97 The role of Totnes as a destination and as a transport hub has led to traffic congestion issues in the town, and any future expansion of the town will need to adequately and effectively deal with air quality issues. The plan proposes development at Dartington, which can directly deliver improvements to bus services and provide further contributions to public transport with the objective of minimising the impact of growth on air quality in Totnes.



Spatial Priority SP6

Spatial priorities for development in Totnes

The plan seeks to enhance the vibrancy and sustainability of Totnes. This will include:

1. Providing for mixed use development to help meet local housing need and increase employment opportunities to support the long term resilience of the town.
2. Protecting the integrity and character of the historic town centre.
3. Ensuring that all development, singularly or cumulatively, will not negatively impact on the ability of the relevant authorities to improve air quality within the A385 AQMA.
4. Working with relevant authorities to look for appropriate solutions to manage traffic flow in and around the town.
5. Ensuring appropriate infrastructure is delivered alongside new development.
6. Ensuring all new development does not have any negative impact on the greater horseshoe bat species and their flight paths within the protected South Hams SAC.



5.98 Totnes is one of the principal heritage attractions of the region. The town is characterised by its distinct identity and its historic town centre, and the quality of the surrounding landscape, extending downstream towards Dartmouth. This character and the extensive range of independent shops are significant in attracting tourists and residents to the town centre.

5.99 The attractiveness of Totnes as a place to live is enhanced by the quality of transport links to other larger employment and retail centres, including Plymouth, Torbay and Exeter. The presence of mainline rail services places Totnes within a wide travel to work area, and provides access to employment markets that offer higher levels of wages than are typically available locally.

5.100 A key challenge for Totnes throughout the plan period is how to provide new homes that are affordable to local people, without further compromising the A385 transport corridor, and without constraining the level of connectivity to larger settlements. Access to the town centre also presents a challenge to the vitality of Totnes, with investment in alternative transport options an opportunity that requires exploration.

5.101 The number of short journeys taken throughout the town has a detrimental impact on the air quality of the entire town, and continues to contribute to the A385 AQMA.

Policy TTV20

Land at KEVICC

Land at KEVICC is allocated for residential-led development, with enhanced education and sports facilities. Provision is made for in the order of 130 new homes. Development should also provide for the following:

1. A replacement of the all-weather sports pitch.
2. Community facilities including public space alongside the River Dart with continuous riverside access.
3. Submission of a site specific mitigation plan to ensure that all new development does not have any negative impact on the greater horseshoe bat species and their flight paths within the protected South Hams SAC.
4. A high quality form of development which integrates with the existing housing.

5. Safe and attractive pedestrian and cycle connections for residents to access local facilities and services.
6. An appropriate strategy to mitigate for any impact on the A385 Air Quality Management Area.



5.102 King Edward VI Community College (KEVICC) provides secondary education for pupils from Totnes and the surrounding area. The school has been replacing and upgrading its teaching and sports facilities over recent years, a process that is continuing. A significant issue has been the split site campus, either side of the main A385 road. Planning permission has recently been granted for the replacement of the all-weather pitch on the Lower School site.

5.103 KEVICC are in the process of considering the re-modelling of the school, but it is recognised that there is capacity within the campus for non-school related development. The realisation of this potential could help fund upgrading of the school's facilities as well as contributing towards the development needs of the town.

5.104 A site specific greater horseshoe bat mitigation plan must be submitted and approved before planning permission will be granted. The plan must demonstrate how the proposed development will retain continued ecological functionality for greater horseshoe bat use associated with the South Hams SAC, and that the development will not have an adverse effect on the SAC.

Policy TTV21

Land at Baltic Wharf

Land at Baltic Wharf is allocated for a mixed-use redevelopment, including residential, marine / employment and commercial uses. Provision is made for in the order of 190 new homes and 3,300 sq.m. employment floorspace (Use Class B1 and B2). Development should provide for the following:

1. A continuing care retirement community including a nursing home (up to 60 bed spaces) an assisted living facility (up to 80 units) and communal facilities.
2. Retention of boatyard and associated facilities.
3. Footpath and cycle path provision including riverside access and connectivity to the Totnes – Ashprington route and towards the town centre.
4. Appropriate flood risk mitigation measures.
5. Submission of a site specific mitigation plan to ensure that all new development does not have any negative impact on the greater horseshoe bat species and their flight paths within the protected South Hams SAC.

6. An appropriate strategy to mitigate for any impact on the A385 Air Quality Management Area.
7. A high quality form of development which integrates with the existing area and the setting of nearby heritage assets.
8. Extensive public access to the riverside.
9. Investigation and remediation of contaminated land.



5.105 Baltic Wharf is an important brownfield regeneration site in a prominent location alongside the River Dart. It was allocated for development in previous plans and has been granted consent for a mixed-use scheme which is now being implemented. Phase one of the housing is largely complete, with the other elements of the scheme, including employment provision and further housing, to be commenced. In addition to the benefits of redeveloping the site for Totnes and the local economy more widely, the appearance of the site and its visual impact on the River Dart can be greatly enhanced.

5.106 The potential flood risk on this site is significant along the eastern edge immediately adjacent to the river. Proposals should find solutions to mitigate against this flood risk.

5.107 A site specific greater horseshoe bat mitigation plan must be submitted and approved before planning permission will be granted. The plan must demonstrate how the proposed development will retain continued ecological functionality for greater horseshoe bat use associated with the South Hams SAC, and that the development will not have an adverse effect on the SAC.

5.108 Within the Totnes area, six further sites are identified as being suitable for development (four of which have planning permission) for a range of uses including residential and employment. The development of these sites will support the vision and objectives of the JLP and the spatial priorities for Totnes.

5.109 The specific requirements identified are additional to the generic requirements of other policies. The allocations should, therefore, be read alongside and considered against the other policies in the JLP.

Policy TTV22

Other site allocations in Totnes

The following additional sites at Totnes are allocated for development.

	Site	Proposal	Est. of housing provision / Employment floorspace	Policy considerations / things to be provided for by the development
1	Dartington Lane	Housing	45 homes	a. Sensitive and high quality design which conserves and enhances the heritage assets.
2	Great Court Farm	Housing	74 homes	a. Appropriate landscaping to address the prominence and scale of development.
3	Transition Homes	Housing	27 homes	a. Appropriate landscaping to address the prominence and scale of development.
4	Riverside	Employment (Use Classes B1,B2 and B8)	3,200 sq.m. of employment floorspace	a. Appropriate landscaping to address the prominence and scale of development. b. Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.
5	ATMOS (former Dairy Crest site)	Mixed use - including new homes and a range of business, commercial and community uses	62 homes	a. Delivery in accordance with the provisions of the Community Right to Build Order (CRtBO), including appropriate flood risk mitigation measures (including improvements to the leat to protect existing development downstream), remediation of contaminated land and habitat enhancement. b. Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.
6	Ashburton Road	Employment (Use Classes B1b,c and B2)	1,200 sq.m. of employment floorspace	



5.110 Taken together Totnes provides for 528 new homes and 7,700 sq.m. of employment floorspace.

c. Smaller Towns and key villages

What we are trying to achieve - our strategic objective for the Smaller Towns and Key Villages

Strategic Outcome

South West Devon's Smaller Towns and Key Villages will provide an essential mix of services and amenities that support a number of surrounding rural communities, and support the roles played by our Main Towns. The Smaller Towns and Key Villages have distinctive local identities and strong connections with the natural landscapes in the rural areas.

5.111 The Smaller Towns and Key Villages perform a valuable role within the rural settlement hierarchy, providing a range of services and amenities that reduces the need to travel long distances to the Main Towns for many rural communities. These communities have strong local identities and connections with the rural hinterlands that they support.

5.112 Planning for some growth of these settlements should ensure that the levels of services and amenities are maintained and where possible enhanced.

Strategic Objective SO8

Maintaining the vitality and viability of the Smaller Towns and Key Villages

To promote the provision of homes, jobs, services and community infrastructure sufficient to enable the smaller towns and key villages to continue to play their important role as local service centres for their surrounding areas. This will be achieved through:

1. Delivering an appropriate level and mix of new homes that responds positively to local housing needs and improves long-term sustainability.
2. Enabling local employment opportunities that can support a thriving rural economy.
3. Sustaining and where possible improving the range of services and amenities available, including sustainable transport links to other settlements. and supporting the provision of new services where needs arise.
4. Conserving and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.



5.113 The settlements that fall into this category are: Bere Alston, Dartington, Hatherleigh, Lifton, Modbury, North Tawton, Salcombe, Stokenham / Chillington and Yealmpton.

5.114 These settlements are all characterised by a level of services and amenities that can support the daily needs of a rural population, although the extent of the provision varies from place to place. These locations are also supported by some public transport have local employment opportunities and there are opportunities for the local community to access locally provided small-scale leisure and recreation choices.

5.115 These settlements make an important contribution to the vitality and sustainability of the Thriving Towns and Villages policy area. In order to ensure our rural communities continue to thrive and benefit from a range of services and facilities, the JLP has identified sites to bring forward a supply of new homes and jobs in our Smaller Towns and Key Villages. It is fully recognised that some of these settlements lie within or adjacent to important designated landscapes including the Tamar and South Devon AONBs and the Dartmoor National Park. The councils are aware of the stringent tests in national planning policy regarding placing major development in these areas. Development in these locations is considered important for the long term sustainability of these towns and villages, to respond to future changes within those communities and also to fully support the role that they play in the wider area. In line with the development strategy for the JLP and the settlement hierarchy for the Thriving Towns and Villages policy area, it is considered that these smaller towns and key villages are required to take an appropriate level of growth.

5.116 In some of these locations, there are neighbourhood planning groups working within the community to prepare plans for their areas. The councils will continue to work alongside these groups to help them plan for sustainable development.

5.117 **Bere Alston** sits within the heart of the Bere Peninsula, and serves a wide range of small rural communities, farmsteads and rural businesses. The village lies within the Tamar Valley AONB and adjacent to the Cornwall and West Devon Mining World Heritage Site. Any new development needs to be delivered sensitively, and with careful consideration given to the impact of development on the special qualities and character of the AONB and the Outstanding Universal Value of the World Heritage Site.

5.118 Bere Alston is located on the Tamar Valley rail line, providing a regular service into Plymouth, as well as further up the valley into Cornwall. In the long term, this service is proposed to be extended to Tavistock by the re-opening of part of the former mainline. The value of the rail service cannot be underestimated, as the road network to Plymouth from the Bere Peninsula does not have the capacity to handle large volumes of traffic.

5.119 As set out in Policy TTV24, 50 new homes are proposed within Bere Alston and this is considered to be an appropriate scale of growth which respects its sensitive location within the AONB to support the future sustainability of the settlement.

5.120 **Dartington** is a settlement that has an extensive range of services and amenities. It is also well connected to other centres, especially the nearby town of Totnes, which extends the range of facilities that can be accessed within a short

distance. This relationship is reciprocal, as many people from around the Totnes area use the services and facilities at Dartington. The village has good pedestrian and bus links to Totnes and the National Cycle Network also connects the two settlements. The primary school has a wide catchment area and the shops at Dartington attract people from the local area and from further afield. The Dartington Hall Estate, which adjoins the village, contains numerous heritage assets of national importance and has established a national and international reputation for its cultural and educational work and events. The Estate also provides significant opportunities for informal recreation, enjoyed by local residents and visitors alike.

5.121 An emphasis is placed on the delivery of a high proportion of self and custom build homes in this area. This is considered to be in keeping with the heritage and legacy of Dartington, which has a global reputation, more recently through the Schumacher College, for leading on sustainable design.

5.122 As set out in Policies TTV23 and TTV24, 254 new homes and 11,800 sqm of employment floorspace are proposed within Dartington and this is considered to be an appropriate scale of growth which respects its historic character and relationship with Totnes to support the future sustainability of the settlement. Given the special qualities of the Dartington Estate, future redevelopment must be sensitive to its character and importance both locally and nationally. It is therefore worth particular mention that the form, scope, scale and design of development in Dartington must be informed by the detail contained by the Heritage Impact Assessment.

5.123 **Hatherleigh** is a thriving small town in the north of the JLP area located on the A386 some 7 miles from Okehampton. It has a popular weekly market which is at the heart of the local community and is part of traditional life in this town.

5.124 The town benefits from a range of shops, cafes and restaurants, and is also located on the popular Devon coast-to-coast cycle trail that brings a large number of passing visitors each year. There is a large dependent community of smaller villages and hamlets that surround the town, which help support the range of services and facilities available.

5.125 There is a strong agricultural tradition in and around the town which traditionally focussed around the cattle market. As agricultural industry and practices have changed over the years, the need for a cattle market has diminished. However, other market functions continue to be popular and are important for the continued success of the town. As a result, the market has been identified as having potential for a comprehensive redevelopment for some time with the retention of market provision.

5.126 In addition to the market site, there is potential to meet some local housing and employment needs on the south western edge of the town, providing greater diversity of housing and employment options for the town than relying on a single large allocation.

5.127 Additional primary school capacity may be needed during the plan period. Land to the south of Hatherleigh primary school was identified for this purpose in the West Devon Local Plan 2005 (Policy H45), and this will be an option for further

consideration with Devon County Council. Should it be determined that additional land is required this will be identified through local planning documents linked to the provisions of Policy SPT13.

5.128 As set out in Policy TTV24, 156 new homes and 8,000 sqm of employment floorspace are proposed within Hatherleigh and this is considered to be an appropriate scale of growth which respects this traditional market town and to support the future sustainability of the settlement.

5.129 **Lifton** is a large village in the north-west of the JLP area, close to the border with Cornwall. Indeed Lifton has a closer functional relationship with Launceston in Cornwall, a short trip down the A30, than with a main town in West Devon.

5.130 Within close proximity to Lifton is Tinhay, home of Premier Foods, Tinhay Builders Merchants and other large local employers. The number of jobs located at Tinhay makes a valuable contribution to the local economy, and helps to make Lifton the sustainable location for future growth that it is. Tinhay is, and continues to be, a distinct and separate settlement to Lifton and whilst there is a functional relationship between the two settlements, the JLP recognises the importance of preventing coalescence. As such, development that could damage the integrity of the two villages will not be supported.

5.131 The provision of local services, the quantity and range of local jobs, as well as access to a wider range of jobs and services via the A30 make Lifton a suitable location for a moderate number of new homes.

5.132 As set out in policy TTV24, 100 new homes and 14,400 sqm of employment floorspace are proposed within Lifton and this is considered to be an appropriate scale of growth to support the future sustainability of the village.

5.133 **Modbury** is a small town located within the southern part of the JLP area, benefiting from a main road and public transport links to Plymouth to the west, and Kingsbridge to the east.

5.134 Modbury has a range of services and amenities typically found in a larger settlement. The town has a good range of independent shops which could benefit if there were more opportunities for car parking and this will be explored if suitably located development sites become available.

5.135 The landscape to the south of the town forms the northern edge of the South Devon AONB, which limits the development potential of this part of the town. Many parts of the landscape to the north of the town are constrained by a steep topography and limited access via narrow lanes, resulting in a necessity to make the most efficient use of the land that is available, and that does not result in a significant adverse impact on the designated landscape to the south.

5.136 Modbury supports many rural communities between the town and coast to the south west. These small villages and hamlets sit firmly within the AONB, and even moderate growth in these locations would be neither sustainable or appropriate. As such, Modbury is the most appropriate location to provide new homes to ensure that local housing needs are met, and that the level of services and amenities enjoyed by the local and surrounding communities are retained and enhanced where possible.

5.137 As set out in policy TTV24, 173 new homes and 1,900 sqm of employment floorspace are proposed within Modbury and this is considered to be an appropriate scale of growth to support the future sustainability of the town.

5.138 **North Tawton** is located to the north of the JLP area, and has functional links with Okehampton and Exeter. The town has a range of services and facilities and there are three significant large local employers in the town; Gregory Distribution, Taw Valley Creamery and Vital Pet Products. Together, this makes North Tawton a sustainable small town, and suitable location for a moderate level of new homes.

5.139 As set out in policy TTV24, 61 new homes and 1,300 sqm of employment floorspace are proposed within North Tawton and this is considered to be an appropriate scale of growth to support the future sustainability of the town.

5.140 **Salcombe** is located in the far south of the JLP area, sitting at the mouth of the Kingsbridge estuary and in the heart of the South Devon AONB. Salcombe is a small town that boasts an enviable and distinctive natural setting, and mild micro climate. It is for this reason that the town continues to prove popular with visitors, who underpin a tourism industry that contributes significantly to the local economy.

5.141 Salcombe's popularity has not all been positive however, with property prices becoming so far inflated that anyone earning a local wage is unable to purchase a home on the open market. Salcombe has become known far beyond Devon as a place that is both expensive to visit and to live in. Such is the character of the town, and of the surrounding landscape, that there are very few available and suitable sites on which to provide homes that are affordable for local people.

5.142 Outside the tourism industry, Salcombe still maintains a small marine sector and fishing fleet. Although boat building no longer makes the contribution to the local economy that it once did, marine services and the related industry and commerce remain an essential part of the heritage and character of the town. As a result, diversity of employment premises is required, with an emphasis on a limited number of small scale premises that can be used flexibly to support a range of trades and sectors.

5.143 A key challenge for the town is to provide affordable homes for local people. Support will be given to innovative delivery mechanisms for housing such as community-led housing schemes, self/custom-build and community land trust models. Any such proposals will need to be carefully considered in respect of the character and special qualities of the AONB.

5.144 As set out in policy TTV24, 63 new homes and 2,000 sqm of employment floorspace is proposed within Salcombe and this is considered to be an appropriate scale of growth which will help to deliver much needed affordable housing whilst respecting its sensitive location within the AONB to support the future sustainability of the settlement.

5.145 **Chillington**, with nearby **Stokenham**, provide a valuable range of services and facilities that supports a large dependent area to the south of the A379. The villages are located within the far south east of the JLP area, and are bordered to the south by the South Devon AONB. The A379 runs through both settlements, providing a valuable transport link between Kingsbridge and Dartmouth, including a

frequent bus service. However, the A379 narrows significantly in places, and is subject to large volumes of traffic during the peak holiday seasons. Notable local pinch points occur to the east and west of Stokenham and Chillington, as well as in between the villages.

5.146 There is an identified need to provide more family housing in the area to help diversify the local housing market in both villages with the current local housing market placing many homes out of the reach of people working in the local area.

5.147 As set out in policy TTV24, 65 new homes are proposed within Chillington and this is considered to be an appropriate scale of growth which will help to deliver much needed family housing whilst respecting its location adjacent to the AONB to support the future sustainability of the settlements.

5.148 **Yealmpton** is a large village located close to Plymouth, and is well connected to both Plymouth and Modbury via the A379. The village is well served with a moderate level of services and facilities.

5.149 The village has seen a moderate level of growth in recent years, with allocated sites in the process of being developed as the JLP is introduced. The existing employment allocation that has yet to be commenced will remain as an allocated site within the JLP, with the provision of new homes in Yealmpton being addressed within the first review of the JLP.

5.150 As set out in policy TTV24, 9,100 sqm of employment floorspace is proposed within Yealmpton and this is considered to be an appropriate scale of development given the growth experienced in recent years. This growth will provide much needed employment land to help balance the development and support the future sustainability of the area.

5.151 Policy TTV24 identifies twenty five sites in the smaller towns and key villages for development within the plan period.

5.152 The allocations should be read alongside and considered against the other policies in the JLP.

What we are going to do - our policies for the Smaller Towns and Key Villages

Policy TTV23

Dartington Hall Estate

Development at the Dartington Hall Estate (within the boundaries defined on the Policies Map), including in the order of 120 dwellings will be supported as a means of securing its long term future and to ensure the conservation of its historic buildings and landscape, where it is brought forward in line with an endorsed Estate Framework and other policies in this Plan. The Estate Framework, which will be periodically reviewed, will identify:

- a. The need for the development and how it will help to achieve the long-term sustainability of the Estate including the future of its historic buildings and landscape without causing harmful fragmentation of the historic entity.
- b. The physical, economic and environmental context.
- c. The significance of heritage assets within the Estate together with an overarching assessment of their condition and vulnerability now and in the future and setting out solutions for how they will be sustained, re-used, conserved and enhanced with identified priorities for investment.
- d. Development principles to underpin future development proposals, the broad areas for development, the type of uses proposed, and how these developments will assist in the conservation of the heritage assets identified in the framework as vulnerable or will deliver other justifiable public benefits.
- e. An estate-wide transport, movement and parking strategy.
- f. How development will be accommodated without any impact on ancient woodland in and adjacent to the site.

Planning applications for development will be required to demonstrate the following where relevant and appropriate to the scale and nature of the proposal:

1. How the proposal complies with the Estate Framework.
2. How the proposal addresses sustainable development by achieving economic, social and environmental gains.
3. Planning applications for the development of sites within the Estate that are outside settlement boundaries should clearly demonstrate how they are contributing to securing key environmental or cultural objectives of the Trust, such as contributing financially to the reuse/repair of heritage assets.
4. Where the proposal could affect the significance of a designated heritage asset, whether as a result of works to the asset or within its setting, how the development will help to secure the long term viable use of the asset and enhance the positive contribution that the asset or its setting makes, or otherwise will deliver justifiable public benefits.
5. How the proposal will make a positive contribution to heritage settings and to the wider distinctiveness and character of the Estate and its landscape.
6. That an archaeological assessment has been undertaken to inform and guide the development proposal.
7. That a full assessment of the potential ecological impacts of the proposed development has been undertaken (including greater horseshoe bats), and, where appropriate, a mitigation plan has been prepared.

8. How design standards ensure that the special architectural, historic, archaeological and artistic qualities of the Estate are retained.
9. The implementation of a appropriate boundary treatment in order to retain the rural character of the wider Estate landscape.



5.153 The Dartington Hall Estate is a major local employer which provides significant social and economic benefits. It is also an internationally important heritage ensemble, incorporating 42 listed buildings (including the Grade I listed Hall), 4 scheduled monuments and a Grade II* historic park and garden.

5.154 The Dartington Hall Trust, as a charitable organisation responsible for the management of the Estate, has a strong innovation agenda and undertakes many educational and research projects of national interest. It also has an important role to play in the conservation of historic buildings and landscape.

5.155 The LPAs acknowledge the special heritage and landscape qualities of the Estate and the unique role that it and the Trust play in the social and economic life of the parish, Totnes and the region. This policy, therefore, seeks to support the role of the Dartington Hall Estate and recognises that an Estate Framework may be able to demonstrate material considerations that justify development outside the settlement boundary. This includes the need for housing and commercial development to generate long term funding streams for re-investment in vulnerable or deteriorating heritage assets.

5.156 The policy requires that individual projects requiring planning permission are brought forward within the context of an Estate Framework which would clearly assess the impacts of development and explain how such development can contribute to the long-term sustainability of the Estate, including the future of its historic buildings and landscape. Importantly, the Estate Framework will provide the Trust with the confidence that once strategic decisions have been taken they can be delivered over time as part of an agreed comprehensive vision. The Trust will engage with Historic England and South Hams District Council, as the relevant LPA, to prepare the Estate Framework with a view to it being endorsed by these parties. It will also be the subject of consultation with its partners, other statutory consultees and the local community.

5.157 It is anticipated that the Estate Framework will demonstrate how the core estate could support in the region of 120 new homes with a range of other uses as part of a sustainable growth strategy including employment, retail, learning and tourism/leisure opportunities. The main focus for enhancement and development will likely be at Foxhole, The Shops, Higher Barton, Woodlands Yard, Old Postern and Aller Park and adjacent land. The core estate's capacity to accommodate future development will, however, need to be tested and justified through the preparation of the Estate Framework. This represents a positive strategy for the ongoing conservation, enhancement and enjoyment of this historic environment. The Estate Framework will be reviewed and revised at agreed intervals, with updated versions being subject to endorsement by the same parties.

5.158 Should development proposals be promoted beyond those identified in the Estate Framework, these will be considered in light of points 1 to 9 in the policy, where relevant and appropriate to the scale and nature of the development proposed and other policies within the JLP.

Policy TTV24

Site allocations in the Smaller Towns and Key Villages

The following sites in the smaller towns and key villages are allocated for development:

	Site	Proposal	est. of housing provision / employment floorspace	Policy considerations / things to be provided for by the development
1	Woolacombe Road, Bere Alston	Housing	30 homes	<ul style="list-style-type: none"> a. Layout, design and location of structural landscaping to be guided by landscape assessment. b. Mitigation of recreational impact on SAC. c. Contribution towards rail link between Tavistock and Bere Alston. d. Ensuring that proposals are well integrated with the existing development.
2	South of Woolacombe Road, Bere Alston	Housing	20 homes	<ul style="list-style-type: none"> a. Layout, design and location of structural landscaping to be guided by landscape assessment. b. Mitigation of recreational impact on SAC.
3	Beacon Park, Dartington	Employment (Use Classes B1b,c,B2 and B8)	11,300 sq.m. employment floorspace	<ul style="list-style-type: none"> a. Appropriate landscaping to address the prominence and scale of development. b. Appropriate flood risk mitigation measures. c. Improved pedestrian and cycle connectivity with the Dartington Estate and village centre.
4	Brimhay Bungalows, Dartington	Housing	14 homes	<ul style="list-style-type: none"> a. Demolition of existing housing and remediation of land. b. Measures to avoid and mitigate biodiversity impact, including protection of woodland and minimising lighting. c. Re-provision of community housing. d. Retention of Public Right of Way.

	Site	Proposal	est. of housing provision / employment floorspace	Policy considerations / things to be provided for by the development
5	Broom Park, Dartington	Housing	80 homes	<ul style="list-style-type: none"> a. Footpath and cycle access to the main road, connecting to the NCN and on towards the village centre. b. An overall site layout and design that respects the setting of the existing housing at Broom Park. c. Retention and future management of the hedgerow along the western boundary. d. Additional strategic landscaping on the western side of the site to soften the edges of the development onto the undeveloped countryside beyond. e. Appropriate flood risk mitigation measures. f. Acceptable impact on the setting of St Mary's Church to the east, which necessitates both strategic landscaping that is sensitive to this context as well as an appropriate extent, scale, layout, design and materials.
6	Higher Tweed Mill, Dartington	Employment (Use Class B1)	500 sq.m. employment floorspace	<ul style="list-style-type: none"> a. Footpath and cycle access to the main road, connecting on towards the village centre and National Cycle Network. b. Retention and future management of the hedgerow at edges of the site. c. Additional strategic landscaping soften the edges of the development onto the undeveloped countryside. d. Locally distinctive frontages.
7	Sawmills Field, Dartington	Housing	40 homes	<ul style="list-style-type: none"> a. Footpath and cycle access to the main road, connecting on towards the village centre and National Cycle Network. b. Retention and future management of the hedgerow along the western boundary and of the tree-belt on the northern part of the site. c. Additional strategic landscaping to the western site boundary to soften the edges of the development onto the undeveloped countryside. d. Provision of locally distinctive frontages onto movement routes, especially the main A385.

	Site	Proposal	est. of housing provision / employment floorspace	Policy considerations / things to be provided for by the development
8	Hatherleigh Market, Hatherleigh	Mixed use - with homes and employment (Use Classes B1, B2 and B8)	106 homes; 880 sq.m. employment floorspace (no net increase)	<ul style="list-style-type: none"> a. Regeneration of existing site to make more efficient use of land including demolition of buildings as appropriate. b. Retail uses where there is no adverse impact on the town centre. c. New public realm including Market Square with associated Pavilion. d. Contributions to expanding primary school capacity in the area. e. Public and private car parking, and associated Infrastructure. f. Appropriate flood risk mitigation measures.
9	Hatchmoor, Hatherleigh	Mixed use - with homes and employment use (B1, B2)	50 homes; 8,000 sq.m. employment floorspace	<ul style="list-style-type: none"> a. Layout and design to be guided by landscape assessment. b. Creation of a high quality 'gateway' to the village. c. Contributions to expanding primary school capacity in the area.
10	Glenhaven, Lifton	Housing	100 homes	<ul style="list-style-type: none"> a. Layout and design to be guided by landscape and heritage assessment. b. Creation of a high quality 'gateway' to the village. c. Contributions to expanding primary school capacity in the area.
11	Land adjacent to Lifton Farm Shop, Lifton	Employment (Use Class B2, B8)	14,400 sq.m.	<ul style="list-style-type: none"> a. Support and promote local tourism initiatives. b. Provide flexible office spaces and / or light industrial units; and/or c. Enable complementary uses such as craft workshops.
12	West of Palm Cross, Modbury	Mixed use - with homes and employment (Use Class B1)	92 homes; 1,900 sq.m. employment floorspace	<ul style="list-style-type: none"> a. Sensitive and high quality design which conserves and enhances the heritage assets. b. Layout and design to be guided by landscape assessment. c. Strategic landscaping and open space to the north and east of the site, linked to the open space to the north east of the site at West Barracks Road.

	Site	Proposal	est. of housing provision / employment floorspace	Policy considerations / things to be provided for by the development
13	Pennpark, Modbury	Housing	40 homes	<ul style="list-style-type: none"> a. Sensitive and high quality design which conserves and enhances the heritage assets. b. Layout and design to be guided by landscape assessment.
14	West of Barracks Road, Modbury	Housing	40 homes	<ul style="list-style-type: none"> a. Sensitive and high quality design which conserves and enhances the heritage assets. b. Layout, design and landscaping to be guided by landscape assessment, with careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.
15	Batheway Fields, North Tawton	Mixed use - with homes and employment (Use Class B1)	61 homes; 1,300 sq.m. employment floorspace	<ul style="list-style-type: none"> a. Layout and design to be guided by landscape assessment. b. Creation of a high quality 'gateway' to the town. c. Contributions to expanding primary school capacity in the area.
16	Bonfire Hill, Salcombe	Housing	13 homes	<ul style="list-style-type: none"> a. Sensitive and high quality design which conserves and enhances the heritage assets. b. Layout and design to be guided by landscape assessment. c. Strategic landscaping bordering the site. d. Careful consideration of the scale and appearance of the development, and the lighting of the site, to minimise wider landscape impacts. e. No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.
17	Shadycombe, Salcombe	Mixed use - with homes and employment (Use Classes B1)	20 homes; 2,000 sq.m. employment floorspace	<ul style="list-style-type: none"> a. Sensitive and high quality design which conserves and enhances the heritage assets. b. Layout and design to be guided by landscape and heritage assessment, with careful consideration of scale and appearance of development and any ground engineering operations, to minimise wider landscape impacts. c. No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI. d. Appropriate flood risk mitigation measures.

	Site	Proposal	est. of housing provision / employment floorspace	Policy considerations / things to be provided for by the development
18	Land West of West End Garage, Salcombe	Housing	20 homes	<p>a. Strategic landscaping to address the sites prominence, to help mitigate any adverse visual impact on the AONB, and to soften the edges of the development onto the undeveloped countryside. The scale, design and density of development should ensure that it is not overly prominent when viewed from the surrounding countryside.</p> <p>b. A lighting strategy, which minimises the impact of light spill to the surrounding countryside.</p> <p>c. No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.</p> <p>d. Careful consideration of extent, scale and appearance of development to minimise local landscape impacts.</p>
19	Green Park Way, Chillington	Housing	65 homes	<p>a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts.</p> <p>b. Mitigation of highway impacts, including safety and congestion.</p> <p>c. Provision and maintenance of a surface water drainage scheme.</p>
20	North of Milizac Close, Yealmpton	Employment (Use Classes B1b,c, B2, B8)	2,500 sq.m. employment floorspace	<p>a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts.</p>
21	North of Riverford Farm Shop, Yealmpton	Employment (Use Classes B1b,c, B2, B8)	4,000 sq.m. employment floorspace	<p>a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts.</p>



5.159 Taken together the smaller towns and key villages provide for 911 new homes and 46,780 sqm of employment floorspace.

d. Sustainable villages

What we are trying to achieve - our strategic objective for the Sustainable Villages

Strategic Outcome

South West Devon's Sustainable Villages will be characterised by strong social networks and traditions. Development will have contributed to enhancing their character and local distinctiveness, and helped to provide a more balanced demographic profile and greater resilience to change for rural communities.

5.160 The Sustainable Villages provide limited yet vital services and amenities to a large proportion of our rural communities. The contribution that they make to our settlement hierarchy is often multiplied by the relationship that many villages have with each other, forming a complementary network of sustainable settlements that are able to meet a number of day to day needs for rural communities.

Strategic Objective SO9

Maintaining the viability of the many sustainable villages in the rural area

To enable the development of new homes, jobs and community infrastructure sufficient to meet the local needs of the sustainable villages identified in the area and the village networks they serve. This will be achieved through:

1. Delivering a mix of new homes that add diversity and accessibility to the rural housing stock.
2. Enabling a balanced demographic profile that retains and attracts young people and working age families.
3. Enabling local employment opportunities that can support a thriving rural economy.
4. Delivering digital connectivity that supports the rural economy and reduces the need to travel.
5. Responding positively to rural travel patterns through innovation and investment.
6. Strengthening links between our rural settlements and the surrounding landscapes.
7. Protecting and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.



What we are going to do - our policies for the Sustainable Villages

Policy TTV25

Development in the Sustainable Villages

Provision in the order of 550 homes will be sought from the sustainable villages as part of the overall housing supply for the TTV Policy Area.

The LPAs support the preparation of neighbourhood plans as a means of identifying local housing and other development needs in the sustainable villages. Development within the sustainable villages, including the indicative level of housing set out in Figure 5.8, should be provided through neighbourhood plans, unless such provision would conflict with other policies of the JLP.

Within sustainable villages without neighbourhood plans the LPAs will still support development that meets the identified local needs of local communities and development which responds positively to the indicative housing figures set out in Figure 5.8. All development proposals, whether in villages which have neighbourhood plans or not, will be considered against the other policies of this plan.



5.161 The JLP does not identify sites for development in the villages defined as being the Sustainable Villages. Rather, an approach is taken which aims to enable development to come forward in these villages which reflects their sustainability, and which will respond to local needs. In these locations, it is clearly important to strike a balance so that development maintains or improves the viability of the villages whilst also being of an appropriate scale and meeting the needs of local people. It is also important that any development in the Sustainable Villages also respects the character of the villages, and particularly of any landscape designations such as the AONBs.

5.162 In the Sustainable Villages, the most appropriate way to balance these considerations will often be for local people to develop neighbourhood plans, responding to local needs and opportunities. The LPAs are supportive of the neighbourhood planning process as a means of identifying and responding to local needs for development and the delivery of sustainable communities. However, where there is no neighbourhood plan, development proposals could come forward through the planning application process, and these would be assessed against the policies of the JLP. It should be noted that neighbourhood plans can also be brought forward for other parts of the Plan Area, but Policy TTV25 specifically relates to their role in meeting local needs in the Sustainable Villages.

5.163 It will be for neighbourhood plans themselves to determine which sites to bring forward for development, provided that they are consistent with the provisions of the JLP. To help identify a potential housing supply figure for the individual

Sustainable Villages, and to provide some guidance for the level of housing that might be appropriate in a village, an indicative assessment has been made of the potential number of homes that are capable of coming forward through neighbourhood plans (the South Hams & West Devon Village Sustainability Assessment Framework', Feb 2017). This assessment is based upon factors such as the level of services and facilities available in each settlement, the accessibility of larger settlements, the quality of digital communications, and the availability of sites in the SHLAA. These indicative housing figures are set out in Figure 5.8.

5.164 The indicative housing figures should be used to inform neighbourhood plan or development plan-led development throughout the TTV policy area. Commitments and completions within sustainable villages prior to the end of March 2017 are not considered to make a contribution to the indicative figures, as these have already been counted within the JLP housing supply figures. The figures should be interpreted locally, applying constraints and opportunities. It is therefore understood that some neighbourhood plans may deliver more or less than indicated where justified by the appropriate level of evidence. The LPAs will keep under review the number of new homes coming forward in the Sustainable Villages over the life of the JLP. If monitoring shows that Neighbourhood Plans are not bringing forward allocations to support Policy TTV25, the LPAs will consider undertaking informal planning studies to identify new site opportunities that can be built in to the next review of the JLP.

Figure 5.8. Indicative Levels of New Housing in Sustainable Villages

Villages able to accommodate around 30 dwellings each	Blackawton, East Allington, Harbertonford, Marldon, Sparkwell, Ugborough Bridestowe, Exbourne, Lewdown, Spreyton
Villages able to accommodate around 20 dwellings each	Berry Pomeroy, Ermington, Halwell, Harberton, Lee Mill, Staverton, Woolston Green Bratton Clovelly, Highampton, Lamerton, Milton Abbot, Northlew, Sampford Courtenay
Villages able to accommodate around 10 dwellings each	Lee Moor, Morleigh, Rattery, Wotter Broadwoodkelly, Folly Gate, Grenofen, Inwardleigh, Monkokehampton, Stowford

5.165 It should be noted that Figure 5.8 does not include villages within AONBs. This is in acknowledgement of the great weight that should be given to conserving their landscapes and scenic beauty. However, neighbourhood plans may wish to bring forward positive allocations to meet local housing need where justified by an appropriate evidence base. Policy DEV25 sets out the policy approach to considering development proposals in AONBs.

e. Countryside

What we are trying to achieve - our strategic objective for the Countryside

Strategic Outcome

The integrity of South West Devon's countryside remains intact, with a strong rural communities that reflect the traditions of the rural landscape. The countryside continues to enjoy national recognition and contributes to a thriving rural economy through investment in traditional industries and innovative diversification.

5.166 The countryside of South West Devon is some of the finest in the country, with no less than three designated landscapes represented within the JLP area. The rural character of the area provides a setting within which our high quality built environments can thrive, supporting not only traditional industries but also by diversifying the rural economy in a way that benefits a wide cross section of the community.

5.167 Since the plan makes enough provision for homes to meet the full objectively assessed need within the sustainable settlements, the countryside areas of South West Devon are not expected to contribute to meeting the OAN of the HMA other than through 'windfall' developments.

Strategic Objective SO10

Maintaining a naturally beautiful and thriving countryside

To protect, conserve and enhance the natural beauty of South West Devon's countryside, and to avoid the creation of new homes development in unsustainable or inappropriate locations.

1. Delivering new homes only in areas where there is an identified local need.
2. Protecting and managing the landscape.
3. Contributing to carbon reduction measures by reducing the need to travel.
4. Delivering digital connectivity that supports diversity and innovation in the rural economy.
5. Responding positively to rural travel patterns through innovation and investment.
6. Strengthening links between our rural settlements and the surrounding landscapes.



What we are going to do - our policies for the Countryside

Policy TTV26

Development in the countryside

The LPAs will protect the special characteristics and role of the countryside. The following provisions will apply to the consideration of development proposals:

1. Isolated development in the countryside will be avoided and only permitted in exceptional circumstances, such as where it would:
 - i. Meet an essential need for a rural worker to live permanently at or near their place of work in the countryside and maintain that role for the development in perpetuity; or
 - ii. Secure the long term future and viable use of a significant heritage asset; or
 - iii. Secure the re-use of redundant or disused buildings and brownfield sites for an appropriate use; or
 - iv. Secure a development of truly outstanding or innovative sustainability and design, which helps to raise standards of design more generally in the rural area, significantly enhances its immediate setting, and is sensitive to the defining characteristics of the local area; or
 - v. Protect or enhance the character of historic assets and their settings.
2. Development proposals should, where appropriate:
 - i. Protect and improve public rights of way and bridleways.
 - ii. Re-use traditional buildings that are structurally sound enough for renovation without significant enhancement or alteration.
 - iii. Be complementary to and not prejudice any viable agricultural operations on a farm and other existing viable uses.
 - iv. Respond to a proven agricultural, forestry and other occupational need that requires a countryside location.
 - v. Avoid the use of Best and Most Versatile Agricultural Land.
 - vi. Help enhance the immediate setting of the site and include a management plan and exit strategy that demonstrates how long term degradation of the landscape and natural environment will be avoided.



5.168 Policy TTV26 provides a policy framework for guiding development within the countryside. It needs to be read alongside other policies of the plan, and especially Policies SPT2 and TTV2 on sustainable communities and rural sustainability and development policies in Section 6 which deal with matters such as rural diversification, AONBs and the natural environment.

5.169 It is acknowledged that even in small rural settlements some limited organic growth may be appropriate and may assist in providing homes and facilities meeting local needs, although the delivery of new homes that are distant from existing services and amenities do not represent a sustainable solution to the need for new homes in rural areas. The policy therefore provides the criteria that need to be met before a development proposal can be supported in the countryside, including the provisions required for the re-use of existing buildings in the countryside, as well as Rural Exception Sites and Village Housing Initiative provisions in relation to housing and employment development adjoining a settlement. These provisions will be amplified as appropriate through the Thriving Towns and Villages SPD and neighbourhood plans. The approach to managing change in the rural areas needs not only to provide adequate protection for the countryside, but will also reinforce the permissive criteria for sites that can be considered sustainable within and adjoining sustainable settlements.

Policy TTV27

Meeting local housing needs in rural areas

Proposals for residential development on sites adjoining or very near to an existing settlement which would not otherwise be released for this purpose may be permitted provided that it can be demonstrated that:

1. It meets a proven need for affordable housing for local people.
2. It includes a mix of affordable and market housing products where necessary to be financially viable. This includes open market housing, providing it does not represent more than 40% of the homes or 40% of the land take excluding infrastructure and services.
3. Management of the scheme will ensure that the dwellings continue to meet the identified need in perpetuity.
4. The proposal meets the requirement of all other relevant policies of the Plan.



5.170 Community led housing initiatives will be supported on rural exception sites. New affordable housing will be subject to eligibility criteria requiring a local connection, and suppressed in value against open market values in perpetuity to ensure that dwellings continue to meet the affordable housing needs of local people.

Policy TTV28

Horse related developments in the countryside

Horse related developments will be supported where:

1. There is adequate land and, for commercial uses, adequate off-road riding facilities available for the number of horses to be kept on the land.
2. Existing buildings are reused where possible but where new buildings are necessary, these are well-related to existing buildings, commensurate in size with the number of horses to be kept on the land and the amount of land available for use by those horses.
3. There is an agreed comprehensive scheme of management for any ancillary development including hardstanding, access roads, parking, fencing, lighting, storage, waste disposal, manèges and sub division of fields.
4. The proposal, either on its own or cumulatively, with other horse related uses in the area, is compatible with its surroundings and adequately protects water courses, groundwater and the safety of all road users.



5.171 The policy addresses the need to have adequate management of horse related developments, which are an important countryside use but need to be implemented in a way which protects the environment and local communities.

Policy TTV29

Residential extensions and replacement dwellings in the countryside

Proposals to extend or replace existing dwellings in the countryside will be permitted provided:

1. The existing dwelling has a lawful use for permanent residential use and has not been abandoned.
2. The size of the new replacement dwelling will not be significantly larger than the original house volume.

3. The number of new dwellings is no more than the number of dwellings to be demolished and replaced.
4. Any new replacement dwelling should be positioned on the footprint of the existing dwelling, unless on design, landscape, highway safety, residential amenity, or other environmental grounds a more appropriate location can be agreed.
5. The extension is appropriate in scale and design in the context of the setting of the host dwelling.



5.172 To help protect the character of the countryside there is a need to manage new built development in rural locations. The erection of replacement dwellings and extensions to existing dwellings can individually, and cumulatively over a period of years, have an adverse impact both on the character of individual properties and on their surroundings.

5.173 When managed effectively the addition of extensions and the creation of new dwellings within rural areas can make a significant contribution to the built and natural landscape, as well as adding diversity to the rural housing stock.

5.174 Further design guidance on the implementation of Policy TTV29 will be included in the Thriving Towns and Villages SPD.

6 Development policies

What we are trying to achieve - our development policies for Plymouth and South West Devon

Strategic Outcome

The development process will have delivered positive changes in the area, delivering sustainable development of the right quality in the right locations to meet the needs of local people for homes and jobs, successful neighbourhoods and communities, and protecting the environment.

6.1 This section of the plan sets out more detailed policies that relate to how and where development takes place, structured around a series of key themes. Each policy needs to be understood in the context of the vision and spatial strategy, as well as the area specific policies that have been set out earlier in the plan. Together, they set out a positive planning framework in order to ensure that sustainable development is delivered.

6.2 Many of the policies will be amplified in supplementary planning documents (SPDs), one for the Plymouth Policy Area and one for the Thriving Towns and Villages Policy Area.

Strategic Objective SO11

Delivering high quality development

To deliver development which is sustainable and of the right type for its location and of good quality, which:

1. Supports healthy communities that enjoy good quality and clean environments and where healthy lifestyles are positively encouraged through the developments and services that are provided.
2. Provides a wide choice of homes that meet the needs of all sectors of the community and provide high quality living environments.
3. Supports a diverse and strong economy, enabled by protecting and providing a good supply of sites.
4. Provides high quality places, which create a positive legacy for future generations, and properly responds to the historic environment, positively engaging with it as an asset to deliver high quality development and sustainable communities.
5. Contributes to and enhances the natural network, providing multiple benefits both to people and wildlife.

6. Responds positively to the challenges of climate change, reducing carbon emissions and creating more resilient communities.
7. Provides for and meets the infrastructure needs generated by the proposal.



a. Healthy Communities

What we are going to do - our development policies for delivering healthy communities

6.3 Healthy communities are places where the local population experiences the conditions that enable them to have good quality of life.

6.4 Health and wellbeing is multi-faceted. To be healthy, communities need to have an identity that engenders community participation in the life of an area with good access to education, employment, transport, housing, green space and leisure, and health and wellbeing facilities and opportunities. There is also a need to protect the quality of environment for, and amenities of, local communities.

6.5 Many of these themes are addressed by policies in other parts of the plan. This section addresses the impacts of development on health and local amenities, its ability to address issues of pollution, and the ways in which development can encourage active and healthy lifestyles through sport and healthy eating.

Policy DEV1

Protecting health and amenity

Development proposals will be required to safeguard the health and the amenity of local communities. In addition to measures set out in other policies of the plan, this will be through, as appropriate:

1. Ensuring that new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise disturbance for both new and existing residents, workers and visitors. Unacceptable impacts will be judged against the level of amenity generally in the locality.
2. Ensuring that developments and public spaces are designed to be accessible to all people, including people with disabilities or for whose mobility is impaired by other circumstances.
3. Requiring a Health Impact Assessment to be submitted as part of any Environmental Statement submitted in relation to planning applications with a likely significant health impact.

Further guidance in relation to this policy will be set out within an appropriate supplementary planning document.



6.6 The policy builds upon the other policies of the JLP to ensure that development helps to deliver healthy communities.

6.7 In particular Policy DEV1 addresses the need for development to support good residential amenity, accessibility and, in respect of larger developments, their wider health impacts.

6.8 Detailed guidance on the implementation of this policy, including the basis by which car parking is provided for in different parts of the Plan Area, will be set out in the Plymouth Policy Area and Thriving Towns and Villages Policy Area SPDs.

Policy DEV2

Air, water, soil, noise, land and light

Development proposals which will cause unacceptable on- or off-site risk or harm to human health, the natural environment or living conditions, either individually or cumulatively, will not be permitted. Development should:

1. Avoid harmful environmental impacts and health risks for both new and existing development arising from soil, air, water, land, or noise pollution or land instability.
2. Where located in or impacting on an Air Quality Management Area, avoid or mitigate its impact through positively contributing towards the implementation of measures contained within air quality action plans and transport programmes, and through green infrastructure provision and enhancements, building design and layout which helps minimise air quality impacts.
3. Prevent deterioration of and where appropriate protect, enhance and restore water quality.
4. Limit the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation.
5. Where appropriate, remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land.
6. Protect soils, safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources.

7. Maintain and where appropriate improve the noise environment in accordance with the Noise Policy Statement for England (including any subsequent updates).
8. Not cause an adverse effect on the integrity of a European Site (see Policy SPT12).



6.9 The planning system plays an important role in protecting the environment and people from pollution and in managing natural resources. Policy DEV2 considers air, water, land, noise and light pollution, alongside other natural resource issues such as land stability and the need to safeguard soils and agricultural land. Its implementation will be amplified in the Plymouth Policy Area and Thriving Towns and Villages SPDs.

6.10 Air Quality Management Areas (AQMAs) highlight those areas where air quality presents a particular issue and challenge. In addition to avoiding unacceptable impacts to air quality in any event, Policy DEV2 seeks to ensure that the individual and cumulative impacts of development on AQMAs is appropriately considered and looks to Air Quality Action Plans and transport programmes in the first instance for appropriate measures to be implemented. The context and circumstances of an existing AQMA will inform the extent to which any impact is considered unacceptable. Any development, whether having an impact on an existing AQMA or not, that could have a significant cumulative impact on air quality, would normally be considered in the context of an Air Quality Assessment or Environmental Impact Assessment.

6.11 Under the Water Framework Directive (WFD) development should not result in deterioration of the status of the relevant waterbody and should aim to improve water quality where possible to help deliver the South West River Basin Management Plan objectives. This includes protected areas under WFD (bathing waters, shellfish waters etc.) which rely on the surrounding water quality. A catchment based approach will be taken when considering water quality following guidance in the National Planning Practice Guidance. Where there is an issue early engagement should be sought with the Environment Agency and relevant water and sewerage companies to clarify the type of assessment required.

Policy DEV3

Sport and recreation

The LPAs will support opportunities for sport, physical activity and active leisure by:

1. Supporting the creation of new or enhancing existing sports facilities where a need has been identified, including bringing private and education related sports facilities into wider community use.

2. Resisting development proposals that result in the loss of sports and recreational buildings and land unless:
 - i. An assessment has been undertaken which has clearly shown the facilities to be surplus to requirements; or
 - ii. The loss resulting from the proposed development would be replaced by equivalent or better provision in a suitable location; or
 - iii. The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

3. Protecting and, where appropriate, enhancing and creating new public rights of way and bridleways.



6.12 Access to high quality sports facilities as well as informal recreational opportunities, including playing pitches which are also covered by the above policy, is a key component in supporting healthy active communities. The development of new and enhanced facilities will need to be delivered in line with the planned growth of the area and meet the needs of new and existing communities.

6.13 The Plymouth and South West Devon Sport and Leisure Facilities Plan supports the JLP and is based on a detailed assessment of local needs and broader ambition for indoor and outdoor sport and leisure provision (excluding playing pitches), in line with national best practice and guidance. This work has identified the need to protect and maintain the existing network of facilities, ensure planned facilities are delivered, invest in improving the quality of some facilities, focus on improving access to sports and leisure facilities where people are less active and improve access to sporting facilities.

6.14 It also identifies a network of key strategic sports sites and specific sports and local facilities that require protection and enhancement to ensure that the sporting needs of the area are met as it grows. These recommendations will be delivered through the life of the JLP to meet the needs of the area.

Policy DEV4

Playing pitches

The LPAs will ensure that development and growth is matched by an appropriate level of provision for playing pitch facilities. This will be achieved through protecting and improving the stock and capacity of playing pitch facilities, and improving the quality of existing playing pitches and ancillary facilities.

New residential development on larger sites will, where practicable, be expected to deliver new playing pitch facilities on site as part of an integrated scheme.

On smaller sites or where this is not practicable, a planning obligation will be sought to mitigate for the impact of new residents through new or improved provision in an appropriate location.



6.15 Playing pitches are a key part of the sporting offer for the Plan Area as they make a significant contribution to the health and well being of communities. The need to protect, enhance and deliver new facilities is based on up to date assessment work included in Playing Pitch Plans for the area.

6.16 The Playing Pitch Plans provide a detailed assessment of local needs and the projected future growth for pitch sports, football, rugby, hockey and cricket following best practice methodology. This assessment has been used to identify the key requirements to protect and enhance playing pitch facilities and deliver new facilities in line with growth as detailed in the JLP. The delivery of these requirements will ensure that the sporting needs of communities are met through the life of the JLP.

6.17 The policy distinguishes between larger and smaller sites. This reflects the general principle that it is better to provide playing pitches closest to the point of need. However, the application of this principle will need to be determined on a case-by-case basis, having regard not only to the practicality and viability of delivering on-site provision, but also to the context of the development in relation to other sports infrastructure within the locality. For example, it is more appropriate to deliver sports facilities in hubs rather than as isolated facilities. For this reason, the policy does not identify a site size threshold to define 'larger sites', and instead leaves this to the planning application process.

Policy DEV5

Community food growing and allotments

The LPAs will support and encourage local food growing by seeking provision of new allotments and/or community food growing sites where there is a deficiency of provision, having regard to the overall demand for and supply of such facilities in the locality and the provisions of Policy SPT2.

Development on existing allotment and community food growing sites will only be permitted where there is an overriding sustainable development justification for the proposal, with re-provision of the lost facilities in a location appropriate to the demand.



6.18 The provision of allotments and food growing land is an important component of a healthy and sustainable community. The LPAs will use a local standard to seek adequate provision for these facilities as set out in Policy SPT2 and its supporting text. Opportunities to explore food growing within the development such as edible landscaping, planting orchards are also encouraged.

Policy DEV6

Hot food take aways in Plymouth

The LPAs within the Plymouth Policy Area will resist proposals to provide new hot food take aways within a 400 metre radius of providers of secondary education to protect the school's food environment.



6.19 Tackling food poverty is recognised as an effective measure in reducing health inequalities, which is a issue of great significance within Plymouth. The Plymouth Health and Wellbeing Board identified obesity and healthy weight as a priority for tackling health inequalities across the city and the City is committed to taking co-ordinated and integrated action to tackle the issue through inter-agency working.

6.20 The Plymouth Report 2014 identifies that across the city 24.9 per cent of children are identified as having excess weight or are obese. A particular measure to help change this narrative is the protection of the food environment (which represents the characteristics of food that is available within a particularly locality) around secondary schools. By limiting the availability of hot food take aways in these locations, there is an increased opportunity for health benefits to be realised in young people. This measure is complementary to other measures in the JLP and Plymouth Plan which support healthy lifestyle choices, and to the work of schools in gaining the Healthy Child Quality Mark which ensures that nutrition is taught and that schools facilitate healthier behaviour in children.

6.21 Detailed guidance on the implementation of this policy through the planning process will be provided in the Plymouth Policy Area Supplementary Planning Document. This is to ensure that there is a proportionate and effective approach to managing the food environment around schools.

b. Housing

What we are going to do - our development policies for delivering quality homes

6.22 The delivery of sufficient homes to meet the needs of the Plan Area is perhaps the greatest challenge for this local plan. Section 3 of the plan (the spatial strategy) sets out the overall need that the plan is seeking to achieve, and the sustainability and strategic principles governing how these homes will be distributed across the

area. Sections 4 and 5 (the strategies for the Plymouth and Thriving Towns and Villages Policy Areas) include strategic and site allocation policies showing how the plan will specifically meet the need identified.

6.23 This section considers the type, mix and quality of housing to be provided, also addressing specific housing needs such as those of students and travellers.

Policy DEV7

Meeting local housing need in the Plymouth Policy Area

The LPAs will seek to deliver a wide choice of high quality homes which widen opportunities for home ownership, meet needs for social and rented housing, and create sustainable, inclusive and mixed communities. The following provisions will apply:

1. A mix of housing sizes, types and tenure appropriate to the area and as supported by local housing evidence should be provided, to ensure that there is a range of housing, broadening choice and meeting specialist needs for existing and future residents. The most particular needs in the policy area are:
 - i. Smaller dwellings most suited to younger and older people.
 - ii. Housing suitable for households with specific needs.
 - iii. Larger three and four bedroom houses, and executive homes at appropriate locations.
2. For developments of above ten homes, at least 30 per cent of the total number of dwellings should be affordable homes without public subsidy. These homes should be provided on-site, except in the case of sites of between 11 and 14 dwellings or where robustly justified. In such cases the requirement can be met by providing an off-site provision or commuted payments in lieu of on-site provision to deliver affordable housing elsewhere in the policy area.



6.24 The justification for this policy is considered after Policy DEV9.

Policy DEV8

Meeting local housing need in the Thriving Towns and Villages Policy Area

The LPAs will seek to deliver a wide choice of high quality homes which widen opportunities for home ownership, meet needs for social and rented housing, and create sustainable, inclusive and mixed communities. The following provisions will apply:

1. A mix of housing sizes, types and tenure appropriate to the area and as supported by local housing evidence should be provided, to ensure that there is a range of housing, broadening choice and meeting specialist needs for existing and future residents. The most particular needs in the policy area are:
 - i. Homes that redress an imbalance within the existing housing stock.
 - ii. Housing suitable for households with specific need.
 - iii. Dwellings most suited to younger people, working families and older people who wish to retain a sense of self-sufficiency.
2. Within rural areas with special designations, as defined in section 157 of the Housing Act 1985, all residential developments of 6 to 10 dwellings will provide an off-site commuted sum to deliver affordable housing to the equivalent of at least 30 per cent of the total number of dwellings in the scheme.
3. Within the whole policy area a minimum of at least 30 per cent on-site affordable housing will be sought for all schemes of 11 or more dwellings. Off-site provision or commuted payments in lieu of on-site provision will only be allowed where robustly justified.



6.25 The justification for this policy is considered after Policy DEV9.

Policy DEV9

Meeting local housing need in the Plan Area

The following additional provisions for the delivery of a range and mix of housing to meet local housing needs shall apply to the Plan Area;

1. Affordable housing could include social and affordable rent, shared ownership, and innovative housing models that meet the local demand/need, such as rent-to-buy, starter homes and shared equity as appropriate.
2. Self and custom build housing will be supported providing they meet the over-arching sustainable development, general amenity and design policies. The LPAs will:
 - i. Negotiate the identification of suitable plots on major development sites to meet this need.
 - ii. Encourage the provision of serviced plots and co-housing schemes.
 - iii. Be proactive in exploring ways to ensure sufficient plots are consented to meet the duty set out in the Self-Build and Custom Housebuilding Regulations.
3. The LPAs will support development which increases choice in housing by greater utilisation of the private rented sector, including new build private rented accommodation (Build to Rent).
4. A mix of accessible housing units will be sought in new housing schemes, representative of the wider housing mix of the development including:
 - i. Requiring at least 20 per cent of dwellings on all schemes of five or more dwellings (including conversions), where practicable, to meet national standards for accessibility and adaptability (Category M4(2) of Building Regulations).
 - ii. Requiring at least 2 per cent of dwellings on all schemes of 50 or more dwellings (including new build housing and conversions) to meet national standards for wheelchair user homes (Category M4(3) of Building Regulations). Category M4(3) dwellings will be counted as contributing towards the category M4(2) dwelling requirement.



6.26 Policies DEV7, DEV8 and DEV9 collectively provide for a range and mix of housing that meets the needs of local communities.

6.27 In order to contribute to the delivery of sustainable linked neighbourhoods and sustainable rural communities it is important that housing development promotes a wide choice of housing types, for both affordable and market housing, to meet the needs of all members of the community, ensuring a better balance between housing demand and supply as well as improving affordability.

6.28 The spatial strategy sets out in Policy SPT3 the overall housing requirement the JLP is seeking to accommodate, and the proportion of that housing requirement that should be affordable. In addition to the measures set out in Policies DEV7 and DEV8, it should be noted that the calculation of the objectively assessed need for new homes in the Plymouth HMA includes a significant uplift to the need for new homes to take account of high house prices across the Plan Area. In effect, this means that the housing requirements of the JLP have been increased to enable more affordable housing to be brought forward, and to boost the supply of housing in response to high house prices.

6.29 In the Plymouth Policy Area even the lowest property prices to be found in the city are over six times the earnings of those on the lowest wages. The analysis of the city's affordable housing needs indicates that we require both smaller properties, with a particular need for one bed properties, as well as larger four bedroom homes, due to significantly lower levels of turnover in larger properties, in order to address current and future needs.

6.30 In the Thriving Towns and Villages Policy Area the affordability gap ranges from average homes costing 11 times the local wage in West Devon, to 14.3 times in the South Hams. High property values are effectively pricing people out of the market in some areas. Further guidance and exceptions can be found in the Affordable Housing Code of Practice. This document will be reviewed annually or when guidance is issued by central government.

6.31 To meet the varied needs of existing and future residents, new development needs to ensure that a mixture of different types, tenure and sizes of homes are provided. This includes delivering accessible homes to accommodate the needs of an ageing population and households with restricted mobility, specialist housing projects for people with a range of disability, and opportunities for self and custom build and co-housing.

6.32 Within the rural areas the need is for housing which provides for a mix of ages and genders. Evidence in the SHMNA has shown a significant ageing population in the Thriving Towns and Villages, which leads to a number of challenges in ensuring that the housing stock caters for the needs of older people. Policy DEV8 sets out that the LPAs will seek to provide a range of dwellings meeting specific identified needs, including enabling the provision of specialist forms of housing such as Assisted Living. More detail on how this should be provided will be set out in the Thriving Towns and Villages SPD. Given the age profile of the Thriving Towns and Villages, it will also be important to maintain a strong core of young working age families that can provide solid foundations from which to build our future economic growth and secure our rural services and facilities.

6.33 Policy DEV8 also contains a range of measures to boost the supply of affordable housing in the policy area, where there are particular difficulties for younger people and local families looking to remain in the area. In addition, by promoting using self and custom build approaches to the provision of new homes, we are not only increasing the opportunities for young working age people to build their own home, but also sharing the responsibility for the delivery of homes for local people.

6.34 Where viability is identified as a constraint on the delivery of the policies, this will be considered in the context of Policy DEL1. The LPAs have a strong expectation of on-site provision of affordable housing, but acknowledge that there can be exceptional circumstance where off site provision or commuted sums might be justified on the basis of robust evidence provided by the applicant. The Plymouth and Thriving Towns and Villages Policy Area SPDs, and for the TTV Policy Area the update of Affordable Housing Code of Practice, will provide amplification of how these policies will be delivered through the development process.

Policy DEV10

Delivering high quality housing

Housing development should be of a high quality in terms of its design and resilience, and provide adequate space to achieve good living standards. The following provisions will apply:

1. Housing developments should be designed to be integrated with the adjacent developments and not appear to be an unrelated addition to the rest of the town, village and neighbourhood. This is to be achieved in the quality of the building design, materials and layout. The development should provide good pedestrian, cycling and public transport connectivity to existing developed areas, open spaces and local services such as schools and shops, as well as visually relating well to adjacent greenspaces to prevent hard urban edges.
2. Development proposals should look for opportunities to design out crime and the fear of crime in the layout of the development.
3. Affordable housing should be indistinguishable from other homes on the site, reflecting the type of housing on the development as a whole.
4. Residential annexes will be supported where they are within the same curtilage and ownership as the principal dwelling. Annexes should be clearly ancillary to the principal dwelling via a functional link, with no separate demarcation or boundary.
5. New dwellings (including conversions of existing properties into flats) should be of sufficient size and layout to provide good quality accommodation to meet the needs of their occupants, with developers required to meet Nationally Described Space Standards. Sufficient external amenity space or private gardens should also be provided.
6. To protect the quality of the urban environment and prevent 'town cramming', development of garden space within Plymouth and the towns will only be permitted where it does not adversely affect the character and amenities of the area, and where the proposal can demonstrate that it contributes to the creation of sustainable linked neighbourhoods.

7. Conversions of existing properties into flats and Houses in Multiple Occupation will only be permitted where the development will not harm the character of the area having regard to the existing number of converted and non-family dwellings in the vicinity, and in the case of flats, where the accommodation is self-contained.
8. Houses in Multiple Occupation will only be permitted where the proposal:
 - i. Provides adequate communal space for future residents including sufficient space to accommodate cooking, dining, bathroom and toilet facilities.
 - ii. Provides a good standard of accommodation and living.
 - iii. Will be adequately managed, including external maintenance and upkeep of the building and curtilage.
 - iv. Does not lead to levels of activity that cause excessive noise and disturbance to other residents in the locality.
 - v. Incorporates adequate refuse provision and facilitates bin container storage that will not have a detrimental effect on the mobility of pedestrians or vehicles.
 - vi. Is located within walking and cycling distance of local services and infrastructure.
 - vii. Provides for levels of on-street parking that can be reasonably accommodated, and sufficient and secure on site cycle storage for residents.



6.35 The LPAs recognise that there are many different needs within our communities regarding the range, type and size of housing required, and that access to good housing is fundamental to improving the health and wellbeing of our communities.

6.36 Ensuring that housing is built to a high standard, and in locations that relate well to existing communities, will bring long term benefits to current and future residents, and make a positive contribution to the character of our all settlements within the JLP area.

6.37 The LPAs recognise the fundamental need to ensure that new homes are delivered in sufficient quantity to meet the identified housing needs across the JLP area. The quality of new housing is of equal importance for all three LPAs, who will ensure that the full range of housing policies will be applied to deliver sustainable development that meets the variety of needs across the JLP area.

6.38 Specific housing needs and local circumstances will arise in different locations across the JLP area, and these may require more specific guidance to ensure that the right homes are provided in the right places. Where appropriate, more explicit standards can be found in either the Plymouth or the Thriving Towns and Villages SPD. It may also be appropriate for locally specific policy requirements to be contained within a Neighbourhood Plan, where sufficient evidence and justification exists.

Policy DEV11

Houses in Multiple Occupation in the Plymouth Article 4 Direction Area

In order to support mixed and balanced communities and to ensure a range of housing needs continue to be accommodated in Plymouth's Article 4 Direction Area, the LPA will not support applications for Homes in Multiple Occupation unless:

1. The proportion of dwelling units in multiple occupation (including the proposed site) does not exceed 10 per cent of the total dwelling stock within 100 metres of the application site.
2. The application site does not sandwich a C3 dwelling unit between two HMO properties.



6.39 Houses in Multiple Occupation (HMOs) can make a valuable contribution to the private rented housing stock. They provide an affordable type of accommodation and contribute to the mix of housing types and tenures available in Plymouth. They are often suited to young and single people, including students, and those on low incomes. However, HMOs can have a detrimental impact on residential character and community cohesion and high concentrations within neighbourhoods can result in harmful impacts including:

- Imbalanced and unsustainable communities;
- Pressure upon local community facilities;
- Negative impacts on the physical environment and streetscape;
- Anti-social behaviour, increased levels of crime, noise and disturbance;
- Issues with parking provision and traffic congestion;
- Community tensions and lack of cohesion.

6.40 Neighbourhoods situated close to Plymouth's higher education institutes, such as Mutley, Greenbank and Pennycomequick have a significant proportion of student occupied HMOs that emerged as a consequence of exponential student population growth; when accommodation needs grew faster than the corresponding purpose built accommodation supply. The private sector responded positively to the increasing demand for student accommodation, which led to the significant conversion of family housing to student occupied HMOs. The uneven distribution of student occupied houses and other HMOs, however, has put pressure on Plymouth's housing stock and the transient nature of students has also changed the character of local services and community facilities.

6.41 In 2012, an Article 4 Direction was enforced by the City Council across a number of centrally located neighbourhoods in the city. The Direction sought to address concerns about the over concentration of HMOs and removed permitted development rights to change a dwelling house in to a large HMO; such changes of use have subsequently required planning permission.

6.42 Since this change of use has been brought under the control of the City Council, fewer new large HMOs have become available for student occupation in the city. Council tax records show that there are currently 2,859 properties in Plymouth that are occupied exclusively by students (Council Tax records November 2016) and many of these properties include large HMOs that are located a short distance from the city's main education campus. In January 2017, there were over 770 licensed HMOs (properties that are occupied by 5 or more people in two or more households or properties that include 3 habitable storeys) in Plymouth with 99 per cent of these located in the Article 4 Direction Area.

6.43 Although it is mandatory to register large HMOs, the type of housing data available to the City Council is restricted, resources are limited and the housing market remains fluid, which means it is not possible to identify every HMO in the city. Using Council Tax data and licensing information, however, the City Council considers there to be a need to continue managing the supply of new large HMOs to avoid high concentrations of non-family dwellings that can create community imbalance and put pressure on the city's housing stock and community infrastructure.

Policy DEV12

Purpose built student accommodation in the Plymouth Policy Area

The provision of purpose built student accommodation in the Plymouth Policy Area will not be supported unless the following criteria can be adequately addressed:

1. The development meets an identified need for the type of accommodation proposed.
2. The development is in an appropriate location, which is easily accessible to university/college facilities by sustainable travel modes.
3. The proposal does not result in an excessive concentration of student accommodation in one locality.

4. The proposal does not result in a harmful loss of an existing use.
5. The layout, design and facilities provided within the development is of a high standard and meet identified student needs including adequate laundry provisions, communal space and social learning facilities.
6. The development does not conflict with adjacent uses or the general amenity of the surrounding area.
7. Appropriate management plans are submitted ensuring that a positive and safe living environment is created for students and to minimise the potential negative impacts on the local community.
8. Detailed arrivals plans are submitted ensuring that adequate facilities are in place to accommodate vehicular movements in particular at the start and end of terms.
9. All proposals are future proofed in terms of design to support potential alternative uses as appropriate.
10. The levels of on street parking required can be reasonably accommodated or regulated through parking control measures.
11. There is adequate storage for recycling/refuse and cycles.



6.44 The education economy is of significant importance to Plymouth. The city hosts three major Higher Education Institutes (HEI) including Plymouth University, the University of St Mark and St John and Plymouth College of Art.

6.45 In total, there are some 22,200 students currently enrolled at HEIs in Plymouth, of which 18,500 are studying full time. Approximately 3,500 students are undergraduates in their first academic year of study at Plymouth University. First year students are considered to have the greatest need for Purpose Built Student Accommodation (PBSA). However, it is also important to allow for overseas students and students in and beyond their second year. This is particularly important given the problems caused by a proliferation of student HMOs. Plymouth University actively encourages these more vulnerable students to live in managed PBSA and provide a commitment that all first year students will have access to PBSA when studying in the city. It is important that we meet the accommodation needs of these students for their welfare and to ensure our HEIs can flourish and continue to positively contribute to Plymouth's economy.

6.46 At present, there is a sufficient number of rooms available in PBSA to accommodate the needs of all first year students enrolled in the city's HEIs. There are approximately 5,420 bed spaces in large-scale operational PBSA and student halls in Plymouth. A significant number of students live in this accommodation type. However, not all of these bed spaces are restricted to student use and can be

occupied by a proportion of key workers. The pipeline supply of PBSA is set to increase in Plymouth; at January 2017 there were approximately 1,281 bed spaces under construction with 1,048 further bed spaces with extant planning consent. If all of these bed spaces are delivered, there will be a total of more than 7,749 bed spaces in PBSA - which is an increase of more than 40 per cent increase on the current number of bed spaces available at present.

6.47 The policy responds to the following issues:

- The need to prevent an over-supply of PBSA, especially where vacant PBSA is not flexible enough to be used to serve another housing or economic need.
- The need to prevent an over-proliferation of PBSA, leading to unbalanced communities.
- The need to protect residential amenity and the supply of family homes.

6.48 However, it also recognises there is a need to provide accommodation for students and it is preferable that student needs are met as far as possible in PBSA because it can:

- Reduce the need to convert more housing that is currently available for families and other non-student resident use.
- Create sustainable locations for student accommodation which reduces the need to travel in areas that serve the needs of students.
- Provide a stock of well-managed, secure and regulated environments that will minimise the impact on amenity for other households in residential neighbourhoods.

6.49 The policy approach therefore applies a series of tests to ensure that when a scheme is to be approved it is responding to a clear need, it is appropriately located and does not lead to over-concentration of student developments, it serves wider regeneration and planning purposes, it has appropriate management in place, and it is future proofed. The Plymouth Policy Area SPD will amplify the policy in more detail.

Policy DEV13

Consideration of sites for Travellers and Travelling Showpeople

New sites for Travellers and Travelling Showpeople will be permitted where they are part of, or can demonstrate that they will contribute to the creation of a sustainable linked neighbourhood or sustainable rural community. Development proposals will be considered in relation to the following provisions:

1. New sites should be located near to existing settlements, with a scale of development that does not dominate the nearest settled community and avoids placing an undue pressure on the local infrastructure.

2. Safe and convenient vehicular, pedestrian, and cycling access must be provided to the site, and proposals should minimise impacts on the local highways network.
3. The site must be large enough to provide for adequate on-site facilities for parking, storage, play, sewage and waste management, and residential amenity.
4. Full consideration will be given to the effect of the proposed site on local environmental quality (such as noise and air quality), on the health and well-being of any Travellers that may locate there, or on others as a result of new development. Particular care will be needed in relation to the provision of mixed-use yards and space for storage of equipment.
5. New sites in areas at high risk of flooding, especially functional floodplains, will not be permitted given the particular vulnerability of caravans.
6. Full consideration will be given to the landscape impacts of any proposals, and measures to mitigate impacts will be sought.



6.50 The policy aims to facilitate the traditional and nomadic life of Travellers and Travelling Showpeople while respecting the interests of the settled community. Its provisions seek to promote peaceful and integrated co-existence between the site and the local community, providing a form of development which considers the well being of the travelling community themselves and the potential impacts of such development on the community.

6.51 No new sites are allocated in this plan given the findings of the South West Devon Gypsy and Traveller Needs Assessment (2016), which identifies a low level of evidence based need in the Plan Area (of only 3 pitches for Travellers in South Hams and only 1 plot for Travelling Showpeople in Plymouth), and the existence of an unimplemented planning consent at Roborough, to the north of Plymouth. This level of need could be met through small sites which come through the planning application process and does not justify the allocation of new sites. This has occurred in the past as members of the travelling community have brought forward sites to meet their specific requirements. It is therefore important to have a policy that sets out how applications will be considered.

c. Economy

What we are going to do - our development policies for supporting a strong and sustainable local economy

6.52 This section of the plan identifies policies that seek to ensure that the Plan Area has a vibrant and diverse economy, supporting too the overarching vision and strategic objectives of the Heart of the South West Local Enterprise Partnership's Strategic Economic Plan (SEP) for 2014-2030.

6.53 The SEP was submitted to the Government on 31 March 2014. It sets out a vision for vibrant and strong urban and rural economies. It builds on the region's core strengths, including its superb natural environment and its economic assets, to set out a vision and strategy for its long term prosperity. Of particular relevance to the Plan Area is the SEP's emphasis on knowledge based industries, digital and transport connectivity, the marine sector, agriculture, food and drink and tourism. The SEP aims to deliver an inclusive approach to growth that links urban and rural economies, continuing to make the area attractive to new and existing residents, tourists and inward investors. Furthermore, it recognises the need for economic growth to benefit both rural and urban people, businesses and places.

6.54 Section 3 of the plan (the spatial strategy) sets out the overall employment and retail need that the plan is seeking to achieve, and the sustainability and strategic principles governing how these facilities will be distributed across the area. Sections 4 and 5 (the strategies for the Plymouth and Thriving Towns and Villages Policy Areas) include strategic and site allocation policies showing how the plan will specifically meet the needs identified.

6.55 This section considers in particular how land will be kept available for employment uses, including the specific requirements of key growth sectors, the diversification of the rural economy, tourism, and shopping.

Policy DEV14

Maintaining a flexible mix of employment sites

A flexible supply of employment land and premises will be maintained to support investment and expansion of existing businesses as well as for the inward investment of high-value businesses, particularly but not exclusively those involved in the marine sector, advanced manufacturing and knowledge based industries. The following provisions will apply:

1. Change of use of existing employment sites (including vacant sites whose lawful use is for employment purposes) will only be allowed where the following applies:
 - i. The proposal is specifically provided for by the local plan to deliver wider strategic objectives, or

- ii. There are overriding and demonstrable economic, regeneration and sustainable neighbourhood / communities benefits from doing so, or
 - iii. There is no reasonable prospect of a site being used for employment use in the future.
2. The following categories of site will be specifically protected:
 - i. Sites that have clear future potential to support the future expansion of existing businesses.
 - ii. Employment sites with access to wharves and/or deep water facilities, quays and pontoons, which will be protected for marine related uses appropriate to the site and location.
 3. Employment sites will be protected from inappropriate neighbouring development that will adversely affect the employment operations taking place on the site.



6.56 A fundamental element of delivering economic growth will be ensuring that there is sufficient land to meet the need for new employment premises. New jobs will be created in many different sectors, not simply those associated with business and manufacturing (the Town and Country Planning 'B' use classes). Nevertheless, at the heart of the plan's economic policy is a drive for businesses to grow and new businesses to locate in the area, particularly in marine industries, knowledge based industries and in the rural areas, businesses that provide valuable local services and employment.

6.57 The plan needs to ensure that there is enough land available for new employment development to accommodate the growth in jobs. There are some types of land (for example marine employment sites with deep water access, or access to rivers and estuaries that are able to support small and medium size marine enterprises) which are in short supply, and that in order to meet the needs of all businesses it is important to be very cautious when considering proposals for the redevelopment of existing employment sites. Research undertaken for the City Deal identified lack of suitable waterside sites with deep water access as a major constraint to growing the marine sector.

Policy DEV15

Supporting the rural economy

Support will be given to proposals in suitable locations which seek to improve the balance of jobs within the rural areas and diversify the rural economy. The following provisions apply:

1. Appropriate and proportionate expansion of existing employment sites in order to enable retention and growth of local employers will be supported, subject to an assessment that demonstrates no adverse residual impacts on neighbouring uses and the environment.
2. Business start-ups, home working, small scale employment and the development and expansion of small business in residential and rural areas will generally be supported, subject to an assessment that demonstrates no residual adverse impacts on neighbouring uses and the environment.
3. Proposals should explore opportunities to improve internet connectivity for rural communities where appropriate.
4. Support will be given to the reuse of suitable buildings for employment uses.
5. The creation of new, or extensions to existing, garden centres or farm shops in the open countryside and unrelated to a settlement will only be permitted if the proposed development is ancillary to, and on the site of, an existing horticultural business or existing farming operation, and provided that 75 per cent of the goods sold will be produced within the immediate and adjoining parishes.
6. Development will be supported which meets the essential needs of agriculture or forestry interests.
7. The loss of tourist or leisure development will only be permitted where there is no proven demand for the facility. Camping, caravan, chalet or similar facilities that respond to an identified local need will be supported, provided the proposal is compatible with the rural road network, has no adverse environmental impact and is not located within the Undeveloped Coast policy area.
8. Development proposals should:
 - i. Demonstrate safe access to the existing highway network.
 - ii. Avoid a significant increase in the number of trips requiring the private car and facilitate the use of sustainable transport, including walking and cycling, where appropriate. Sustainable Travel Plans will be required to demonstrate how the traffic impacts of the development have been considered and mitigated.

- iii. Demonstrate how a positive relationship with existing buildings has been achieved, including scale, design, massing and orientation.
- iv. Avoid incongruous or isolated new buildings. If there are unused existing buildings within the site, applicants are required to demonstrate why these cannot be used for the uses proposed before new buildings will be considered.



6.58 To support the economic growth and diversification in the TTV Policy Area, it is important that land is made available for business use. It is recognised that some economic activities do not have a land requirement, for example where small businesses can be established from home, and permitted development rights also enable some home working use. However, to support the rural economy to grow and become more prosperous, land is needed to provide premises for businesses to expand, and to accommodate new businesses. Supporting rural entrepreneurial culture and setting aside land to support start up survival rates will help build resilience in the rural economy.

6.59 This policy provides some flexibility to enable carefully selected development outside settlements where it can be demonstrated that this could be achieved sustainably, taking into account how the proposal might reduce rural isolation, provide jobs for residents of the immediate area reducing commuting, and foster vitality without significant adverse effects on the local character and environmental quality.

6.60 The uses of the rural environment have changed over time and some buildings which have become redundant offer opportunities for redevelopment. This policy supports that where it can be demonstrated that it meets the sustainable development criteria set out in other policies of this plan.

Policy DEV16

Providing retail and town centre uses in appropriate locations

In determining development proposals which include retail and other town centre uses, including new floorspace, changes of use of existing floorspace, variations in planning conditions and obligations, and also extensions of existing units, the LPAs will consider the following matters:

1. Proposals will be assessed in relation to their support for the spatial strategy of the local plan and the sequential hierarchy of centres. Proposals within identified centres should be of a scale appropriate to the role of the centre.

2. Proposals for main town centre uses in edge of centre locations, out of centre locations and the Derriford Commercial Centre should be supported by a sequential test that demonstrates flexibility in its assessment and that there are no other sequentially preferable suitable and available sites within or on the edge of an appropriate centre within the hierarchy of centres. This sequential approach is not applicable to applications for small scale rural offices or other small scale rural development.
3. Proposals for retail, leisure and office development in edge of centre locations, out of centre locations and the Derriford Commercial Centre must be accompanied by an impact assessment where the floorspace exceeds the thresholds set out below. Any proposal which would have a significant adverse impact on the investment in and/or the vitality and viability of an existing centre or prejudice the deliverability or investment in a proposed centre will not be permitted.
 - i. Retail development creating new or additional floorspace greater than 500 square metres (gross) in the Plymouth Policy Area.
 - ii. Retail development creating new or additional floorspace greater than 250 square metres (gross) in the Thriving Towns and Villages Policy Area.
 - iii. Leisure and office development creating new or additional floor space greater than 2,500 sq.m.(gross).
4. For bulky goods retail provision a limited amount of out of centre retail floorspace will be permitted only where it is robustly demonstrated that it relates to a format of store which has particular market and locational requirements which can only be accommodated in specific locations and cannot be located in the City Centre or another centre in the retail hierarchy. This floorspace will be closely controlled in terms of size of units, range of goods and overall amount of floorspace, and will only be permitted if it is shown through a retail impact assessment that there is no significant adverse impact on the investment in and/or the vitality and viability of any other centre, existing or proposed. Consideration will also be given to how a scheme can improve the appearance and accessibility of the area.
5. Limited development of main town centre uses including retail may be permitted within Plymouth's core tourism areas, including the waterfront area, provided that they are complementary to the role of Plymouth City Centre and other centres and specifically support the visitor economy of these destinations.



6.61 Sequential and impact tests are planning tools that need to be used, where appropriate to ensure that the integrity of the retail hierarchy is maintained. In particular, this aims to protect Plymouth City Centre as a regional and sub regional centre of strategic importance, and to ensure that all centres continue to deliver their functions effectively.

6.62 In considering the sequential test, the hierarchy of centres forms the starting point for any assessment. Applicants must demonstrate that in centre and edge of town centre locations have been thoroughly assessed and sites within these locations can only be discounted where it is shown that sites are not suitable and/or available. In undertaking that assessment, flexibility in relation to the proposed development must be demonstrated for sites to have been properly considered. The LPAs will also consider whether the development is of an appropriate scale for the centre having regard to the function it plays, for example, a large supermarket or department store would normally not be appropriate scale for a local centre.

6.63 Given the specific potential impacts of retail development in the Plymouth Policy Area on the City Centre, the policy sets out a locally defined threshold for when a retail impact assessment is needed. In relation to the Thriving Towns and Villages Policy Area, the threshold is set lower reflecting the nature of retail provision in its town centres. The national default threshold of 2,500 sq.m. is maintained for leisure and office development generally.

6.64 The policy recognises that there are particular types and formats of retail development which can be difficult to accommodate within centres. Therefore, provision is made for out of centre floorspace which provides for genuinely bulky goods retailing where it is robustly demonstrated that there are locational requirements which mean it cannot be located in town centre locations. This particular type of retail floorspace will only be permitted where it can be demonstrated that there will be no significant harm to the hierarchy of centres having considered a sequential and impact assessments. The floorspace will be closely controlled to ensure that it is and will be retained as bulky goods. This will be secured through detailed conditions which restrict the size of units, range of goods to be sold, total amount of floorspace and type of occupier. The LPA's will also consider how such proposals can improve the appearance and accessibility (by all modes of transport) of the area they are seeking to locate in as part of the consideration of proposals.

6.65 Additionally, within Plymouth's core tourism areas the policy allows for complementary forms of town centre use. Such uses should help to develop and enhance the visitor economy of these destinations.

Policy DEV17

Promoting competitive town centres

In the town centres of the Thriving Towns and Villages Policy Area the LPAs will enable and where appropriate support measures to enhance the economy, including:

1. The identification and redevelopment of appropriate town centre sites.

2. Initiatives such as Business Improvement Districts, and Heritage based schemes.
3. Provision of visitor attractions, events, festivals, weekly and permanent markets and other such initiatives.
4. Proposals which create larger floorspaces for comparison shopping uses in the town centre.
5. Uses which increase variety and choice in shopping provision.
6. Business, social and residential uses above ground floor retailing, commercial and eating premises.
7. Improved walking, cycling and public transport links in and around the town centre.
8. Improved sustainable transport facilities, for walking, cycling, public transport and low emission vehicles, including cycle parking and electric vehicle charging points.
9. Uses which boost the evening economy of the town.

Such proposals for development or change of uses in the town centres will be supported in suitable locations and in accordance with the town centre, primary shopping frontages and secondary shopping frontages designations.



6.66 South Hams and West Devon have a complex network of shopping catchments with different roles and functions. Dartmouth, Ivybridge, Kingsbridge, Okehampton, Tavistock and Totnes are the main retail centres but the smaller towns and key villages also play an important role in providing shopping facilities. Shopping patterns are influenced by the accessibility of Plymouth and Exeter, which are major retail destinations.

6.67 The PBA Retail and Leisure Study identifies individual but similar circumstances in the towns across the area, in that they are vibrant but vulnerable to out of centre development and to leakage of trade to other centres. Specifically the report finds that each town centre performs well against the NPPG health check indicators and that the key drivers of town centre vitality and viability are local affluence and tourism.

6.68 Policy DEV17 supports protection of this vital function provided by the main towns and facilitates the specific opportunities for redevelopment as well as the more general, but innovative, aspirations in the PBA Report. In this way the JLP will deliver enhancement in the main towns to the retail, leisure and tourism-related offer along with complementary strategies to improve the quality of the public realm, and to encourage sustainable modes of transport to reduce congestion.

Policy DEV18

Protecting local shops and services

The LPAs will consider proposals which result in the loss of retail and local services and facilities, both within and outside designated centres in accordance with the following provisions:

1. Development within centres should maintain the vitality and viability of the centre as a whole and ensure that the centre retains its role in the retail hierarchy, meeting the needs of the area it serves.
2. Development within centres should create an attractive street frontage and not cause unacceptable fragmentation or isolation of retail premises or a frontage.
3. In the Plymouth Policy Area the LPA will support proposals which:
 - i. Preserve the primary retailing role within primary frontages, with complementary supporting A2, and A3 uses and a limited number of other town centre uses which support the principal shopping role of the area.
 - ii. Provide a mix of principally A1, A2 and A3 uses. with other leisure and town centre uses within secondary frontages, subject to the overall shopping character of the centre being maintained and the use adding to the vitality of the area.
 - iii. Within the wider centre, provide a broad range of uses which contribute to vitality of the area and do not lead to inactive frontage.
4. In the Thriving Towns and Villages Policy Area the LPA will support proposals which:
 - i. Result in the loss of ground floor premises in retail use (Use Class A1) within primary frontages to uses within Use Class A2 and A3 only where they do not create a continuous frontage of more than two non Class A1 uses and would not result in more than 15m of continuous frontage in non-Class A1 use.
 - ii. Do not result in more than:
 - 30 per cent of the overall number of units within the defined Primary Shopping Frontage being in non-Class A1 uses in Dartmouth and Tavistock;
 - 40 per cent of the overall number of units within the defined Primary Shopping Frontage being in non-Class A1 uses in Kingsbridge;

- 45 per cent of the overall number of units within the defined Primary Shopping Frontage being in non-Class A1 uses in Ivybridge and Totnes; and
 - 60 per cent of the overall number of units within the defined Primary Shopping Frontage being in non-Class A1 uses in Okehampton.
- iii. Provide uses outside Classes A1, A2 or A3 in ground floor premises within primary frontages only where the use would achieve a significant improvement in the vitality and viability of the centre.
 - iv. Result in the loss of ground floor premises in retail use (Use Class A1) within secondary frontages to other main town centre uses where they encourage footfall within the centre and support the main functions of the rest of the centre.
 - v. Within the wider centre, provide a broad range of uses which contribute to vitality of the area and do not lead to inactive frontage.
5. Proposals for drinking establishments (Use Class A4), hot food take aways (Use Class A5), betting shops, pay day loan premises and amusement arcades, when considered individually or cumulatively, will not be permitted where they result in:
- i. Unacceptable levels of noise, smell, litter, disturbance, or otherwise detrimental impacts to the role and function of the area or centre and residential amenity.
 - ii. Unacceptable traffic and parking problems.
 - iii. Detrimental impact on the character and appearance of the area.
6. The change of use to other uses of facilities of local community importance, such as local convenience shops, post offices, public houses, cafes, restaurants and community facilities, will only be supported where there is no significant harm to the level of service locally and where there is no reasonable prospect of the business or community use continuing.



6.69 The policy seeks to ensure that centres retain their primary functions and to ensure that local services and facilities are retained to serve communities. In implementing the policy there is a need to recognise that the nature and role of town centres has evolved over the years in response to issues such as changing retail

behaviour. The policy therefore seeks to find a balance between protecting the primary retail functions of centres whilst also allowing the process of change to continue so that centres stay strong and relevant at the heart of local communities.

6.70 Each centres' Primary Shopping Area (PSA) boundary is defined on the Policies Map. For the City Centre, the PSA is defined as the main shopping areas shown on Figure 4.2.

6.71 Within Plymouth, it is not considered appropriate to apply specific thresholds to determine the numbers of different uses which should be located within a centre or individual type of frontage. The primary function of a centre is substantially determined by the nature of the retail role it plays within the city. However they also play a wider role in providing a social heart for communities and, in some locations, play an important role in supporting the visitor and tourism economy. The Plymouth Policy Area Supplementary Planning Document provides detailed amplification of how the policy will be implemented in Plymouth.

6.72 The loss of retail uses in rural areas is a particularly pertinent issue, where the impact of services and facilities is often conversely proportionate to the amount of services and facilities available - when there is only one shop within a 10 mile radius, that shop is very important to a large number of people.

Policy DEV19

Provisions for local employment and skills

Major development proposals will be required to enter into site related employment and skills plans in order to support local employment and skills in the construction industry.

Developments that result in the loss of existing employment buildings or sites, or the non-implementation of previously consented employment use, will be expected to contribute to an appropriate local employment growth scheme or alternative employment uses.



6.73 These requirements are on the basis that to properly provide for the required growth it is necessary to ensure a commensurate growth in the area's employment base which it is recognised to require investment both in job growth and skills, with both Science, Technology, Engineering and Maths (STEM) and construction jobs and skills being of primary importance.

6.74 Local employment growth schemes will be varied throughout the Plan Area, and might be delivered by a a council economic development service, a town or parish council, or charitable and community based training and local employment organisations.

6.75 The Supplementary Planning Documents for the Plymouth and Thriving Towns and Villages Policy Areas will provide guidance on the implementation of this policy, including in cases where the delivery of a local employment growth scheme is not practical or feasible.

d. Place shaping and heritage

What we are going to do - our development policies for delivering distinctive places which respect our heritage and culture

6.76 Although great priority is placed on meeting the objectively assessed needs for new homes and jobs, the plan does not seek growth for growth's sake, nor at any cost. Instead, the plan is seeking to deliver quality growth that provides places for people, contributing to their quality of life and engendering a sense of local pride.

6.77 The Plan Area is rich in heritage assets and they play a huge role in its community life, giving a sense of place, wellbeing and cultural identity. The way we nurture and value our historic environment has the potential to bring economic, social and environmental benefits across the Plan Area. The historic environment plays a key part in making the Plymouth and South West Devon area a diverse and special place to live, work and enjoy. It is varied and unique, and the heritage assets have intrinsic value as an irreplaceable international and national resource. The historic environment contains a number of important historic assets including listed buildings, scheduled monuments, registered parks and gardens, archaeological sites and other buildings and areas which contribute to the character of the local area. Historic assets also make a significant contribution to a sense of local identity and place and new development should make a positive contribution to the historic character of the area.

6.78 The LPAs also think it is important to respond positively to proposals which help secure the long term viability of our heritage assets and their role in the community while also ensuring that development schemes respect their integrity and enhance, conserve and protect them. These uses may include opportunities for new uses, including those supporting local communities.

6.79 This section sets out policies which will help ensure that development genuinely helps to shape high quality and locally distinct places which celebrates and strengthens the unique quality and inherent value that historic assets and culture offer. These policies provide a positive strategy for the conservation, enjoyment and enhancement of the historic environment.

Policy DEV20

Place shaping and the quality of the built environment

Development proposals will be required to meet good standards of design, contributing positively to both townscape and landscape, and protect and improve the quality of the built environment through:

1. Using materials and design solutions that are resilient to their context and will endure over time. Larger scale development should seek to address Building for Life criteria or a similar design framework.

2. Having proper regard to the pattern of local development and the wider development context and surroundings in terms of style, local distinctiveness, siting, layout, orientation, visual impact, views, scale, massing, height, density, materials, detailing, historic value, landscaping and character, and the demands for movement to and from nearby locations.
3. Achieving a good quality sense of place and character through good utilisation of existing assets such as quality buildings, heritage assets, trees and landscape features and attention to the design details of the scheme. Masterplanning approaches will be strongly encouraged for major schemes.
4. Delivering locally distinctive design.
5. Delivering landscape design that is appropriate to the location of the development, with full consideration given to its future management and maintenance and the need for landscape measures that are resilient.
6. Ensuring that the layout and details of new development adequately contribute towards high standards of community safety and reduce opportunities for crime and fear of crime.
7. Rectifying and repairing damaged environments and townscapes.
8. Enhancing the appearance of key gateway locations and routes into Plymouth and the main towns.
9. Integrating public art into proposals for major developments in Plymouth. Artists should be engaged in the process at an early stage, when the design brief is being scoped. The use of public art will be particularly promoted in strategically important gateway locations for Plymouth and in the city's core tourism area, including the City Centre.



6.80 The quality of the built environment is important to meeting the aspirations of the city and also to maintaining the local distinctiveness of rural settlements. Design affects the way we interact with our city place and can contribute positively to people's lives.

6.81 The policy seeks to ensure that all development has regard to key design principles for a high quality places. Design is not just about the architecture of a building. It is also about the spaces within which the development sits, the quality of the relationships between the development and surrounding areas, and the appropriateness of the function of the building in its context. Together these types of consideration combine to create high quality places that people find attractive, accessible and easy to live in.

6.82 The policy will be amplified in the Plymouth and Thriving Towns and Villages Policy Areas through supplementary planning documents.

Policy DEV21

Development affecting the historic environment

Development proposals will need to sustain the local character and distinctiveness of the area by conserving and where appropriate enhancing its historic environment, both designated and non-designated heritage assets and their settings, according to their national and local significance. The following provisions will apply:

1. The significance, character, setting and local distinctiveness of heritage assets should be considered within an appropriate assessment to determine impact.
2. Great weight will be given to the conservation of the Plan Area's designated heritage assets. Where development proposals will lead to any harm to the significance of a designated heritage asset, they must be fully justified against:
 - i. the public benefits of the development, and whether there are substantial public benefits in cases where there would be substantial harm
 - ii. whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses or mitigate the extent of harm to the assets significance and if the work is the minimum required to secure its long term use.
3. Development that harms the significance of locally important non-designated heritage assets, or their contribution to the character of a place will only be permitted where it can be justified on the basis of a balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset.
4. Where harm to designated and non-designated heritage assets can be justified applicants will be required to undertake excavation or recording as appropriate, followed by analysis and publication to professionally acceptable standards.
5. Development should help secure the long term sustainable future for the Plan Area's heritage assets, especially those identified as being of greater risk of loss and decay and that might have a community benefit where possible.
6. Development should respond positively and creatively to ensure those elements that contribute to the special character and appearance of conservation areas are conserved or enhanced using, where appropriate, Conservation Area Appraisals and Management Plans to inform future development.



6.83 New development, including alterations and the conversion of buildings and the placement of advertisements, will be required to conserve or enhance the historic environment and contribute to local distinctiveness, drawing upon local character and displaying new ideas which help create new quality townscapes and other local built and landscaped settings. Heritage assets and their settings are an irreplaceable national resource and contribute significantly to the local character and distinctiveness of an area.

Policy DEV22

Cornwall and West Devon Mining Landscape World Heritage Site

Development proposals within the Cornwall and West Devon Mining Landscape World Heritage Site or its setting will conserve or where appropriate enhance the Outstanding Universal Value of the site. In particular, regard should be given to the following:

1. The historical and cultural significance of the seven key attributes that express the Outstanding Universal Value of the Site as well as other key buildings or other features and their contextual setting as may contribute to this significance.
2. The need to conserve and maintain existing historic fabric and to retain and reflect locally distinctive features in the design of buildings, layouts and landscape to ensure the authenticity and integrity of the World Heritage Site is maintained.
3. The integrity and authenticity of industrial infrastructure, transportation networks and associated features.
4. The importance of and evidence for ancillary industries.
5. The need to be in accordance with the principles and objectives of the relevant Cornwall and West Devon Mining Landscape World Heritage Site Management Plan and other guidance/ adopted documents, including the World Heritage Site Supplementary Planning Document.
6. Proposals that would result in harm to the authenticity and integrity of the Outstanding Universal Value should be wholly exceptional. Less than substantial harm must be justified. Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal and whether it has been demonstrated that all reasonable efforts have been made to mitigate the extent of the harm. If the impact of the proposal is neutral, either on the significance or setting, then opportunities to enhance or better reveal the significance should be taken.

7. All development proposals should be informed by proportionate historic environment assessments and evaluations. These will identify the significance of all heritage assets that would be affected by the proposals, the nature and degree of any effects, and demonstrate how any harm will be avoided, minimised or mitigated.



6.84 Parts of West Devon are designated within the Cornwall and West Devon Mining Landscape World Heritage Site which was inscribed in 2006. The conservation and enhancement of the Outstanding Universal Value (OUV) of the World Heritage Site is of strategic importance, and the adopted Management Plan for the World Heritage Site sets out how the protection and enhancement of this important cultural landscape should be undertaken. The influence of mining is clear to see in the historic buildings, structures, listed buildings and scheduled monuments within 'Area 10: Tamar Valley Mining District with Tavistock' of the World Heritage Site.

e. Natural Environment

What we are going to do - our development policies for delivering the natural network

6.85 The natural network is multi-faceted and includes statutory and non-statutory designated sites for nature conservation, geodiversity and landscape; public open space, allotments, play areas, woodlands, trees, playing pitches, Local Green Spaces, Strategic Greenspace Areas, Undeveloped Coast and marine areas.

6.86 Plymouth has a unique and diverse natural environments of any city in the country. Over 40 per cent of the city is designated as green space, and is surrounded by three Areas of Outstanding Natural Beauty (AONBs), a European Marine Site, a Marine Conservation Zone and Dartmoor National Park.

6.87 The majority of the natural environment throughout South Hams and West Devon is of the very highest quality, with much of it designated and protected in recognition its intrinsic value and the contribution that our natural landscapes make to the lives of our communities.

6.88 High quality natural spaces, and the network of links and stepping stones between them, are essential in the delivery of services that provide significant social, economic and environmental benefits. A high quality and properly functioning natural network will therefore provide the following:

- Spaces for nature
- Space for recreation and relaxation.
- Playful spaces.
- Engaging learning environments.

- Benefits to businesses.
- Climate change support measures.

Policy DEV23

Landscape character

Development will conserve and enhance landscape, townscape and seascape character and scenic and visual quality, avoiding significant and adverse landscape or visual impacts. Development proposals should:

1. Be located and designed to respect scenic quality and maintain an area's distinctive sense of place and reinforce local distinctiveness.
2. Conserve and enhance the characteristics and views of the area along with valued attributes and existing site features such as trees, hedgerows and watercourses that contribute to the character and quality of the area.
3. Be of high quality architectural and landscape design appropriate to its landscape context.
4. Be located and designed to prevent erosion of relative tranquility and intrinsically dark landscapes, and where possible use opportunities to enhance areas in which tranquility has been eroded.
5. Restore positive landscape characteristics and features that reinforce local landscape quality and distinctiveness.
6. Where necessary, be supported by Landscape and Visual Impact Assessments and landscaping schemes that enhance that proposed development.
7. Avoid, mitigate, and where appropriate compensate, for any residual adverse effects and take opportunities to secure landscape character and visual enhancements.



6.89 The Plan Area contains a wide range of landscapes, townscapes and seascapes including three nationally protected landscapes. The LPAs are committed to ensuring that proper consideration of impacts on landscape character and visual amenity is made through the planning process and that development will contribute to this area's valued character and identity. In this regard, landscape and visual impact assessments will need to be provided where appropriate.

Policy DEV24

Undeveloped Coast and Heritage Coast

Development which would have a detrimental effect on the undeveloped and unspoilt character, appearance or tranquility of the Undeveloped Coast, estuaries, and the Heritage Coast will not be permitted except under exceptional circumstances. Development will only be permitted in the Undeveloped Coast where the development:

1. Can demonstrate that it requires a coastal location.
2. It cannot reasonably be located outside the Undeveloped Coast.
3. Protects, maintains and enhances the unique landscape and seascape character and special qualities of the area.
4. Is consistent with policy statements for the local policy unit in the current Shoreline Management Plan.
5. Is consistent with the relevant Heritage Coast objectives, as contained within the relevant AONB Management Plan.

Development for the purposes of agriculture, forestry, public access and enjoyment of the coast and estuaries, or community facilities that meet the objectively assessed needs of the local community, will be supported if it meets the above tests.



6.90 Some of the country's most spectacular undeveloped coastlines are found in the Plan Area. These are a hugely important part of character, identity and economic asset base of the region. Throughout South Hams and West Devon the coastlines are cherished for their unspoilt, wild and rugged nature as is evident in the popularity of the South West Coast Path and coastal tourism and recreation in the Plan Area. Whilst the port city of Plymouth is heavily developed and the coastline is punctuated with historic coastal settlements the area retains a predominantly undeveloped coastline. In Plymouth the character of Plymouth Sound is heavily influenced by the undeveloped, rural edges to the south.

6.91 Undeveloped Coasts have been designated for the Plan Area to conserve their undeveloped character. Heritage Coasts are defined by Natural England to conserve, protect and enhance the natural beauty, heritage, and flora and fauna of the Heritage Coasts; to facilitate and enhance their enjoyment, understanding and appreciation by the public; to maintain and improve the environmental health of their inshore waters and beaches; and to take account of the needs of agriculture, forestry and fishing, and of the economic and social needs of small communities on these coasts.

6.92 This policy seeks to protect this region's valuable undeveloped coast and defined Heritage Coast, ensuring that only development that contributes positively to its character is permitted. The South Devon AONB Management Plan incorporates the objectives and targets for the South Devon Heritage Coast.

Policy DEV25

Nationally protected landscapes

The highest degree of protection will be given to the protected landscapes of the South Devon AONB, Tamar Valley AONB and Dartmoor National Park. The LPAs will protect the AONBs and National Park from potentially damaging or inappropriate development located either within the protected landscapes or their settings. In considering development proposals the LPAs will:

1. Refuse permission for major developments within a protected landscapes, except in exceptional circumstances and where it can be demonstrated that they are in the public interest.
2. Give great weight to conserving landscape and scenic beauty in the protected landscapes.
3. Give substantial weight to other natural beauty criteria, including the conservation of wildlife and cultural heritage in the AONBs and great weight to the conservation of wildlife and cultural heritage in Dartmoor National Park.
4. Assess their direct, indirect and cumulative impacts on natural beauty.
5. Encourage small-scale proposals that are sustainably and appropriately located and designed to conserve, enhance and restore the protected landscapes.
6. Seek opportunities to enhance and restore protected landscapes by addressing areas of visually poor quality or inconsistent with character, securing through the development visual and other enhancements to restore local distinctiveness, guided by the protected landscape's special qualities and distinctive characteristics or valued attributes.
7. Support proposals which are appropriate to the economic, social and environmental wellbeing of the area or desirable for the understanding and enjoyment of the area.
8. Require development proposals located within or within the setting of a protected landscape to:
 - i. Conserve and enhance the natural beauty of the protected landscape with particular reference to their special qualities and distinctive characteristics or valued attributes.

- ii. Be designed to prevent the addition of incongruous features, and where appropriate take the opportunity to remove or ameliorate existing incongruous features.
- iii. Be located and designed to respect scenic quality and maintain an area's distinctive sense of place, or reinforce local distinctiveness.
- iv. Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests.
- v. Be located and designed to prevent the erosion of relative tranquility and, where possible use opportunities to enhance areas in which tranquility has been eroded.
- vi. Be located and designed to conserve and enhance flora, fauna, geological and physiographical features, in particular those which contribute to the distinctive sense of place, relative wildness or tranquillity, or to other aspects of landscape and scenic quality.
- vii. Retain links, where appropriate, with the distinctive historic and cultural heritage features of the protected landscape.
- viii. Further the delivery of the relevant protected landscape management plan, having regard to its supporting guidance documents.
- ix. Avoid, mitigate, and as a last resort compensate, for any residual adverse effects.



6.93 Areas of Outstanding Natural Beauty (AONBs) and National Parks are protected landscape areas which receive the highest degree of protection owing to their national significance. AONBs and National Parks are International Union for Conservation of Nature (IUCN) Category V protected landscapes. The international objectives of these landscapes are *'To protect and sustain important landscapes/seascapes and the associated nature conservation and other values created by interactions with humans through traditional management practices'*. Local authorities have a legal duty to have regard to the statutory purposes of AONBs and National Parks during plan-making and decision-taking on individual developments. This duty also applies to Parish and Town Councils during the preparation of Neighbourhood Plans. These statutory duties are set out in the Countryside and Rights of Way Act 2000 and The National Parks and Access to the Countryside Act 1949, for AONBs and National Parks respectively.

6.94 The statutory purposes of these nationally significant landscape areas are:

- For AONBs the purpose is the conservation and enhancement of their natural beauty.
- For National Parks the purposes are, first, to conserve and enhance their natural beauty, wildlife and cultural heritage; and second, to promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public. Where there is a conflict between these two purposes, greater weight shall be attached to the first purpose.

6.95 Dartmoor National Park, South Devon AONB and Tamar Valley AONB each make a significant contribution to the economic, social and environmental value of the Plan Area. The LPA's are committed to supporting the delivery of their respective Management Plans and ensuring they receive the required level of protection from inappropriate development.

Policy DEV26

Protecting and enhancing biodiversity and geological conservation

Development should support the protection, conservation, enhancement and restoration of biodiversity and geodiversity across the Plan Area. Specific provisions are identified below:

1. The highest level of protection will be given to European Sites. Development will not be permitted unless it will not adversely affect the integrity of a European site, either alone or in combination with other development. Proposals having a harmful impact on the integrity of European Sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where:
 - i. There are no suitable alternatives.
 - ii. There are Imperative Reasons of Overriding Public Interest.
 - iii. Necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European Sites is protected.
2. A high level of protection will be given to sites of national significance for nature conservation. Development proposed on land within or outside such a site which would be likely to have a harmful impact on the site (either individually or in combination with other developments) will not be permitted unless the benefits of the development, at the site, clearly outweigh both the impacts on the notified special interest features of the site and any broader impacts on the national network of sites of national significance for nature conservation.
3. Development likely to have a harmful impact on locally designated sites, their features or their function as part of the ecological network, will only be permitted where the need and benefits of the development clearly outweigh the loss and where the coherence of the local ecological network is maintained.

4. Harmful impacts on European and UK protected species and Biodiversity Action Plan habitats and species must be avoided wherever possible, subject to the legal tests afforded to them where applicable, and unless the need for, or benefits of the development clearly outweigh the loss.
5. Net gains in biodiversity will be sought from all major development proposals through the promotion, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of legally protected and priority species populations. Delivery of net gains in biodiversity should be designed to support the delivery of the identified biodiversity network that crosses the Plan Area and links the city of Plymouth to the countryside and coast, as well as the network within the city itself. The level of biodiversity net gain required will be proportionate to the type, scale and impact of development. Enhancements for wildlife within the built environment will be sought where appropriate from all scales of development.
6. Development will provide for the long term management of biodiversity features retained and enhanced within the site or for those features created off site to compensate for development impacts.



6.96 Biodiversity and geological interests (geodiversity) are protected through a hierarchy of European, national and locally designated sites which seek to protect important habitats and the habitats of species of conservation importance, as well as geological and geomorphological interests. The importance of protecting and enhancing biodiversity occurring outside these designated sites is also recognised in European and national law and in the NPPF. In particular, requirements to maintain functioning ecological networks at the landscape scale and irreplaceable habitats and biodiversity features which may not necessarily be covered by a formal designation.

6.97 The Biodiversity Network has been designed to help protect and enhance wildlife. The Network consists of Core Sites (consisting of European, National and locally designated sites) but also future Restoration Areas, Stepping Stones and Corridors. This approach is consistent with the UK Governments' commitment to halt the decline in biodiversity and the approach taken in Lawton's 'Making Space for Nature' report in 2010. This approach is embedded within NPPF paragraphs 109, 114 and 117 which require Local Authorities to create biodiversity or ecological networks.

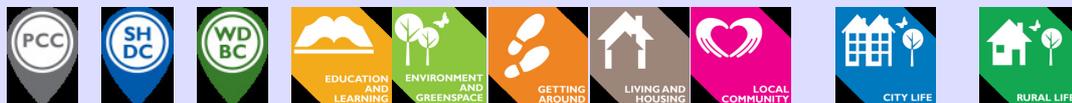
6.98 Inter-tidal habitats (including priority habitats) are an important part of the biodiversity network in the Plan Area. Tidal encroachment should be avoided and potential impacts upon estuarine ecology must be fully assessed, taking account of predicted sea level rise (coastal squeeze) and any in-combination effects.

Policy DEV27

Green and play spaces

The LPA's will protect and support a diverse and multi-functional network of green space. The following provisions apply:

1. Development that would result in an unacceptable conflict with the function(s) or characteristic of Strategic Green Spaces will be resisted. In these areas development will normally only be permitted where it enhances the value of the green space, for example through sports, allotment and play provision, lighting, cafes, educational uses and sustainable transport routes.
2. Existing open spaces, which also includes designated City Green Spaces and Neighbourhood Green Spaces, should not be built on unless it is demonstrated that the open space is surplus to requirements; or the loss will be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss. In making this judgement regard will be had to evidence of the identified value of the green space's attributes as set out in relevant open space assessments and account will be taken of the plan's green space and play accessibility standards. Development will be resisted on sites where the functions and characteristics of the greenspace will be lost and mitigation is not possible.
3. The quality and quantity of accessible green space and play space should be improved in line with local targets and standards for the provision of greenspace and play space. This can be delivered through on-site provision or financial contributions to off-site provision where appropriate.
4. Local deficiencies in the accessibility and quality of green space and play space should be addressed in development, in line with local standards.



6.99 Green open spaces and play spaces are an integral part of sustainable communities. To ensure that these spaces are protected and enhanced as a result of the growth in the area the network of greenspaces have been mapped and will be protected. There is a hierarchy of greenspace due to their importance and role in relation to the area's growth. Policy DEV27 relates both to sites with a specific designation and also to undesignated green spaces within the Plan Area.

6.100 Within the Plymouth Policy Area, the hierarchy includes Strategic Green Spaces, City Green Spaces and Neighbourhood Green Spaces. Strategic Green Spaces are allocated due to their essential and multi-functional role in the

growth of the area. Neighbourhood Green Spaces are identified in terms of their greenspace and community value. Each category of green space includes land which is either publicly accessible or not accessible.

6.101 Policy DEV27 seeks to protect existing open space from new built development, whilst acknowledging also the circumstances where development can be justified. Proposals therefore will need to be carefully assessed, and particular regard will be had to published Open Space Assessments that identify the key functions and value attributes of green spaces, and in the case of accessible green space the wider standard of the LPAs in terms of accessibility and whether suitable replacement provision can be made (having regard to Policy SPT2 and Figure 3.2.

6.102 An important element of a sustainable community is the accessibility of green open spaces and play spaces due to their substantial health and well being benefits. Spaces should be in close proximity to where people live and a good level of provision should be provided across the Plan Area.

6.103 Green infrastructure also provides significant benefits in terms of flood risk and water quality management as well as aiding adaptation to climate change.

Policy DEV28

Trees, woodlands and hedgerows

Development that would result in the loss or deterioration of the quality of:

- Ancient woodland, aged or veteran trees or impact on their immediate surroundings;
- Other woodlands or high amenity trees including protected trees;
- Important hedgerows including Devon hedgebanks; will not be permitted unless the need for, and benefits of, the development in that location clearly outweigh the loss and this can be demonstrated.

Development should be designed so as to avoid the loss or deterioration of woodlands, trees or hedgerows. If the loss of trees, woodlands or hedgerows, cannot be avoided, new native and locally appropriate trees and hedgerows will be secured as mitigation to ensure they contribute to a 'net gain'. Mitigation should be delivered on site, but if this is not achievable, offsite compensation will be required to provide a net gain in canopy cover in line with local standards.



6.104 The visual contribution that trees, woodlands and hedgerows make to the communities is significant. They also offer additional benefits which may not be so visible, but are hugely significant as we move to adapt to climate change. For example they:-

- Provide urban cooling through evapotranspiration.
- Create micro-climatic effects that can reduce energy demands in buildings by reducing wind speeds.
- Reduce rain water runoff, provide shade, shelter and help improve air quality.
- Help deliver sustainable water flow and improved water quality through interception and filtration in our catchment area.

6.105 In addition trees, woodlands and hedgerows offer other benefits, including:

- Providing visual amenity, softening or complementing the effect of the built environment; adding maturity and value to new developments
- Displaying seasonal change and providing opportunities for biodiversity in urban environments.
- Improving mental health and wellbeing
- Providing corridors for wildlife to move along, such as bats.

6.106 The Plan Area contains Ancient woodland and veteran trees that are irreplaceable and the NPPF paragraph 18 emphasises their importance.

6.107 A Tree Canopy Cover assessment has been undertaken in the Plymouth Policy Area which will be used to ensure new planting required when tree, woodland or hedgerow loss on a site cannot be avoided, is targeted and results in a positive contribution to the area.

6.108 Tree Preservation Orders will be made where appropriate in the interest of amenity and in accordance with Government Guidance.

f. Transport and infrastructure

What we are going to do - our development policies for meeting transport and infrastructure needs

6.109 One of the most important issues in the management of development delivery is the need to ensure that the necessary infrastructure is also provided. Infrastructure includes the public systems, services, and facilities that are necessary for economic and social activity, including highways, schools, waste management facilities, telecommunications, power and water supplies. Unless infrastructure needs are met, development can be unsustainable and lead to the creation of unbalanced communities without the services and facilities they need to thrive.

6.110 This section sets out policies in relation to transport, community infrastructure and (in the case of Plymouth which is a waste planning authority) waste management.

Policy DEV29

Specific provisions relating to transport

Development will be required to contribute positively to the achievement of a high quality, effective and safe transport system in the Plan Area. It will promote sustainable transport choices and facilitate sustainable growth that respects the natural and historic environment. Development proposals should therefore, where appropriate:

1. Consider the impact of development on the wider transport network.
2. Provide safe and satisfactory traffic movement and vehicular access to and within the site.
3. Ensure sufficient provision and management of car parking in order to protect the amenity of surrounding residential areas and ensure safety of the highway network.
4. Limit / control the overall level of car parking provision at employment, retail and other destination locations.
5. Provide for high quality, safe and convenient facilities for walking, cycling, public transport and zero emission vehicles.
6. Mitigate the environmental impacts of transport, including impacts on air quality, noise pollution, landscape character and the quality and distinctiveness of urban and rural environments.
7. Incorporate travel planning, including Personalised Travel Planning (PTP), which helps to maximise the use of sustainable transport in relation to the travel demands generated by the development and limit the impact of the development on the road network.
8. Ensure that access and infrastructure delivered as part of the development meets the need for walking, cycling and public transport connectivity both within the development and in the wider area alongside supporting place-shaping objectives.
9. Contribute to meeting the wider strategic transport infrastructure needs generated by the cumulative impact of development in the area.
10. Locate new homes in locations that can enable safe, secure walking, cycling and public transport access to local services and amenities.



6.111 As the population of the Plan Area grows so too will the demand for travel. The scale of growth necessitates major infrastructure investments to provide greater real travel choices with more reliable journey times, across all modes of transport alongside smarter choices measures to encourage people to try those alternatives.

6.112 In accordance with the National Planning Policy Framework the transport proposals supporting this plan are being developed such that the system is balanced in favour of sustainable travel giving people a real choice about how they travel with consideration being given to both the physical transport infrastructure needed to deliver a high quality, effective and safe transport system and the complementary behavioural change schemes.

6.113 Through encouraging and enabling more walking, cycling and use of public transport; network capacity will be released. The independently immobile will be able to access places of education, employment and training, the accessibility of key services will rise, public health will improve and environmental benefits will be achieved.

6.114 There is a significant need, and opportunity, to affect travel behaviour. Development has a key role to play in achieving the transport philosophy set out within the Plan both in terms of providing critical infrastructure and the complementary measures (either directly, or indirectly in the form of a financial contribution) by supporting residents and employees predisposed to reviewing their travel habits arising from one or more of the following factors; moving house, changing school or changing job.

Policy DEV30

Meeting the community infrastructure needs of new homes

The development of new homes (including student housing) should contribute to the delivery of sustainable communities with an appropriate range of community infrastructure, such as schools, primary health care infrastructure, sports / recreation and community facilities / village halls.

Major housing developments will be considered in the context of the sufficiency (or otherwise) of the community infrastructure to meet the demands generated by the development. Where there are existing or anticipated capacity issues, financial contributions to appropriate projects will be sought to enable the community impacts of the development to be mitigated. Where possible, developments should directly incorporate community infrastructure and services as integral parts of the development.



6.115 The LPAs are concerned not just about delivering new homes but delivering sustainable communities. This means that extensive single use areas of housing need to be avoided, instead ensuring that developments build in community infrastructure and help mitigate any adverse impacts (e.g. through Section 106 contributions to appropriate projects).

6.116 Major developments should include an assessment of their impacts on local communities, including off-site impacts such as the need to support safe walking and cycling routes to local schools and contribute to local services, including transport.

6.117 This policy needs to be read alongside other policies of this plan that deal with open space, play facilities, local shops, playing pitches and transport impacts - which taken together are designed to deliver the infrastructure and service needs of development.

6.118 The link between infrastructure, services and facilities and new homes will vary from place to place. Neighbourhood Plans can play an important role in bringing forward the amount of new homes identified as being appropriate within the JLP, and also working alongside LPAs and infrastructure providers to identify future infrastructure and service needs are adequately understood and planned for alongside new homes and jobs.

Policy DEV31

Waste management

The LPAs will support the implementation of the following waste management hierarchy: Prevention; Preparing for reuse; Recycling; Other recovery; Disposal. This will be achieved through the following provisions:

1. New developments should have regard to the operational needs of the relevant waste collection authorities in their design and access arrangements.
2. New developments should provide integrated facilities for the storage of recyclable and non-recyclable waste.
3. All planning applications for major development in the Plymouth administrative area will be required to include a site waste management plan demonstrating how the demolition, construction and operational phases of the development will minimise the generation of waste. The provisions of Policy W4 of the Devon Waste Plan will apply to the South Hams and West Devon administrative areas.

4. Encouragement will be given to the reuse and recycling of construction and demolition waste in the city, together with other suitable alternative secondary aggregates, in delivering regeneration and infrastructure projects that support the delivery of Plymouth's growth vision.
5. Within the Plymouth administrative area, where Plymouth City Council is the statutory waste planning authority, proposals for new waste management facilities, or extensions and amendments to existing facilities, will need to demonstrate that:
 - i. The proposals are compatible with the objective of moving the management of waste up the waste hierarchy. Landfill of waste arisings within Plymouth will not be supported.
 - ii. The proposals will not result in unacceptable direct or indirect impacts on the residential amenity of existing or proposed communities, or unacceptable impacts on the amenity of other neighbouring uses that would be sensitive to waste management development.
 - iii. There is good access to the principal road network. Where practicable, they should have access to a choice of transport modes other than road.



6.119 Policy DEV31 seeks to ensure that development takes place in a manner which supports sustainable waste management within the Plan Area. This is in support of the waste management hierarchy of: 1. Prevention; 2. Preparing for reuse; 3. Recycling; 4. Other recovery; 5. Disposal. It also acknowledges that waste does not respect local authority boundaries and a partnership relationship sees flows of waste to and from the city, region and district.

6.120 One important method of reducing is ensuring the careful management of resources. In terms of construction, conditions will be used on planning consents where appropriate to ensure that waste is minimised during the construction process. Conditions are also used to ensure residents are provided with facilities to assist them in recycling waste. A second important function of the local plan is to ensure look for alternative materials that can be reused for construction and therefore reduce the need for quarrying.

6.121 In respect of proposals for waste management uses, the Devon Waste Plan sets the policies that will need to be complied with in South Hams and West Devon council areas. This includes a supplementary planning document; Waste Management and Infrastructure.

6.122 In Plymouth, a strategic 'energy from waste plant' provides capacity to meet the domestic waste disposal needs of Plymouth, South Hams and Torbay in full for the plan period as well as spare capacity for commercial and industrial waste.

Additionally, a materials recycling facility is provided at Chelson Meadow. Other than the policies identified elsewhere in this plan for waste management facilities (Chelson Meadow and Moorcroft Quarry), there is no identified need for new site allocations. However, any proposals for new or extended facilities will need to support the overall waste hierarchy and be appropriately located in relation to other sites and the road network. The City will work jointly with adjoining waste planning authorities to ensure that adequate capacity remains available to meet the city's needs.

g. Climate change, flooding and coastal change

What we are going to do - our development policies for delivering resilient communities and a low carbon future

6.123 The JLP has an important role to play in helping to deliver a more sustainable future for the area, whilst at the same time supporting national and international efforts to respond to the challenge of climate change and build more resilient communities.

6.124 The spatial strategy of the plan (Section 3) puts in place the strategic framework for sustainable patterns of development and growth to take place. This section sets out more detailed policies so that individual development proposals play their part, through providing low carbon solutions and managing the risks associated with flooding and other impacts of climate change.

Policy DEV32

Delivering low carbon development

The need to deliver a low carbon future for Plymouth and South West Devon should be considered in the design and implementation of all developments, in support of a Plan Area target to halve 2005 levels of carbon emissions by 2034 and to increase the use and production of decentralised energy. The following provisions apply:

1. Developments should identify opportunities to minimise the use of natural resources in the development over its lifetime, such as water, minerals and consumable products, by reuse or recycling of materials in construction, and by making best use of existing buildings and infrastructure.
2. Major development should take account of projected changes in temperature, rainfall, wind and sea level in its design with the aim of mitigating and remaining resilient to the effects of changing climate.
3. Development proposals will be considered in relation to the 'energy hierarchy' set out below:
 - i. Reducing the energy load of the development.

- ii. Maximising the energy efficiency of fabric.
 - iii. Delivering on-site low carbon or renewable energy systems.
 - iv. Delivering carbon reductions through off-site measures.
4. Developments should reduce the energy load of the development by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area. For major developments, a solar master plan should show how access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours.
 5. All major development proposals should incorporate low carbon or renewable energy generation to achieve regulated carbon emissions levels of 20 per cent less than that required to comply with Building Regulations Part L.
 6. Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to that network. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.



6.125 The UK continues to move towards the legally binding commitment of reducing our national carbon emissions by 80 per cent from the 1990 baseline (Climate Change Act 2008). In order to ensure national governments are progressing as effectively as possible towards this target, interim targets have been periodically agreed, the most recent of these being the 5th Carbon Budget, adopted by Parliament in 2016. The LPAs will play an important role through seeking developments that are well designed and which support the delivery of renewable and low carbon energy. The policy identifies a carbon reduction target for the Plan Area in support of this outcome.

6.126 Research commissioned by the City Council has established the main sources of carbon emissions from Plymouth. It indicates that the commercial and industrial sector is responsible for 39 per cent of the city's carbon dioxide emissions, the residential sector 34 per cent, and the transport sector 27 per cent. The research has identified the elements of a strategy which could help deliver challenging carbon reduction goals. These are supported by the policy. Its success will rely on proactive local implementation of national schemes to reduce energy use, drive energy efficiency in how we live, work and move around; and an increased uptake of renewable and low carbon forms of energy generation. Sustainable design and construction will be integral to new development in South West Devon, including the delivery of zero carbon development where possible.

6.127 Development should minimise energy demand, maximise energy efficiency and integrate the use of renewable and low carbon energy, and we will expect energy strategies for major developments to apply the energy hierarchy as a fundamental principle for sustainable development.

6.128 The UK Climate Change Commission has recently drawn attention to the need for continued improvement in energy efficiency in order to meet UK government commitments under the Climate Change Act 2008 and Paris Climate Change Agreement. The Energy Performance of Buildings Directive requires all new buildings to be nearly zero-energy by the end of 2020, and all new public buildings to be nearly zero-energy by 2018. The UK Government has paused its stated trajectory towards this end point. Nevertheless, the LPAs regards action on energy efficiency to be good business practice, and that building to lower energy efficiency standards places additional future costs (in higher energy bills) on businesses occupying those buildings and therefore negatively impacts productivity and competitiveness. Further, the LPAs are mindful of the likelihood of further moves towards a zero carbon standard, and will respond to any new national policy in the first review of the plan.

6.129 To mitigate the effects of growth on climate change and increase the level of decentralised energy, major developments should deliver a proportional contribution to on-site or off-site renewable energy generation capacity. Where appropriate, this will include heat networks using low carbon or renewable heat sources. Recognising that fabric efficiency measures are most efficient (see energy hierarchy) the policy allows fabric efficiencies in excess of Building Regulation standards at the time of construction to be offset against the renewable/low carbon generation requirement. Building Regulations Part L provides a convenient, measurable baseline against which to measure relative carbon savings. We have used carbon as a convenient metric by which we quantify the amount of renewable energy generation and energy efficiency savings, as calculating energy demand can be complex.

6.130 Layout, orientation and design of development to maximise natural heating, cooling and lighting can achieve significant benefits. We set out a standard for developments to meet, measured as the Vertical Sky Component (VSC) and Winter Probable Sunlight Hours (WPSH) following BRE guidance (BR209).

6.131 Delivery of renewable heat to multiple sites is complex and planning plays an important role in facilitating the delivery of the requisite infrastructure. Similarly, supporting the transition to low carbon lifestyles requires a coordinated approach, such as provision of strategic infrastructure to encourage the use of Ultra Low Emission Vehicles.

Policy DEV33

Renewable and low carbon energy (including heat)

To increase the use and production of renewable and low carbon energy to contribute to national targets, renewable energy development will be supported where:

1. The impacts arising from the construction, operation and de-commissioning of installations (both individually and cumulatively) are or can be made acceptable.
2. The proposal has been robustly assessed and shown to be acceptable, both individually and cumulatively, in terms of its likely impact on landscape sensitivity and capacity, and on the natural environment and heritage assets. It should also be demonstrated that the proposal does not compromise the purposes of nationally designated landscapes.
3. There are appropriate plans in place for the removal of the technology on cessation of generation, and restoration of the site to an acceptable alternative use.
4. Any farm land that is used is retained in some form of agricultural or biodiversity use, proportionate to the scale of the proposal.
5. There has been early consultation with the local communities affected by the development, the planning application demonstrates how the proposal has been informed by the outcome of the consultation, and the development contains proposals for shared ownership between the developer/operator and the community or justification as to why this is not appropriate.
6. Where the development is to meet a business need, the proposed generation is proportionate to the business use.
7. For wind turbine proposals, the site has been allocated for that use within a neighbourhood plan.
8. For renewable or low carbon energy generating proposals (including energy from waste), where appropriate, the development should provide for the efficient distribution of heat off site, for the co-location of energy producers with users, and for the maximisation of energy recovery or efficiency of generation.
9. The proposals do not lead to unsustainable, isolated development in the countryside.



6.132 There are many contributory factors to carbon reduction, and the opportunities and challenges faced in urban and rural areas can vary greatly. Efficiency of energy use in buildings and transport continue to make valuable contributions to reducing emissions, but the production of low and zero carbon energy offers significant potential for greater reductions still and for mitigating the carbon emissions due to new growth.

6.133 The energy market is continually evolving, with new technologies and innovations competing against more established energy sources. The market is also continually volatile with both supply and pricing subject to significant fluctuation. The establishment of a clean, secure supply of energy has been recognised by successive

governments as playing a key part in ensuring long-term economic prosperity, with a clear role identified for renewable energy and energy storage as part of the required energy mix. The mechanisms that different governments have deployed to achieve this have varied, and will continue to do so. Notwithstanding the shifting sands of technological innovation and market fluctuation, the planning system must remain as permissive as possible to the principle of renewable energy, whilst recognising specific transient restrictions placed on certain technologies.

6.134 The Government has promoted shared ownership of commercially developed renewable energy schemes. Shared ownership most commonly takes the form of split ownership, shared revenue or joint venture. One-off payments in cash or in kind to community groups or organisations do not constitute shared ownership. The LPAs expect shared ownership to be delivered through a not-for-profit institution, having a majority of local representation on its governing body and being established to deliver benefits that will be enjoyed by the community for the lifetime of the development.

Policy DEV34

Community energy

Community-led energy efficiency and energy generation projects will be supported where:

1. The impacts arising from the proposal are acceptable or can be made acceptable.
2. They are community led and there is evidence of community consensus in support of the proposal and/or the proposals are brought forward as part of neighbourhood planning processes.
3. The proposals deliver local social and community benefits.
4. There are administrative and financial structures in place to deliver/manage the project and the income stream from it.



6.135 The government has promoted community energy, which it defines as being ‘collective action to reduce, purchase, manage and generate energy’. Community energy projects have an emphasis on ‘local engagement, local leadership and control and the local community benefiting collectively from the outcomes’. Community-led action can often tackle challenging issues around energy, with community groups well placed to understand their local areas and to bring people together with common purpose.

6.136 Community-led energy development proposals will be required to address impacts of the development in the same way as any commercial scheme. However, the LPAs consider that community-led schemes have the potential to offer significant and greater sustainable development benefits than wholly privately owned and operated developments. These benefits should be elaborated fully in applications for consent.

Policy DEV35

Managing flood risk and water quality impacts

The LPAs will assist the Lead Local Flood Authority in the management of flood risk and water pollution within the Plan Area by directing development away from areas at highest risk, but where development is necessary ensuring that it is safe without increasing flood risk and pollution elsewhere. Specific provisions include:

1. In respect of development of sites not provided for in this plan, a sequential approach will be used in areas known to be at risk from any form of flooding. Development will be resisted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.
2. Where it is not possible for the development to be located in zones with a lower probability of flooding, an Exception Test must be undertaken to demonstrate that:
 - i. There are overriding sustainability benefits to the community to be gained from allowing the development.
 - ii. The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This must be demonstrated through a site-specific flood risk assessment.
3. Development proposals at sites which fall into Flood Zones 2 or 3 (in whole or in part) should as a minimum:
 - i. Be supported by a comprehensive and deliverable strategy to minimise flood risk.
 - ii. Be resilient to flooding through design and layout, incorporating sensitively designed mitigation measures. These may take the form of on-site flood defence works and/or a contribution towards, or a commitment to undertake such off-site measures as may be necessary to meet required flood protection standards, for example, as set out in the Local Flood Risk Management Strategy.

- iii. Provide sufficient space for drainage and flood alleviation schemes.
 - iv. Promote the safety of people in consultation with emergency planning services.
4. Development should incorporate sustainable water management measures to reduce water use, and increase its reuse, minimise surface water run-off, and ensure that it does not increase flood risks or impact water quality elsewhere, in compliance with the Local Flood Risk Management Plan and national standards for sustainable urban drainage systems. Surface water from proposed developments should be discharged in a separate surface water drainage system which should be discharged according to the drainage hierarchies set out in the Plymouth and Devon Local Flood Risk Management Strategies.
 5. Proposals for discharges of surface water direct to coastal waters must include measures to remove particulate and dissolved pollutants in order to conserve the quality of coastal environments.
 6. Developments which undermine the role of undeveloped estuarine coastal margins in providing resilience to climate change will not be allowed.
 7. Developments located within the Critical Drainage Area should include a Drainage Strategy setting out and justifying the option(s) proposed, present supporting evidence, and include proposals for long term maintenance and management.
 8. Development will not be permitted without confirmation that sewage / wastewater treatment facilities can accommodate or will be improved to accommodate the new development, in advance of the development taking place.
 9. Where necessary, financial contributions will be sought for the maintenance and improvement of drainage infrastructure, fluvial and tidal flood defences, and erosion defences. Development should provide financial contributions, as necessary, to mitigate impacts on sewer network and to ensure no adverse effect on the integrity of any designated sites.



6.137 Flooding can come from a range of sources such as tidal inundation, flooding from rivers after heavy rainfall and flash flooding caused by rainfall running off hard surfaces or from fields in rural areas. The risks of flooding are a significant issue for the Plan Area. The policy seeks to ensure that adequate measures are in place to reduce the risk of flooding and to make Plymouth and South West Devon more resilient to the increased risks of flooding arising from climate change.

6.138 It is important that flood risk is carefully considered, including how new development is designed so as not to increase vulnerability. Where areas are vulnerable, risks should be managed through suitable adaptation measures.

6.139 Flood risk areas are divided into different categories: Flood Zone 1 consists of areas of no or low risk to flooding and Flood Zones 2, 3a and 3b are areas which are more likely to flood. Information on the sequential and exception tests are set out in the National Planning Policy Framework and Planning Practice Guidance. The sequential test steers new development to areas with the lowest probability of flooding, but allows also for an exceptions test where there are no reasonable alternative sites for the development. This can test whether there are wider sustainability benefits for the community, which might include the need for regeneration, developer contributions or reducing flood risk overall.

6.140 The policy supports national requirements for all major development to incorporate sustainable urban drainage systems (SUDS) and will also help by requiring design and drainage solutions which should lead to a reduction in the amount of rainwater reaching the sewers and water courses. and improvements to the capacity of particular water courses and sewers. Discharges of surface water flows to the combined sewer should be avoided as they can increase the risk of pollution of the water environment through releases from combined sewer overflows which in turn can have impacts on the water quality, especially bathing waters. Development should incorporate water efficient design principles, reducing water usage through sustainable water management, such as reuse of rainwater and other water use reduction measures. Flood risk management strategies for specific risk areas will be developed as necessary to help define and quantify essential infrastructure needs. The provision of high quality sustainable drainage systems need to be fully integrated into the design process, in addition to managing flood risk this will result in multiple environmental benefits for amenity, water quality, biodiversity and green infrastructure provision.

6.141 Plymouth City Council's Local Flood Risk Management Strategy sets out a drainage hierarchy which differs from the Devon County Council in that discharge of surface water to a waterbody is identified ahead of infiltration, both hierarchies are set out in the relevant Local Flood Risk Management Strategies. A number of factors have led to a different approach in Plymouth including the strategic location of waterbodies within Plymouth Surface Water drainage catchments, the presence of contaminated land, the dense urban nature of Plymouth and development sites restricting soakaway location, an underlying geology that varies locally combined with steep topography which can increase the risk of groundwater re-emergence. This approach is better able to support rain water harvesting by allowing surface water to be intercepted prior to discharge, which in turn had ecological and amenity benefits and also proves easier to adopt and maintain in an urban area.

6.142 In relation to coastal flooding, South Hams District Council and Plymouth City Council currently support the South Devon and Dorset Shoreline Management Plan policy. This is 'hold the line' for the majority of the Plymouth. Some areas, including parts of Start Bay, are in managed retreat or have a policy of no active intervention. Given the recent increase in frequency and severity of storms that have impacted on coastal villages, this position will continue to be monitored with the input of the relevant statutory partners. However, the LPAs must play their part by taking full account of coastal flood risk in the consideration of development proposals as

well as safeguarding undeveloped estuarine coastal margins. These play an important role in ensuring resilience to climate change, enabling habitat to migrate in response to sea level rise. They also provide a location for habitat creation to mitigate habitat loss elsewhere.

6.143 A number of different bodies have responsibility for managing flood risks. DEFRA has overall national responsibility for policy on flood and coastal erosion risk management. The Environment Agency is responsible for taking a strategic overview of the management of all sources of flooding and coastal erosion, for example setting the direction for managing risks through strategic plans, providing evidence and advice to inform policies and preparing National Flood and Coastal Risk Management Strategies. Lead Local Flood Authorities are responsible for developing and maintaining a strategy for local flood risk management in their areas and maintaining a register of flood risk assets. The Water and Sewerage Companies, such as South West Water, are responsible for providing and managing highway drainage and roadside ditches, and must ensure that road projects do not increase flood risk.

Policy DEV36

Coastal Change Management Areas

Inappropriate development, or any development that could add to the impacts of physical change to the coast, will not be permitted in the Coastal Change Management Area as designated on the Policies Map.

Where development and infrastructure needs to be relocated away from the Coastal Change Management Areas it will be permitted subject to the following criteria:

1. The new development is located in an area at less risk of coastal erosion.
2. The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, and local amenity.
3. The new development meets the requirements of policies on protected landscapes and the Undeveloped Coast.
4. The existing site is cleared and restored.
5. If it is a replacement proposal, the gross volume of the replacement building or structure is no larger than the one it is to replace.

Any development that includes any form of sea defence will require the submission of a vulnerability assessment, showing how the sea defence will not be to the detriment of adjacent or any other sections of coastline.



6.144 Although there are uncertainties regarding the extent and pace of sea level rise and coastal change, the Shoreline Management Plan has defined the over-arching strategy for managing the coast, identifying which sections of the coast should be protected and managed in the short (0 to 20 years), medium (20 to 50 years) and long term (50 to 100 years) through identifying Coastal Change Management Areas. Project delivery will be dependent on the funding available at the time, but through the Shoreline Management Plan the LPAs will seek to avoid coastal flooding risks to people, property and the historic and natural environment.

7 Delivery and monitoring

Delivering and monitoring the Joint Local Plan

This section explains the overarching approach to delivery and monitoring of the Joint Local Plan (JLP). This is a complex but crucial element of the planning process, and operates alongside broader approaches operated by each council in the context of their wider strategic planning processes (The Plymouth Plan, South Hams Our Plan and West Devon Our Plan). The need for new homes and jobs, for conservation and enhancement, and for the creation of a more sustainable future requires proactive management and delivery. Monitoring in this context is a positive tool by which to check that delivery remains on track and if not, to take corrective measures.

Strategic Objective SO12

Delivering infrastructure and investment

To take a proactive and co-ordinated approach to delivering the infrastructure and investment needed to realise the plan's vision and deliver its strategic objectives and policies. This will be achieved by:

1. Assessing infrastructure and investment needs to enable growth, remove barriers to investment and deliver sustainable communities.
2. Co-ordinating infrastructure and investment in the context of a long term perspective together with short and medium term resource planning.
3. Planning the delivery of infrastructure as growth takes place.
4. Identifying and managing the key risks to delivery of the Joint Local Plan and devising contingency scenarios.
5. Using developer contributions to help deliver the vision and mitigate any negative impacts of growth.
6. Creating supportive conditions that enable and encourage private, public and community sector investment in new homes, jobs and infrastructure.



Plan governance and delivery

7.1 Currently, decisions on the JLP are taken by the three constituent local authorities, advised by a Joint Member Group. Operationally, this is supported by a lead officer group and teams within the constituent local authorities who oversee delivery, monitoring and review.

7.2 To be delivered effectively the JLP relies on the co-operation of a wide range of different partners from the public, private and voluntary / community sectors. Nevertheless, this will be led by the local planning authorities. The partners involved in delivering each policy and, crucially, who specifically is leading, are identified in a summary table at the end of each section of the plan. The LPAs are committed to working flexibly, proactively and creatively so that the right conditions are in place to support investment in the plan's delivery.

7.3 With such a wide ranging set of objectives, there will be many mechanisms to secure delivery of the objectives of the plan. One of the key coordinating documents for the effective delivery of the JLP is a 'Plan for Infrastructure and Investment'. This will identify in detail how and when the development and infrastructure will be delivered to achieve the outcomes of the plan, setting out the anticipated delivery mechanisms and co-ordination of funding and investment programmes, and considering contingencies in the event that investment is deferred or not forthcoming. The key expected delivery mechanisms for each policy are identified in a summary table at the end of each section of the plan.

7.4 Clearly the planning system itself will be the key mechanism for delivery, through guiding private sector investment opportunities and managing the process of development in support of the plan's vision and objectives. Separate guidance will be published in the Supplementary Planning Documents (SPDs) for the Plymouth and Thriving Towns and Villages Policy Areas to amplify the policies of the plan and demonstrate how they are delivered in the context of the planning consents process.

7.5 Delivery of the JLP and the wider strategic plans of the three local authority areas relies also on a range of other interventions from the local authorities and their partners, including in relation to marketing, lobbying and presenting a clear and consistent message about the area's direction of travel and priorities. Corporate, service and business plans of our partners will therefore be expected to take their lead from the JLP.

7.6 The JLP also supports giving greater levels of power to local people both to enable them to take control of their own lives but also to influence their communities and the area as a whole. The more strategic approach to neighbourhood plans advocated elsewhere in this plan is one of the tools we can use to achieve greater personal and community engagement.

7.7 A JLP Delivery Schedule will be published to identify the key delivery agencies and mechanisms for each policy of the plan.

Infrastructure

7.8 Delivery of the JLP will require significant investment from many different partners and sectors. This will not just be in delivering the specific policies identified in the plan, but also in the infrastructure that is needed so that growth can take place in a socially, economically and environmentally sustainable way. Infrastructure includes the public systems, services, and facilities that are necessary for economic and social activity, including roads, schools, telecommunications, power and water supplies. Collectively, these constitute the physical and social foundations of a strong society.

7.9 Much of what is known as infrastructure is provided directly by agencies funded through customer charges e.g. water, electricity, and telecommunications. Whilst the local authorities have little direct input into the delivery of this infrastructure, it is essential that forward planning and co-ordination takes place to ensure that services are available in time and that economies of scale, including those derived from working together, are captured. This requires a high degree of collaborative working with infrastructure providers, agencies, the HoSW LEP, and local authorities across the sub region. Consultation has taken place with all relevant partners and an Infrastructure and Investment Forum has been established to enable this coordination to take place.

7.10 In order to secure sufficient funding for infrastructure the local authorities will take a proactive and creative approach to investment planning. This will enable us to bid more successfully to various national and LEP funding streams as well as being party to any devolution deal which could bring devolved funding. The objectives of the JLP are also defining the priorities for spend of CIL and S106.

7.11 Some of the infrastructure required to enable the city to achieve its growth and quality of life objectives will be provided outside of the region. For example, in order to improve rail journeys to and from the city, service and network enhancements will be required on the entire route to London. This will require a high level of lobbying and influencing, and joint working with national agencies, and Government.

7.12 Of particular significance is the provision of adequate sewage / wastewater treatment facilities, particularly in areas where development without the provision of adequate facilities could have an adverse effect on the integrity of a European Site, including the Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA. Provisions are included in Policy DEV35 to ensure that these facilities are able to accommodate or be improved to accommodate the impacts of the new development to avoid an adverse effect on European Sites.

7.13 To support the identification and delivery of infrastructure across the Plan Area, an Infrastructure Needs Assessment has been produced. This is an evidence based document rather than a policy document or strategy. It will be used to inform decisions on plans, programmes and priorities. It will also demonstrate to funding bodies and investors that the local authorities have a clear understanding of the area's infrastructure needs through to 2034. It provides an assessment of the funding required to achieve the aspirations for the Plan Area, and any gaps in funding provision, and hence will also support the review of the Community Infrastructure Levy for Plymouth and decisions over the use of Section 106 agreements. It is a 'living document' that will be kept up to date to ensure it remains relevant in response to opportunities, pressures and changes over time, such as technological advances. The Infrastructure Needs Assessment contributes to and supports the Plan for Infrastructure and Investment which is a key coordinating document and will effectively be the Infrastructure Delivery Plan for the JLP.

7.14 The starting point for identifying the area's infrastructure needs is the objectives, policies and site allocations set out in the JLP. Each of the overarching objectives together with each of the specific policies has been assessed to identify the need for infrastructure and what types of infrastructure are required. The local authorities have also worked together with other infrastructure providers to establish

their future intentions and to confirm their ability and the means by which they are able to respond to future growth, especially housing growth, and to respond to deficiencies in existing infrastructure provision.

7.15 The need for infrastructure is classified according to whether it is considered to be Critical, Necessary or Desirable and whether it is strategic or local infrastructure. The definition of strategic or local infrastructure is directly related to its spatial context within the Plan Area and the extent of its impact. For the Plymouth Policy Area, strategic infrastructure will have a significant wider impact for the city or a Growth Area as well as the immediate location. For the Thriving Towns and Villages Policy Area, strategic infrastructure will have a significant impact for the six Main Towns. In both the Plymouth Policy Area and the Thriving Towns and Villages Policy Area, local infrastructure will have significance for a site or its immediate area. The categorisation of infrastructure is based on the following criteria:

- **Critical** - Some infrastructure will be identified as being 'critical'. This means that the delivery, improvement or maintenance of the infrastructure is critical because of the consequences of not providing it in a short time frame, or because growth is unlikely to happen in the timeframe envisaged unless the infrastructure in question is put in place 'up front'. It is especially important to identify how and when such infrastructure can be secured so that risks to its timely delivery can be reduced and to ensure that this does not undermine the delivery of the spatial strategy of the JLP or a specific requirement of the plan, e.g. the delivery of a strategic growth area vision in Plymouth or strengthening the role of the six Main Towns in South Hams or West Devon. The Critical designation applies to projects that are deliverable within the first 10 years of the JLP, i.e. the Short and Medium Term (not including projects completed or commenced since 2014). Critical projects will normally apply only to Education, Flood Defence and Drainage and Transport infrastructure together with other essential 'enabling infrastructure', infrastructure that addresses key Utilities deficiencies, and infrastructure that mitigates impacts on protected environmental designations.
- **Necessary** - Most of the infrastructure identified will be classed as 'necessary' to achieving one or more of the plan's strategic objectives. This means that it does not necessarily need to be implemented 'up front' to unlock development and growth but can be implemented as development takes place, or over time as resources become available. It does however identify that it will be necessary to provide the infrastructure.
- **Desirable** - Some infrastructure will be identified as being 'desirable' rather than 'necessary'. This is because whilst its provision will support the plans and will be of genuine benefit, the achievement of the fundamental objectives of the plan is not reliant on its implementation.

7.16 Significant infrastructure interventions required to deliver the overall thrust of the plan and its key objectives are listed in Annex 1. The series of infrastructure policies are contained within the respective chapters to reinforce the inseparable connection between development, infrastructure and local communities. Annex 1 isn't an exhaustive list, for example it doesn't include all projects commenced or completed since 2014, but it does identify future interventions that are fundamental

to the JLP, especially during the first 5 years of delivery. The Infrastructure Needs Assessment provides a complete list of infrastructure interventions at the time of Plan submission.

Planning obligations, the Community Infrastructure Levy and development viability

7.17 A positive approach to delivery of development and its relationship to communities, infrastructure and the environment is critical to the achievement of the plan's vision and strategic outcomes. This will involve making proactive use of the legal and policy tools available to the LPAs to accelerate the delivery of development, especially housing and job-creating projects, and ensure that it takes place in a way that helps deliver sustainable development.

7.18 When assessing a planning application, the LPAs can take into account specific conditions, restrictions, activities or operations which would make the development proposal acceptable in planning terms. These are referred to as 'planning obligations' and can be used not only to mitigate the impacts of development but also to prescribe uses and secure policy compliance, such as affordable housing, and compensation for facilities lost through development. Planning obligations (delivered through what are known as 'Section 106 agreements') are also an established and valuable mechanism for securing developer contributions towards meeting the infrastructure needs of a development.

7.19 Additionally, Plymouth City Council operates a Community Infrastructure Levy (CIL). CIL is a charge which local authorities can place on developers to help fund infrastructure needed to support new development in their areas. To charge CIL the authority must have an adopted CIL Charging Schedule in place. CIL partially replaces the Section 106 planning obligations process by reducing the range of infrastructure types or projects for which it will be appropriate to secure planning obligations for. Unlike planning obligations, CIL receipts from a particular development are not earmarked for particular infrastructure. Instead, CIL monies are pooled into one fund which can be used to pay for a wide range of community infrastructure (strategic, citywide and local) that is required to support the needs of sustainable development. CIL authorities are required to maintain a list, prepared under Regulation 123 of the CIL Regulations, which sets out the infrastructure that can be funded by CIL. Plymouth's CIL Charging Schedule, which came into effect on 1 June 2013, is currently under review.

7.20 Development viability is a critical issue in the Plan Area, given the importance of the agenda for growth, affordable housing and sustainable development. Whole plan viability has been assessed, and as a result, infrastructure asks, affordable housing requirements and other policy costs have been set at a level that does not put in jeopardy the overall development ambitions of the plan. However, viability challenges can exist on specific sites. Where this is the case, viability appraisals are a key and necessary tool to help achieve sound planning judgements. They enable decisions to be reached securing the appropriate balance between the policy and infrastructure benefits, and the benefits of the development itself.

7.21 Policy DEL1 sets out the policy approach that the LPAs will take in considering planning applications and in planning negotiations. This will be amplified into specific guidance in the two SPD documents, which will also include detailed provisions relating to how development must meet its statutory obligations to avoiding adverse impact on the integrity of European sites.

Policy DEL1

Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy

The LPAs will take a positive and strategic approach to the use of their powers in relation to planning consents, planning obligations or agreements and, for Plymouth, the Community Infrastructure Levy (CIL), in order to accelerate the delivery of development and secure developer contributions to meet the infrastructure needs of the city. This approach will involve:

1. Positive use of planning conditions (including where appropriate varying from the standard three year time consent for commencement of development) to encourage early delivery and a strong pipeline of projects.
2. Positive use of CIL for the securing of developer contributions towards Plymouth's infrastructure requirements.
3. Seeking to negotiate planning obligations where they are needed to:
 - i. Prescribe the nature of the development so that it meets policy requirements (such as the delivery of affordable housing).
 - ii. Offset the loss of any significant amenity or resource through compensatory provision elsewhere (such as an impact on wildlife, loss of employment uses, loss of community facilities).
 - iii. Provide for the ongoing maintenance of facilities provided as a result of the development, or secure commuted maintenance sums for facilities that a developer would like the responsible agency to adopt.
 - iv. Mitigate the impact of development on infrastructure, including its cumulative impact, through direct provision or a financial infrastructure contribution, including on natural infrastructure and European sites.
4. Maximising the effectiveness of developer contributions secured through prioritising their use as a match funding / gap funding source, linked to other infrastructure funding, and through programming spend in accordance with a 'Plan for Investment and Infrastructure'.
5. Requiring robust viability evidence to be submitted where a developer contends that planning obligations sought, including for affordable housing, would make a proposal economically unviable. The LPAs will seek an open book approach in these cases. In determining whether or not to

grant planning permission, the LPAs will have regard to the overall economic, social and environmental benefits of the development and whether, on balance, some relaxation of planning obligations is justified.



Monitoring, management and review

7.22 Monitoring and management is critical to the delivery of the JLP. It provides an understanding of how the plan is progressing against its targets, and whether the approach needs to be changed. It is an integral part of the Plan. It also enables the Protected Characteristics of the Equality Act 2010 and any Significant Effects identified in the SA and HRA to also be included within the monitoring regime.

7.23 Monitoring of the JLP will have three distinct components:

1. The overall direction will be tracked to ensure that it is making sufficient and timely progress towards the Vision and expected outcomes. Each Strategic Outcome has a set of measures of success attributed to it, and there is also a suite of 30 key indicators and targets. Together they will provide a comprehensive picture of the direction of travel of the plan.
2. Monitoring of the detailed delivery of the plan, as contained within the policies, and associated delivery plans.
3. The LPAs will monitor housing delivery to ensure the requirements of the NPPF are being met to show how each LPA is contributing to delivering new homes as envisioned by the strategy and policies set out in the JLP, and chiefly to demonstrate that growth is taking place across the two policy areas as set out in the spatial strategy. LPA housing monitoring indicative requirements are set out as Indicator I1a in Annex 2 of the JLP.

7.24 The high level monitoring will be a combination of a number of factors including:

1. Key Indicators with baseline and targets where appropriate. Existing indicators and measuring regimes have been used wherever possible. These are shown in Annex 2.
2. Physical milestones - expected dates of completion of significant events for key 'flagship' projects.
3. Community inputs - community insight into the state of the area and perceived progress of the plan on the ground.
4. Partner inputs – commentary from partners, and neighbouring authorities on how the delivery of the plan is progressing

7.25 Monitoring of housing delivery will be against the five year land requirement set out in the Spatial Strategy above.

7.26 Monitoring of the detailed delivery will be by way of more detailed indicator sets and other intelligence. This will be through a joint Authorities Monitoring Report. Where there is a clearly identifiable need for co-ordination across a number of policies, mechanisms will be established that ensure that the evidence gathering, analysis and subsequent resource allocation can be effectively co-ordinated. Management of the plan will enable the results of monitoring to be turned into useful analysis and intelligence able to influence decision making and review. Contextual indicators will be assessed together with horizon scanning to give a full picture for decision making.

7.27 The results of monitoring will be reported annually through the Authorities Monitoring Report. This will also include reporting on CIL and S106, as well as identifying the infrastructure that has been delivered (particularly as a result of the CIL and S106 income received), and the key items of infrastructure that remain to be delivered.

7.28 There will be a full review of the JLP every five years from adoption which is anticipated to be during 2017/18. The first review therefore is likely to be in 2022/23.

7.29 Where monitoring identifies issues that require a change to be made to the plan itself, these will be collected and dealt with at the next five yearly review unless they are so significant that they precipitate an earlier urgent review. A risk based approach is being used to identify those matters that may be so significant that major deviation or delay from the target trajectory could put the overall delivery of the Plan's objectives in jeopardy.

7.30 Where monitoring identifies issues that can be dealt with through changes to delivery plans, a review of the JLP will not be necessary but an interim policy statement will need to be prepared and consulted upon by the LPAs concerned.

Risk, flexibility and contingency

7.31 A certain degree of flexibility is built into the plan to allow for changes in circumstances that may impact on delivery, and this is reflected in the relevant chapters. To assess the robustness of policies against more major or unforeseen circumstances, a risk assessment has been undertaken to identify the extent to which a delay or failure of a particular initiative, might have a significant impact on the delivery of the plan's overall objectives. The approach taken to identify the significance and robustness of each policy is shown in the table below.

Scale of impact on Plan outcomes	x	Likelihood of difficulties / failure	=	Robustness and significance risk rating
Influencing factors: Relevance to delivery of key objectives Geographical influence		Influencing Factors: Large number of partners Broad scale and scope of policy		Policies that have a high impact and/or a high likelihood of difficulties will be closely monitored in the Contingency Plan

Scale of impact on Plan outcomes	x	Likelihood of difficulties / failure	=	Robustness and significance risk rating
Numbers of beneficiaries Scale of financial impact Scale of non-financial impact		Untested interventions Amount of funding required Challenging targets Changing regulatory environment Impacted by changes in global conditions		

7.32 External factors will undoubtedly play a significant part in the success or otherwise of achieving the plan's objectives. We shall therefore continue to scan the contextual indicators that might have a bearing on our own local objectives, to seek to understand better how these might have a local impact. An example might be where a dip in the national economy reduces confidence in the housing market, leading to lower house building rates. Whilst we have limited control over these national and sometimes international trends, we do need to understand how these might impact on achieving our plan objectives, and take whatever remedial action we can.

7.33 A key element of any plan therefore is to identify the key risks to its successful delivery, and what can be done if things start going wrong. The starting point is to identify the key areas that are absolutely critical to the overall success of the plan. The second element is to then identify the trigger points (the "What if...?") that might highlight the need to consider alternatives. The third is to consider what measures need to be taken to help the Plan get back on course.

7.34 In addition to the actions that characterise our proactive approach to delivery, identified in para 3.32 above, there are also some generic set of measures that can be taken to address any contingency issue. These include:

- Identifying the reasons for under-performance.
- Discussing with partners alternative options for delivery.
- Reviewing the opportunity sites to see if replacement allocations can be brought forward.
- Reviewing the evidence base to identify alternative delivery options.
- Working with developers and landowners to review sites to improve viability or suitability.
- Working with infrastructure providers to review scheme delivery.
- Identifying additional sources of finance.

- Review targets and outcomes or delivery timescales.
- Bring forward review of the plan.

7.35 More detailed measures that might need to be taken in relation to specific key risks are identified in the Plan Contingency Measures in Annex 3.

8 Annex 1

INFRASTRUCTURE SCHEDULE

Infrastructure provided for or safeguarded / promoted in the plan:	Identified in Policy:
Strategic connectivity	
Plymouth airport	SPT8; PLY42
Port infrastructure	SPT8
Plymouth Railway Station improvements	SPT8; PLY16
Strategic rail network	SPT8
Strategic road network	SPT8
Digital connectivity	SPT8
Plymouth Policy Area – City Centre & Waterfront Growth Area	
Port infrastructure	SPT8
Plymouth Station	PLY16
History Centre	PLY18
Central Park Master Plan	PLY19
Central Park (Sports Plateau)	PLY19
Sutton Harbour trail	PLY23, 24, 25, 26
Sutton Harbour fish quay	PLY26
Water transport infrastructure	PLY20, 29
Millbay Boulevard	PLY7, 30, 31, 37
Millbay Arena	PLY31
South Yard (Oceansgate)	PLY33
City Centre Public Realm	PLY6, 37
Cruise Ship Terminal	PLY37
Sutton Harbour Lock Gate	PLY37
Sutton Harbour – West Pier	SPT8; PLY37
Strategic Drainage Corridor (Millbay and City Centre)	PLY37
Pilgrim (Mayflower 400) Public realm Improvements	PLY37

Infrastructure provided for or safeguarded / promoted in the plan:	Identified in Policy:
Plymouth coach station	PLY37
Mayflower Experience	PLY37
City Centre School	PLY37
The Breakwater, Plymouth Sound	PLY37
<p>Strategic Transport Measures</p> <ul style="list-style-type: none"> - Charles Cross Roundabout improvements - Millbay Cruise Ship Terminal local network improvements - Intelligent Transport Systems - St Andrews Cross roundabout - A374 Octagon to Derry's Cross - A374 Western Approach - A374 / A386 North Cross roundabout - Royal Parade improvements - A379 Exeter Street - Strategic Cycle Network - City Centre parking improvements 	PLY37
City Centre / Waterfront Strategic Cycling and Walking network improvements	PLY37
Plymouth Policy Area – Derriford & Northern Corridor Growth Area	
Derriford Commercial Centre transport infrastructure	PLY38
Derriford Health and Wellbeing Hub and community infrastructure	PLY38
Glacis Park Green Corridor	PLY39
Derriford Community park	PLY41
Woolwell urban extension Primary School	PLY44
Woolwell Community Park	PLY44

Infrastructure provided for or safeguarded / promoted in the plan:	Identified in Policy:
Woolwell community and sports infrastructure	PLY44
Plym Valley Strategic Greenspace	PLY45
SWW Treatment Works	PLY47
Derriford Primary School	PLY47
Plymouth to Tavistock rail link	PLY47, SP5
Strategic Transport Measures (see below) <ul style="list-style-type: none"> - Marjon Link Road - Northern Corridor junction improvements - A386 Derriford Transport Scheme - Derriford Hospital interchange - Strategic Cycle Network - Forder Valley Link Road - Forder Valley A38 interchange - Woolwell to The George, A386 dualling scheme - A38 Manadon Junction to Crownhill - A38 Manadon Junction - Derriford Car Park (public) - Improved Northern Corridor Park and Ride sites and services - B3250 Mannamead Road - A386 Outland Road - Morlaix Drive / Brest Road 	PLY47
Northern Corridor Strategic Cycling and Walking network improvements	PLY47
Plymouth Policy Area – Eastern Corridor Growth Area	
Sherford Primary Schools (3)	PLY48
Sherford Sports Recreation facilities (sports facility, swimming pool, outdoor playing pitches and courts)	PLY48

Infrastructure provided for or safeguarded / promoted in the plan:	Identified in Policy:
Sherford Secondary School	PLY48
Sherford Community Facilities (town hall, library, youth centre, multi-faith building)	PLY48
Sherford Health and Social Care Centre	PLY48
Sherford Community Park	PLY49
Saltram Meadow Primary School	PLY50
Plympton Primary School (West Park Hill)	PLY52
Saltram Countryside Park	PLY54
Cemetery, Crematorium, Memorial Facilities	PLY54, 57
<p>Strategic Transport Measures</p> <ul style="list-style-type: none"> - Stanborough Cross - Deep Lane junction improvements - A38 Deep Lane junction improvements (South) - Eastern Corridor junction improvements - Marsh Mills MOVA improvements - Strategic Cycle Network – improvements / expansion - Pomphlett roundabout to The Ride – capacity / bus priority - Cattedown roundabout – capacity / bus priority - Deep Lane Park and Ride - Langage southern access road - A374 / B3416 Plymouth Road and key junctions in Plympton (to include B3416 MOVA improvements) - St Mary’s Bridge – capacity / bus priority - Tavistock Junction – improved rail / freight facilities - Stanborough Cross / Haye Road – capacity / bus priority 	PLY57, 53
Eastern Corridor Strategic Cycling and Walking network improvements	PLY57

Infrastructure provided for or safeguarded / promoted in the plan:	Identified in Policy:
European Marine Site	SPT14
Plymouth Policy Area - other	
High quality public transport network	SPT10
Expansion of early years places, primary school, secondary school and special needs provision where required	SPT13
Her Majesty's Naval Base and Dockyard	PLY4
Western Corridor park and ride	PLY62
A3064 St Budeaux Bypass / Wolseley Road / Camels Head junction	PLY62
Western Corridor Strategic Cycling and Transport network improvements	PLY62
Improvements to the A38 trunk road and its main junctions (including the Weston Mill junction and widening of the A38 between Weston Mill junction and Forder Valley junction).	PLY62.1
Thriving Towns and Villages Policy Area – Main Towns	
Road linking Crediton Road to Exeter Road in Okehampton	TTV3
A386 improvements between Tavistock and Plymouth (subject to a further study to identify key interventions, all modes to be considered, and including consideration to cycle route and public transport measures)	TTV3
Improvements to rail infrastructure in Okehampton and Tavistock	TTV3
Connectivity across and along the River Dart will be improved by increasing the number of ferry services and their frequency, including a 24 hour service between Noss Marina and Dartmouth (this will be delivered through the Noss on Dart development)	TTV3, 4, 6
Expansion of early year places, primary school and secondary school provision where required	TTV3
Expansion of special educational needs places	TTV3
Totnes flood defence scheme	TTV3
Victoria Road, Dartmouth, flood alleviation scheme	TTV3
Kingsbridge flood alleviation scheme	TTV3

Infrastructure provided for or safeguarded / promoted in the plan:	Identified in Policy:
Improved access to the south of the A38 from the east of Ivybridge	SP2
New primary school in east of Okehampton and relocation of post 16 provision at Okehampton College	SP4
Okehampton town centre traffic management / access road	SP4
New primary school to west of Tavistock	SP5
Improvements to Tavistock secondary school facilities	SP5
Totnes traffic flow management	SP6
Tongue End Cross – Junction of A30 and B3260 minor scheme	TTV15.2

9 Annex 2

PLAN TARGETS AND DIRECTION OF TRAVEL INDICATORS

Measure of Success	Key Indicators	JLP Target (by 2034)
Meeting the housing and employment numbers	I1. Total homes consented and built (including brownfield and windfall)	P: 19,000 TTV: 7,700
	I1a Total homes consented and built (including brownfield and windfall) by Local Planning Authority area (base date – 1 April 2014)	PCC: 13,200 WDBC: 3,200 SHDC: 5,800 in Plymouth Policy Area; 4,500 in TTV Policy Area
	I2. Total affordable homes consented and built	P: 4,550 TTV: 2,050
	I3. Total employment land/floorspace consented and built (including office)	P: 93,000m ² (offices) P: 51,000m ² (industrial) P: 99,000m ² (storage) TTV: 24,000m ² (offices) TTV: 18,100m ² (industrial) TTV: 27,600m ² (storage)
	I4. Total retail consented and built	P: 1,900m ² (food) P: 26,200m ² (non food) TTV: 720m ² (food) TTV: 14,000m ² (non food)

Measures of Success	'Direction of travel' indicators
SPATIAL STRATEGY	
Distribution of growth is concentrated in sustainable locations	I5. Quantity / distribution of housing and employment development between the policy areas
Meeting the housing and employment numbers	I6. Housing numbers and employment floorspace delivered, and total jobs.
Increases in the options available for widening travel choice, and increases in the use of active and sustainable options	I7 Travel used for journey to work: car or van I8 Railway station passenger footfall in key stations I9 % deaths attributable to particulate air pollution.
Improvements to the quality and resilience of the area's transport and digital connectivity	I10 Train journey time between Plymouth and London. I11 Tonnage / passenger numbers through Plan Area ports. I12 % of population and businesses with access to superfast broadband.
The area's stunning setting, maritime heritage, quality environment and natural assets continue to be protected and harnessed	I13 Amount of new strategic greenspace delivered I14 Water body classification and bathing water quality. I15 Air quality – nitrogen. I16 Carbon emissions.
PLYMOUTH'S STRATEGIC ROLE	
Plymouth recognised as a key regional economic driver	I17 Plymouth's population I18 GVA per hour (index). I19 Number of jobs

Measures of Success	'Direction of travel' indicators
SPATIAL STRATEGY	
High quality strategic services and facilities that serve the people of Plymouth and the sub-region	I20 City Centre market share of catchment area
Safeguarding and strengthening of Plymouth's strategic defence role	I21 Number of jobs in Dockyard and Naval Base.
CITY CENTRE AND WATERFRONT GROWTH AREA	
City Centre is renewed and enhanced	I22 Retail premises vacancy rate
Waterfront has been transformed	I23 Visitor spend.
DERRIFORD AND NORTHERN CORRIDOR GROWTH AREA	
Derriford district centre delivered providing the catalyst for a new heart in the north of Plymouth.	I24 Delivery progress.
Major northern corridor transport infrastructure has been delivered to unlock growth potential of the area.	I25 Delivery progress.
EASTERN CORRIDOR GROWTH AREA	
All of the areas's strategic housing sites have significantly progressed to completion.	I26 Delivery progress.
The area's strategic greenspace projects are delivered.	I27 Delivery progress.
THRIVING TOWNS AND VILLAGES	
The housing and employment requirement for the TTV Policy Area is provided for in accordance with the settlement hierarchy	I28 Quantity / distribution of housing and employment development across the settlement hierarchy
Each of the Main Towns has sustained and strengthened their role in providing a broad range of services for the wider rural area	I29 Vacancy rate of different use classes.
Neighbourhood plans have driven the delivery of sustainable and thriving rural communities.	I30 Number of Neighbourhood Plans adopted.

10 Annex 3

PLAN CONTINGENCY MEASURES

10.1 These are in addition to the generic contingency measures identified in para 7.32 of the JLP.

Significant issue, and rationale	Review triggers (ie What if....?)	Contingency options
Meeting the housing numbers	Inability to demonstrate a five year supply to meet the needs of the HMA	a. Apply the implementation measures set out in para. 3.32 2 of the plan b. This may be one of the issues that could trigger an early Review of the Plan
Meeting the employment numbers	Insufficient land supply is available to enable employment development	a. Review the opportunity sites to bring forward replacement allocations b. This may be one of the issues that could trigger an early Review of the Plan
Meeting the affordable housing numbers	5 year average affordable housing completions fall short of the required trajectory	a. Work with partners to intensify the delivery of affordable homes by other 'direct' means b. Adjust the S106/affordable housing balance to achieve more affordable housing
Distribution of growth	Delivery is not distributed according to this hierarchy	a. Ensure development management policies are being fully implemented b. This may be one of the issues that could trigger an early Review of the Plan
Infrastructure and investment	Investment and funding fails to ensure delivery of key infrastructure	a. Review alternative funding sources b. Review the opportunity sites to bring forward replacement allocations which are not dependant on new infrastructure c. Use 5 year Local Plan review process to review strategic alternative distribution strategies in light of the then prevailing investment funding context.

Significant issue, and rationale	Review triggers (ie What if....?)	Contingency options
Natural assets	Strategic natural infrastructure not delivered as planned	<ul style="list-style-type: none"> a. Look to secure further funding b. Accelerate build programme c. Find alternative sites to make provision
Plymouth as economic driver	Plymouth not becoming a major economic driver, higher value sectors not growing	<ul style="list-style-type: none"> a. Assess nature of issue (eg inward investment / business growth/decline / specific sector / skills/skills retention issue) b. Strengthen issue specific interventions in the local economy, increasingly targeting resources on high value sectors c. Work further with universities on high value sector growth, graduate retention etc.
Plymouth's role as regional city and focus for services for the wider area	The city fails to build on its role as regional service centre (key indicator I23)	<ul style="list-style-type: none"> a. Identify the causes. b. Intensify measures to support further investment in strategic services such as health, sports, culture, hospitality and higher education c. Investigate further support for economic initiatives to increase, in particular, knowledge based industries, the marine, medical and health, and advanced manufacturing sectors, growth within the City Centre, Waterfront and Derriford, and strategic connectivity
City Centre	Key City Centre site allocations not delivered or delayed - Colin Campbell Court, Civic Centre, History Centre and Railway station	<ul style="list-style-type: none"> a. Identify the cause of the blockages b. Work with stakeholders / funders / partners to unblock development c. Working with partners, intensify the proactive housing delivery interventions d. Review the opportunity sites to bring forward replacement allocations e. Where the issue is viability, review the CIL charging schedule f. Bring forward a new part Local Plan identifying new allocations

Significant issue, and rationale	Review triggers (ie What if....?)	Contingency options
Waterfront	Site allocations at Millbay Waterfront, Bath Street (E&W), Stonehouse Barracks not delivered on schedule	<ul style="list-style-type: none"> a. Working with partners, intensify the proactive housing delivery interventions b. Review the opportunity sites to bring forward replacement allocations c. Where the issue is viability, review the CIL charging schedule d. Bring forward a new part Local Plan identifying new allocations
Derriford and northern corridor	Site allocations at Seaton neighbourhood, Plymouth Airport, Woolwell, Glacis Park, Derriford Commercial centre, not delivered on schedule	<ul style="list-style-type: none"> a. Identify the cause of the blockages b. Work with stakeholders / funders / partners to unblock development c. Working with relevant stakeholders, intensify the use of proactive housing delivery interventions d. Potential use of compulsory purchase powers e. Review the opportunity sites to bring forward replacement allocations f. Where the issue is viability, review the CIL charging schedule g. Bring forward a new part Local Plan identifying new allocations
Eastern corridor	Site allocations at Sherford and Saltram Meadow not delivered on schedule	<ul style="list-style-type: none"> a. Working with partners, intensify the proactive housing delivery interventions b. Review the opportunity sites to bring forward replacement allocations c. Where the issue is viability, review the CIL charging schedule d. Bring forward a new part Local Plan identifying new allocations

Significant issue, and rationale	Review triggers (ie What if....?)	Contingency options
Main towns of Thriving Towns and Villages	Failure to ensure competitive town centres	<ul style="list-style-type: none"> a. Identify the causes of decline b. Ensure development management policies are being fully implemented. c. Intensify measures to promote evening uses and diversification, improve transport and accessibility, make use of upper floors, and promote business initiatives and events d. Bring forward alternative development sites and adopt flexible approach to enlargements and conversions of existing premises
Local housing need in the TTV area	Neighbourhood plans are slow to come forward or do not deliver needed	<ul style="list-style-type: none"> a. Subject to the level of under delivery, prepare separate planning studies which identify new sites, and which will be an evidence base input to the next review of the local plan.

11 Annex 4

JOINT LOCAL PLAN EVIDENCE BASE

Reference	Document Title	Author	Date
TOPIC PAPERS			
TP1	Housing Distribution Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	November 2016
TP2	Thriving Towns and Villages Settlement Boundary Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	March 2017
TP3	Housing Topic Paper (Provision and Supply)	Plymouth City Council, South Hams District Council and West Devon Borough Council	March 2017
TP3(rev)	Revised Housing Topic Paper (Provision and Supply)	Plymouth City Council, South Hams District Council and West Devon Borough Council	January 2018
TP3(rev2)	Revised Housing Topic Paper (Provision and Supply) Addendum	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
TP3(rev2)A	Revised Housing Topic Paper (Provision and Supply) Addendum (tracked changes)	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
TP3A	Joint Local Plan Area Housing Trajectory	Plymouth City Council, South Hams District	March 2017

Reference	Document Title	Author	Date
		Council and West Devon Borough Council	
TP3Ai	Joint Local Plan Area Housing Trajectory (reformatted TP3A)	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2017
TP3B	Plymouth Policy Area Housing Trajectory	Plymouth City Council, South Hams District Council and West Devon Borough Council	March 2017
TP3Bi	Plymouth Policy Area Housing Trajectory (reformatted TP3B)	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2017
TP3C	Thriving Towns and Villages Policy Area Housing Trajectory	Plymouth City Council, South Hams District Council and West Devon Borough Council	March 2017
TP3Ci	Thriving Towns and Villages Policy Area Housing Trajectory (reformatted TP3C)	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2017
TP3D	Housing Topic Paper (Provision and Supply): Errata List	Plymouth City Council, South Hams District Council and West Devon Borough Council	July 2017
TP3E	Joint Local Plan Area Housing Trajectory updated to the March 2017 monitoring point	Plymouth City Council, South Hams District Council and West Devon Borough Council	November 2017

Reference	Document Title	Author	Date
TP3F	Plymouth Policy Area Housing Trajectory updated to the March 2017 monitoring point	Plymouth City Council, South Hams District Council and West Devon Borough Council	November 2017
TP3G	Thriving Towns and Villages Policy Area Housing Trajectory updated to the March 2017 monitoring point	Plymouth City Council, South Hams District Council and West Devon Borough Council	November 2017
TP3H	Plymouth Policy Area Housing Trajectory Agreement	Plymouth City Council, South Hams District Council and West Devon Borough Council	November 2017
TP3I	Thriving Towns and Villages Housing Trajectory Agreement	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
TP3J	Joint Local Plan Area Housing Trajectory March 2017 Monitoring Point, incorporating proposed Main Modifications	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
TP3K	Plymouth Policy Area Housing Trajectory March 2017 Monitoring Point, incorporating proposed Main Modifications	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
TP3L	Thriving Towns and Villages Policy Area Housing Trajectory March 2017 Monitoring Point, incorporating proposed Main Modifications	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018

Reference	Document Title	Author	Date
TP4	Employment Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	July 2017
TP4(rev)	Revised Employment Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
TP4(rev)A	Revised Employment Topic Paper (tracked changes)	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
TP5	Strategy Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	July 2017
TP6	Governance Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	January 2018
TP6(rev)	Revised Governance Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	March 2018
TP7	Development in Plymouth's Urban Fringe Topic Paper	Plymouth City Council, South Hams District Council and West Devon Borough Council	October 2018
ECONOMY			

Reference	Document Title	Author	Date
EC1	Torridge DC, South Hams DC, West Devon BC and North Devon DC Employment Land Review	GVA Grimley	December 2006
EC2	Plymouth District and Local Centres Study	Cushman & Wakefield LLP	November 2010
EC3	Plymouth Retail and Centres Study	Roger Tym & Partners	May 2012
EC3A	Retail and Centres Study – Final Report Volume 2: Retail Expenditure and Capacity Tables	Roger Tym & Partners	May 2012
EC3B	Retail and Centres Study – Final Report Volume 3: Retail Impact Assessment Tables	Roger Tym & Partners	May 2012
EC4	Facilitating Economic Growth in South Hams and West Devon	JOHT Resources Ltd	May 2014
EC5	Plymouth Hotel Market Study	Colliers International	September 2014
EC6	Employment Land Review 2011 to 2031	ARUP	March 2015
EC6A	Employment Land Review 2011 to 2031: Schedule of Sites	Plymouth City Council	July 2015
EC7	Productivity and Wider Economic Impact Study: Peninsula Rail Task Force	Parsons Brinkerhoff	April 2015
EC8	Plymouth and South West Devon Joint Local Plan: Assessment of Employment Forecasts	PBA on behalf of Plymouth City Council, South Hams District Council and West Devon District Council	February 2017
EC9	Plymouth Retail Study 2017	Bilfinger/GVA	February 2017

Reference	Document Title	Author	Date
EC10	Retail and Leisure Study	PBA on behalf of South Hams District Council, West Devon Borough Council	February 2017
EC10A	Retail and Leisure Study: Appendices	PBA on behalf of South Hams District Council, West Devon Borough Council	February 2017
EC11	Review of City, District and Local Centres in Plymouth for the Joint Local Plan	Plymouth City Council	March 2017
EC12	Tavistock Town Benchmarking Report 2013	Mike King	2013
EC13	Okehampton 2014 Town Benchmarking Report	People and Places	May 2015
EC14	Tavistock 2014 Town Benchmarking Report	People and Places	May 2015
EC15	Okehampton 2016 Town Benchmarking Report	People and Places	December 2016
EC16	Tavistock Town Benchmarking Report	People and Places	January 2017
ENVIRONMENT			
EN1	Plymouth Sound and Estuaries Water Transportation Study	Scott Wilson	March 2004
EN2	Plymouth Waterfront Characterisation Study	Alan Baxter and Associates	June 2006
EN3	Plymouth Sound and Estuaries Coastal Planning Study: Project Report	Royal Haskoning	September 2006
EN3A	Plymouth Sound and Estuaries Coastal Planning Study: Key Guidance	Royal Haskoning	September 2006

Reference	Document Title	Author	Date
EN3B	Plymouth Sound and Estuaries Coastal Planning Study: Figures 1 to 4	Royal Haskoning	September 2006
EN4	Plymouth's Green Space Strategy 2008 to 2023	Plymouth City Council	April 2009
EN4A	Plymouth's Green Space Strategy 2008 to 2023: Appendices	Plymouth City Council	April 2009
EN4B	Plymouth's Green Space Strategy 2008 to 2023: Background Report	Plymouth City Council	April 2009
EN5	Plymouth's Green Infrastructure Delivery Plan	Plymouth City Council	June 2010
EN6	A Review of Renewable Energy Resource Assessment and Targets for Devon	University of Exeter	March 2011
EN7	Analysis of Carbon Reduction Policies for Plymouth	University of Exeter	June 2011
EN8	Shoreline Management Plan Review (SMP2) Durlston Head to Rame Head	Halcrow on behalf of South Devon & Dorset Coastal Advisory Group	June 2011
EN9	Devon Landscape Policy Group Advice Note No.2: Accommodating Wind and Solar PV Developments in Devon's Landscape	LUC	June 2013
EN10	Plym Valley Connections Heritage Lottery Fund Project: Landscape Character and Heritage Assessment	LDA Design	August 2013

Reference	Document Title	Author	Date
EN10A	Plym Valley Connections Heritage Lottery Fund Project: Landscape Character and Heritage Assessment – Figures	LDA Design	August 2013
EN11	The South West – Extreme Weather Resilience: 2012 and Early 2013 Report	Cornwall Council, Devon Country Council, Plymouth City Council, Somerset County Council, Torbay Council, Cornwall & Isles of Scilly Local Enterprise Partnership, Heart of the South West Local Enterprise Partnership	February 2014
EN12	Analysis of Carbon Targets for Plymouth City Council: 2014	University of Exeter	April 2014
EN13	Waterfront Evidence Base	Plymouth City Council	July 2014
EN14	Review of Waste Strategy, Future Needs and Sites	AMEC Environment & Infrastructure UK Limited	August 2014
EN15	Solar Optimisation Report	Brooks Development Practice Ltd	September 2014
EN16	Plymouth District Heating: Millbay Heat Network Feasibility Study	BuroHappold Engineering	November 2014
EN17	Playing Pitch Strategy: Needs Assessment, South Hams and West Devon	NAA	January 2015
EN18	South Hams Green Infrastructure Framework	South Hams District Council	April 2015

Reference	Document Title	Author	Date
EN18A	South Hams Green Infrastructure Framework: Appendices	South Hams District Council	April 2015
EN19	West Devon Green Infrastructure Framework	West Devon Borough Council	April 2015
EN19A	West Devon Green Infrastructure Framework: Appendix 1	West Devon Borough Council	April 2015
EN19B	West Devon Green Infrastructure Framework: Appendix 2	West Devon Borough Council	April 2015
EN19C	West Devon Green Infrastructure Framework: Appendix 3	West Devon Borough Council	April 2015
EN20	Plan for Playing Pitches 2015 to 2018	NAA	April 2015
EN20A	Plan for Playing Pitches 2015 to 2018: Appendices 1 to 4 and NA1, 2 and 4	NAA	April 2015
EN20B	Plan for Playing Pitches 2015 to 2018: Appendix NA3	Plymouth City Council	April 2015
EN21	South Hams and West Devon Playing Pitch Strategy	NAA	November 2015
EN22	Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment (Chapters 1 to 3)	LUC	October 2016
EN22A	Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment, (Chapter 4 onwards)	LUC	October 2016
EN23	Plymouth District Heating: WP3 – Wider CQ and City Centre	BuroHappold Engineering	December 2016

Reference	Document Title	Author	Date
	Connections Heat Mapping and Energy Masterplan		
EN24	South Hams Open Space, Sport and Recreation Study 2017: Quantity, Quality and Accessibility Standards	South Hams District Council	2017
EN25	West Devon Open Space, Sport and Recreation Study 2017: Quantity, Quality and Accessibility Standards	West Devon Borough Council	2017
EN26	Plymouth Play Assessment 2017	Plymouth City Council	2017
EN27	Landscape Impact Assessment of Potential Allocation Sites in the Plymouth Policy Area	Plymouth City Council	2017
EN28	Strategic Landscape Area Identification Process	Plymouth City Council	2017
EN29	Undeveloped Coast Identification Process	Plymouth City Council, South Hams District Council, West Devon Borough Council	2017
EN30	Biodiversity Network Creation Process 2017	Plymouth City Council, South Hams District Council, West Devon Borough Council	2017
EN31	Plymouth Greenspace Policy Development Process 2017	Plymouth City Council, South Hams District Council, West Devon Borough Council	2017
EN31(rev)	Revised Plymouth Greenspace Policy Development Process	Plymouth City Council, South Hams District	October 2018

Reference	Document Title	Author	Date
		Council, West Devon Borough Council	
EN32	Landscape Impact Assessment of Potential Housing and Employment Sites Across The Thriving Towns and Villages	South Hams District Council, West Devon Borough Council	2017
EN33	A Landscape Character Assessment for South Hams and West Devon	LUC	February 2017
EN34	Plymouth Policy Area Open Space Assessment	LUC	February 2017
EN34A	Plymouth Policy Area Open Space Assessment: Appendix 2	LUC	February 2017
EN35	Plymouth and South West Devon Sports and Leisure Facilities Plan 2016 to 2034	RPT Consulting, 4Global	July 2017
EN35A	Plymouth and South West Devon Sports and Leisure Facilities Plan 2016 to 2034: Action Plan	RPT Consulting, 4Global	July 2017
EN35B	Plymouth and South West Devon Sports and Leisure Facilities Plan 2016 to 2034: Assessment Report	RPT Consulting, 4Global	July 2017
EN36	Plymouth Policy Area Tree Canopy Cover Assessment	Treeconomics & Forest Research	February 2017
EN37	EMS Recreation Study Document 04. Survey of recreational use within the Plymouth Sound and Estuaries European	Marine Biological Association	March 2017

Reference	Document Title	Author	Date
	Marine Site: Scoping Report and Survey Results		
EN38	Baselines and Trajectories for Carbon Dioxide Emissions in Plymouth, South Hams and West Devon	University of Exeter	April 2017
EN39	Plymouth City-Wide District Energy Strategy	BuroHappold Engineering	July 2017
EN40	Better Understanding Coastal Flood Risk in Plymouth: Role of Plymouth Breakwater	Environment Agency	February 2018
FLOODING			
F1	Plymouth City Council Strategic Flood Risk Assessment	Pell Frichmann	2006
F2	Strategic Flood Risk Assessment Level 1 Report and Recommendations	South Hams District Council	June 2007
F2A	South Hams District Council SFRA Level 1 Addendum	JBA Consulting	May 2016
F3	Strategic Flood Risk Assessment Level 2: North Plymstock	JBA Consulting	2007
F4	Strategic Flood Risk Assessment Level 2: East End, Sutton Harbour and Millbay	JBA Consulting	2008
F5	South Hams District Council Strategic Flood Risk Assessment Level 2 Report: Totnes	Scott Wilson	2008
F6	South Hams District Council Strategic Flood Risk Assessment Level 2 Report: Kingsbridge, Ivybridge and Salcombe	Scott Wilson	2009

Reference	Document Title	Author	Date
F7	Strategic Flood Risk Assessment Level 2: Plympton	Capita Symonds	May 2010
F8	West Devon Level 1 Strategic Flood Risk Assessment	JBA Consulting	December 2014
F9	Plan for Managing Local Flood Risk	Plymouth City Council	2016
F9A	Plan for Managing Local Flood Risk: Annex 1	Plymouth City Council	2016
F9B	Plan for Managing Local Flood Risk: Annex 2	Plymouth City Council	2016
F10	Plymouth Drainage Study	Pell Frischmann	February 2016
F10A	Plymouth Drainage Study: Appendix A	Pell Frischmann	February 2016
F10B	Plymouth Drainage Study: Appendix B	Pell Frischmann	February 2016
F11	Plymouth and South West Devon Joint Local Plan: Flood Risk Sequential and Exceptions Test Report	Plymouth City Council, South Hams District Council, West Devon Borough Council	April 2017
F11A	Local Flood Risk Management Strategy Part 2: A Technical Design Guide	Amey, Plymouth City Council	2017
F11B	Local Flood Risk Management Strategy Part 2: Appendix A, Local Flood Risk Strategies	Amey, Plymouth City Council	2017
F12	Sustainable Drainage Systems: Guidance for Devon	Devon County Council	January 2017
HERITAGE			
HE1	Plymouth Rapid Urban Character Study	Alan Baxter and Associates	February 2005

Reference	Document Title	Author	Date
HE2	South Hams District Design Review Assessment	The Prince's Foundation for the Built Environment	June 2009
HE3	Plymouth Palmerston Forts Stage C: Strategic Summary and Individual Site Statements	URS/Scott Wilson	May 2011
HE4	Heritage Impact Assessment	Plymouth City Council, South Hams District Council, West Devon Borough Council	February 2017
HOUSING			
HO1	Strategic Housing Land Availability Assessment	PBA	April 2014
HO2	Plymouth Strategic Housing Land Availability Assessment Main Report	Plymouth City Council	February 2017
HO2A	Plymouth Strategic Housing Land Availability Assessment Appendix 1 (Plymouth SHLAA Viability Report)	Plymouth City Council	February 2017
HO2B	Plymouth Strategic Housing Land Availability Assessment Appendix 2 (sites with planning consent for housing as at 1 April 2016)	Plymouth City Council	February 2017
HO2C	Plymouth Strategic Housing Land Availability Assessment Appendix 3 (Plymouth lapse rate methodology)	Plymouth City Council	February 2017
HO2D	Plymouth Strategic Housing Land Availability Assessment Appendix 4 (correspondence with	Plymouth City Council	February 2017

Reference	Document Title	Author	Date
	landowners/developers, availability/delivery rates and lead in times)		
HO2E	Plymouth Strategic Housing Land Availability Assessment Appendix 5 (sites rejected at stage 1)	Plymouth City Council	February 2017
HO2F	Plymouth Strategic Housing Land Availability Assessment Appendix 6 (findings per Plymouth Plan area)	Plymouth City Council	February 2017
HO2G	Plymouth Strategic Housing Land Availability Assessment Appendix 7 (methodology, development lead in times)	Plymouth City Council	February 2017
HO2H	Plymouth Strategic Housing Land Availability Assessment, appendix 8 (methodology, delivery rates)	Plymouth City Council	February 2017
HO2I	Plymouth Strategic Housing Land Availability Assessment, appendix 9 (Plymouth student accommodation, methodology, student accommodation release)	Plymouth City Council	February 2017
HO3	South Hams and West Devon Strategic Housing Land Availability Assessment Viability Report	PBA	February 2017
HO4	Strategic Housing Land Availability Assessment Final Report	South Hams District Council and West Devon Borough Council	March 2017
HO4A	Site Information Packs (South Hams) A-D	South Hams District Council	March 2017

Reference	Document Title	Author	Date
HO4B	Site Information Packs (South Hams) E-L (including Sherford, Moreleigh and Ugborough)	South Hams District Council	March 2017
HO4C	Site Information Packs (South Hams) M-R	South Hams District Council	March 2017
HO4D	Site Information Packs (South Hams) S-T	South Hams District Council	March 2017
HO4E	Site Information Packs (South Hams) U-Z	South Hams District Council	March 2017
HO4F	Site Information Packs (West Devon) A-L (including Thrushelton)	West Devon Borough Council	March 2017
HO4G	Site Information Packs (West Devon) M-Z	West Devon Borough Council	March 2017
HO4H	Site Information Pack (Plymouth Urban Fringe)	Plymouth City Council, South Hams District Council, West Devon Borough Council	July 2017
HO5	Plymouth Sustainable Growth Study Stage 1 and 2	Llewelyn-Davis	July 2004
HO6	Sustainable Growth Distribution Study	Baker Associates	March 2005
HO7	Plymouth Urban Fringe Development: Site Assessment Matrix	Baker Associates	2010
HO8	Devon State of the Market Report	Devon Strategic Housing Group	May 2011
HO9	Threshold Land Values report to inform the Strategic Development Viability Assessment for both South Hams and West Devon	Colliers International	January 2015

Reference	Document Title	Author	Date
HO10	National Space Standards: Assessing the Impact of Adopting Space Standards	PBA	December 2015
HO11	South Hams Strategic Viability Assessment Stage 1: Residential Viability	Level	February 2015
HO12	Plymouth Housing Market Area Population and Housing Projections 2014 to 2034: Local Modelling Report	Devon County Council	February 2017
HO13	Strategic Housing Market Assessment Part 1: The Housing Market Area and Updating the Objectively Assessed Need	PBA	February 2017
HO13A	Strategic Housing Market Assessment Part 2: Objectively Assessed Need for Affordable Housing	HDH Planning and Development Ltd/PBA	February 2017
HO14	Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Final Report	Opinion Research Services	December 2016
HO15	Gypsies and Travellers and Travelling Showpeople Site Assessment Study: Final Report	PBA	February 2017
HO16	Plymouth Student Accommodation	Plymouth City Council	February 2017
HO17	Joint Local Plan - Plymouth, South Hams, West Devon: Establishing the Objectively Assessed Need	PBA	June 2016

Reference	Document Title	Author	Date
HO18	The Housing Needs of Physically Disabled People in Plymouth	Plymouth City Council	February 2015
HO19	Joint Local Plan - Plymouth, South Hams, West Devon: Market Signals Update	PBA	June 2016
HO20	Joint Local Plan - Plymouth, South Hams, West Devon: Testing and establishing the Plymouth Housing Market Area	PBA	June 2016
HO21	Extra Care Housing: Refresh of the Commissioning Strategy for Extra Care Housing (2009)	Devon County Council	August 2015
HO22	Needs of the over 55s in rural Devon	Devon Communities Together	January 2018
TRANSPORT			
T1	Plymouth Eastern Gateway Framework Study	Llewelyn Davies in association with King Sturge, SIAS and Scott Wilson	March 2004
T1A	Plymouth Eastern Gateway Framework Study: Appendix 1 Plymouth Eastern Gateway Issues Report	Llewelyn Davies in association with King Sturge, SIAS and Scott Wilson	June 2003
T1B	Plymouth Eastern Gateway Framework Study: Appendix 2 Plymouth Eastern Gateway Stage 2 Report: Option Development	Llewelyn Davies in association with King Sturge, SIAS and Scott Wilson	July 2003, revised October 2003
T1C	Plymouth Eastern Gateway Framework Study: Appendix 3 Plymouth SRB Scoping Report		

Reference	Document Title	Author	Date
T1D	Plymouth Eastern Gateway Framework Study: Appendix 4 Paramics Modelling Report	Llewelyn Davies in association with King Sturge, SIAS and Scott Wilson	November 2003
T2	Plymouth Eastern Corridor Transport Study	Faber Maunsell	2006
T3	East of Plymouth Infrastructure Study	Faber Maunsell	2007
T4	Western Corridor Park and Ride Study	ITP	September 2009
T5	Port of Plymouth Evidence Base Study: Executive Summary and Final Report	Atkins Ltd	April 2010
T5A	Port of Plymouth Evidence Base Study Final Report Volume 2: Appendices	Atkins Ltd	April 2010
T5B	Port of Plymouth Masterplan Evidence Base Study	Plymouth City Council	
T6	Local Transport Plan 2011 to 2026	Plymouth City Council	April 2011
T6A	Local Transport Plan 2011 to 2026: Transport Implementation Plan	Plymouth City Council	April 2011
T7	Devon and Torbay Local Transport Plan 3 2011 to 2026	Devon County Council	April 2011
T7A	Devon and Torbay Local Transport Plan 3 2011 to 2026: Implementation Plan	Devon County Council	April 2011
T7B	Devon and Torbay Local Transport Plan 3 2011 to 2026: Evidence Report	Devon County Council	April 2011

Reference	Document Title	Author	Date
T7C	Devon and Torbay Local Transport Plan 3 2011 to 2026: Report of Consultation	Devon County Council	April 2011
T8	Totnes Transport Strategy	Jacobs	December 2012
T9	The South West Spine: The Case For Greater Investment Across The South West Railway Network	Cornwall Council, Devon County Council, Plymouth City Council, Somerset County Council, Torbay Council	February 2013
T10	River Tamar Crossings Study	Peter Brett Associates LLP	July 2013
T11	Plymouth Airport Study: Final Report	ARUP	September 2014
T12	Connections from Tavistock to Plymouth: Option Assessment Report	Devon County Council	October 2014
T13	Transport Infrastructure Plan: Delivering Growth to 2030	Devon County Council	March 2015
T14	Ivybridge Queue Length Monitoring	Devon County Council	November 2016
T15	Closing The Gap: The South West Peninsula Strategic Rail Blueprint	Peninsula Rail Task Force	November 2016
T16	Plymouth Airport Safeguarding Consideration of Alternatives	ARUP	November 2016
T17	A study of consultancy reports' conclusions on reopening Plymouth City Airport for commercial passenger services	Department for Transport	December 2016
T18	Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report	WSP/Parsons Brinckerhoff	February 2017

Reference	Document Title	Author	Date
T18A	Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report Appendix A	WSP/Parsons Brinckerhoff	February 2017
T18B	Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report Appendix B	WSP/Parsons Brinckerhoff	February 2017
T18C	Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report Appendix C and D	WSP/Parsons Brinckerhoff	February 2017
T18D	Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report Appendix E and F	WSP/Parsons Brinckerhoff	February 2017
T18E	Plymouth and South West Devon Joint Local Plan: Baseline Transport Conditions Report Appendix G and H	Devon County Council	February 2017
T19	Plymouth and South West Devon Joint Local Plan: Strategic Modelling Methodology Note	WSP/Parsons Brinckerhoff	February 2017
T20	Plymouth and South West Devon Joint Local Plan: 2034 Forecast SATURN Model Results Summary	WSP/Parsons Brinckerhoff	February 2017
T20i	Plymouth and South West Devon Joint Local Plan: 2034 Forecast SATURN Model Results Summary (updated T20)	WSP	December 2017
T20ii	Plymouth and South West Devon Joint Local Plan: 2034 Forecast SATURN Model Results	WSP	January 2018

Reference	Document Title	Author	Date
T20A	Plymouth and South West Devon Joint Local Plan: 2034 Forecast SATURN Model Results Summary (Spatial Scenarios)	Plymouth City Council	December 2017
T21	Plymouth Airport Site Condition Assessment and Capital Investment Update	ARUP	February 2017
T22	Plymouth and South West Devon Joint Plan Transport Infrastructure Statement	Devon County Council	February 2017
T23	Strategic Cycle Network	Plymouth City Council	February 2017
T24	Position Statement One: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group	Plymouth City Council	February 2017
T25	Position Statement Two: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group	Plymouth City Council	March 2017
T26	Okehampton Town Centre Access Road Summary	Jacobs	April 2017
T27	Position Statement Four: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group	Plymouth City Council	December 2017
T28	Memorandum of Understanding: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group	Plymouth City Council	March 2017

Reference	Document Title	Author	Date
T29	Position Statement Five: Plymouth and South West Devon Joint Local Plan Transport Strategy Working Group	Plymouth City Council	January 2018
T30	Safe Operating Practices at Unlicensed Aerodromes	Civil Aviation Authority	July 2010
T31	Aviation Policy Framework	Government White Paper	March 2013
T32	General Aviation Strategy	Department for Transport	March 2015
T33	Data showing the general and scheduled air traffic movements at Plymouth Airport 2002 to 2011	ARUP (Source: CAA)	2011
T34	Slapton Coastal Zone Management Main Study: Executive Summary	Prepared by Scott Wilson for Slapton Line Partnership	August 2006
T34A	Slapton Coastal Zone Management Main Study Volume 1: Phase 1 Report (I)	Prepared by Scott Wilson for Slapton Line Partnership	August 2006
T34B	Slapton Coastal Zone Management Main Study Volume 2: Phase 1 Report (II)	Prepared by Scott Wilson for Slapton Line Partnership	August 2006
T34C	Slapton Coastal Zone Management Main Study Volume 3: Phase 2 Report	Prepared by Scott Wilson for Slapton Line Partnership	August 2006
T34D	Slapton Coastal Zone Management Main Study: Business Survey Report	Roger Tym & Partners	February 2005
T34E	Slapton Coastal Zone Management Main Study Volume 3: Annex A - Consultation Addendum	Prepared by Scott Wilson for Slapton Line Partnership	August

Reference	Document Title	Author	Date
STRATEGIC GROWTH AREAS			
SGA1	Derriford Development Framework Evidence Report	LDA Design	February 2009
SGA2	Derriford and Seaton Area Action Plan Report on Proposed New District Shopping Centre	Cushman & Wakefield LLP	January 2011
SGA3	Plymouth City Centre Development Study: Executive Summary	GVA	September 2014
SGA3A	Plymouth City Centre Development Study: Main Report	GVA	September 2014
SGA3B	Plymouth City Centre Development Study Appendix A (Heritage Audit and Statement of Significance)	Asset Heritage Consulting on behalf of GVA and Plymouth City Council	May 2014
SGA3C	Plymouth City Centre Development Study Appendix B (Plymouth Precinct Retail Study Design Appraisal)	NEW masterplanning on behalf of GVA and Plymouth City Council	September 2014
SGA4	Plymouth City Centre Strategic Masterplan	LDA	February 2017
SGA5	Plymouth Waterfront Strategic Masterplan	LDA	February 2017
OTHER			
O1	A Vision for Plymouth	MBM Arquitectes with AZ Urban Studio	October 2003
O2	South Hams Local Development Framework Strategic Infrastructure Delivery Plan	South Hams District Council	2010
O3	West Devon Infrastructure Delivery Plan	West Devon Borough Council	February 2015

Reference	Document Title	Author	Date
O4	Education Infrastructure Plan (revised) 2016 to 2033	Devon County Council	2016
O5	Plymouth and South West Devon Joint Local Plan Viability Study	PBA	February 2017
O6	South Hams and West Devon Village Sustainability Assessment Framework	Plymouth City Council, South Hams District Council and West Devon Borough Council	February 2017
O7	Plymouth Plan Part One Refresh	Plymouth City Council	March 2017
O8	South West Devon Infrastructure Planning Evidence Base Report	Devon County Council	June 2017
O9	Plymouth and South West Devon Infrastructure Needs Assessment: Main Report	Plymouth City Council, South Hams District Council, West Devon Borough Council and Devon County Council	July 2017
O9A	Plymouth and South West Devon Infrastructure Needs Assessment: Appendix 3	Plymouth City Council, South Hams District Council, West Devon Borough Council and Devon County Council	July 2017
O9B	Plymouth and South West Devon Infrastructure Needs Assessment: Appendix 4	Plymouth City Council, South Hams District Council, West Devon Borough Council and Devon County Council	July 2017

Reference	Document Title	Author	Date
O10	Plymouth and South West Devon Plan for Infrastructure and Investment	Plymouth City Council, South Hams District Council, West Devon Borough Council and Devon County Council	July 2017
O11	Plymouth Policy Area Education Infrastructure Planning Evidence Base Report	Plymouth City Council	July 2017
O12	Minerals Topic Paper 1 Spatial Strategy Version 2	Dartmoor National Park, Devon County Council, Plymouth City Council and Torbay Council	January 2016
O13	Minerals Topic Paper 2 Safeguarding Mineral Resources & Infrastructure Version 2	Dartmoor National Park, Devon County Council, Plymouth City Council and Torbay Council	January 2016
O14	5th Devon Local Aggregate Assessment 2006-2015 Version 2	Devon County Council	August 2016
O15	6th Devon Local Aggregate Assessment 2007-2016	Devon County Council	July 2017
O16	Plymouth Report	Plymouth City Council	October 2017

12 Annex 5

HOUSING TRAJECTORIES - ILLUSTRATIVE GRAPHS

12.1 The plan-monitor-manage graphs in this Annex illustrate the housing trajectories relating to the plan period for the JLP Plan Area and the two policy areas. The plan period is 1 April 2014 – 31 March 2034.

12.2 The trajectories illustrated by the graphs rely on housing supply evidence based on the end-March 2017 monitoring point. The detailed evidence for the JLP, PPA and TTVPA trajectories is set out in Examination documents TP3J, TP3K and TP3L respectively, which provide the latest trajectories available to the JLP Examination. The detailed explanation of those graphs is set out in the Revised Housing Topic Paper Addendum October 2018-Appendix 4.

12.3 The graphs are a ‘snap-shot’ in time. Delivery of housing supply in the plan period will be monitored. The LPAs therefore commit to update the housing trajectories plus the related graphs and analysis with supply evidence at subsequent monitoring points, and to publish this annually in the Authority Monitoring Reports.

12.4 Illustrative graphs (Based on end March 2017 Housing Trajectories)

1. Plymouth and South West Devon Joint Local Plan – Plan Area (annualised target)

SPT3 Housing Provision Target is at least 26,700 dwellings (annualised 1,335 pa)

Housing Trajectory illustrated by graphs : Plan, Monitor, Manage housing land supply

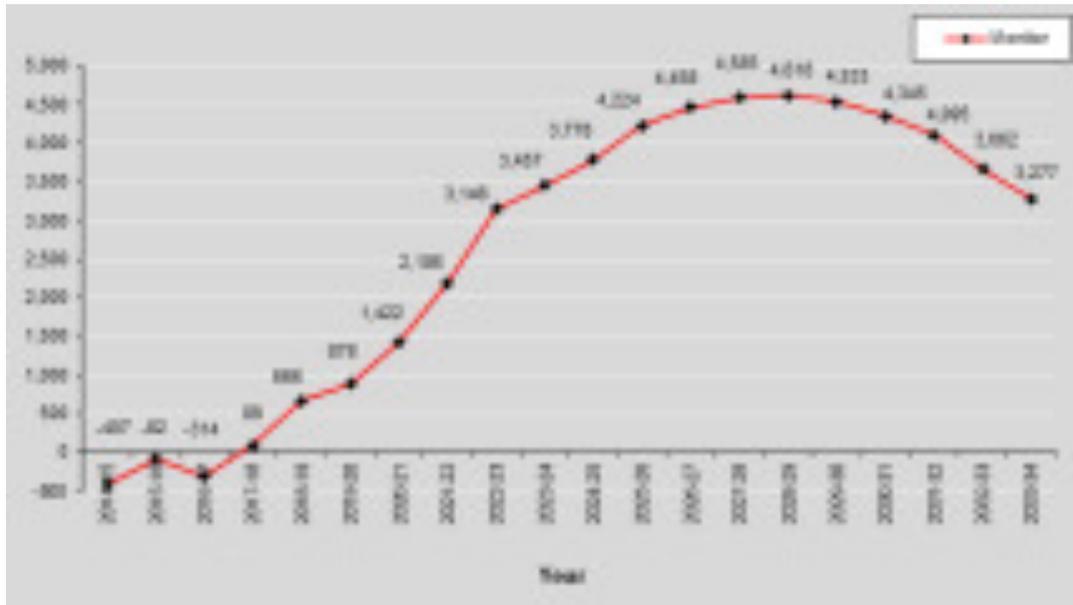
Graph 1a JLP – Plan Area – Plan / Manage

Dwellings



Graph 1b JLP – Plan Area – Monitor

Dwellings



2. Plymouth Policy Area (annualised target)

SPT3 Housing Provision Target is at least 19,000 dwellings (annualised 950 pa)

Housing Trajectory illustrated by graphs: Plan, Monitor, Manage housing land supply

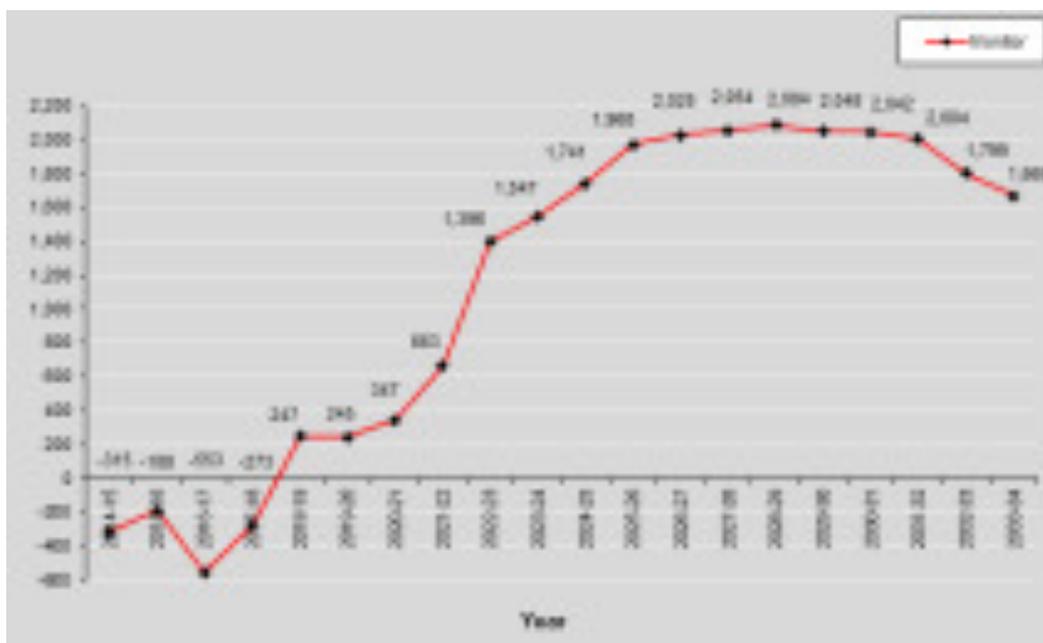
Graph 2a Plymouth Policy Area – Plan / Manage

Dwellings



Graph 2b Plymouth Policy Area – Monitor

Dwellings



3. Thriving Towns and Villages Policy Area (annualised target)

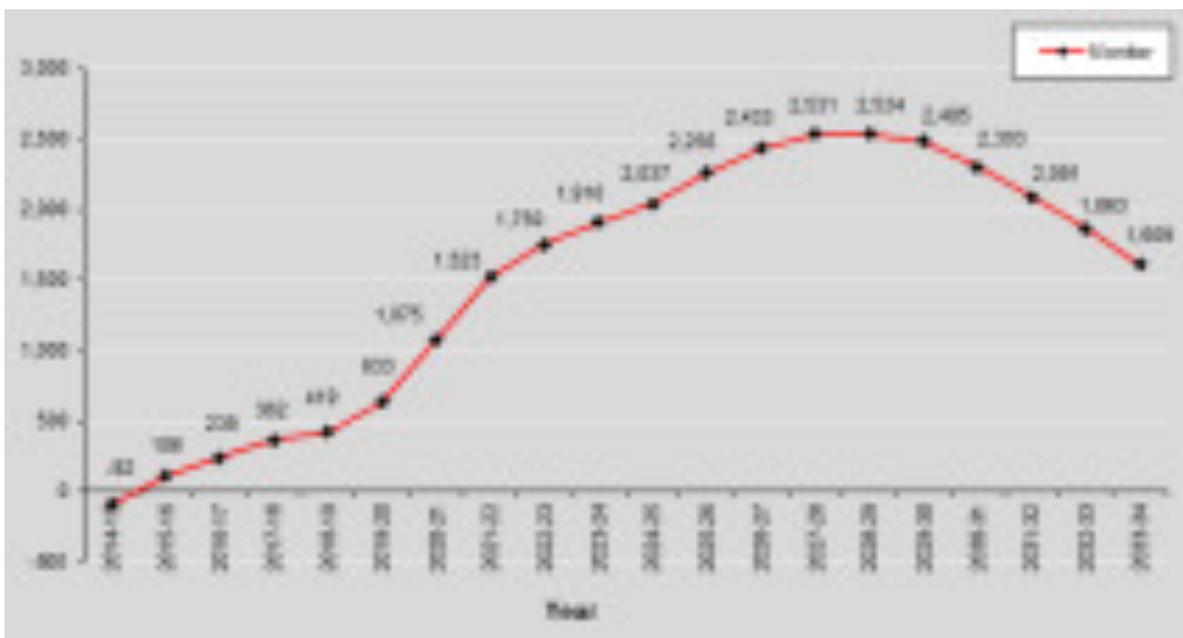
SPT3 Housing Provision Target is at least 7,700 dwellings (annualised 385 pa)

Plan, Monitor and Manage housing land supply – Housing Trajectory illustrated by graphs

Graph 3.1a Thriving Towns and Villages Policy Area – Plan/Manage Dwellings



Graph 3.1b Thriving Towns and Villages Policy Area – Monitor Dwellings



13 Glossary

- **Air Quality Management Area (AQMA)** - An area where the Air Quality Objectives are not likely to be achieved.
- **Affordable housing** - Housing, whether for rent, shared ownership or outright purchase, provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing.
- **Ancient Woodlands** - Any wooded area that has been wooded continuously since at least 1600 AD. It includes: '*ancient semi-natural woodland*' mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.
- **Area of Outstanding Natural Beauty (AONB)** - An area of countryside designated by a government agency as having natural features of exceptional beauty and therefore given a protected status.
- **Article 4 Direction** - A special planning regulation adopted by a Local Planning Authority in all or part of their borough which removes whichever permitted development rights specified in the direction.
- **Authorities Monitoring Report** - The Authorities Monitoring Report will assess the implementation of the Local Development Scheme and the extent to which policies in the local plan are being successfully implemented.
- **Biosphere Reserve** - A designation by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) which identifies an area of world Biosphere Reserve class natural value that demonstrates the best example of people working in harmony with nature for the benefit of all.
- **Building Regulations Categories M4(2) & M4(3)** - Building regulations which ensure that people are able to access and use buildings and their facilities. M4(2) relates to accessible and adaptable dwellings. M4(3) relates to wheelchair user dwellings.
- **City Deal** - City deals are bespoke packages of funding and decision-making powers negotiated between central government and local authorities and/or Local Enterprise Partnerships and other local bodies.
- **Commitment sites** - These are sites which had an extant planning permission on 1 April 2016 that count towards the overall housing and employment land supply.
- **Community Infrastructure Levy (CIL)** - A planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area.
- **Community Right to Build Order (CRtBO)** - A type of Neighbourhood Development Order and one of the neighbourhood planning tools introduced in the Localism Act 2011. It can be used to grant outline or full planning permission for specific development which complies with the order.

- **Connectivity / Strategic connectivity** - A term use to refer to the physical connections between different areas, usually by transport modes but also by digital means such as broadband connections. Strategic connectivity is a reference to connections to a wider spatial area, particularly regional, national and international.
- **Conservation Area** - An area of special architectural and/or historic interest where the character or appearance should be preserved or enhanced.
- **Core Sites** – See Map 2 (Biodiversity). Include European Sites, Sites of Special Scientific Interest, Local Nature Reserves, County Wildlife Sites, Registered Park and Gardens, Registered Common Land and Regionally Important Geological Sites as Core Sites, and key sites critical for the protection and recovery of the Horrid Ground Weaver spider.
- **Corridors** – See Map 2 (Biodiversity). Interconnecting areas tending to follow linear features including river corridors and the Beelines corridors, Strategic Nature Areas and Greater Horseshoe Bat strategic flyways.
- **County Wildlife Sites** - Areas of land recognised as being at least county, sometimes national, importance for their nature conservation value; this is defined by the presence of important, distinctive and threatened habitats and species. CWS are designated by a panel of experts assembled by the Devon Biodiversity Records Centre.
- **Designated Rural Areas** - These are parish-level areas designated under S.157 of the Housing Act 1985 through SI 2009 No. 2098.
- **Development plan** - The statutory planning document each Local authority prepares, setting out planning policies which will be used to determine planning applications and to set out long term development goals. This joint local plan is a development plan.
- **Development Plan Documents** - Spatial planning documents that are subject to independent examination and which form the development plan for a local authority area. Since the introduction of the National Planning Policy Framework, development plan documents are referred to as the Local Plan. Each authority must set out its programme for preparing its Development Plan Documents in the Local Development Scheme.
- **European Marine Site (EMS)** - A marine area which is both a Special Area of Conservation (SAC) and a Special Protection Area (SPA), protected under the European Communities Habitats and Birds Directives.
- **European Union (EU)** - An economic and political association of certain European countries with internal free trade and common external tariffs.
- **Flood Zones 2 and 3** - If an area is in flood zone 2 or 3 it is at the potential risk of flooding. The higher the number, the greater the risk.

- **Functional Economic Market Area (FEMA)** - The functional area over which the local economy and its key markets operate irrespective of administrative boundaries.
- **Future Core Sites** – See Map 2 (Biodiversity). Areas identified where future measures are planned to create high value areas. In Plymouth, these are the three strategic Green Infrastructure Sites within the city boundary – Central Park, Derriford Community Park and Saltram Countryside Park, and in South Hams these include Cirl Bunting Enhancement Zones and Greater Horseshoe Bat sustenance zones.
- **Green Infrastructure** - Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, rivers, marine sites and other water bodies and features such as green roofs and walls. In practice this is inter-changeable with Natural Infrastructure.
- **Gross Value Added (GVA)** - The measure of the value of goods and services produced in an area, industry or sector of an economy.
- **Habitat Regulation Assessment (HRA)** - An assessment undertaken which determines whether a plan (or project) has a significant effect on natural habitats.
- **High Quality Public Transport (HQPT)** - This defines the aspiration in relation to the provision of attractive and realistic sustainable transport alternatives/or choices to the private car. It relates specifically to bus / coach, rail and water based forms of transport, but could in future include cycle hire schemes. The term 'High Quality Public Transport Bus Network' refers to all routes which carry bus services, whilst the term 'High Quality Public Transport Bus Corridors' (which is part of the wider HQPT Bus Network') refers specifically to those routes which carry multiple bus services. The reason behind this terminology, and the need to differentiate between it, is firstly to explain the concept, and secondly to establish a hierarchy in terms of our approach to interventions on the HQPT Bus Network. Our intention is to focus on delivering HQPT on our HQPT Bus Corridors as a priority whilst maintaining the wider aspiration to achieve this on our entire HQPT Bus Network in the longer term.
- **House in Multiple Occupation (HMO)** - A house where at least three tenants live there forming more than one household.
- **Housing Market Area (HMA)** - A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.
- **Housing Need** - Refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.

- **International Union for Conservation of Nature (IUCN)**- The global authority on the status of the natural world and the measures needed to safeguard it.
- **Listed Building** - A building mentioned in statutory lists as being of special architectural or historic interest under the Listed Buildings and Conservation Areas Act. There are different grades of listing to indicate relative interest.
- **Local Development Scheme** - A document which sets out the scope and timetable of local plans the local planning authorities are preparing.
- **Local Enterprise Partnership** - Voluntary partnerships between local authorities and businesses set up in 2011 by the Department for Business, Innovation and Skills to help determine local economic priorities and lead economic growth and job creation within the local area.
- **Local Green Spaces** - A series of greenspace have been identified by using the criteria set out in NPPF paragraphs 76 and 77 and by consulting local communities to arrive at a list of sites that are demonstrably of local significance.
- **Local Nature Reserves (LNR)** - A place with wildlife or geological features that are of special interest locally. It is a statutory designation made under Section 21 – "Establishment of nature reserves by local authorities" – of the National Parks and Access to the Countryside Act 1949.
- **Local Plan** - The Localism Act 2011 and the National Planning Policy Framework re-introduced the concept of a single Local Plan setting out planning policies relating to a Local Authority area, instead of a suite of documents called a Local Development Framework.
- **Local Planning Authority (LPA)** - This term describes the particular statutory role each council has to administer the planning function. Within the JLP, where the term 'LPAs' is used to, this is a reference to two or three of the councils operating in their role as local planning authorities together to implement a policy. Where a specific LPA is mentioned (eg. 'Plymouth LPA') this highlights the particular LPA which will be responsible for implementing that policy. Where the term 'the City' is used (capitalised), this is in the context of policies where the City Council and/or other partners in Plymouth are working together to deliver the wider objectives.
- **Major developments** - A generic term which describes the scale of a development proposal and which needs to be interpreted in the context of the policy and the location of the development. In some cases, for a particular policy, major development may be specifically defined in a supplementary planning document to mean a development of over a certain number of units or amount of floorspace. Where the term is used, it is not intended for it to mean 'major' in the context of the classification of a planning application as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

- **Marine Conservation Zones** - Sites which have been designated under the Marine and Coastal Access Act 2009 in order to protect a range of nationally important, rare or threatened habitats and species.
- **Ministry of Defence (MoD)** - The British government department responsible for implementing the defence policy set by Her Majesty's Government and the headquarters of the British Armed Forces.
- **National Nature Reserves (NNRs)** - NNRs were established to protect some of our most important habitats, species and geology, and to provide 'outdoor laboratories' for research. NNRs are declared by the statutory country conservation agencies under the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981.
- **National Planning Policy Framework (NPPF)** - National planning policy is set out in the NPPF, which was published in 2012 and gained full weight in March 2013. The NPPF replaces all of the previous Planning Policy Statements.
- **Natural Infrastructure** - For a definition see 'Green Infrastructure'. Natural Infrastructure is used more often due to the need to consider Plymouth's blue aquatic and marine environment which often gets forgotten through the use of 'green'.
- **Neighbourhood Plans** - The Localism Act 2011 introduced powers to enable local communities to produce Neighbourhood Plans. These plans have the ability to set out policies dealing with the use and development of land, and upon formal adoption, following an examination and referendum, form part of the development plan.
- **Objectively Assessed Need (OAN)** - The NPPF requires that local planning authorities identify the 'objectively assessed need' for housing in their areas, and that Local Plans translate those needs into land provision targets. The overall need (demand) is assessed on the basis of standard methodology and used to inform the setting of targets. OAN is also relevant in respect of determining the need for new employment land.
- **Office for National Statistics (ONS)** - The UK's largest independent producer of official statistics and the recognised national statistical institute of the UK.
- **Office of Rail and Road (ORR)** - Provides regulation on safety and performance of the rail industry across the UK and monitors Highways England.
- **Personalised Travel Planning (PTP)** - An established approach that enables people to think about the way they currently travel and provides them with the information, advice and motivation to walk, cycle and use public transport more often.
- **Policies Map** - The adopted policies map illustrates on a base map (reproduced for, or based upon a map base to a registered scale) all the policies contained in the Local Plan which have a spatial dimension – for example, site allocations or greenspace designations.

- **Primary Shopping Area (PSA)** - An area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).'
- **Priority Habitats** - Those identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)
- **Regionally Important Geological and Geomorphological Sites (RIGS)** - Places that are considered to be especially important for the geology they exhibit. They are mostly old quarries, pits, roadside cuttings and other excavations which expose rocks normally covered by soil and vegetation. Some sites are natural exposures of interesting rocks in river banks and cliffs, and others are fine views which demonstrate how the underlying geology and forces of erosion have shaped the landscape. These sites are identified by the Devon RIGS Group.
- **Royal National Lifeboat Institution (RNLI)** – A charity that saves lives at sea across the UK.
- **Rural areas with special designations** – An area within a National Park, an Area of Outstanding Natural Beauty or an area designated by order of the Secretary of State as a rural area.
- **Rural Exception Sites** - These are sites adjoining or very near to rural settlements where development which meets the essential local needs of the settlement might be permitted.
- **Scheduled Monument** - A nationally important and protected historic building or site that is included in the Schedule of Monuments kept by the Secretary of State for Culture, Media and Sport.
- **Section 106 agreement** - A legally binding contract, between a developer and the local planning authority that constitutes a planning obligation.
- **Sites of Special Site of Scientific Interest (SSSI)** - SSSIs are a suite of sites providing statutory protection for the best examples of the UK's flora, fauna, or geological or physiographical features. These sites are also used to underpin other national and international nature conservation designations. Most SSSIs are privately-owned or managed; others are owned or managed by public bodies or non-government organisations.
- **Special Areas of Conservation (SACs)** - SACs are defined as those given special protection under the European Union's Habitat's Directive as transposed into UK law by the Habitat and Conservation of Species Regulations 2010.
- **Special Protection Areas (SPAs)** - SPAs are defined in the NPPF as 'Areas which have been identified as being of international importance for the breeding, feeding, wintering or migration of rare and vulnerable species of birds found within European Union countries'. The NPPF goes on to describe them as 'European designated sites, classified under the Birds Directive'.

- **Sports hub site** - A site that provides multiple pitches or other sports provision and ancillary facilities such as changing and parking, and serves as a local hub for sport. For example, Stonehouse Creek Rugby Pitches.
- **Strategic Cycle Network** -The Strategic Cycle Network (SCN) is a plan of proposed cycle routes that are suitable for cyclists of all levels. The network includes routes for experienced cyclists (which involve dealing with traffic); routes for less experienced cyclists and children (including leisure routes); and those which are suitable for all. The SCN routes also provide benefits for pedestrians including those with mobility and other impairments.
- **Strategic Economic Plan (SEP)** - A plan written by LEPs to help guide government negotiations when driving forward economic growth in their areas.
- **Strategic Housing Land Availability Assessment (SHLAA)** - A piece of evidence which identifies land and assesses the availability, suitability and deliverability of that land as a potential housing site.
- **Strategic Housing Market Needs Assessment (SHMNA)** - A piece of evidence that provides information about an area's future housing requirements.
- **Strategic sports site** - A site that provides primary and ancillary facilities for a number of sports and serves as a destination for sport. For example, Plymouth Life Centre.
- **Stepping Stones** – See Map 2 (Biodiversity). Isolated sites that contribute to connecting the biodiversity network including Strategic Nature Areas.
- **Sub National Population Projections (SNPP)** - Provides an indication of the future size and age structure of the population.
- **Supplementary Planning Documents** - Provide supplementary information in respect of the policies in Local Plans. They do not form part of the Development Plan and are not subject to independent examination.
- **Sustainability Appraisal (SA)** - A tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors) and required to be undertaken for all local development documents.
- **Sustainable Development / Sustainability** - The United Nations General Assembly has defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy *Securing the Future* set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

- **Undeveloped Coast** - Defined in the Plymouth Policy Area based on landscape character areas that have strong coastal characteristics and meet the definition of Undeveloped Coast identified by the Devon Landscape Policy Group. In the Thriving Towns and Villages Policy Area the Undeveloped Coast is predominantly based on the existing Heritage Coast designation.
- **Use Classes** -The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. This Order is periodically amended.
 - Part A
 - A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.
 - A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies. It does not include betting offices or pay day loan shops - these are now classed as “sui generis” uses (see below).
 - A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.
 - A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs).
 - A5 Hot food takeaways - For the sale of hot food for consumption off the premises.
 - Part B
 - B1 Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.
 - B2 General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).
 - B8 Storage or distribution - This class includes open air storage.
 - Part C
 - C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).
 - C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

- C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.
- C3 Dwellinghouses - this class is formed of 3 parts:
 - C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
 - C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
 - C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.
- C4 Houses in multiple occupation - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.
- Part D
 - D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non residential education and training centres.
 - D2 Assembly and leisure - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).
- Sui Generis
 - Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops

selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, laundrettes, taxi businesses, amusement centres and casinos.

- **Village Housing initiatives** - A community-led planning project within the South Hams, enabling small scale affordable housing projects for local people in rural areas. The aim of the Village Housing Initiative is to increase the supply of affordable housing sites and reduce the reliance on public funding for affordable housing.
- **World Heritage Site** - A place listed by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as of special cultural or physical significance.



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1. Introduction

1.1 Plymouth City Council, West Devon Borough Council and South Hams District Council adopted the Plymouth and South West Devon Joint Local Plan at their respective Council Meetings on the following dates :

- South Hams - 21st March 2019
- West Devon - 26th March 2019
- Plymouth - 26th March 2019

1.2 During the preparation of the Joint Local Plan, the Local Planning Authorities (LPAs) have been required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both SA and SEA requirements were met through an integrated process referred to as the Integrated Assessment of the Joint Local Plan. The method and findings of this

process have been published alongside each key stage of the Joint Local Plan preparation. The documentation supporting this process can be found on the Joint Local Plan website. This document sets out the final stages of the SA SEA process.

Why do the Councils need to publish this final adoption report?

- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires LPAs to make the final SA Report available alongside the adopted Development Plan.
- 1.4 This final SA Report for the Adopted Joint Local Plan for Plymouth and South West Devon also meets the requirements of an Environmental Report in accordance with the SEA Regulations.
- 1.5 The SEA Regulations 16 require a specific number of steps to be taken as soon as reasonably practicable following the adoption of Development Plan. A copy of the plan must be made publically available alongside a copy of the SA Report and an SEA Adoption Statement. The Councils must inform the public and appropriate consultation bodies about the availability of these documents. The SEA adoption statement must explain:
 - (A) How environmental (and sustainability) considerations have been integrated into the plan.
 - (B). How the Environmental Report (contained with the SA Report) has taken into account during the preparation of the plan.
 - (C) How the opinions expressed by the public , consultation bodies and where appropriate other European Member states , during the consultation on the plan and Environmental /SA Report have been taken into account
 - (D). The reasons for choosing the plan as adopted and the reasonable alternatives dealt with
 - (E) The measures that are to be taken to monitor the significant environmental and sustainability effects of the plan.
- 1.6 As the SEA process was incorporated in the SA process, this document constitutes both the SA Report and the SEA Adoption Statement for the Plymouth and South West Devon Joint Local Plan.
- 1.7 A number of documents are referenced within this final adoption statement. These documents are available to view on the Examination Webpage for the Joint Local Plan. These documents with their appropriate references are listed below.

- [SUB1 Plymouth and South West Devon Joint Local Plan: Submission \(July 2017\)](#)
- [SUB9 - Plymouth and South West Devon Integrated Assessment \(including SASEA\) July 2017](#)
- [SUB9A Appendix 1 SUB9 Non-Technical Summary](#)
- [SUB9B – Statement on compliance with SEA Directive and Regulations](#)
- [SUBC – Integrated Assessment Report Scoping Report](#)
- [SUB9D – Assessment of Reasonable Alternatives for Growth](#)
- [SUB9E – Assessment of Reasonable Alternatives for the Distribution Strategy](#)
- [SUB9F – Site Selection Methodology](#)
- [SUB9G – PPA – Site Selection Process – Assessment of Reasonable Alternatives](#)
- [SUB9H – TTV – Site Selection Process – Assessment of Reasonable Alternatives](#)
- [SUB9I – Summary of JLP Policy Options considered by the JLP LPAs and the decisions taken](#)
- [SUB9J – Assessment of Vision, Objectives and Policies](#)
- [06 South Hams and West Devon Village Sustainability Assessment Framework – February 2017](#)
- [TP1 Housing Distribution Topic Paper](#)
- [TP3 Housing Topic Paper](#)
- [TP4 Employment Topic Paper](#)
- [TP5 Strategy Topic Paper](#)
- [TP3\(rev\) New Housing Topic Paper](#)
- [SUB10 – Habitats Regulations Assessment, July 2017](#)
- [SUB 12 – Duty to Cooperate Statement. July 2017](#)
- [JLP10 – Plymouth and South West Devon Joint Local Plan: Pre-submission, March 2017.](#)
- [JLP22 – Habitats Regulations Assessment \(Draft\), Feb 2017](#)
- [Statement of Common Ground between Natural England and the JLP Authorities. December 2017 SOCG6](#)
- [JLP2 At Plymouth Map: Sites being considered for development and protection](#)
- [JLP3 At Plymouth Back of Map](#)
- [JLP4 At Plymouth Booklet](#)
- [JLP5 At Plymouth Area Visions](#)

- [JLP6 Thriving Towns and Villages](#)
- [JLP8 Extra Sites Booklet](#)
- [EXC3D Summary of allocated and rejected sites](#)

1.8 The sections below set out the answers to the questions set out in 1.5 and constitute the SEA Adoption Statement and the SA Final Report.

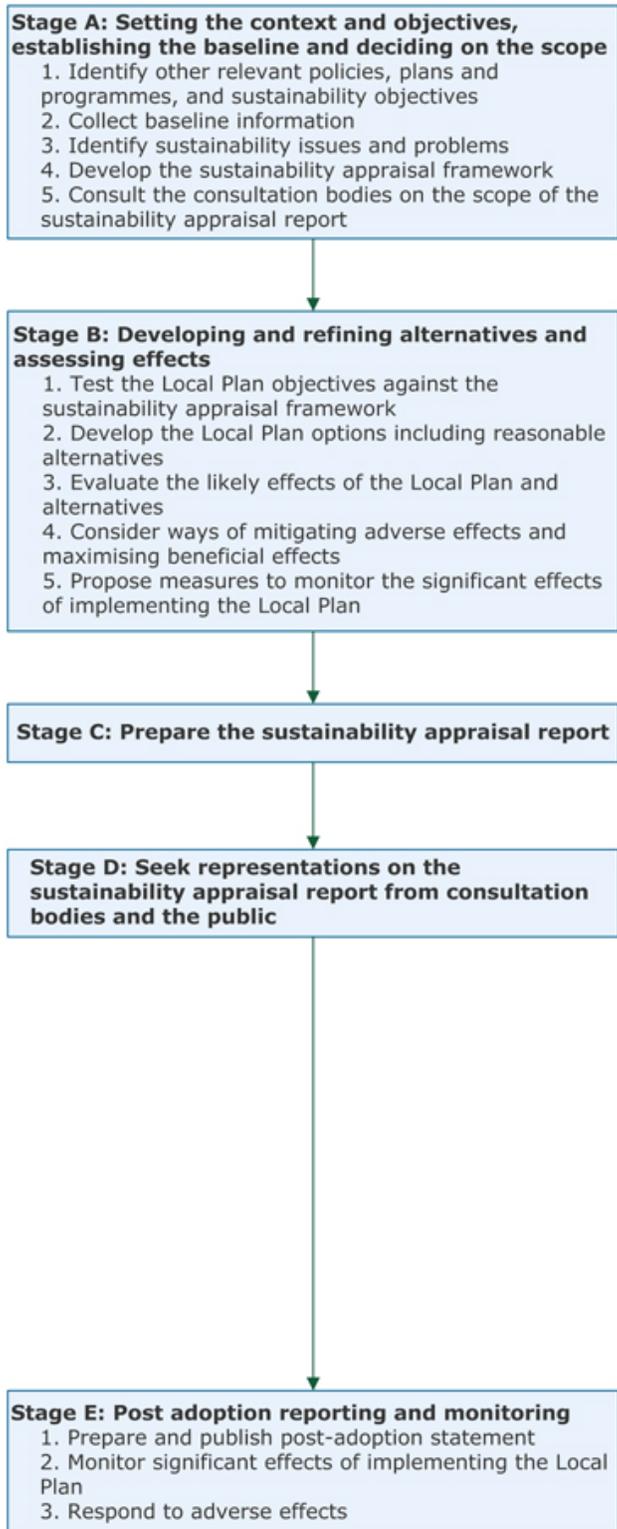
2. (A) How have sustainability considerations been integrated into the Joint Local Plan?

2.1 Plymouth City Council, West Devon Borough Council and South Hams District Council have ensured that the Integrated Assessment Report (SUB9) document which incorporates the Sustainability Appraisal (SA) Report meets the requirements of the Planning and Compulsory Purchase Act 2004, the Town and County Planning (Local Planning)(England) Regulations 2012 and is legally compliant.

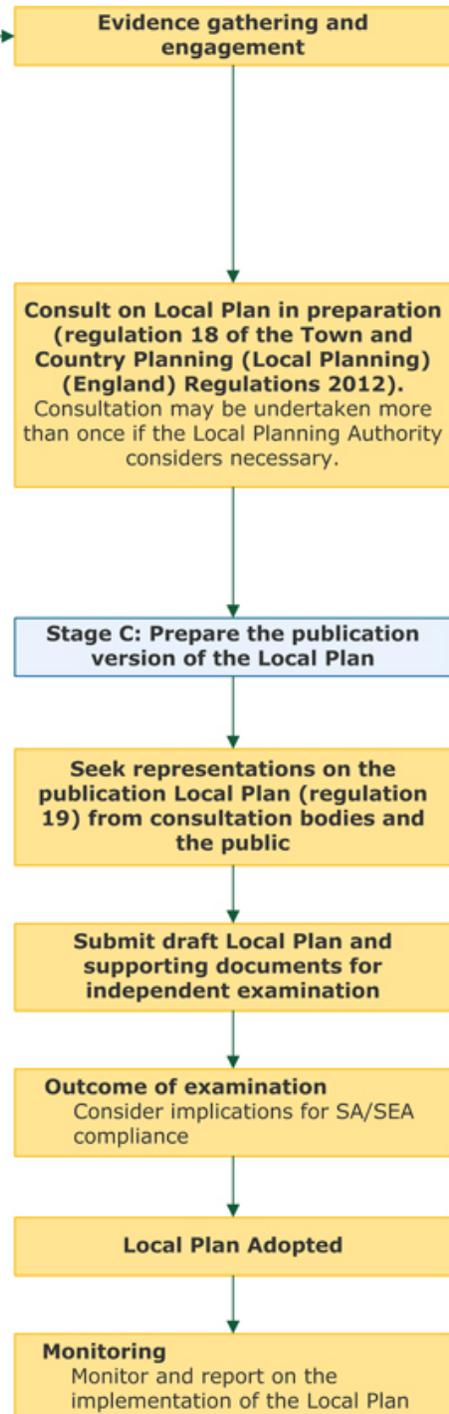
2.2 The appraisal process set out in SUB9 and its associated appendices (see the Councils Website) also seeks to incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the Strategic Environmental Assessment Regulations) which implements the requirements of the European Directive 2001/42/EC (the Strategic Environmental Assessment Directive) on the assessment of the effects of certain plans and programmes on the environment.

2.3 The Councils have followed the process set out in the flow chart below which has allowed the Councils to meet requirements for both the SA and SEA processes. This final report represents the Post Adoption Statement as set out in Stage E Post Adoption Reporting for both SA and SEA.

Sustainability appraisal process



Local Plan preparation



- 2.4 The work on the Joint Local Plan brought together each of the Councils previous work on SA SEA into a single SA SEA process, this was set out in the JLP Scoping Report (SUB9c) alongside baseline information, plans, programmes, policies, objectives and local sustainability issues. This has enabled the Councils to identify the key issues, through the scoping report (SUB9c) which need to be addressed within the Joint Local Plan.
- 2.5 The JLP Scoping Document examined the evidence and set out a framework of 17 criteria (Section 8, page 74 of SUB9c) and decision aiding questions which could be used to assess reasonable alternatives, policies and proposals within the Joint Local Plan, this has allowed the potential environmental effects of the JLP to be considered alongside the social and economic issues identified within the JLP area. See Appendix 1 of this document to view the Framework Document.
- 2.6 The Scoping Report was sent to consultation with the statutory consultees and changes were made as appropriate to the document. It should be noted that each of the Councils had consulted on their individual SA SEA processes in the past and that the current SA SEA document was bringing together previous processes into one single process. The key environmental organisations were consulted at each plan-making stage as the SA SEA evolved alongside the plans.
- 2.7 SUB9 Section 4 and Appendix III of the SA SEA Report also sets out the state of the environment, a baseline on which judgements can be made to help set out a 'direction of change' assessment of the likely impacts of both having the JLP and not having the JLP in place. It is considered that that SEA considers the likely significant environmental impacts which the JLP may cause and where possible appropriate mitigation has been included within the JLP to ensure that any identified effect including secondary, cumulative, synergistic, short, medium and long term permanent, temporary, positive or negative do not have significant negative effect on the environment and on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between these factors
- 2.8 At each appraisal stage, the likely effects of the reasonable alternatives available were identified, described and evaluated and possible mitigation measures to minimise adverse effects identified were proposed. The SA findings informed the choice of allocations within the plan and helped to refine policies taken forward in the various chapters of the plan. The SAs provide an appropriate level of detail, focusing on significant effects identified at the strategic level.

2.9 The appraisal of policies and proposals is set out in a number of appendices within SUB9 documentation on the Examination Website.

3. (B) How has the Environmental Report (contained with the SA Report) has taken into account during the preparation of the plan?

3.1 The Councils have used the SA SEA process to help inform each stage of the plan preparation. The SUB9 submission document and its associated appendices sets out the various stages of the SA SEA process.

3.2 In the early stages of the plan making process, the Councils assessed three reasonable alternatives for growth, the assessment is shown in Appendix SUB9D on the Joint Local Plan Website. These scenarios included the DCLG based housing growth which are considered to be the standard starting point for all calculations of OAN, a 10 year migration scenario and the regulation 18 consultation figure. The Councils felt that the 10 year migration figure provided the most robust basis on which to plan for the future growth within the JLP area. As highlighted in JLP submission document SUB9D the range of the ‘reasonable alternatives’ identified at this stage of the plan making process is quite narrow. The Councils agreed that they wanted to provide for all the identified need within the JLP Area so there was no ‘reasonable alternative’ above the DCLG level of growth. The key issue here was ensuring that the proposed level of growth would be a robust reflection of the how growth will happen within the JLP area. This meant that the 10 year migration figure was considered to provide a more accurate picture of growth within the JLP area.

3.3 Joint Local Plan Submission Document Appendix SUB9e sets out a matrix which tested some early work on the Reasonable Alternatives for the Distribution Strategy, it was the intention that this matrix formed part of a consultation document ‘Plymouth and South West Devon Joint Local Plan – deciding upon the distribution of development topic paper’ (TP1). This document sets out a number of reasonable alternatives for the distribution growth. The initial reasonable alternatives which were considered are set out in the table below:

1 Urban Intensification	a) Within Plymouth admin boundaries
	b) Including urban extensions in the urban fringe
2 Urban Concentration	a) Concentration at Plymouth
	b) Concentration at Plymouth and adjoining settlements (creating a necklace of settlements/garden villages)

	c) Concentration at Plymouth and key transport corridors
	d) Concentration at Plymouth, and New Settlements
	e) Concentration at Plymouth and the Area Settlements
3 Dispersal of Development	a) Dispersal – City of Plymouth delivers what it can, and the unmet HMA need is dispersed across SHWD
	b) Complete dispersal - development is shared out evenly across all settlements of the HMA.

Table 1 – Distribution Options

3.4 The Councils had begun to use the initial work on ‘reasonable alternatives to start to develop a preferred option, this was described as concentration of development at Plymouth, Area Centres and Local Centres of West Devon and South Hams. This “preferred option” which was tested on pages 12 and 13 of JLP submission document SUB9E identified Plymouth as the main growth area, with Tavistock, Okehampton, Ivybridge, Totnes, Dartmouth and Kingsbridge playing an important role in South Hams and West Devon along with a number of villages. On page 12 of SUB9E the Councils begin to describe the need for the creation of two sub areas of the JLP area, this included the city of Plymouth and its immediate surroundings and the remaining Towns and Villages of South Hams and West Devon. These were developed through the plan making process into 2 distinct policy areas.

3.5 Plymouth Policy Area comprises of an area including the city of Plymouth and its immediate surrounding in which growth will be driven by economic growth agenda and initiatives being delivered to drive and increase the pace of transformation and change within the City.

3.6 The rest of the JLP area is described as the Thriving Towns and Villages Policy Area, this area comprises of the rest of the JLP Area excluding Plymouth Policy Area and the Dartmoor National Park. It is set out in this part of the plan area that growth would be more modest and will lead to the consolidation of sustainable market towns and thriving hinterlands

3.7 The SA SEA matrix commented that the strategy and emerging policy areas could benefit from clearly setting out the approach to the AONB, recognising that major development should be carefully considered within the AONB in line with the NPPF and that there is a need to carefully balance the needs for development within the AONB against the character of the local area.

3.8 Work was already underway to think about the towns and villages within the TTV area and to refine how development could be dispersed within the towns and villages to ensure that sustainability and the special characteristics of the area are carefully balanced. This was carried out through an assessment of South Hams and West Devon Villages published as Joint Local Plan Evidence O6 South Hams and West Devon Sustainability Assessment in February 2017

3.9 Following this work and further thinking, Sustainability Matrix SUB9E was then updated to reflect some of the concerns raised and a number of additional options were added and tested in the November Topic Paper (TP1). This is shown in TP1 pages 42 to 46 where we have a number of additional options labelled (F) Concentration on Plymouth, Area Centres, Local Centres and all sustainable villages OUTSIDE THE AONB and (G) Concentration on Plymouth, Area Centres all sustainable villages including WITHIN the AONB added to the consultation document.

3.10 This work supported the further refinement of the strategy which was set out in the Regulation 19 version of the Joint Local Plan published in March 2017 along with supporting evidence in the form of a Housing Topic Paper dated March 2017 (TP3). Alongside the JLP the SA SEA was published along with a number of appendices this included SUB9I which set out a summary of the policy options considered by the Councils, pages 4-7 set out the options listed in Table 1 above with some commentary in relation to each of the options

3.10 This table includes options (F) and (G) which were included in the Topic Paper TP1 and which should have been included as an amended SA SEA Matrix within SUB9

1 Urban Intensification	a) Within Plymouth admin boundaries (SUB9i Option 6)
	b) Including urban extensions in the urban fringe (SUB9I Option 7)
2 Urban Concentration	a) Concentration at Plymouth and adjoining settlements (creating a necklace of settlements/garden villages) (SUB9I Option 8)
	b) Concentration at Plymouth and key transport corridors (SUB9I Option 9)
	c) Concentration at Plymouth, and New Settlements (SUB9I Option 10)
	d) Concentration at Plymouth and the Area Settlements (SUB9I Option 11)
	e) Concentration at Plymouth, Area Centres and Local Centres (SUB91 Option 12)

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	<i>f) Concentration at Plymouth, Area Centres, Local Centres and sustainable villages outside of the AONB (SUB9I Option 13)</i>
	<i>g) Concentration on Plymouth, Area Centres, Local Centres and all sustainable villages including within the AONB (SUB9I Option 14)</i>
3 Dispersal of Development	a) Dispersal – City of Plymouth delivers what it can, and the unmet HMA need is dispersed across SHWD
	b) Complete dispersal - development is shared out evenly across all settlements of the HMA.

Table 2

3.11 JLP Submission document SUB9I sets out that the preferred way forward for the distribution strategy was Option 14 Concentration on Plymouth, Area Centres, Local Centres and all Sustainable Villages including those within the AONB. This is the option which was taken forward into the JLP distribution strategy. This is also described as 2 Urban Concentration, Option G. Further discussion about this option and how it is developed into the strategy for the JLP is covered in a number of Topic Papers including:

- TP1 Housing Distribution Topic Paper – Pages 34-37
- TP3 Housing Topic Paper. Para 5.27
- TP4 Employment Topic Paper – Section 3, page 4
- TP5 Strategy Topic Paper – Pages 6-11
- TP3 (rev) New Housing Topic Paper

3.12 As well as testing the strategy and distribution the SA SEA also tested other proposals and policies. Submission document SUB9G and H set out how the reasonable alternatives for development were tested and identified factors which needed to be considered if the sites were to be allocated in the JLP. SUB9J sets out an assessment of all the policies and proposals within the plan. The issues raised in matrices SUB9G and H in relation to the particular sites have helped to inform the policy wording for the allocations in the JLP

3.13 SUB9J includes SA SEA matrices for all of the policies within the plan. The process of incorporating the SA SEA into the plan writing process has been very iterative and the Councils ensured that those who drafted policies and proposals thought carefully about possible impacts and mitigated for them within the policy wording. In some instances the early stages of SA identified ways of improving the policies and where possible these suggestions have been incorporated into the JLP.

Where this is the case there is a commentary about how the SA influenced the plan within the commentary below the policies. For example on pages 9 SUB9J (the matrix for SPT1) and page 10 SUB9J (the matrix for SPT2), there is some text setting out that early assessment of policies suggested a number of changes to the policies which were made prior to the consultation on the pre- submission version of the JLP. This shows how the SA SEA process influenced the submission JLP

- 3.14 In accordance with section 20(7C) of the 2004 Act the Councils requested that the Inspectors should recommend any modifications (MM) necessary to rectify matters that made the JLP unsound and therefore unable to be adopted. Following the examination hearings the Councils prepared a schedule of main modifications to the plan [View the JLP Main Modifications Consultation here](#). These were subject to public consultation for six weeks from Monday 22nd October 2018 until Monday 3rd December 2018. These were accompanied with a SA SEA Report which assessed each of the MM to see if they had any significant effect on the environment and the sustainability indicators. This document concluded that the Main Modifications did not have any significant negative effect on the sustainability indicators as set out in the Sustainability Framework.
- 3.15 The appraisal of the MM shows that the majority of the proposed changes to the JLP have been made in order to provide greater clarity to the policies and proposals, correct factual errors or update the wording in accordance with new guidance. Where changes have been more substantive in nature (through the introduction of a new policy for example), those proposed changes have been tested against the sustainability criteria and it is concluded that there are no significant negative effects from the changes proposed to the Joint Local Plan through the Main Modifications.
- 3.16 The Councils have also tried to ensure that the SA SEA Report is of an appropriate length and at a level of detail to suit a wide range of users. It uses a combination of matrices and commentary to present and summarise its findings.
- 3.17 It is considered that the SA SEA process has helped to both influence and improve the quality of the plan making process by:
- raising awareness of the social, economic and environmental impacts of the plan;
 - facilitating the identification and assessment of reasonable alternatives for the plan, where they existed
 - demonstrating that the plan is the most appropriate given the reasonable alternatives;
 - providing transparency in the decision making process and facilitating public participation;

- facilitating the effective monitoring of implementation of the plan

4. (C) How have the opinions expressed by the public, consultation during the consultation on the plan and Environmental /SA Report have been taken into account

4.1 At each stage of the Joint Local Plan preparation the SA SEA has assessed the potential impacts of the policies and proposals. . The Consultation document shown as SUB11 on the Councils Joint Local Plan submission webpage sets out how the Councils have complied with the Town and Country Planning (local Planning)(England) Regulations 2012 and both the Plymouth City Council and the joint South Hams and West Devon Council’s Statements of Community Involvement (SCIs)

4.2 The Joint Local Plan has been through various stages of consultation.

Plan Preparation stage	Name of Engagement	Date	No of comments
Plymouth City Council			
Issues and Options Consultation	Plymouth Plan Conversation	October to July 2013	2500
	Plymouth Plan Connections	July to October 2014	1000
	Plymouth Plan Check Up	21 January to 4 March 2015	800
South Hams District Council			
Issues and Options Consultation	Our Plan publicity campaign	May to June 2014	76
West Devon Borough Council			
Issues and Options Consultation	Our Plan publicity campaign	May to June 2014	59
Consultation on site options for development	Regulation 19 Stage	February 2015 (6 weeks)	164
Plymouth and South West Devon Joint Local Plan			
Consultation on site options for development	Crunch Time! And Have your Say.	1 July to 23 August 2016	3020

	Considerations	9 th November to 21 December 2016	297
Consultation on submission version of Plymouth and South West Devon Joint Local Plan 2014-2034	Regulation 19 Consultation	15 th March to April 2017	2282 (incl comments on other documents)
Plymouth and South West Devon Joint Local Plan Proposed Main Modifications Consultation	Reg19 Main Modifications	22 October – 3 December 2018	1337

- 4.3 Alongside the consultation on the Joint Local Plan. The SA SEA process has also been through various stages of consultation.
- 4.4 It is a requirement of the Planning and Compulsory Purchase Act (2004) for all planning policy documents to undergo a Sustainability Appraisal (SA) in order to determine their impact on social, economic and environmental objectives. The first stage in the process is to determine the scope of the Sustainability Appraisal and to set out the Sustainability Appraisal Framework, which will be used to assess the Local Plan
- 4.5 The draft scoping report (August 2016), which included a suggested appraisal framework was produced by the three Joint Local Plan Councils. It was sent for consultation to the three statutory consultation bodies (Environment Agency, Historic England and Natural England) for 5 weeks between 17 August and 30 September 2016. It is important to note that previously each of the individual scoping reports for each of the three Councils had been subject to widespread consultation and the topics had been broadly the same, the scoping report provided a way of amalgamating all previous work into one framework
- 4.6 The Scoping Report was updated at the submission stage alongside the JLP. This did not make any changes to the SA SEA Framework but updated it to include reference to the up to date evidence provided to support the Plan and also to ensure that the document references the correct content in terms of the Vision and Objectives of the JLP.

- 4.7 The process of SA SEA is an iterative process that has taken place alongside the evolution of the Joint Local Plan. The Submission Assessment Document clearly sets out the steps taken to assess 'reasonable alternatives' for growth, distribution, site selection and policies in the plan, it also includes an assessment of the vision, policies and proposals which are in the Joint Local Plan. Sustainability has been carefully considered throughout the preparation of the plan and where possible negative effects have been identified the plan has included mitigation so that potential harm can be avoided. The SA SEA of the Plan has concluded that there are no 'significant negative effects' in implementing the Joint Local Plan.
- 4.8 Further details of the comments received and how this helped influence the Plan can be seen in the SUB11 documents and associated appendices.

5. (D) What are the reasons for choosing the plan as adopted and how have the reasonable alternatives been dealt with?

5.1 The SA SEA has adequately considered the likely effects of the reasonable alternatives. Reasonable alternatives are the different realistic options available to deliver the objectives of the JLP. They should be consistent with other aspects of the plan and in particular the plan strategy. Section 5 of Submission document SUB9 sets out the 'reasonable alternatives' which have been considered alongside the preparation of the JLP. The Councils have considered

- Reasonable alternatives for growth SUB9D
- Reasonable alternatives for distribution SUB9E
- Reasonable alternatives for site allocations SUB9G and SUB9H
- Reasonable alternatives for policy options SUB9I

5.2 In respect of the scale of housing and employment provision, the JLP Assessment considered a range of jobs and homes targets which would enable the JLP Authorities to deliver the identified housing and employment needs for the plan period to 2034. This is set out in Section 5 of Submission document SUB9 and the specific SA matrix can be found at SUB9D.

5.3 In terms of the alternatives for distribution, the Councils set out a number of growth scenarios which were tested through the Nov 2016 Topic Paper along with an emerging preferred spatial strategy. This was refined further into the JLP policies and a commentary regarding how it was assessed can be found in Section 5 of SUB9 and the specific matrix can be seen at SUB9E, the November Topic Paper provides more detail in relation to the emerging preferred strategy.

- 5.4 Submission document SUB9I set out the options which have been tested and the decisions which have been made regarding which is the best strategy for the JLP and which options should be disregarded, Pages 3-7 of SUB9I set out a summary of why the Option G (listed as option 14 in SUB9I) Concentration on Plymouth, Area Centres, and all Sustainable Villages in including WITHIN the AONB was chosen as the preferred strategy, although this was modified through the main modifications consultation to remove some villages within the AONB from the list of villages which could accommodate around 10 dwellings. There is still the ability within the AONB for communities to bring forward sustainable development through the production of a Joint Local Plan.
- 5.5 The Strategy Topic Paper (TP5) and the Employment Topic Paper (TP4) published alongside the submission Joint Local Plan along with the newly updated Housing Topic Paper (TP3(rev)) published alongside the Hearing Statements each set out how and why the emerging strategy was chosen.
- 5.6 The SA SEA process identified various positive and negative effects related to strategic alternatives. The cumulative and residual effects of the preferred strategy were identified in the various appendices of SUB9 and it is considered that the SA SEA process has made an effective contribution to the plan-making process
- 5.7 The SA SEA Process also helped inform the distribution of development across the plan area. This is set out in detail in the Housing Topic Paper.

6. (E) The measures that are to be taken to monitor the significant environmental and sustainability effects of the plan

- 6.1 The SEA Regulations require that the responsible authority shall monitor the significant environmental effects of the implementation of each plan and programme with the purpose of identifying unforeseen effects at an early stage and being able to take appropriate remedial action. This also fits in with the need for the Councils to monitor the implementation of the JLP.
- 6.2 Section 6 of SUB9 sets out the Monitoring Requirements for the JLP as follows. To ensure that the JLP delivers its vision and objectives the implementation of its policies will be monitored. This also serves the purpose of measuring how sustainable development is being monitored within the JLP area. The process for monitoring the Joint Local Plan including the Protected Characteristics of the Equality Act 2010 and any effects identified through the Sustainability Assessment

and Habitats Regulations Assessment is set out in section 7 of the Joint Local Plan. The results of the monitoring will be reported annually through the Councils Monitoring Report. There will be a full review of the JLP every 5 years from adoption which will provide an opportunity to assess how the plan is progressing and look at the effects the plan is having on the sustainability criteria.

6.3 The Councils will also use the Annual Monitoring Process to set out any new scoping documents which have been published and the implications that these might have on the SA SEA Framework. The SA SEA Framework document will be reviewed in due course to ensure that it meets with the new NPPF 2019.

Appendix 1- The SA SEA Framework

SEA Topic	Objective	Issues to consider
Population	SA/SEA Criteria 1 To promote community vitality and resilience by improving health and reducing inequalities.	Does it: <ul style="list-style-type: none"> • Promote a sustainable mix of uses which are compatible to their surroundings? • Promote the retention and development of community services and facilities? • Facilitate flexible working practices which enable people to live near their place of work? • Provide opportunities for communities to respond to unforeseen events and circumstances? • Promote social inclusion? • Promote healthier lifestyles through access to leisure opportunities (e.g. walking/Cycling)? • Promote access to health and social care facilities, and to green and open space? • Ensure that land contamination or pollution do not pose unacceptable risks to human health? • Meet the noise standards required by law for specific land uses?
Population and Human Health	SA/SEA Criteria 2 To improve the health and wellbeing of communities including reducing crime and fear of crime.	Does it: <ul style="list-style-type: none"> • Improve the health of the community and encourage healthy lifestyles? • Have direct impact on health, mental health and wellbeing? • Have an impact on social, economic and environmental

	<p>For any health impacts identified during the assessment... Will the health impacts affect the whole population or will there be differential impacts within the population?</p> <p>Will the health impacts be difficult to remedy or have an irreversible impact?</p> <p>Will the health impacts be medium to long term?</p> <p>Are the health impacts likely to generate public concern?</p> <p>Are the health impacts likely to generate cumulative and/or synergistic impacts?</p> <p>Combining the answers, on balance will the health impacts have an important positive or negative impact on health?</p>	<p>living conditions that would indirectly affect health?</p> <ul style="list-style-type: none"> • Affect an individual's ability to improve their own health and wellbeing? • Lead to a change in demand for or access to health and social care services? • Encourage social interaction in public spaces? • Improve access to open space and sports, leisure and recreation facilities? • Improve the walking and cycling provision? • Help people remain independent? • Promote a safe environment through designing out crime and fear of crime? • Discourage anti-social behaviour?
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		Can the policy be improved?	
Population and Human health	SA/SEA Criteria 3	To help provide access to a suitable mix of good quality housing	Does it: <ul style="list-style-type: none"> • Improve the mix and quality of housing stock, including open market and affordable housing to meet a range of needs? • Increase needed provision for specific sectors of the community e.g the elderly, disadvantaged, gypsies and travellers? • Promote improvement to the existing and future housing stock?
Population and Human Health	SA/SEA Criteria 4	To improve access to a range of basic services and amenities	Does it: <ul style="list-style-type: none"> • Improve the access to key services (education, shops, employment, recreation, health, community services and cultural assets)? • Provide physical access for those with disabilities? • Improve and/or sustain public transport or other sustainable transport modes?
Population and Human Health	SA/SEA Criteria 5	To provide access to opportunities for education and skills development.	Does it: <ul style="list-style-type: none"> • Ensure the provision of education and training facilities that meet local needs and that are accessible to all? • Support skills and training development in the local community and will it contribute to meeting identified skills shortages? • Will it support collaboration between educational establishments, businesses and industry?

<p>Population and Material Assets</p>	<p>SA/SEA Criteria 6</p>	<p>To support the growth potential of business sectors to provide jobs and encourage sustainable economic growth and prosperity.</p>	<p>Does it</p> <ul style="list-style-type: none"> • Provide for the needs of the economy, particularly local businesses (such as choice of premises, services, infrastructure and skilled workforce)? • Support the growth of existing businesses and business and business sectors? • Improve efficiency, competitiveness, vitality and adaptability of the local economy? • Encourage investment in businesses, people and infrastructure long term? • Encourage the provision of jobs which are accessible to all? • Sustain and active and working countryside, including rural diversification? • Promote competitive town centres which enhance customer choice, retail offer and the individuality and vitality of the town centre? • Improve access to high quality communications infrastructure? • Facilitate the creation of, or sustain local supply chains and retention of spending in the local economy?
<p>Material Assets and Climatic Factors</p>	<p>SA/SEA Criteria 7</p>	<p>To help develop a low carbon economy which will help to prepare the area for climate change for example by reducing energy demand and</p>	<p>Does it:</p> <ul style="list-style-type: none"> • help to protect the community from changing weather patterns and environmental conditions and adapt to climate change? • Will it minimise the demand for energy?

		promoting energy generation for renewable sources.	<ul style="list-style-type: none"> • Will it encourage efficiency in the use of energy? • increase the ability of the community to be more self-sufficient? • reduce the need for energy use and/or reduce fuel poverty? • support decentralised low carbon and renewable energy generation? • facilitate the generation and use of renewable energy? • support reductions in greenhouse gas emissions? • Promote the production of community owned energy? • Enable increased local retention of the benefits of energy generation?
Population and Human Health	SA/SEA Criteria 8	To reduce the need to travel, encourage alternatives to the car, and make best use of existing transport infrastructure	<p>Does it:</p> <ul style="list-style-type: none"> • Improve transport of goods/people by more sustainable means? • Encourage walking, cycling and use of public transport? • Help to reduce traffic congestion and improve road safety? • Reduce the need to travel, especially by car? • Help provide walking/cycling/public transport infrastructure? • Integrate well or improve the existing public transport infrastructure?
Biodiversity, Fauna and Flora	SA/SEA Criteria 9	To protect, conserve and enhance biological and geological diversity.	<p>Does it:</p> <ul style="list-style-type: none"> • Protect and enhance species, habitats, soils and geologically important sites? • Enhance and improve connectivity of green

			<p>infrastructure and the natural environment?</p> <ul style="list-style-type: none"> • Provide opportunities for habitat creation or restoration and link existing habitats as part of the development process? • Ensure the sustainable management of natural habitats? • Help address any identified recreational impacts on biological and geological diversity?
Landscape	SA/SEA Criteria 10	To conserve and enhance the distinctive character and special qualities and features of green and blue spaces	<p>Does it:</p> <ul style="list-style-type: none"> • Conserve and where possible enhance landscape character? • Conserve and enhance the natural beauty and special qualities of protected landscapes and their settings in particular the AONB and Dartmoor National Park? • Maintain the character of the undeveloped coast? • Protect and enhance natural networks, the living networks of green spaces (including parks, nature reserves, woodlands and allotments) and blue spaces (including rivers, streams, the coast and sea) throughout the area? • Will it improve access to public open space?
Cultural Heritage	SA/SEA Criteria 11	To protect and enhance the cultural and historic environment	<p>Does it:</p> <ul style="list-style-type: none"> • Continue to protect and or enhance historical, archaeological and cultural assets and their settings?

			<ul style="list-style-type: none"> • Make a positive contribution to existing landscape, townscape and villages and their settings? • Promote or enhance local culture? • Protect or enhance designated or non-designated heritage assets (including landscapes) and their settings including the World Heritage Site? • Does it harm the significance of the asset?
Population and Human Health	SA/SEA Criteria 12	To respect, maintain and strengthen local distinctiveness and sense of place by providing high standards of design.	<p>Does it:</p> <ul style="list-style-type: none"> • Enhance the quality and character of places? • Promote good design including density and site layout appropriate to the character of the location? • Encourage the use of local materials? • Minimise pollution from light and noise?
Water and Climatic Factors	SA/SEA Criteria 13	To avoid development in areas of high flood risk and reduce vulnerability to flooding	<p>Does it:</p> <ul style="list-style-type: none"> • Help to manage and minimise the risk of flooding and coastal erosion to existing and new development and infrastructure? • Help to discourage inappropriate development in areas at risk from flooding and coastal erosion? • Reduce the risk of flooding to the development and surrounding areas? • Help reduce the rate of run off? • Promote sustainable flood risk management? • Encourage sustainable drainage?

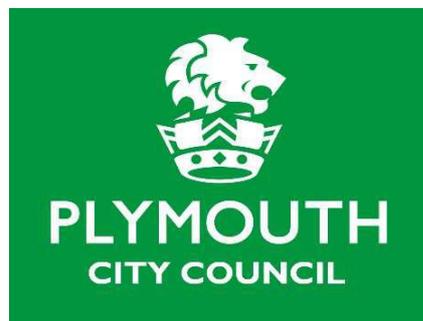
Soil and Water	SA/SEA Criteria 14	To minimise resource use including greenfield land, minerals and water and to maintain and improve land quality	<p>Does it:</p> <ul style="list-style-type: none"> • Make the most efficient use of land including previously developed land where appropriate? • Help remediate contaminated sites? • Minimise the loss of good quality agricultural land? • Safeguard mineral resources and encourage their efficient use? • Increase efficiency in the use of raw materials and promote recycling? • Conserve water resources and quality? • Improve the quality of rivers, the sea and groundwater? • Protect and improve freshwater and estuarine quality? • Provide adequate utilities infrastructure that does not adversely impact on the environment? • Protect soils of high environmental quality? • Provide appropriate soil management and storage?
Material assets, water, soil, Human Health and Population	SA/SEA Criteria 15	To minimise the production of waste and encourage the sustainable use of resources	<p>Does it:</p> <ul style="list-style-type: none"> • Reduce the use of primary resources and promote the use of recycled materials? • Encourage the use of local products and services?
Air, Climatic Factors, Human Health	SA/SEA Criteria 16	To protect and improve air quality	<p>Does it:</p> <ul style="list-style-type: none"> • Help improve air quality • Support specific actions in designated AQMAs? • Help reduce pollution from traffic?

			<ul style="list-style-type: none"> Minimise atmospheric pollution and enhance air quality?
Equality Objectives			
Equality and Diversity	SA/SEA Criteria 17	To promote equality of opportunities and eliminate discrimination	Does it <ul style="list-style-type: none"> Ensure equality of opportunity and equal access to facilities and infrastructure for all? Ensure no discrimination based on the 'protected characteristics' defined in the Equality Act 2010?

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West Devon
Borough
Council



South Hams
District Council

Plymouth and South West Devon Joint Local Plan – Delivery and Governance

March 2019

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Introduction

- 1.1 This paper sets out the officer and member arrangements for the implementation of the adopted Plymouth and South West Devon Joint Local Plan (JLP). It sets out:
 - The approach the JLP takes to the distribution of development across the plan area, and the implications of this distribution for monitoring of development and managing the implementation of the JLP strategy.
 - The governance that the JLP Authorities have put in place to ensure that the JLP is effectively monitored, that delivery is properly managed, and that strategic planning continues to take place collaboratively between the 3 LPAs.

Background

- 1.2 Plymouth City Council, West Devon Borough Council and South Hams District Council, working together have prepared a joint local plan for their area - the Plymouth and South West Devon Joint Local Plan (the JLP).
- 1.3 The JLP provides a strategic spatial framework for an acknowledged economic and housing market functional area (SHMA Part 1 (HO13) Section 2). It sets a strategic framework and goes on to set out land required for development (site allocations) and the development management policies to be used to guide development throughout the plan period.
- 1.4 The Plan is driven by the function and character of the place, and particularly by the nature and role of the settlements and the relationship between them. The plan area varies very significantly in its character and with parts of the area performing very different economic roles, yet there are strong relationships between the different parts. Managing these roles and relationships for the greater wellbeing of the area and its communities in the future is the purpose of the Plan.
- 1.5 It should be emphasised that the JLP represents the first time that the three JLP Authorities have collaborated so fully on plan making. There is a clear commitment to continuing and building upon the collaboration that has occurred so far.

Managing the Distribution of Development, and the Implications for the Delivery of Housing

- 1.6 The Plan seeks to do something more than could ever be achieved by three separate plans for individual districts defined by administrative boundaries – it sets out a strategic framework unconstrained by local authority boundaries for managing the relationship between the growing city of Plymouth and the surrounding rural areas. It does this by framing the strategy around two Policy Areas: the Plymouth Policy Area (PPA) which includes the city and parts of South Hams adjoining the city boundary, and the Thriving Towns and Villages Policy Area (TTVPA) which comprises the remaining parts of South Hams and West Devon. The Policy Areas are therefore different from the local authority areas due to the inclusion of parts of South Hams on the fringe of Plymouth into the Plymouth Policy Area, and the amalgamation of the remaining part of South Hams with all of West Devon into the Thriving Towns and Villages Policy Area. The definition of the Policy Areas in this way recognises the relationship between housing, economic activity, infrastructure and movement, and seeks to move towards more sustainable patterns of development.
- 1.7 The JLP makes provision for housing to be developed to meet identified needs, and distributes that housing across the plan area to achieve a sustainable pattern of development. It expresses the amount of housing to be developed during the Plan period by setting the plan housing requirement at the whole plan level (26,700 new homes – note that this excludes any housing to be provided in the Dartmoor National Park).

The above approach means that if a five year supply of land for new homes cannot be demonstrated against the whole plan requirement at any time, the supply will need to be addressed at the whole plan level – i.e. as the plan requirement is set at the whole plan level, the consequences of there being a lack of a 5 year land supply are also taken into consideration at the whole plan level. Nevertheless, the JLP also sets out how many new homes are expected to be delivered in the two Policy Areas and in the three local planning authorities. These additional figures are based on:

- A distribution of housing development that gives force to the sustainable development strategy that forms the basis of the Joint Local Plan
- the housing sites identified in the housing supply.

They are not housing requirements. They are intended to be used

to show that each LPA is bringing forward development in line with the strategy set out in the JLP, ensuring that through monitoring of delivery, each LPA is making decisions which will implement the JLP approach. These figures are therefore an important element of the governance that the JLP authorities are setting up to deliver the JLP, and enable the JLP authorities to ascertain where any shortfall in supply has arisen by both policy area and LPA, and to therefore take responsibility, acting to address the shortfall in those places where it has arisen. Appendix One sets out how this approach would be used if a five year land supply of lands for housing could not be demonstrated at any time.

Governance Arrangements

- 1.8 The innovative and positive approach taken in the JLP requires similarly innovative and positive approaches to its implementation. The JLP Authorities have therefore developed new arrangements to be put in place upon adoption of the JLP. These arrangements have the following aims:
- To ensure that implementation of the JLP is monitored on a consistent basis across the plan area, and is clearly reported
 - To ensure that there is a clear and consistent understanding of the JLP across the three LPAs and that consistent advice on policy is given to Members and officers
 - To ensure that in the event that monitoring should show that the JLP is not being implemented as envisaged, or that key delivery targets are not being met, that there is Member oversight and scrutiny which enables remedial action to be taken by each LPA.
- 1.9 The JLP Authorities have therefore put in place the following structures to drive delivery of the JLP, and particularly to ensure that the approach to housing delivery and five year land supplies at the whole plan level is maintained:

A Joint Local Plan Team

- 1.10 The Joint Local Plan Team is a joint officer team of the three authorities, working together under common leadership, with a clear role and responsibilities, and reporting to a combined senior management team. This is a natural evolution of the group that has undertaken the collation of evidence and the preparation of the JLP, but with a stronger and simpler structure. The team works across the three JLP

Authorities, advising Members and Officers on the implementation and eventual review of the JLP.

- 1.11 Clearly all decisions on planning applications will in future be made in accordance with the JLP as adopted, according to the relevant legislative and policy provisions. The Joint Local Plan Team will assist the Development Management Committees of the Councils by advising case officers of the implications of any proposals for the delivery of the JLP, by providing advice on the application and interpretation of the JLP strategy, and attending the committees where appropriate to provide similar advice to Members. The Joint Local Plan Team will also assist in Member and officer training, to ensure a consistent understanding of the JLP across the three LPAs.
- 1.12 The terms of reference for the new Joint Local Plan Team are appended to this paper as Appendix 2.

A Single Team undertaking monitoring of the JLP, and a single AMR

- 1.13 The Joint Local Plan Team plays a key role in undertaking the dynamic monitoring of the implementation of the JLP on a consistent basis across the Plan area. Monitoring will have a vital role going forward, in particular in keeping on top of the provision of housing across the plan area and in managing any measures arising from any concern about the maintenance of a five year supply of land for housing. The Joint Local Plan Team would therefore be in control of monitoring housing delivery against the whole plan requirement, reporting on the 5 year land supply for the whole plan area, and setting out the implications of housing delivery for each local planning authority, including any evidence of past and/or future fall in supply in the context of the 5 year land supply position..
- 1.14 There will be one common Annual Monitoring Report for the JLP, supplemented by more frequent monitoring and review to assist in managing the implementation of the JLP.

The Joint Local Plan Partnership Board

- 1.15 The JLP was prepared under the guidance of a member Steering Group made up of two members from each of the three participating local authorities. This Steering Group continues to meet and whilst not a decision-making body has provided strong and consistent guidance on the formulation of

the JLP on behalf of the JLP Authorities.

- 1.16 The JLP Authorities have decided that the JLP Member Steering Group should evolve to become a Joint Local Plan Partnership Board, made up of senior members from each authority. This Partnership Board would be a more formal body than the existing Steering Group, with powers to review progress on the implementation of the JLP and engage with the individual Councils in addressing any delivery issues revealed by monitoring. The Joint Local Planning Team would provide officer support to the Partnership Board, advising on the results of monitoring and recommending actions to be taken. Clearly, the responsibility for making decisions on planning applications remains with the Planning Committees of the three local authorities, but it is the intention of these arrangements that the new Joint Local Plan Team should provide advice and guidance to the case officers, and that the JLP Partnership Board should have a role scrutinising the results of decisions made at the local level on the delivery of the JLP.
- 1.17 It will be the responsibility of the Partnership Board to ensure that all elements of the Joint Local Plan are being delivered as set out in the plan. This means that the Partnership Board will be responsible for examining the results of the monitoring of all elements of the plan – including housing delivery, employment land delivery, retail land delivery, and infrastructure – and taking action in the event that delivery does not match what is set out in the plan.
- 1.18 An example of how the JLP authorities envisage these arrangements working would be in the event of monitoring showing the lack of a five year land supply at the whole plan level. The Joint Local Planning Team would alert the Partnership Board to the issue and to the implications – ie that given the lack of a 5 year land supply para 11 of the 2018 NPPF is engaged and that housing proposals across the plan area should be considered in the light of the presumption in favour of sustainable development with the 'tilted balance' engaged. Monitoring against the LPA indicators set out in annex 2 of the JLP should reveal which LPA is experiencing the under delivery, enabling the Board to ascertain why delivery is not occurring as expected. The Board would then assist the LPA to develop appropriate actions based on the Housing Implementation Strategy set out in para 3.32 of the JLP, and to implement agreed actions, to remedy the under delivery and achieve a 5 year land supply. The seniority of the Members on the Partnership Board would enable actions

to be taken directly to the decision making committees of each LPA.

- 1.19 The Terms of Reference for this Board are appended to this Topic Paper as Appendix 3.

APPENDIX 1 – FIVE YEAR LAND SUPPLY SCENARIOS

Key principles:

The key principle underpinning the approach that the JLP Councils will use when taking actions to maintain a 5 year land supply of sites is that of **Collective responsibility**. This principle means that the LPAs commit to work together to ensure that the five year supply target is achieved for the Plan Area as a whole.

The monitoring levels:

Monitoring data on housing delivery will be collected at three levels:

- Whole plan area – 26,700 dwellings. This is the level at which 5 year land supply and Housing Delivery Test performance will be monitored in the light of the 2018 NPPF and PPG.
- Policy Areas (for the purpose of monitoring the delivery of the spatial strategy as set out in the JLP)
 - Plymouth PA – 19,000 dwellings
 - TTV PA – 7,700 dwellings
- LPA Areas (for the purpose of monitoring the delivery of each LPA's contribution to the overall housing requirement for the JLP)
 - Plymouth – 13,200 dwellings
 - West Devon – 3,200 dwellings
 - South Hams – 10,300 dwellings (5,800 dwellings in Plymouth PA; 4,500 dwellings in TTV PA)

Primary plan-monitor-manage tools:

The following tools represent the main methods that the JLP Councils will use to monitor housing delivery and the maintenance of a 5 year land supply of sites:

- Single Joint Local Plan Team overseeing monitoring and management of 5 year land supply and Housing Delivery Test performance.
- Annual Monitoring Report, including a detailed Annual Housing Statement setting out detailed reporting on housing delivery issues and 5 year land supply position against the JLP whole plan requirement..

- Ongoing internal monitoring of delivery progress and sites intelligence during the year.
- Annual housing forum to discuss with industry:
 - General market conditions
 - Housing supply and delivery constraints.
 - Progress on planning applications/consents issued
 - Actions required to maintain supply
- Rolling Housing Implementation Strategy – to be incorporated in Annual Housing Statement – including actions the JLP Councils are taking to ensure maintenance of a 5 year land supply and housing delivery.

Governance tools to deliver individual and collective responsibility:

In the event that a 5 year land supply of sites cannot be demonstrated, the following processes would be triggered, overseen and guided by the Joint Local Plan Partnership Board.

- In the event that there is a shortfall in five year supply at Plan Area level, the Joint Councils collectively will enter into formal discussions to reach an agreement on the details of measures to remove the shortfall, identifying:
 - The scale of the shortfall.
 - The location of the shortfall (i.e. . in which LPA is the shortfall occurring, comparing delivery to the LPA monitoring targets set out above).
 - The LPA/s taking responsibility for removing the shortfall.
 - The actions to be taken to remove the shortfall.
- This overall process will be guided by the Joint Local Plan Partnership Board.

Development management scenarios.

The JLP sets out a position in which the tilted balance is triggered if the whole plan area cannot demonstrate a 5 Year Land Supply. This means that the tilted balance is not triggered if an individual LPA cannot demonstrate a 5 YLS against the monitoring targets in Annex 2 of the JLP, as long as the whole plan area can demonstrate a 5YLS.

NB – ‘Tilted Balance’ is a term which has been used to describe how judgements on planning applications should be made when a 5 Year Land Supply cannot be demonstrated. It simply means that in such a situation, the contribution that a housing proposal could

make to improving the housing supply in an area and therefore contributing to a 5 Year Land Supply of sites for housing should be weighed against any potential reasons to refuse the application. The amount of weight given to this consideration by Inspectors is often considerable, leading to a greater number of permissions for housing on such sites in places where housing land supply and delivery has not kept pace with the requirement set out in an up to date local plan.

Under the governance arrangements set out in this Paper, the Joint Local Plan Team will monitor housing delivery across the whole plan area, the Policy Areas, and at LPA level. The JLP Team will also monitor the maintenance of a 5 Year Land Supply so that any deficiencies are picked up and reported to the JLP Partnership Board at the earliest opportunity and are used to inform decision making by Planning Committees.

In terms of DM decision making, it is also important to ensure that when refusal reasons are drawn up for inappropriate development proposals, that reference is made to the JLP distribution strategy as expressed by the Policy Areas – as this will provide an additional policy position for considering applications. The scale of development will clearly be a factor in such a consideration, and it would be for the JLP Team to provide clear guidance to planning committees as to how policy should be applied.

SUMMARY OF SCENARIO

Scenario where 5 year supply targets not met in part/full	1. Application of LPA monitoring target	2. Application of Policy Area policy target	3. Application of HMA policy target	4. Consequences
Where the whole Plan Area cannot show a five year supply	<ul style="list-style-type: none"> Aim to rectify the issue – initially within the LPA area(s) where the deficiency is occurring. 	<ul style="list-style-type: none"> In event that no remedy within the LPA area(s) where the deficiencies are occurring, aim to remedy in the other LPA area of each respective policy area. 	<ul style="list-style-type: none"> In event that the situation has not been able to be remedied in either or both policy areas sufficient to satisfy the HMA target, the JLP Councils undertake full review of the cause and potential solutions to the deficiency within the policy area(s) concerned. 	<ul style="list-style-type: none"> If no remedy found within policy areas, the Framework’s presumption in favour of sustainable development becomes primary consideration. The JLP Councils will need to formally consider whether the need for a partial or full review of the JLP is required.

APPENDIX 2 - SCOPE OF THE JOINT LOCAL PLAN TEAM

- The JLP Councils are committed to putting in place joint officer arrangements in relation to the monitoring, implementation and future review of the joint local plan.
- This will be delivered through a dedicated Joint Local Plan Team that will report to the Joint Local Plan Senior Management Team and be responsible to the Joint Local Plan Partnership Board.
- The primary responsibility of the Joint Local Plan Team will be to ensure the delivery of effective programme management of the preparation, monitoring, implementation and review of the Joint Local Plan.
- To undertake this primary responsibility the team will:
 - Establish a consistent JLP monitoring framework across the Plan Area and for each Policy Area and LPA – covering housing, employment, retail and all of the indicators identified in the plan - and commission work as required to ensure that this framework is delivered and maintained.
 - Maintain up to date information on the 5 year housing land supply situation for each LPA and each Policy Area.
 - Maintain a local plan delivery risk register and putting in place appropriate mitigation strategies and intervention programmes as required.
 - Maintain a sound and robust evidence base, meeting statutory requirements and ensuring that the LPAs have the core information available to meet their wider planning responsibilities.
 - Provide training and consistent quality support to officers and members in relation to interpretation of the JLP and its monitoring information through the development management process.
 - Provide strategic policy guidance and support to teams leading on the preparation of supplementary planning documents and to neighbourhood planning groups.
 - Produce reports (at least annually) on the delivery of the JLP and identifying any interventions / remedial measures needed where the plan is off track.

- Programme manage partial and full reviews of the JLP as required.
- Represent the LPAs in regional and national planning as appropriate, including horizon scanning of national policy changes.
- Maintain an up to date local development scheme and authorities monitoring reports, and commission work as appropriate to meet other statutory requirements, including brownfield land registers and statement of community involvement.
- Provide support and advice to the JLP Partnership Board, and to officers and Members of the JLP Authorities, in relation to plan preparation, monitoring, implementation and review.

APPENDIX 3 - PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN PARTNERSHIP BOARD – TERMS OF REFERENCE

1 Overall objective

- 1.1 To oversee the preparation, monitoring and review of the Plymouth and South West Devon Joint Local Plan and to keep the individual local planning authorities (LPAs) on the agreed course to implement the plan.

2 Key functions

- 2.1 To ensure that the constituent councils maintain a clear programme for preparation, monitoring and review of the Joint Local Plan and associated Supplementary Planning Guidance through annual updates of the Local Development Scheme (LDS) and oversight of the project plans identified in the LDS.
- 2.2 To provide strategic guidance to the LPAs in their plan making and delivery functions.
- 2.3 To provide active and dynamic overview of the performance of each LPA in meeting targets for maintaining a five year housing land supply for each Policy Area, and for delivering all other elements of the JLP, including the delivery of key infrastructure and development projects.
- 2.4 To identify where key plan targets are not being realised and to ensure that appropriate action is recommended.
- 2.5 To keep under review changes to the international, national, regional and local context which affect the plan and its delivery.
- 2.6 To keep under review the effectiveness of governance around the preparation, monitoring, implementation and review of the JLP.
- 2.7 To direct such work through the JLPC Senior Management Team as necessary in the fulfilment of the Board's overall objectives.

3. Accountability

- 3.1 The Partnership Board is not a constituted committee of the constituent councils and has no executive or local authority decision making powers delegated to it.
- 3.2 Decisions in relation to the review of, implementation of, or amendments to the Joint Local Plan will require ratification through the standard governance processes of each constituent council.
- 3.3 The Partnership Board will make recommendations for action to constituent councils or the representatives as appropriate.

4. Membership

- 4.1 Membership will comprise 2 Members following authorities. Each Local Authority will agree their own Members.
 - Plymouth City Council

- West Devon Borough Council
- South Hams District Council

4.2 The Partnership Board will co-opt additional partners whom it is considered are most likely to be able to assist in the delivery of the JLP, such appointments will not be voting members. A Member from Devon County Council will be co-opted onto the Partnership Board as a key delivery partner.

5. Frequency and meeting locations

- 5.1 The Partnership Board will meet at least twice per year which will be reviewed after 12 months, including an Annual General Meeting to receive and agree the Annual Monitoring Report.
- 5.2 The date, time and venue of meetings will be fixed in advance by the Board and an annual schedule of meetings published.
- 5.3 Additional meetings may be convened at the request of the Chair in consultation with the JLP Senior Management Team
- 5.4 All meetings will take place in locations as determined by the authority chairing the Partnership Board.

6. Voting

- 6.1 In principle, all decisions and recommendations will be reached on a consensus basis.
- 6.2 In exceptional circumstances, and where decisions cannot be reached by a consensus of opinion and/or there is a need to provide absolute clarity to executive bodies, voting will take place and decisions agreed by a simple majority of all members present.
- 6.3 Where there are equal votes the matter will be escalated to the Leaders of the LPAs for decision.

7. Chair

- 7.1 The Chair shall serve a one-year term beginning in May of each year.
- 7.2 The Chair will rotate between constituent authorities.
- 7.3 Where the Chair is not present, the members present shall select a Chair for the meeting.
- 7.4 Two Vice-Chairman will be selected, to represent each of the two authorities not represented by the Chairman.

8. Declaration of Interests

- 8.1 Members of the Board must, before the end of 28 days beginning with the day on which they become a member of the Board, notify the host authority's monitoring officer of any disclosable pecuniary interests.

9. Quorum

9.1 At a meeting of the Board the quorum shall be at least one representative from each of Plymouth City Council, South Hams District Council and West Devon Borough Council.

10. Substitutes

10.1 Substitutes to the Board will not be allowed.

11. Vacancy

11.1 Should a vacancy occur by virtue of the death, resignation, or ineligibility replacements will be appointed by the constituent authority which holds the vacancy.

12. Access to Information/ Freedom of Information

12.1 Partnership Board meetings will not be public meetings, however, there will be one meeting per year held as the Partnership Board Public Forum at which the Annual Monitoring Report will be presented.

12.2 Freedom of Information Act provisions shall apply to all business.

13. Papers

13.1 The agenda and supporting papers shall be in a standard format and circulated at least five working days in advance of meetings. The minutes of decisions taken at meetings will be kept and circulated to constituent authorities as soon as possible and will be published on the host authority's website.

13.2 Meetings summons and related papers will be provided electronically to members.

14. Secretariat

15.1 The administration of the Board will be supported by the Chair's Authority

15. Communications

16.1 The Joint Local Plan team will prepare communications on behalf of the Board for the approval by the Chair.

16.2 Communications will be shared with members of the Board electronically before being issued publically.

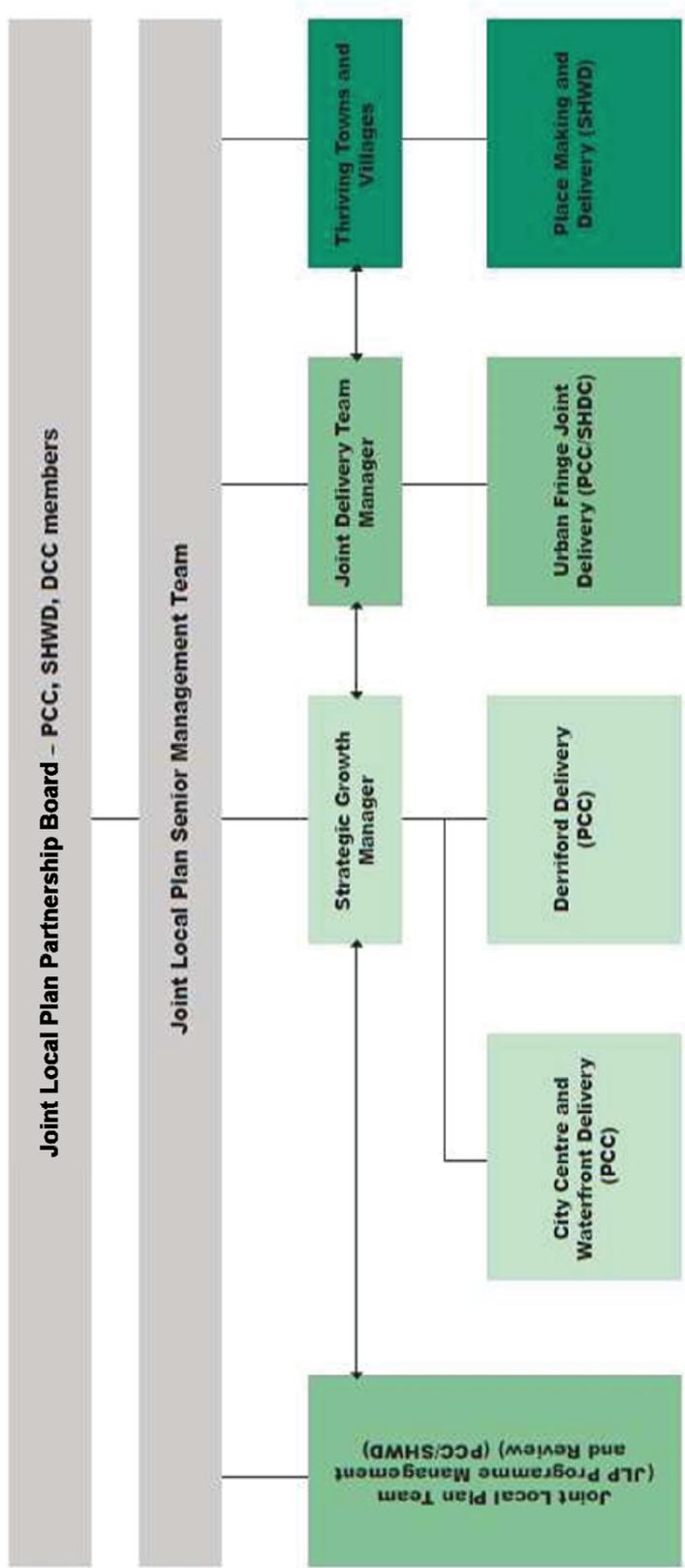
16.3 Communications will be issued by the Communications Team of the Chair's authority with the agreement of the Chairman and the two Vice Chairmen.

16. Gaps in procedure

17.1 Where there are gaps in procedure the Chair determines what to do.

APPENDIX 4 – JLP GOVERNANCE STRUCTURE DIAGRAM

PROPOSED JOINT LOCAL PLAN GOVERNANCE FRAMEWORK



Note: This diagram shows structures that are explicitly related to the management and delivery of the Joint Local Plan. It is not an attempt to show the complete structure for how each council manages its planning functions.



Special Council Meeting – Advice to Members re Interests

I have been asked to provide advice to Members with guidance on declarations of interest in consideration of the Council Agenda Item recommending adoption of the Plymouth and South West Joint Local Plan.

Members could be regarded as having, as a matter of law, Disclosable Pecuniary Interests (DPI) due to land ownership within the red line settlement boundaries simply because you are residents of the District. Government has previously issued guidance that the legislation was not intended to cover such District wide decisions, however, for the avoidance of doubt and Members' protection, I take the view acting as the Council's Monitoring Officer that the criteria set out in Section 33 (2) (a) to (e) of the Localism Act 2011 applies and for land ownership simply within the red line settlement boundaries, it is appropriate to grant a dispensation to all Members to enable them to debate and vote on the item.

However, if you or your spouse/partner have land ownership (still a DPI) in any of the specific areas which are to be allocated for development, the above blanket dispensation does not apply. For specific land allocation, an individual dispensation would be required to remain in the room, take part in the debate and vote on the item.

Members who own land within an allocated site or adjacent to an allocated site where the value of your property is likely to be affected by the allocation should explain the nature of their interest at the meeting and will not be able to participate in the item without the benefit of an individual dispensation. I consider a personal dispensation would be inappropriate but if any Member has a query regarding their own personal circumstances please contact me ahead of the meeting. Failure to declare a DPI and take part in a decision is a criminal offence.

Land within specific allocations, which is owned by an external body or organisation, may also fall within the definition Disclosable Pecuniary Interests if you are employed for profit or gain by that organisation.

If you were appointed or nominated to an outside body or organisation by the Council which owns or controls land then this will amount to a Personal Interest and participation at meetings is set out in the Code of Conduct.

Becky Fowlds 20/3/19

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Internal Audit Report

Tavistock Hotel Proposal

West Devon Borough Council

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Auditing for achievement

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Devon Audit Partnership

The Devon Audit Partnership has been formed under a joint committee arrangement comprising of Plymouth, Torbay and Devon councils. We aim to be recognised as a high quality internal audit service in the public sector. We work with our partners by providing a professional internal audit service that will assist them in meeting their challenges, managing their risks and achieving their goals. In carrying out our work we are required to comply with the Public Sector Internal Audit Standards along with other best practice and professional standards.

The partnership is committed to providing high quality, professional customer services to all; if you have any comments or suggestions on our service, processes or standards, the Head of Partnership would be pleased to receive them at robert.hutchins@devonaudit.gov.uk

Confidentiality and Disclosure Clause

This report is issued under strict confidentiality and, whilst it is accepted that issues raised may well need to be discussed with other officers within the Service, the report itself must not be copied/circulated/disclosed to anyone outside of the Service without prior approval from the Head of Devon Audit Partnership.

This report is prepared for the Service's use. We can take no responsibility to any third party for any reliance they might place upon it.

1 Introduction

1.1 The Devon Audit Partnership (DAP) was asked by the Chief Executive of West Devon Borough Council, to undertake a review on the basis of what lessons could be learnt following the rejection by Members to approve the funding for a proposal to develop the Abbey Rise Car Park site in Tavistock. An audit brief was agreed with the following objectives:

- An assessment of the effectiveness of the strategy, using the information and evidence that was considered as part of the business case for the Tavistock Hotel proposal and its robustness (in relation to the decision to proceed to the Hub Committee to recommend to Council for the funding to be set aside for the project as part of the Capital Programme Proposals for 2019-20) – to include outline consideration of car parking, the economy, the design and planning considerations;
- To detail the timetable of events for reports and meetings on the decision, prior to the Hub Committee recommendation on 29th January 2019;
- To determine the level of consultation which had taken place and with whom, including other local authorities, business organisations, consultants and voluntary/specialist organisations;
- An assessment of whether due process and the correct governance procedures were followed and adhered to as part of the decision making process;
- What were the factors that led to a number of recommendations from the Hub Committee on 29th January being overturned at Full Council on 12th February – not just by a majority of Councillors but by a unanimous vote;
- A high level review of the information and content on social media.

1.2 Our approach to this work and our findings are detailed in Section 2 below.

Background / Timeline

Due to ongoing reductions in central government grant funding, local authorities are increasingly reliant upon income generation. This has led many Councils to implement strategies to generate additional income, as a means to address funding challenges, to support ongoing service delivery.

Direct Property Investment is now commonly undertaken by Local Authorities as one way of generating income, acquiring assets both within and outside of their governance boundaries. Public Works Loan Board (PWLB) long term lending is at very preferential rates when compared to commercial investors. Property investment is capable of generating returns above PWLB rates, creating positive surplus income. This can be used to fund current services and mitigate the impact of ongoing cuts to council services, protecting those that would otherwise be at risk.

In line with this move by Local Authorities, West Devon Borough Council approved a commercial property investment strategy and the procurement of a property agent to work on behalf of the Council in relation to the strategy in April 2017.

In May 2018, CCD Properties, an independent consultancy firm appointed by the Council to identify investment opportunities, presented to Hub Committee Members, the Invest to Earn Group and the chairs of Development Management, Audit and Overview & Scrutiny Committees, a number of proposals across the Borough where council-owned assets could be developed as investment opportunities. Whilst some proposals were rejected, a report for Hub Committee was requested that would see some of the opportunities progressed. One of these opportunities was a proposal to develop an 80 bedroom, 5 floor hotel on the site of the existing Abbey Rise car park in Tavistock.

The subsequent report was presented at Hub Committee on 5th June 2018, as a Part II (Exempt from the public) "To Follow" paper. Outline details of three projects, two in Okehampton and the Tavistock Hotel proposal were described in the report, with financial projections, photos and plans of the sites, issues to be addressed and benefits provided in an Appendix. The Committee were asked to approve up to £90,000 from existing Council Earmarked Reserves and Capital Budgets in order to prepare detailed business cases and progress negotiations for each of the proposals.

Full Council in July 2018 considered the report as an "Unstarred" minute (HC4) and approved the recommendation although the report and appendix were not included with the meeting papers as is the current practice. It is noted, however, that Members could access the Hub Committee reports as they are stored online with the Committee agenda.

In September 2018, the Hub Committee received a report that put forward amendments to the existing Commercial Property Acquisition Strategy. The revised Strategy, entitled "Commercial Property Strategy" combined the ability to make property acquisitions with in-Borough asset developments whilst keeping the same delegated authorities in place i.e. "Delegated Authority to be given to the Head of Paid Service, in consultation with the S151 Officer, Leader of the Council and Chair of the "Invest to Earn" (or their deputy). Each receive one vote to proceed with purchase. In the event of a split decision, the S151 Officer has the casting vote"

The revised strategy also introduced the following requirement:

"Before a final decision to proceed with a development or acquisition is made, if applicable, local ward Members will be briefed and be able to share their views with the Invest to Earn Group"

Appendix C to the report provided illustrative borrowing requirements in the form of a list containing three commercial property acquisitions, five asset developments followed by other schemes or services with borrowing requirements. The five asset developments were identified as "Project 1", "Project 2" and so on, one of which was the Tavistock hotel proposal but this was not evident to the reader.

The Council's Invest to Earn Group met on 5th November 2018 to discuss a number of proposals, including the Tavistock Hotel and two Okehampton in-borough developments outlined in the June Hub Committee report. Following presentations by officers, which included business cases prepared by CCD Properties and a "Transaction Review Template" (the Council's Investment decision template) which had been completed by officers, the Group voted to recommend that the proposals proceed and they were subsequently approved under the delegated authority scheme as set out in the Commercial Property Strategy. There followed an informal Council meeting immediately after where those present received an update on the Group's decision.

At a further informal Council meeting on 7th January, Members that were present were informed that the Tavistock Hotel scheme was being pursued.

On 21st January 2019, the Council issued a press release regarding the Tavistock Hotel scheme which stated “Councillors at West Devon have already agreed a multi-million pound investment into the development.....The project will still be subject to planning permission and the funding needs to get a final stamp of approval from West Devon Borough Council’s Full Council in February”. Coverage in the local and even national press then followed including the publication of articles and letters of opposition from the public. In addition, the proposal became a big topic of “conversation” on social media.

On 29th January 2019, the Hub Committee met and considered a report entitled “Commercial Development Financing”. The report provided more detail on the Tavistock Hotel proposal including data to back up the potential benefits that the development would bring, as well as what the next stages of the process were, namely “to agree an agreement to lease in January 2019, prior to seeking planning permission” which was anticipated to be submitted in May 2019. The report sought approval for how the proposal would be funded through the pre-development, construction and initial letting period. The report’s recommendations set out a range of funding to allow the schemes to proceed and the Committee resolved that Full Council be recommended to approve the report.

Full Council met on 12th February 2019 where Members received the minutes of the latest Hub Committee and were asked to consider the adoption of the unstarred minutes that required approval, of which HC73, “Commercial Development Financing” was one. After some debate, Members voted unanimously to reject the recommendations from the Hub Committee on 29th January.

2 Methodology

2.1 The audit approach and methodology involved:

2.1.1 “Interviews” were held with the following:

- Leader of West Devon Borough Council;
- Members of the Invest to Earn Group;
- Six of the seven Members representing the three Tavistock wards, the seventh being abroad at the time of this review;
- Remaining two Members who signed a Scrutiny Proposal Form dated 18th February 2019;
- Chief Executive;
- Group Manager for Business Development;
- Group Manager for Strategic Finance (Section 151 Officer);
- Monitoring Officer;
- Head of Planning Practice.

2.1.2 A review of relevant documentation was undertaken, including Council and Committee agendas, reports and minutes, the Commercial Property Strategy, acquisition and development proposal papers, meeting notes and a selection of email communication between Members and Members and officers.

2.1.3 As well as the documentation above, reference has been made to the Scrutiny Proposal Form dated 18th February 2019 (requesting the setting up of a Task & Finish Group to review the procedures for proposing development funded by the Council) and the Council’s Constitution.

3 Findings

3.1 Commercial Property Strategy – In September 2018, the existing Commercial Property Acquisition Strategy was amended to include commercial development opportunities. When reading the Strategy, its wording continues to be focussed on acquisitions with occasional reference to developments. It can be argued that the process of acquiring property and other assets is different from the development of assets, the latter bringing a more complex, protracted process as well as a range of different risks. It is appreciated that when acquiring property there is a need to be able to move quickly when a compelling opportunity arises. It can be likened to purchasing a house, you view it today, sleep on it overnight, only to find it has been sold to someone else the next morning. When adopting an asset acquisition strategy, then it would need a clear and efficient decision making protocol, e.g. delegated authorities, approved criteria for selecting properties etc. Rapid decision making is important in this market.

In the case of commercial development, it can be argued that the timescales are not so pressing, development proposals take longer to come to fruition and involve a wider range of tasks and more consideration of issues and risks. That does not mean to say that the commercial world operates at the speed of the public sector and local authorities in particular and there is a need for Councils to be able to “fast track” the decision making process if necessary. Given the differences it could be argued that approval of development proposals, or at least those with significant impact, for example, above a specified value or having a high degree of risk, should be considered by the wider Council membership rather than decided through delegated authority. It is recognised that a balance has to be reached between the need for commercial confidentiality during the development of these schemes and the need to keep Members informed for decision making purposes and meeting the Council’s responsibilities for consulting stakeholders such as the public and businesses.

3.2 Delegated Authority – The review noted that the delegated authority that existed for the acquisition of commercial property was adopted for commercial development when the Strategy was amended in September 2018.

In addition, the review noted that the scheme of delegation laid down in the Commercial Property Strategy is separate from the Council’s overall Delegation Scheme that appears in the Part 3 of the Council’s Constitution and there is no indication in the overall scheme that the former exists.

3.3 Due Diligence Process – Whilst the Commercial Property Strategy sets out the objectives, desired outcomes, criteria and governance arrangements, it does not set out how “due diligence” should be carried out and the issues and risks that should be taken into consideration. The audit review found that there is a due diligence process in place to be followed for acquisitions and documentation that officers complete that forms part of the decision making process. That process is represented in a flowchart that identifies the various tasks and steps that need to be taken. A similar process flowchart does not exist for commercial development opportunities. Within the business case presented to the Invest to Earn Group, there is a “Preliminary Programme” in the form of a Gantt Chart (a project timetable). This lists a range of tasks and events against which timescales are set. Such charts are commonly used as part of project management. Examination of the tasks listed would indicate that they are geared towards the role of a developer and do not take into account tasks that the Council should carry out in its duty as a Local Authority, such as consultation with stakeholders and assessment of impact on issues such as car parking and local businesses. Similarly the business case includes a Risk Register which, on closer inspection identifies developer programme risks that concentrate on risks with i) the site and ii) financial risks which again centre on costs associated with site works. The risk register

does not identify risks that relate to issues the Council may face when fulfilling some of its strategic themes and priorities or risks such as the public or business reaction and more crucially the mitigating actions to minimise the risks, their likelihood and impact.

- 3.4 **Invest to Earn Group** – The Invest to Earn Group was established in early 2017 as a small group of three Members with support from officers, that reports to the Council’s Hub Committee. The Group’s remit is to:

“work in conjunction with officers on any project or initiative linked to income generation, investment strategy or efficiency improvement.”

In addition,

“Members will suggest, consider and evaluate proposals and help officers to shape these, agreeing parameters, criteria and ultimately assist with building credible business cases for presentation and approval at the appropriate Council committee”.

It is noted that

“the group themselves cannot determine whether an opportunity should proceed (or funds be expended) if such an opportunity needs delegated authority approval or Council Committee approval, in line with the Council’s constituted scheme of delegation”.

The Terms of Reference seen by the review also states that

“Members will provide input and engage/act as advocates with the wider membership” and “Group Members are responsible for reporting back on the activities of the group to their political group and the wider elected membership”.

It is evident that this engagement with Ward Members did not take place in respect of the Tavistock Hotel proposal and this process was not carried out by officers (whereby Tavistock Members were formally consulted). This is recognised by those involved as a failing in the process.

The review found no evidence that the Terms of Reference for the Group have been reviewed since it was established, despite it stating that a review will take place annually, commencing in January 2018. At the same time it is noted that the current Terms of Reference do not make specific reference to Council commercial development, despite this aspect being added to the Council’s Commercial Property Strategy in September 2018.

When speaking to those Members involved on the Invest to Earn Group, it appeared they had an interest and understanding of financial sustainability and investment. However, it is noted that the Group has received no formal training on the risks and merits of commercial property acquisition and development, the governance and independence considerations, the key questions/considerations in appraising an investment business case and how proposals fit with Council objectives.

At the meeting of the Invest to Earn Group in November 2018, Members were presented with the CCD Properties business plan and a Transaction Review sheet (the Council’s Investment decision template) completed by officers for consideration when discussing and subsequently voting on whether to approve the proposal.

The Investment decision template sets out the facts of the proposal in tabular form against the following criteria:

- a. Location;
- b. Property Condition;
- c. Credit Rating of Tenant(s);
- d. Length of Lease;
- e. Gross Yield;
- f. Net Yield;
- g. Management & Maintenance Costs;
- h. Conformity with MHCLG (Government) April 2018 Guidelines;
- i. Any Specific Problems Identified.

Each of these is given a “RAG” rating, Red, Amber, Green as a way of scoring each criteria where green denotes the least risk or issues, through to red which would indicate large risks and issues.

For the Tavistock hotel proposal, all criteria were given a green rating with the exception of net yield which was amber on the basis that the net yield figure was lower than the minimum 1% as set out in the Commercial Property Strategy.

Under “Any Specific Problems Identified” issues with the site location, with regard the Conservation Area and World Heritage Site, and impact on car parking were highlighted. As far as site location was concerned it stated that “therefore design will need to accommodate concerns over setting / scale”. As for car parking officers stated “Site used will result in loss of car parking for town. Other options to mitigate the impact on the town will need to be considered; however, benchmarking analysis shows that there is sufficient surplus capacity outside of peak times.”

The document (the Council’s Investment decision template) then continues by providing more detail as follows:

Property Details and Address
Owner
Tenant Details
Purchase Price
Probable Completion Date
Net Annual Rental Income
Amount to be Borrowed:
Gross Yield
Loan Period & Interest Rate:
Confirmation of Useful Life of the Building (for loan length purposes and MRP calculations)
How the property meets the Council’s multiple objectives under the Council’s strategy
Debt Proportionality considerations
Lease expiry details:
Tenant Strength details:
Exit Strategy
Option to Tax the property for VAT
Insurance - Date added to Council’s Insurance cover
Assets CoP Summary & Recommendation
S151 Summary & Recommendation

It is noted that as part of the above, both the Assets Head of Practice and the Section 151 Officer provided a summary of the facts covering their area of expertise and a recommendation on the proposal. In their comments, the Assets Head of Practice commented that:

“A hotel of this size would operate in a different market to existing providers and the users will then utilise the town’s facilities for dining & entertainment. Whilst the initial net yield is below 1%, it is felt that the economic benefits to the town, job creation and additional footfall will yield wider benefits” and “Discussion about re-provision of car parking to be continued. Consultation with public / local business to be part of planning process”.

The only record of discussions and decisions taken at Invest to Earn Group meetings are “notes” taken by the Business Development Group Manager, which represented minutes of the meeting. The notes for the meeting held in November 2018 show that the Tavistock Hotel proposal was one of a number of capital projects being considered at that meeting. The notes indicate that the issue of loss of car parking was identified by the group and that this may generate *“complaint from some local ward Members / Chamber / residents”*.

The notes go on to state:

“Car parking is emotive, understood that in order to bring employment and footfall and linked spend to town, there will need to be disruption. Public consultation through the planning application can tease out issues and as a result, solutions can be explored to limit the impact.”

The review could not find any formal recording of the Group’s evaluation of the proposal other than the notes above. The review of a proposal such as this could be completed in a similar way as the evaluation and moderation of a procurement tender submission where scores are recorded against each of the evaluation criteria and where a detailed narrative of the reasoning for the respective scores is provided.

- 3.5 Due Diligence on Planning Issues** – The position of the Abbey Rise car park within a Conservation Area and adjacent to the World Heritage Site raises a number of risks with regard to obtaining planning permission for the scheme. As part of the due diligence process, the review has seen evidence that officers progressing the hotel proposal held a meeting with Council Planners, Conservation and Heritage officers to highlight any “red lines” and points that would need to be addressed with this and other schemes. The review has been informed that outline plans and “fly throughs” were presented. The feedback would suggest that a five storey building may not be acceptable but be in relation to Godolphin House next door. The scale/design of the building would need work to ensure it would be acceptable in planning terms and the loss of parking would need to be addressed. Topographical and Block drawings would be required showing the scale of the development in context to ensure the footprint and size was acceptable. In addition, the frontage would need to be bespoke. The meeting referred to a document entitled “Outline of Main Planning Considerations”, prepared by the Planning Department in May 2016. This was in connection with an earlier proposal to develop the car park for residential use. Whilst that proposal would not see the loss of car parking space the document did state

“Any redevelopment of the site that does not propose to retain the existing number of car parking spaces must demonstrate that there is

capacity in other town centre car parks that the loss of parking will not adversely impact on the vitality and viability of the town.”.

With regard to the “Type and Scale of Development”, the Planning Department advised that

“if development is accepted on the site it is likely that a high density design solution may be appropriate”.

Reference was made to the adjoining site (Godolphin House) as a four storey building (albeit with one storey below road height) and

“it may be possible to develop this site to a similar scale”.

“this site”, referring to Abbey Rise Car Park. The document continued saying:

“A contemporary design is in principle acceptable but it should preserve and enhance the Conservation Area and the World Heritage Site” and “It is possible that uses other than residential may also be appropriate for this site, such as hotel, leisure and/or offices but these uses may bring greater demands for onsite parking.”

The document concluded by stating:

“The overriding site constraint is the site’s sensitive location within a Conservation Area and proximity to a World Heritage Site.....this will require a high quality design solution for the site. Also key is the need to ensure there is no loss of car parking unless it can be justified, and that adequate parking is provided to meet the needs of the new development.”

From speaking to officers and Members involved in moving the proposal forward, it appears that further discussions would be held with Planning, Conservation and Heritage Officers as part of a “pre-application” process. This would further examine issues that would be considered by the Planning Committee. Officers in the Planning Department have indicated to the review that the impact on car parking would be a material consideration and questions would be asked regarding the number of spaces being lost, are they being provided elsewhere and if so are they comparable. If there is an overall loss of some or all current parking provision in the town, the proposal would need to detail what the impact would be. Planning officers and Committee would be seeking factual evidence to back up statements made in the planning application. The use of the Town Benchmarking Report, dated January 2017, would be seen as one piece of evidence.

With regards to the impact on existing hotel and other overnight accommodation providers, Planners and the Planning Committee would see this as a material consideration and any planning application would need to provide evidence, for example impact assessments to back up statements in the application, preferably from an independent expert. The review has not found evidence of any studies or assessment taking place as part of the due diligence process prior the Invest to Earn Group meeting in November 2018 nor before the press release in January 2019. It is understood that this work would have been commissioned prior to the planning application being submitted.

- 3.6 Members’ Responsibility to Stay Informed** – Whilst a number of those Members who took part in this review agreed that they have a duty/responsibility to find out and keep up to date on issues and events, they also pointed out that where reliance was placed on information being presented in Committee reports, the size of agendas and report packs meant that it

was difficult to read everything presented to them. It could be questioned whether there is too much of an expectation on Members to be fully informed in this way and that ways to assist Members should be explored for example, signposting those matters that are of greater significance or by reducing the size of reports. However, it is recognised that reports need to include as much information as possible and therefore can be lengthy.

- 3.7 Member Access to Information** – Views were expressed by a number of Members when interviewed that they did not have access to Hub Committee reports, which, if they had, would have informed them of the Tavistock hotel proposal. This is due to the relevant Hub Committee minute being “unstarred” when presented to Full Council, without any accompanying reports that had been considered by Hub. This review could not find any formal rules on how the “unstarred” minute process should operate and whether an “unstarred” minute warrants its appearance as a standalone agenda item, with all the relevant papers available to access. It is pointed out that Members can access Hub Committee papers through the ModGov system online, including Part II exempt “pink papers” using their logon details and that they are able to track down a report relating to an unstarred minute using the system. It is understood that the use of “unstarred” minutes and the process behind it is to be considered by the Political Structures Working Group.

Committee papers are now solely produced in electronic form and rely on a Member’s ability to access them using a suitable IT device. It has been made apparent to the review by some Members that they had issues with the reliability of the technology.

3.8 Communication – Briefing Local Ward Members

One amendment made to the Commercial Property Strategy in September 2018 was the inclusion of the following:

Before a final decision to proceed with a development or acquisition is made, if applicable, local ward members will be briefed and be able to share their views with the Invest to Earn Group.

The local ward members in Tavistock have stated that no such briefing took place. It is recognised by Members and officers involved in taking this proposal forward, that there was a failure to carry this out and that local ward Members indeed were not briefed prior to the Invest to Earn Group meeting on 5th November where the scheme was discussed and approved under delegated authority, nor afterwards. Although those Members in attendance were briefed on the proposals at two Informal Council meetings, if the Ward Members were not able to attend these meetings, they would not have had the verbal briefing that other Members received.

Where the Strategy refers to “if applicable”, the review has been told this applies where a scheme is “in Borough”. Therefore, if a scheme were outside the Borough then there is no need to brief local members.

The Strategy does not make it clear what constitutes “local ward members should be briefed”, whether this means a formal presentation of plans and documentation, as a group, individually, or whether reliance is on them to read papers that are presented to Committee or Council. Likewise the strategy does not make it clear how such Members can share their views with the Invest to Earn Group, whether this is by attendance at a formal meeting of the Group, an informal meeting of the Group or by submitting questions to the Group or its Members in writing/email.

It is noted that a number of Members representing Okehampton did receive a briefing from officers and a Member of the Hub Committee regarding the proposals being pursued in the town as well as the Tavistock hotel proposal.

3.9 Communication – Press Release and Visibility of Process

The press release issued to Members on 21st January 2019 uses language that would give the reader the impression that the proposal was in its final stages of approval and that it had the support of the majority, if not all Councillors. Whilst the press release does state that “the project will still be subject to planning permission and the funding needs to get a final stamp of approval from West Devon Borough Council’s Full Council in February”, the reader could interpret this as saying that the scheme would go ahead if approved at that Council meeting. This could be further enforced when it states “we have agreed Heads of Terms with a hotel chain and aim to sign an agreement for lease within the next month”. Whilst some readers may understand the implications of that statement, there could be many others who reading that the Council was aiming to “sign an agreement” took this to mean that the Council was about to commit itself to a deal that it couldn’t reverse.

In addition, there was an opportunity to outline to the public and press what actions had already taken place as part of the due diligence process and provide more detail about what tasks were still to be done especially those that focussed on the issues surrounding car parking, impact on local businesses, design and other planning issues. By doing so, it may have provided answers to some of the questions being raised, especially those being raised in the press and social media.

The impact of the press release and subsequent coverage was to create and galvanise opposition to the proposal without the full facts being provided, such that when the proposal was brought before Full Council on 12th February, the report on the financing of proposed commercial developments, that had been “approved” by the meeting of Hub Committee two weeks before, was seen as perhaps the last chance to stop the hotel proposal from going ahead. In fact the purpose of the report was to make provision for the funding of the various schemes under consideration in much the same way as one would arrange to have a mortgage in place when looking to purchase a house. Having a mortgage offer on the table is no guarantee that a particular house purchase will proceed to completion. This was the same scenario with the Hotel proposal.

The report brought before the Hub Committee and the subsequent Full Council in February was just one of several steps and approvals required as part of a process to move the scheme forward, ahead of the submission of a planning application, in much the same way as the decision made by the Invest to Earn Group in November 2018. The lack of visibility of the process being followed meant that many outside of the Council and those Members not involved in the process were not aware of the work already undertaken and the work that was planned to take place in the future. An opportunity was perhaps missed to inform those with an interest in the scheme and answer some of the questions that were being asked.

- 3.10 **Informal Council and Group Meetings** – These sessions act as a way of disseminating information and for topics to be discussed. Given their informal nature, there is no formal agenda or minutes taken that indicate what was discussed or who was in attendance. The audit review has not been able to confirm who was in attendance at any Informal Council meetings or what was discussed. From an audit viewpoint, it would be recommended that a formal agenda was issued and minutes taken but it would lead to a loss of “informality”. However, if there is reliance on both Hub and Members Group meetings being a way of keeping Members informed of current topics and issues, then perhaps more emphasis is placed on Members attending and consideration given to finding some method of letting Members who cannot attend, know of the topics raised, if not the discussions that took place,

rather than rely on those Members attempting to find out themselves. In this way the risk of inconsistent messages is minimised.

- 3.11 The Rejection of Hub Committee Recommendations by Full Council** – From speaking with Members as part of this review, both those involved in progressing the Tavistock Hotel proposal and those outside of the process, it is evident that the majority of the local ward Members, once they were aware of the scheme, were opposed to it. In light of the reaction of the public, business and fellow Members and the issues that were being raised, other Members began to question whether the proposal was "achievable". Efforts were made to put forward an amendment to be put before Full Council that would delay a decision, to allow further due diligence work, for example on heritage issues. However, it was deemed unnecessary by Legal officers as the purpose of the report on financing of schemes being debated was merely to have the finances in place once all the steps, including the granting of planning permission had been completed. It was pointed out that a deferral to obtain further information was not necessary in order to ensure "the public purse is protected", the purpose of the report was to secure and allocate funds and not addressing the planning merits of the scheme(s) being put forward.

Prior to the meeting of the Full Council on 12th February, the Conservatives and Independent Members attended their respective group meetings. After debate, it became evident that the majority of the Conservative Group would enter Full Council with the intention to oppose the Hub recommendations. It appears that a number of the remaining Members of the Group then felt that the recommendations would not succeed and therefore chose to vote against it, in line with their colleagues. Some Independent Members appear to have entered the Full Council meeting thinking that the recommendations had the support of the majority of Members and were surprised to learn that this was not the case and despite being in favour of the scheme, they decided to reject the Hub Committee recommendations after listening to the debate. As a consequence, the recommendations were unanimously rejected.

- 3.12 The Use of Social Media** – Following the press release and meetings with Tavistock Town Council and Chamber of Commerce, the Tavistock Hotel proposal generated large amounts of "discussion" on social media platforms such as Facebook.

The review was provided with examples of posts and responses/comments by users soon after the public were aware of the proposal in early February 2019 and whilst these have not been examined in detail by this review, it is noted that there was often a mixed response, not all negative, posts often contained incorrectly informed opinion and some put forward ideas that could be further explored. A number questioned the process or possible lack of process being followed and some posts, whilst not against a hotel, were against its location, the loss of car parking and that it appeared that it was to be built using Council Taxpayers money. There were instances where people's views on the ability to park their car differed, some saying there wasn't a problem whilst others argued that it was difficult to find a space. It should be noted that unless the "Facebook user" identified where they were from, those involved in the online conversation could come from any part of the UK or outside the UK.

From the examples provided, it is noted that some replies to posts were from Members, contributing to the "conversations", often to support posts that opposed the proposal and that could be seen as critical of the Council. This review has not considered whether Members' posts on Facebook were inappropriate or merely intended to be informative;

A review of the use of Social Media by Council officers and Members is included in the Internal Audit plan for 2019/20 that was recently agreed by the Council's Audit Committee.

4 Conclusions

The main conclusions from our review are as follows:

4.1 Effectiveness of the Commercial Property Strategy

The consequences of amending the existing Commercial Property Acquisition Strategy, with the inclusion of commercial development on Council land, particularly around the process of delegated authority, were not appreciated by the vast majority of Members at the time. The nature of commercial development when compared to acquisition is different, both in terms of timescales and the risks involved which perhaps is not reflected in the strategy. Given this, it could be questioned whether the delegated authority in place is appropriate for commercial development proposals, particularly those over a certain size or where it is judged they have a high level of risk associated with them. In these cases, it may be more appropriate for decisions to be taken at Full Council.

Evidence would suggest that the Council took the role as developer when proceeding with the proposal. The implementation plan and risk register contained in the business case focuses on development issues that a developer, in this case West Devon Borough Council, would face and does not address issues that would be faced by the Council in its role as the provider of public services. An important element of the Commercial approach is finding the right balance between public sector ethos, including the delivery of social value and commercial practices, ensuring that Council pledges are met, to improve the lives of West Devon residents, supporting local businesses, as well as increasing income and opportunity. It is important that those involved in commercial investment opportunities whether they are officers, Members or external experts who identify and negotiate deals, understand that they are not operating in a purely commercial environment and that the prime purpose of a local authority is to deliver statutory services to local residents.

4.2 Timetable of Events

The review has identified a sequence of meetings where it is either evident or alleged that the Tavistock Hotel proposal, along with other development proposals, were presented and/or discussed.

4.3 Level of Consultation

Whilst ward Members in Okehampton were briefed by officers on the two development schemes in the town whilst in their early stages, there was a failure on the part of officers and the Invest to Earn Group to ensure that local ward Members were briefed on the Tavistock Hotel proposal in advance of the Group's meeting on 5th November. It is fully recognised by all those involved in the proposal that there was a failure to inform and brief local Members in Tavistock.

It is noted that as part of their briefing, Okehampton Members were made aware of the Tavistock hotel development and this may be how other non-Tavistock Members became aware.

There are conflicting views as to whether local ward Members were aware of the Tavistock hotel proposal prior to the press release. This review has been unable to confirm whether the issue was discussed at meetings where evidence shows that those Members were in attendance. Where reports were presented at Committee, these were taken as "Part II" Exempt reports and the identity of the various schemes was not made public for commercially sensitive reasons (although this information was available to all West Devon Borough Council Members through their electronic login to the Committee agendas and

reports). In addition, Informal Council meetings are not minuted and attendance not recorded. Given the significance of the proposal, the fact that local ward Members had not raised concerns could lead one to feel that they, in fact, were unaware. It is understood that a review of the Council's Constitution is currently taking place and the running of Informal Council and other informal meetings of Committees could be taken into consideration as part of this exercise.

The review has seen evidence that initial contact had been made with Planning, Conservation and Heritage Officers to identify issues that Planners would take into consideration when presented with a planning application.

The Council had sought the services of property experts, in the form of CCD Properties to initially identify possible viable Council assets that could be developed and possible tenants. They were then asked to prepare a Business Plan that would be presented to the Invest to Earn Group for their consideration. In addition, external legal experts were engaged to pursue the drafting of legal agreements with prospective tenants.

4.4 Due Process / Governance Procedures / Decision Making Process

Whilst there is a process for acquiring an asset, which is documented by way of a flowchart, the process to be followed when developing an existing asset is not formally set out, in particular the due diligence process and the steps that need to be taken. It is accepted that the due diligence process followed by officers was similar to for acquiring an asset and there are extra steps in the due diligence process for a development e.g. consultation with Ward Members, which was not carried out formally. In terms of planning, the review has seen evidence that officers met with planners, conservation and heritage experts in order to highlight the planning issues that would need to be addressed in order to obtain planning permission. In addition to the comments made by planning officers at that meeting, some reliance has been placed on a document produced by the Planning Department two years earlier which outlined the main planning considerations for a residential development on the Abbey Rise car park site.

The press release that was issued gave the impression that a deal was about to be signed and failed to explain the true position of the proposal, the due diligence work that had been carried out up to that point and was to be undertaken before a planning application would be submitted and considered. Had there been more visibility of the due diligence process to Members, the press and the public, it may have answered a number of concerns in the minds of some that were being expressed.

The review would question the appropriateness of the scheme of delegation within the Commercial Property Strategy for commercial developments on council land (see comment above).

The Invest to Earn Group is a small group of Councillors that is not formally recognised in the Council's Constitution. Given its role as evaluator/moderator of proposals put before it and the levels of funding and risk involved, being a "closed" meeting leaves it open to questions over its transparency. There are examples elsewhere of similar gatherings being constituted as formal committees in an attempt to present a degree of openness. It is recognised that much of the business that would be handled by such a Committee would have to be heard under Part II conditions, which would restrict access by members of the public but it would afford Council Members the opportunity to attend and observe or at least be aware of proceedings.

In addition, apart from notes recorded by the Business Development Group Manager, the review found no formal recorded evidence of challenge and evaluation undertaken by those

Members on the Invest to Earn Group, for example “scoresheets” that give an indication of a participant’s judgement of a proposal and crucially a record of their reasoning behind their support or opposition to a proposal. Instead the process used was a ‘show of hands’ in a more traditional voting manner.

4.5 Factors Leading to Rejection of Scheme at Full Council on 12th February 2019

Following the reaction of local ward Members and the public to the press release in January 2019, a number of Members began to question whether the proposal was the best way forward. The language used both in the press release and at meetings with the business community gave the impression that the proposal was in the final stages of going ahead and therefore the meeting of Full Council in February was seen as perhaps the only opportunity to stop the scheme from going ahead rather than it being just a stepping stone that would see the funding arrangements being agreed. Efforts were made to table amendments to delay a decision on approving the Hub recommendations, to allow time for further due diligence that could, in part, mitigate some of the concerns raised by the public and allow a public meeting, to be held on 18th February. However, officers deemed that such an amendment was not relevant to the Finance minute that Council was being asked to approve. As the date of the Full Council meeting approached, opposition to the scheme amongst Members grew and whilst some Members entered the meeting either unaware of this or still prepared to approve the Hub recommendations, the weight of Member and public feeling led to all members voting against.

4.6 Social Media

Once word of the Tavistock Hotel proposal entered the public domain through the press release and subsequent meeting with local businesses, the public and some Members took to social media to voice their opposition and concerns over the scheme, although not all of the posts were negative, with some supporting the idea and the benefits it could bring to the town. From the examples of posts seen by the review, comments were sometimes misinformed and generated rumour and even hostility towards the Council. It is evident that the Council chose not to respond via this channel but to arrange for a question and answer open session for the public. However some Members did respond using social media, often in support of the arguments being put forward. It should be pointed out that this review has not examined whether the use of social media by Members or the Council has been appropriate in this particular case.

Whilst it is recognised that commercially sensitive information linked to some aspects of the work done by officers could not be released, the lack of information and transparency over other aspects of the work carried out by the Council up to that point, especially with regard to planning issues and car parking, the decision making process as well as the due diligence work still to be done prior to the submission of a planning application, meant that the full facts were not known at that time. In addition, the tone and words used in the press release fuelled opposition by giving the impression that the scheme was near to being given final approval and agreements being signed.

5 Recommendations

- 5.1 **Commercial Property Strategy** – The Council should consider having separate strategies for acquisitions and commercial development on Council owned land. In addition, consideration should be given as to whether the strategy should make a clear differentiation between acquisitions and development opportunities that are “In Borough” and “Out of Borough”.

If the current Strategy remains, then a review of its current wording should be carried out to ensure that where reference is made to acquisitions, that the implications on commercial development and the process to be followed are considered and clearly set out where they differ from acquisitions (e.g. consultation with ward Members).

5.2 **Scheme of Delegation**

The Head of Legal or other appropriate officer should identify and maintain a record of those schemes of delegation that are not referred to in the Council’s Constitution and have this “signposted” in the overall Scheme of Delegation within the Constitution so that they are more visible.

5.3 **Due Diligence Process**

The Council should consider formally documenting the due diligence process that is followed by officers and external advisors and experts when taking forward a proposal to develop an asset on Council owned land. This would have similarities to the due diligence process that is used for an acquisition, but with extra due diligence checks such as consultation with ward Members. The process should outline the steps that need to be taken, the risks and issues that need to be considered, the documentation/evidence that should be completed and held and the approvals that should be sought before an application is submitted to the Local Planning Authority.

5.4 **Access to Information**

Consideration should be given to providing hyperlinks to Committee reports as part of the Full Council agenda.

5.5 **“Unstarred Minutes”**

The current practice and process of “unstarred” minutes should be examined by the Political Structures Group. A possible solution could be the adoption of a process whereby, once Hub Committee minutes are published, a ‘Panel’ (to include the Chief Executive, S151 Officer and Monitoring Officer), in consultation with the Leader (as Chair of the Hub Committee) and the Mayor (as Chair of Council), decide whether any of the Unstarred Minutes are deemed so significant that they then warrant being a standalone agenda item at the next Council meeting.

5.6 **Role of Invest to Earn Group**

The Council should consider the following:

- a) A review of the Invest to Earn Group’s Terms of Reference to ensure that they are fit for purpose when dealing with commercial development proposals, especially those within the Borough, as well as commercial acquisitions.
- b) Establishing the Group as a formal Committee listed within the Council’s Constitution which is open to the public where possible, with formal agendas, papers and minutes

taken. It is noted that much of the content of these papers would be Exempt Part II papers where the public are not able to attend for reasons of commercial confidentiality.

- c) The introduction of a formal record showing the results of evaluation of either each Member of the Group or the Group as a whole, that provides commentary that outlines the reasoning behind the decision reached.
- d) The provision of training from commercial acquisition and development experts to Members of the Invest to Earn Group and the wider Council membership, to enable the Group to challenge investment business cases and make informed decisions on future investment proposals brought forward.

5.7 Briefing of Local Ward Members

The Council should ensure that it complies with the Commercial Property Strategy where it states that local ward Members will be briefed before a final decision to proceed with a development or acquisition is made.

It should be made clear how local ward Members are to be briefed and how they can share their views with the Invest to Earn Group.

5.8 Members Responsibility to Stay Informed

The Council should consider ways of assisting Members to stay informed where reliance is placed on Committee agendas and reports as the method of delivery of that information.

The Council should consider the provision of “refresher” training to existing Members following the forthcoming elections in May, including the use of the iPads for accessing Committee papers.

5.9 Informal Council

As part of the on-going review of the Council's Constitution, the conclusions of this report should be taken into consideration as part of future review discussions, namely in connection with the running of Informal Council.

5.10 Use of Social Media

The Council should undertake a review of its use of Social Media by both officers and Members, including all relevant policies and procedures that currently exist. This could be carried out in conjunction with the intended review by Internal Audit that is included in the 2019/20 Audit Plan.

Dominic Measures
Audit Manager

Robert Hutchins
Head of Audit Partnership

Report to: **Council**
Date: **26 March 2019**
Title: **Registered Provider Application**
Portfolio Area: **Customer First – Cllr Roberts**

Wards Affected: **All**

Relevant Scrutiny Committee:

Urgent Decision: **Y** Approval and clearance obtained: **Y**

Date next steps can be taken: Immediately following this meeting

Author: **Alex Rehaag** Role: **Senior Specialist Placemaking**

Contact: **01822 813722 or alex.rehaag@swdevon.gov.uk**

Recommendations:

That the Council:

- 1. support the preliminary application to Homes England for Registered Provider Status to enable the authority to apply for grant funding for affordable housing projects; and**
- 2. agree to delegate to officers, applications for individual schemes as and when the need arises. The initial application will be for the Tavistock temporary accommodation development.**

1. Executive summary

- 1.1 The Council agreed not to form a wholly owned housing company on the 5th June 2018 as a result of the findings in the Altair report which was commissioned to explore the various options to deliver housing in the Borough. However, members wished to continue supporting officers to increase the delivery of affordable housing in the borough. The council and officers are looking at innovative ways to increase delivery and to ensure that the council is in the best place to secure grant funding that is made available. Homes England funding, formerly Homes and Communities Agency, has changed significantly over the last few years and it is one of the caveats that funding is allocated to an RP or we become an investment partner in order to secure funding for affordable

housing projects. This is relevant in terms of the actual build of the properties, infrastructure funding is separate from this.

- 1.2 The Hub committee agreed to fund a development of temporary accommodation in Tavistock on 12 February 2019 (minute reference HC73). This development has approved funding through various different budgets and borrowing, but the Council could acquire funding through Homes England if it were to achieve registered provider status. Therefore, officers are asking the committee to agree to support this application. Additionally, there are potential community housing schemes emerging in Brentor and Lamerton and should we manage any of these properties in the future, we will be in a position to apply for further funding. This will reduce the reliance on the council's affordable housing capital programme and borrowing.

2. Background

- 2.1 Officers have identified that the Homes England Move on Fund is a potential suitable funding application that would be appropriate to bid for. However part of the condition for this bid (and any other where Homes England funding is attached) is on the proviso that you have are working towards becoming or are a Registered Provider.
- 2.2 This aligns with national priorities to deliver more housing and the ability to secure funding which is available to councils, not just for move on funding but in order for the council to achieve the aspirations set out in the community housing strategy.
- 2.3 The application for Registered Provider status will benefit our communities as funding could be achieved to deliver further homes, this will be especially apparent for those people who may have a need for specialist homeless, and move on accommodation and homes in more rural areas. Not all Registered Providers will be interested in providing and managing this type of accommodation.

3. Outcomes/outputs

- 3.1 The Move On funding which we would initially apply for is open until 2020 and tight timescales apply to deliver the finished accommodation. The concept plans are currently being drawn up along with a costing exercise along with liaison with planners from WDBC. This will be presented as soon as practicably possible once the costs and options have been appraised.
- 3.2 The success would be affordable, safe, modernised accommodation for people within the community who have a need for temporary, supported accommodation. Whilst, also reducing the use and impact on the councils budget due to using B&B as temporary accommodation to meet our statutory housing duties.

4. Options available and consideration of risk

- 4.1 The council could choose to use further borrowing or use of budgets and not apply for this status and grant in respect of a development of Tavistock temporary accommodation. It could also continue to ask RP's to manage and own the properties delivered through the community housing programme.
- 4.2 Ownership and control will be lost and could impact on the temporary accommodation budget, housing providers may not wish to take on small numbers of properties in rural areas.
- 4.3 Detailed costing and savings exercises have been undertaken in respect of the new development. All options will be presented and appraised by officers regarding the development project once these have been provided by the Council's chosen contractors. Becoming a registered provider means that there will be financial scrutiny for each project we apply for regarding funding. The finances will be presented to Homes England on completion of the project and will have to withstand their scrutiny.

5. Proposed Way Forward

- 5.1 Apply for Registered Provider status, this will avoid applying for this in haste and ensure that we are prepared for funding streams that are announced as they normally have very short timescales.
- 5.2 Meets the aims of the council to increase delivery of affordable housing.
- 5.3 Allows the council to retain ownership of schemes, to ensure we are prepared for scrutiny of Homes England we will need to ensure that projects are monitored and accounted for in terms of costs.

6. Implications

Implications	Relevant to proposals Y/N	Details and proposed measures to address
Legal/Governance		<p>Legal Specialists will complete a preliminary application the details of which can be found here https://www.gov.uk/guidance/register-and-de-register-as-a-provider-of-social-housing At this stage we are progressing</p> <p>We will take further advice when appropriate and after this preliminary application.</p>
Financial		<p>We will know more once we have engaged with the preliminary application as to the costs. However as the primary aim currently for RP status is to access funding from Homes England the benefits are likely to outweigh the costs.</p>
Risk		<p>None currently</p>

Comprehensive Impact Assessment Implications		
Equality and Diversity	Yes - Meets the needs for all who require affordable housing, particularly vulnerable groups	
Safeguarding		
Community Safety, Crime and Disorder		
Health, Safety and Wellbeing		
Other implications		

Supporting Information

Appendices:

None

Background Papers:

'Commercial Development Financing', a report presented to Hub Committee 29th January 2019 and Council on 12 February 2019

Report to: **West Devon Council**

Date: **26 March 2019**

Title: **Public Toilet Closures**

Portfolio Area: **Environment Services (Cllr Robert Sampson)**

Wards Affected: **Buckland Monachorum**
Dartmoor
Okehampton
Tavistock

Urgent Decision: **N** Approval and clearance obtained: **Y**

Date next steps can be taken: Immediately following this meeting

Author: **Cathy Aubertin** Role: **Head of Environment Services Practice**

Contact: Cathy.Aubertin@swdevon.gov.uk

RECOMMENDATION:

That Council be RECOMMENDED that:

- 1. following consultation with all affected Town and Parish Councils to consider alternative ways of providing the service, that the Council approves the closure of the following public toilets where feasible alternatives have not been found:**
 - **Buckland Monachorum – Bedford Bridge;**
 - **Okehampton – Market Street; and**
 - **Tavistock – Bedford car park OR Bus Station; and**
- 2. whilst the recommendation to approve closure at Princetown remains, the Council continues to provide a limited facility in Princetown whilst alternative uses of the building are explored with Dartmoor National Park Authority (DNPA) and the Duchy of Cornwall, in line with the terms of the current lease and head lease arrangements.**

1. Executive summary

- 1.1 Following extensive consultation with Town and Parish Councils and consideration by Hub Committee Members in order to assess alternative ways of providing the public toilet service in specific locations, it is recommended that the listed public toilets are closed in order to achieve the financial savings required for the 2019/ 20 budget.
- 1.2 Although Dartmoor Forest Parish Council has declined to take on the facility in Princetown, nor contribute 75% of the full running costs, the lease on the building means that we must continue to operate the service in a reasonable form until the expiry (23 March 2026) or suitable renegotiation of the lease. Agreement on the level of reasonable service in terms of both opening hours and months and scale of facilities is to be further discussed with the National Park and the Duchy in the next month.
- 1.3 The current lease and head lease in respect of Princetown was written to support the place-shaping and regeneration of Princetown some years ago. The regeneration work was supported jointly by the Borough, Duchy and National Park, and was designed to boost the economy in Princetown. At this time the Borough Council was unable to support the economy improvement scheme financially so supported it through its local service infrastructure.

2. Update on local discussions

- 2.1 In order to continue to provide the public toilet service, which is discretionary, the Council has required Parish and Town Council support to provide a network of public toilets in West Devon. This is an extension of the devolution of service which occurred some time ago and the Council has seen continued support from communities.
- 2.2 Members will be aware that the Hub Committee previously resolved (minute HC39) that Parishes would be requested to take on the public toilets in their areas, or contribute 75% of full running costs to the Borough Council, increasing to 100% over the following three years. Town Councils were also required to look at the town centre provision of public toilets.
- 2.3 Dialogue with Parish and Town Councils has been ongoing since August 2018 and has resulted in a number of Parish and Town Councils deciding to take on toilet facilities in their areas.
- 2.4 As a result, the following arrangements will be completed by 31 March 2019:

Parish	Facility	Ownership
Brentor	Brentor	Owned by DNPA. Officers to facilitate a lease between DNPA and Brentor PC. Whilst this work is ongoing the parish will fund the service costs for the financial year 2019/20.
Buckland Monachorum	Yelverton	Owned by Maristow – officers are facilitating the implementation of a new lease between Maristow and the Parish.
Chagford	Chagford	Owned by WDBC. Asset to be transferred.
Hatherleigh	Hatherleigh	Owned by WDBC. Parish Council to contribute 75% of total costs, to be increased to 100% over following three years.
Lydford	Lydford	Owned by DNPA. Officers to facilitate a lease between DNPA and Lydford Parish Council. Whilst this work is ongoing the parish will run the facility by an agreement between it and the Borough Council for the financial year 2019/20.
Okehampton	Fairplace	Owned by WDBC. Asset to be transferred.
Tavistock	Bedford car park Bus Station Guildhall Square	Owned by WDBC. Guildhall Square and one other facility to be transferred to the Town Council (NOTE – this will not be completed by 31 March 2019).

2.5 On the 6 March 2019 officers met with the DNPA officers to consider the future of the facilities owned by the DNPA, which are Princetown, Lydford and Brentor.

2.6 The lease for the Princetown facility, which ends on 23 March 2026, states that WDBC must use the premises as public conveniences only and that it must be kept open at all reasonable times. Subject to DNPA's and the Duchy's (the Superior Landlord) agreement, it is, therefore, recommended that the provision be reduced to possibly one unisex and disabled facility, open seasonally (March to October)

in order to reduce cleaning and other costs, whilst officers work together with DNPA and the Duchy with a view to finding potential alternative uses for the building, which would look to include an on-going provision of a public toilet facility.

- 2.7 In respect of the facilities at Brentor and Lydford, there are long-standing contractual agreements in place for each facility, dating back to 1970 and 1967 respectively, which may be easily terminated by the Borough Council. Of course, that is not the wish and officers will continue to work with DNPA to reach a satisfactory conclusion for all parties. However, as it will not be possible to for this work to be concluded by 31 March 2019, Members should note that alternative cost-neutral arrangements have been agreed with the two Parish Councils.
- 2.8 Brentor Parish Council have agreed to contribute a sum to the Borough Council for the next financial year.
- 2.9 Lydford Parish Council wish to run the public toilet themselves for 12 months so that they have the opportunity to assess for themselves the footfall and logistical challenges that providing the service may present. This pilot would be arranged under a service level agreement for the 12 month period.
- 2.10 For some facilities it is not feasible to maintain service for the reasons stated below. It is, therefore, recommended that the following facilities are closed:

Parish	Facility	Reason for closure
Buckland Monachorum	Bedford Bridge	<p>Although the Parish Council explored the possibility of taking on this facility, it concluded that it could not afford to take on both this one and Yelverton.</p> <p>This toilet was already seasonal and has lesser usage than the Yelverton toilet block.</p> <p>The building is owned by Maristow so the lease will be surrendered at the appropriate time.</p>
Okehampton	Market Street	<p>Following consideration, the Town Council has concluded it wishes to take on Fairplace facility only, given the proximity of other toilets.</p> <p>The Market Street building and land is owned by WDBC.</p>

Tavistock	Bedford car park OR Bus Station	<p>The Town Council is yet to put a proposal forward, but it is anticipated that the Town Council may wish to take on two facilities (discussions are on-going).</p> <p>Depending on the proposal, one of the three facilities in the town should be closed, and consideration will be given to alternative use.</p>
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3. Next steps

- 3.1 Officers will conclude discussions with Tavistock Town Council in order to reach a satisfactory financial position, and will update Hub Committee in this respect in the next financial year.

4. Outcomes/ outputs

- 4.1 Further updates will be provided to Members in due course.

5. Options available and consideration of risk

- 5.1 Not for consideration at this stage.

6. Implications

Implications	Relevant to proposals Y/N	None at this stage.
Legal/Governance	Y	Under s87 of the Public Health Act 1936, the Council has the power to provide public toilets (and to charge a fee where it is reasonable to do so) but it is under no obligation to do so
Financial	N	Financial information attached at Appendix A.
Risk	N	N/A at this stage.
Comprehensive Impact Assessment Implications		
Equality and Diversity	N	N/ A at this stage.
Safeguarding		No implications.
Community Safety, Crime and Disorder		None.
Health, Safety and Wellbeing		As per Comprehensive Impact Assessment attached at Appendix B.
Other implications		None.

Appendices

Appendix A – financial information

Appendix B – Comprehensive Impact Assessment

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Schedule of savings 2019-20 to 2021-22

Savings identified	2019-20		2020-21		2021-22	
	£	£	£	£	£	£
Income to be generated from 75% contribution (increasing by 5% per annum)		2,164		2,308		2,452
- <i>Hatherleigh</i>	2,164		2,308		2,452	
Savings from asset transfers, to take place from April 2019*		30,659		30,659		30,659
- <i>Yelverton</i>	6,848		6,848		6,848	
- <i>Brentor</i>	1,289		1,289		1,289	
- <i>Chagford</i>	666		666		666	
- <i>Lydford</i>	3,350		3,350		3,350	
- <i>Okehampton (Fairplace)</i>	18,506		18,506		18,506	
Savings from closures, to take place from April 2019**		21,222		21,222		21,222
- <i>Bedford Bridge</i>	6,275		6,275		6,275	
- <i>Okehampton - Market Street</i>	14,946		14,946		14,946	
100% business rate relief saving from all public conveniences in 2020-21		0		22,116		22,116
Total saving		54,044		76,304		76,449

*Legal cost of up to £1,000 per asset transfer to be deducted from the overall savings (maximum £5,000 in total)

**Future demolition costs of approximately £30,000 per building

Note: Negotiations are currently ongoing with Tavistock Town Council, therefore, no savings have been included at this stage

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West Devon
Borough
Council

COMPREHENSIVE IMPACT ASSESSMENT

PUBLIC TOILET PROJECT

Comprehensive Impact Assessment Template

Assessment being undertaken		Public Convenience Review
Group: Commercial Services		Commercial Services
Service:		Environment Services
Name of Officer/s completing assessment:		Emma Widdicombe
Date of Assessment:		9th January 2019
1.	<p>Why are you doing this CIA?</p> <p>Provide a brief explanation of the reason. Is it: new/change in policy, procedures, strategy, function, service.</p>	<p>Further to the review of the public conveniences in West Devon, the purpose of this CIA is to identify if the proposed closure closures on selected toilets will impact on health & safety, equality & diversity etc and to assess whether any mitigating action is required.</p>
2.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p>	<p>West Devon Borough Council approved to deliver efficiencies of £50,000 (or more) from the overall public convenience service. It was agreed these efficiencies would be achieved through consideration of the provision of pay on entry systems at the higher footfall facilities and where the pay back can be achieved on a capital spend within a reasonable period, through 75% contribution to the overall running costs which will be increased over the following three years to a point where the full costs are covered by the Parish and Town Councils, through transfer of the freehold or leasehold property or where none of the above are agreed the closure of these toilets will occur.</p>

		<p>The Council has a power but not a duty to provide public conveniences (Public Health Act 1936). It currently provides 12 public toilet facilities within West Devon Borough Council and the overall budget for public toilets, excluding officer salary costs, totals almost £181,000 for this financial year, of which over half of that amount is committed to contract cleaning costs, with the remainder paying for other running costs, such as business rates, repairs and maintenance, energy and water. Given the Borough Councils financial position and the need to secure savings in support of its Medium Term Financial Plan, the discretionary service of providing public conveniences is unsustainable. To continue to provide the current level of service provision means the Borough Council will need to identify savings elsewhere within its overall budget.</p>
3.	<p>Who implements or delivers the above? State if this is undertaken by more than one team, service, and department including any external partners.</p>	<p>The project will be managed by the public review project group which consists of officers from environment services, assets, support services, property maintenance, ICT, legal and the project sponsor being the Executive Director/Group Manager. The team have met with Parish and Town Councils as required to discuss the various proposals.</p>
4.	<p>Equality and Diversity, safeguarding, health, safety and wellbeing - Who will be affected by this proposal? Is the proposal likely to result in positive or negative impacts/risks? If so what are they? What plans do you have in place, or are developing, that will mitigate the likely identified negative impacts/risks?</p>	<p>All members of the public and local communities which include more specifically:</p> <ul style="list-style-type: none"> • Users with chronic health issues (bowel and bladder problems) • People with young families • Disabled people • Parish and Town Councils who could potentially be recipients of existing facilities

- Travellers
- Homeless people
- Young people
- Older people
- Pregnant mothers
- Public health teams
- Outdoor/mobile workers
- Holiday makers/day visitors
- Private businesses (restaurants/pubs/shops/cafes)
- Tourist groups

Positive Impacts

- Through devolution these public conveniences will be spared from closure, or even enhanced
- Services may be designed in accordance with local priorities and needs, using local knowledge and resources
- There may be the potential to foster a greater degree of civic pride and increased involvement in public services by local residents
- Where alternative facilities have been recognised eg pub, café this may have a positive impact on local businesses due to increased footfall, with an increase in money spent in local areas
- The hours of opening of the alternative facilities may offer a variety of opening hours which would not cause significant disadvantage.

		<p>Negative Impacts</p> <ul style="list-style-type: none">• Closure of public toilets may have a restrictive effect upon the willingness of certain groups to access public space, socialise and shop. This in turn can lead to isolation and negatively impact upon a person's well-being. Disabled people, older people, mothers and fathers of young children and carers and people with chronic health problems all need easy access to toilet facilities.• Lack of toilet facilities at the right time and right place contributes to dirty streets that are unsanitary, unpleasant and can spread infection. Public toilets in places of open space help to encourage people who may need regular toilet access to take exercise and stay physically active.• Public toilet provision is an important issue for areas relying on tourism income, or seeking to develop their profile as a visitor destination. Tourists choose their destinations based on previous experience, looking up feedback on the internet and knowledge of facilities. Meeting visitor's needs is vital to secure repeat trade and build a sustainable economy. However, there is also a view that reduced availability of facilities would not impact on a family's choice to visit certain areas. The perception is that private facilities are more modern and have better facilities for mothers and babies.• A reduction in the provision of public conveniences will mean users will have to travel further to find alternative provision, where it is available
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		<ul style="list-style-type: none">• Individuals with disabilities, older people or individuals with health related problems may find alternative facilities difficult to use• It is likely that there will be an increased demand for remaining facilities• Older people are more likely to suffer from incontinence problems and other health related issues that require them to use the toilet more frequently. Lack of toilet facilities will result in older people staying at home.• Young children are less likely to be able to wait to use the toilet and mother with babies may need baby changing facilities. Pregnant women are more likely to need the toilet more frequently and will be disadvantaged if there are a lack of facilities.• Some toilets identified for closure include disabled facilities. Those with mobility problems may find it harder to get to alternative facilities. Lack of toilet facilities prevent disabled people from taking part in everyday activities and going out.• Carers who look after older people, disabled and young people may be disadvantaged.• There could be negative impacts to homeless individuals who use public toilets as somewhere to wash as well as a toileting facility. Homeless people may also suffer from stigma, and may not be or may not feel welcome in some establishments. <p>To mitigate the impact the following has been carried out:</p> <ul style="list-style-type: none">• Towns and villages with multiple facilities have been assessed and alternative toilet provisions identified should those business and cafes allow access at
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		<p>their discretion (no agreements have been reached with these business to allow public access) or customers made choose to purchase goods to have access to the toilets</p> <ul style="list-style-type: none"> • There will be appropriate knowledge transfer and due diligence processes prior to devolution and during negotiations
5.	<p>Information Management – What type of information will be required to deliver this proposal? Is the proposal likely to result in increased risks to the information? If so, what are they? What plans do you have in place, or are developing, that will mitigate the likely identified negative impacts/risks?</p>	<p>To achieve the aims of the project, data will be required on the service running costs.</p> <p>During negotiations with Town & Parish Councils, it will be necessary for data to be shared.</p>
6.	<p>Community Safety/Crime and Disorder - Who will be affected by this proposal? Is the proposal likely to result in positive or negative impacts/risks? If so what are they? What plans do you have in place, or are developing, that will mitigate the likely identified negative impacts/risks?</p>	<p>If toilets are closed there is a risk of vandalism of the empty building.</p> <p>Positive</p> <ul style="list-style-type: none"> • Where toilets have been devolved to Parish and Town Councils it will have a positive impact in terms of keeping properties in use and reducing the risks associated with crime and vandalism in disused premises <p>Negative</p> <ul style="list-style-type: none"> • Risk of vandalism and antisocial behaviour of the empty building should closure occur

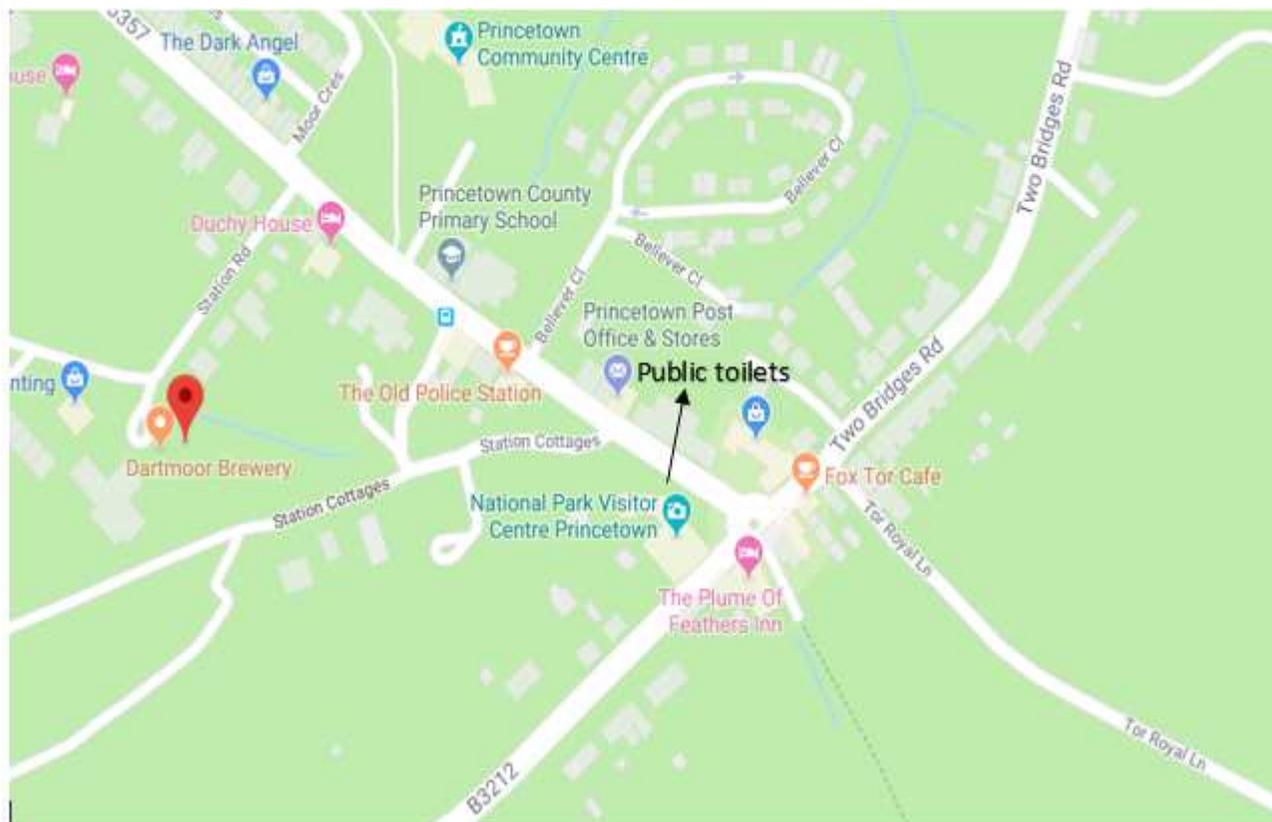
7.	<p>Have the impacts identified in Questions 4 to 6 been assessed using up to date and reliable evidence and data? Please provide a link to the evidence/data or state what the evidence/data is. The data and research page on the intranet is a useful resource.</p> <p>Do you need to engage or consult with any representative group/s?</p> <p>Are our staff affected? Have the unions or staff forums been involved? If not do they need to be?</p>	<p>Consultation has been undertaken with the Town and Parish Councils</p> <p>Consultation has also taken place with National and Local Interest Groups to inform them of the project brief and requested feedback or meetings if desired.</p>
8.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? The full impact of the policy/decision may only be known after the proposals have been implemented.</p>	<p>Once a transfer of services and assets has taken place, in legal terms the Council no longer retains an interest or responsibility therefore in such cases there is an argument that the need for ongoing monitoring does not arise. However, in the short term there will need to be a clear communications and support to direct enquiries appropriately.</p> <p>Where facilities may close the opportunity to dispose through sale, demolition or termination of the lease would be considered. However, during this time empty buildings</p>

		would be monitored by our MLO's for antisocial behaviour and vandalism
9.	<p>Are there other implications not covered by this CIA that need to be considered? These can include: staffing, procurement and contracts, property, climate change, transport, waste and economy. If yes then please explain.</p> <p>Refer to the Committee Report Template Guidance page for further information.</p>	No other implications.

Summary of Comprehensive Impact Assessment Implications (These should be copied and pasted into your report)	
Equality and Diversity	Alternative facilities have been identified where possible should those businesses wish to allow access however no formal agreement with the Council to make them do this.
Safeguarding	Vulnerable customers are more likely to be affected by the outcome of this review. However, as above, alternative facilities have been identified.
Community Safety, Crime and Disorder	Closed facilities will be sold where feasible so that empty, unused buildings are not left as targets for vandals, and, in the meantime, will be monitored.
Health, Safety and Wellbeing	Alternative facilities have been identified where it is proposed that public toilet facilities are closed should those business wish to allow access.
Other implications	

Bedford Bridge – When looking to identify alternative facilities unfortunately, we were unable to identify any within close proximity to the current public conveniences however, there are toilets located a short drive to nearby Horrbridge.

Princetown



- There are cafes and public houses located in Princetown which provide toilet facilities within a short walk of the current facilities. These are the Fox Tor café, The Plume of Feathers Inn, The Prince of Wales and The Old Police Station Café should they wish to allow access however no formal arrangement has been made with the Council to allow this.

Okehampton – Market Street



- There are a number of establishments within Okehampton which provide toilet facilities which includes cafes and public houses.
- Waitrose provide a toilet which is only a short walk from the current public conveniences. There are also the Fairplace public conveniences which will remain open for use by the public.

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The current guidance for a Council's level of borrowing is the Prudential Code (2017) and as "proper practice" must be adhered to. The following extracts from the Code summarise the Code's approach to level of borrowing (self-regulating) and the governance that should apply.

"the local authority shall ensure that all its capital and investment plans are affordable, prudent and sustainable.

'A local authority shall determine and keep under review how much money it can afford to borrow.'

"the level of capital investment that can be supported will, subject to affordability and sustainability, be a matter for local discretion"

Capital Strategy - As from 2019/20, all local authorities are required to prepare an additional Capital Strategy report.

Investment Strategy – The guidance includes a new requirement for Councils to prepare an Investment Strategy. Councils are required to prepare indicators that enable Members and the public to assess the Council's investments and the decisions taken. The new indicator measures net commercial income as a percentage of net service expenditure and total investment exposure.

Treasury Management Strategy - Treasury risk management at the Council is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2017 Edition* (the CIPFA Code) which requires the Council to approve a treasury management strategy before the start of each financial year. This report fulfils the Council's legal obligation under the *Local Government Act 2003* to have regard to the CIPFA Code.

To demonstrate the proportionality between the treasury operations and the non-treasury operation, high-level comparators are shown throughout all three of the Strategies presented for approval.

2. Outcomes/outputs

The budget for investment income remains the same as in 2018/19 and has been set at £90,321 in 2019/20.

3. Options available and consideration of risk

It is a statutory requirement for the Council to annually approve its Capital Strategy, Investment Strategy and Treasury Management Strategy.

4. Proposed Way Forward

It is recommended for the Council to approve the Capital Strategy (Appendix A), Investment Strategy (Appendix B) and Treasury Management Strategy (Appendix C).

5. Implications

Implications	Relevant to proposals Y/N	Details and proposed measures to address
Legal/Governance	Y	<p>The elements set out in paragraph 2 cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, MHCLG MRP Guidance, the CIPFA Treasury Management Code and MHCLG Investment Guidance.</p> <p>It is within the Terms of Reference of the Audit Committee to receive regular reports on the treasury management function.</p> <p>It is within the Terms of Reference of the Hub Committee to receive regular monitoring reports on the Council's Capital Programme and Capital Plans.</p>
Financial	Y	<p>Good financial management and administration underpins the entire treasury management strategy. The budget for investment income for 2019/20 is £90,321.</p> <p>The Council's Investments are predicted to be £6.5 million at 31.3.19 as per Table 8 of the Capital Strategy.</p>
Risk	Y	<p>The security risk is the risk of failure of a counterparty. The liquidity risk is that there are liquidity constraints that affect the interest rate performance. The yield risk is regarding the volatility of interest rates/inflation. The Council produces an Annual Capital Strategy, Investment Strategy and Treasury Management Strategy in accordance with CIPFA guidelines.</p> <p>The Council engages a Treasury Management advisor and a prudent view is always taken regarding future interest rate movements. Investment interest income is reported quarterly to SLT and the Hub Committee as part of budget reports.</p>

Comprehensive Impact Assessment Implications		
Equality and Diversity	N	N/a
Safeguarding	N	N/a
Community Safety, Crime and Disorder	N	N/a
Health, Safety and Wellbeing	N	N/a
Other implications	N	none

Supporting Information

Appendices:

Appendix A – Capital Strategy 2019/20.

Appendix B – Investment Strategy 2019/20.

Appendix C – Treasury Management Strategy 2019/20.

Background Papers:

Council: 27/03/18 - TMS & Annual Investment Strategy 2018-19 (CM 70)

Audit Committee: 22/01/19 - TMS (Mid-Year Update – AC 30)

Capital Strategy Report 2019/20

1. Introduction

1.1. This capital strategy is a new report for 2019/20, giving a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services, along with an overview of how associated risk is managed and the implications for future financial sustainability.

2. Capital Expenditure and Financing

2.1. Capital expenditure is where the Council spends money on assets, e.g. property/ vehicles that will be used for more than one year. In Local Government this includes spending on assets owned by other bodies and loans and grants to other bodies, enabling them to buy assets. The Council has some limited discretion on what counts as capital expenditure, e.g. assets costing below £10,000 are not capitalised and are charged to revenue in the year.

2.2. The Council has incurred £24m capital expenditure in 2018/19 to date and may incur further capital expenditure by the end of the year. The Council has approved a Capital Programme for 2019/20 of £2.076 million all of which relates to general fund services. Officers are also currently working on Community Housing Schemes within the Borough and a report will be presented to the Hub Committee in the Summer regarding this. This is estimated to cost £4.7 million to deliver 30 residential units and would be funded in the short term by borrowing. A recommendation will be made to Council to approve the capital expenditure of £4.7m and it is included within the estimates below for modelling purposes and for completeness.

2.3 In September 2018 (Minute CM34) the Council approved an updated Commercial Property Strategy, which included multiple objectives: (a) to support regeneration and the economic activity of the Borough, the LEP area and the South West Peninsula (in that priority order) (b) to enhance economic benefit (c) to grow business rate income (d) to assist with the financial sustainability of the Council as an ancillary benefit and (e) to help continue deliver and/or improve frontline services in keeping with its adopted strategy and objectives.

2.4 Details of the Council’s commercial property strategy can be found in the report taken to the Hub Committee on 11th September 2018 (and subsequently approved by Full Council on 25th September 2018 - minute Reference CM34 and HC26)

<http://mg.swdevon.gov.uk/ieListDocuments.aspx?CIId=221&MIId=1206&Ver=4>

2.5 This strategy, which is expected to be predominantly funded through prudential borrowing, has two strands. The first is development within the Borough, the second is commercial property acquisition either within the Borough, the LEP area or the South West Peninsula (in that priority order).

2.6 Also in September 2018 Council approved an overall Borrowing Limit (for all Council services) of £50 million. It is estimated that there is approximately £16million left of this overall limit that could potentially be spent on commercial investments in 2019/20. This has been included within the table below for modelling purposes and completeness also.

Table 1: Prudential Indicator: Estimates of Capital Expenditure in £ '000s

	2017/18 actual	2018/19 forecast	2019/20 budget	2020/21 budget	2021/22 budget
General Fund services	3,214	2,318	2,076	786	586
Community Housing (see 2.2 above)	0	0	4,700	0	0
Capital investments* (see 2.2 above)	0	21,452	16,000	0	0
TOTAL	3,214	23,770	22,776	786	586

*Capital investments relate to areas such as capital expenditure on investment properties.

2.7. A Commercial Development Financing Report was considered by the Hub Committee on 29th January 2019 which outlined the financing for three in-Borough developments. These were for a hotel development in Tavistock, a new leisure/hospitality/food retail unit in Okehampton (Okehampton Pod) and for new temporary accommodation provision in Tavistock.

<http://mg.swdevon.gov.uk/documents/s20323/Commercial%20Development%20Financing.pdf>

2.8 At the Council meeting on 12th February 2019, the Tavistock project and the Okehampton Pod were not approved (Council Minute CM 51). The new temporary accommodation provision in Tavistock was approved and is included within the 2019/20 Capital Programme within Table 1.

2.9 Also at the Council meeting on 12th February 2019, the Capital Programme Proposals (taken into account the changes in outlined in 2.8 above) was approved for £2.076 million. This is shown within Table 1 above.

2.10 In addition there will be a future recommendation to Council to fund £4.7m on Community Housing capital expenditure. Also in September 2018 Council approved an overall Borrowing Limit (for all Council services) of £50 million. It is estimated that there is approximately £16million left of this overall limit that could potentially be spent on commercial investments in 2019/20. This has been included within Table 1 for modelling purposes and completeness also.

2.11 The main General Fund capital project to which the Council is currently committed is Leisure Investment of £1.5m. The Council is being reimbursed by the leisure contractor for the borrowing of the Leisure Investment and the income has already been factored into the Medium Term Financial Strategy. In terms of slippage, £0.1m of capital expenditure approved for 2018/19 will be spent in 2019/20 (this is for all Council capital projects within the Capital Programme).

2.12. All items in Table 1 which are also in the Capital Programme for 2019/20 are based on budgeted estimates and will be subject to the normal project appraisal procedures as required under the Council's Assets Strategy.

2.13. Governance

2.13.1. The Head of Finance Practice invited bids for capital funding from all service areas, for a new capital programme during July 2018 on the strict proviso that all bids must go towards meeting a strategic priority. All capital bids received were ranked against a prescribed priority criteria set out in the bid process. The submitted capital bids have been assessed against the categories in each priority. Priority 1 categories include meeting strategic priorities and statutory obligations (e.g. Health and Safety, DDA etc.) and other capital works required to ensure the existing Council property assets remain open.

2.13.2. Priority 2 categories link to good asset management whereby the capital work proposed would either generate capital/revenue income or reduce revenue spending. A capital bid that will enable rationalised service delivery or improvement is also considered a Priority 2 category to meet the Council's aims and objectives.

2.14. Financing

2.14.1. All capital expenditure must be financed, either from (i) external sources (government grants and other contributions), (ii) the Council's own resources (revenue contribution, reserves and capital receipts) or (iii) debt (internal borrowing and borrowing from third party lenders such as the Public Work Loans Board). The planned financing of the above expenditure is as follows:

Table 2: Capital financing in £ '000s

	2017/18 actual	2018/19 forecast	2019/20 budget	2020/21 budget	2021/22 budget
(i) External sources	331	629	938	597	536
(ii) Own resources	317	250	546	189	50
(iii) Debt	2,566*	22,891**	21,292	0	0
TOTAL	3,214	23,770	22,776	786	586

*Debt in 2017/18 relates to external PWLB borrowing for the waste vehicles - £2.65 million borrowed in March 2018.

** In 2018/19 the Council has undertaken capital expenditure (financed by prudential borrowing from the PWLB) of £22.9m. This was mainly to purchase four investment properties as part of the Council's Commercial Property Acquisition Strategy. A monitoring report was presented to the Audit Committee on 9th October 2018 and is available on the attached link:

<http://mg.swdevon.gov.uk/ieListDocuments.aspx?CIId=130&MIId=1190&Ver=4>

2.15. The projected debt for 2019/20 relates to borrowing for projects in Tavistock for a temporary accommodation development (which has been approved by Full Council in February 2019). In addition, an estimated maximum of £16m of further debt could be undertaken in relation to opportunities that may arise in 2019/20 for either further acquisitions of commercial property or further in Borough development opportunities. The £16m has been shown in Table 1 under the category of Commercial Investments.

2.16. Members have received briefings through the Members' Bulletin on potential community housing schemes within the Borough. A report on the schemes will be presented to the Hub Committee in the summer 2019, this will contain a recommendation to undertake capital expenditure of £4.7m to deliver the schemes.

2.17 Debt is only a temporary source of finance, since loans must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as Minimum Revenue Provision (MRP). Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance. Planned MRP and use of capital receipts are as follows:

Table 3: Replacement of debt finance in £ '000s

	2017/18 actual	2018/19 forecast	2019/20 budget	2020/21 budget	2021/22 budget
Own resources					
- MRP	42	494	560	735	762
- Use of capital receipts					4,700

The Council's full MRP statement is shown below:

2.18. Minimum revenue provision (MRP) policy statement

2.18.1. Regulation 28 of the Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2003 states that 'A local authority shall determine for the current financial year an amount of minimum revenue provision which it considers to be prudent'. The provision is made from revenue in respect of capital expenditure financed by borrowing or credit arrangements.

2.18.2. With all options MRP should normally commence in the financial year following the one in which expenditure was incurred. Regulation 28 does not define 'prudent'. However MRP guidance has been issued, which makes recommendations to authorities on the interpretation of that term. Authorities are legally obliged to 'have regard' to the guidance.

2.18.3. The first recommendation given by the guidance is to prepare, before the start of each financial year, an annual statement of the policy on making MRP in respect of that financial year and submit this to Full Council for approval.

2.18.4. The guidance aims to ensure that the provision for the repayment of borrowing which financed the acquisition of an asset should be made over a period bearing some relation to that over which the asset continues to provide a service.

The MRP policy to be adopted is as below:-

Borrowing	MRP Methodology
Commercial Property acquisition (Total Council Borrowing of up to £50 million to include all Council services)	<p>Annuity Method (over the 50 years)</p> <p>Under this calculation, the revenue budget bears an equal annual charge (for principal and interest) over the life of the asset by taking into account the time value of money.</p> <p>Since MRP only relates to the 'principal' element, the amount of provision made annually gradually increases during the life of the asset. The interest rate used in annuity calculations will be referenced to prevailing average PWLB rates.</p> <p>In area Council developments on Council land may propose to repay MRP based on 50% on the annuity method over the 50 year life (the assets will be regularly maintained), and 50% will be paid on maturity of the loan from either sale of the asset (a capital receipt) or through refinancing of the debt. The position would be regularly monitored. If at any point in time the valuation of the asset falls below the open market value then the MRP policy will be revisited.</p>
Waste Fleet, Leisure Investment and Kilworthy Park	<p>Asset Life Method</p> <p>MRP is charged using the Asset Life method – based on the estimated life of the asset.</p> <p>This option provides for a reduction in the borrowing need over approximately the assets' life.</p>

2.19. The Council's cumulative outstanding amount of debt finance is measured by the Capital Financing Requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt. The CFR is expected to increase by £20.7m during 2019/20.

Based on the above figures for expenditure and financing, the Council's estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement in £ '000s

	31.3.2018 actual	31.3.2019 forecast	31.3.2020 budget	31.3.2021 budget	31.3.2022 budget
General Fund services	4,240	5,366	5,638	5,313	4,971
Community Housing (2.2)	0	0	4,700	4,700	0
Capital investments	0	21,066	36,826	36,416	35,996
TOTAL CFR	4,240	26,432	47,164	46,429	40,967

2.20. Asset management

2.20.1. To ensure that capital assets continue to be of long-term use, the Council has an asset management strategy in place.

2.21. Asset disposals

2.21.1. When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The Council is currently also permitted to spend capital receipts on service transformation projects until 2021/22. Repayments of capital grants, loans to third parties for capital expenditure and investments also generate capital receipts. The Council estimates to receive nil capital receipts in the coming financial year as follows:

Table 5: Capital receipts in £ '000s

	2017/18 actual	2018/19 forecast	2019/20 budget	2020/21 budget	2021/22 budget
Asset sales	31	100	0	0	0
Loans repaid	0	0	0	0	0
TOTAL	31	0	0	0	0

3. Treasury Management

3.1. Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Council is typically more cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

3.2. At 31st March 2018, the Council had external borrowing of £4.75 million.

3.3. The Council currently has £10m treasury investments earning an average rate of around 0.70% which are expected to fall to £6.5m at 31/3/2019.

3.4. Borrowing strategy

3.4.1. The Council's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Council therefore will seek to strike a balance between cheap short-term loans (currently available at around 0.75%) and long-term fixed rate loans where the future cost is known but higher (currently 2.0 to 3.0%).

3.4.2. Projected levels of the Council's total outstanding debt which comprises borrowing is shown below, compared with the capital financing requirement (see above).

Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ '000s

	31.3.2018 actual	31.3.2019 forecast	31.3.2020 budget	31.3.2021 budget	31.3.2022 budget
Debt	4,750	24,200	46,850	46,234	40,904
Capital Financing Requirement	4,240	26,432	47,164	46,429	40,967

3.4.3. Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term. As can be seen from table 6, the Council expects to comply with this in the medium term. In 2017/18 the debt is slightly higher than the CFR by £0.51m but this is only a short term position as the gross debt will reduce in 2018/19.

3.5. Affordable borrowing limit

3.5.1. The Council is legally obliged to set an affordable borrowing limit (also termed the "Authorised Limit" for external debt) each year and to keep it under review. In line with statutory guidance, a lower "Operational Boundary" is also set as a warning level should debt approach the limit.

In view of the Council's commercial property strategy, the Council obtained independent external advice on the total amount of borrowing that would be acceptable for the Borough Council based on the Council's own financial status. The report on the advice is confidential, the advised maximum limit of £50 million is incorporated into the Prudential Indicator for the Authorised Limit. This limit takes into account the commercial property strategy and the other borrowing projections such as borrowing for community housing schemes.

Table 7: Prudential Indicators: Authorised limit and operational boundary for external debt in £'000s

	2018/19 limit	2019/20 limit	2020/21 limit	2021/22 limit
Authorised limit – total external debt	50,000	50,000	50,000	50,000
Operational boundary – total external debt	47,500	47,500	47,500	47,500

3.5.2. Further details on borrowing are in the treasury management strategy (Appendix C).

3.6. Investment Strategy

3.6.1. Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

3.6.2. The Council's policy on treasury investments is to prioritise security and liquidity over yield, i.e. to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely including in collective investment schemes (pooled funds whose underlying assets are company shares, bonds, property etc.) one example of which is the CCLA Local Authorities' Property Fund in which the Council is invested, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy and the Council may request its money back at short notice.

Table 8: Treasury management investments in £'000s

	31.3.2018 actual	31.3.2019 forecast	31.3.2020 budget	31.3.2021 budget	31.3.2022 budget
Short-term investments	6,200	6,000	6,500	6,500	6,500
Longer-term investments	500	500	500	500	500
TOTAL	6,700	6,500	7,000	7,000	7,000

3.6.3. Further details on treasury investments can be found in the treasury management strategy (Appendix C).

3.7. Governance

3.7.1. Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Strategic Finance Lead (S151 Officer) and finance staff (where appropriate), who must act in line with the treasury management strategy approved by Council. Semi-annual reports on treasury management activity are presented to the Audit Committee which is responsible for scrutinising treasury management decisions.

4. Investments for Service Purposes

4.1. The Council has approved making a £50,000 investment in the South West Mutual Bank which takes the form of shareholding in the bank. Other than this, the Council does not currently have investments assisting local public services, such as making loans to local service providers or to local small businesses to promote economic growth or to subsidiaries that provide services. However, it may do so in the future if required. In light of the public service objective, the Council would thus be willing to take more risk than with treasury investments, however the objective would be for such investments to break even after all costs (Council Minute CM44).

4.2. Governance

4.2.1. Decisions on service investments are made by the relevant service manager in consultation with the Strategic Finance Lead (Section 151 Officer) and must meet pre-approved criteria and limits. Most loans and shares are capital expenditure and purchases will therefore also be approved as part of the capital programme.

5. Current and Proposed Commercial Activities

5.1. West Devon Borough Council owns a number of commercial units, industrial units, office accommodation, within the Borough, valued at £3 million at 31/3/2018.

5.2. The Council leases various parcels of land and buildings to external organisations. This reflects the historic policy of supporting small start-ups which has proved and continues to be successful.

5.3 Commercial activity generates net income each year after all costs, but it also exposes the Council to normal commercial risks. In 2018/19 rental income net of direct operating expenses is expected to be £195,000 as per the Quarter 3 Budget Monitoring report presented to the Hub Committee on 29th January 2019 .

5.4 The risks are managed by the Council's Senior Leadership Team and the Council's Assets team who engage specialist advisors where appropriate. The Council has a comprehensive due diligence check list which is completed before any commercial property acquisitions or commercial developments are made.

5.5. The Council's Commercial Property Strategy

5.5.1. With the withdrawal of Government funding, the Council recognises it will need to generate additional income (as an ancillary benefit) to be able to carry on delivering the current range of services.

5.5.2. In September 2018 (Minute CM34) the Council approved an updated Commercial Property Strategy, which included multiple objectives: (a) to support regeneration and the economic activity of the Borough, the LEP area and the South West Peninsula (in that priority order) (b) to enhance economic benefit (c) to grow business rate income (d) to assist with the financial sustainability of the Council as an ancillary benefit and (e) to help continue deliver and/or improve frontline services in keeping with its adopted strategy and objectives.

(Note the previous commercial property acquisition strategy was approved by Council on 27th March 2018. The new strategy approved in September 2018 included both commercial property acquisition as well as the funding of commercial development on Council land. This proposal is in line with the "Enterprise" corporate strategic aim of creating places for enterprise to thrive and business to grow.)

5.5.3. Details of this strategy can be found in the report taken to the Hub Committee on 11th September 2018 (and subsequently approved by Full Council on 25th September 2018 - minute Reference CM34 and HC26)

<http://mg.swdevon.gov.uk/ieListDocuments.aspx?CIId=221&MIId=1206&Ver=4>

5.5.4. This strategy, which is expected to be predominantly funded through prudential borrowing, has two strands. The first is development within the Borough, the second is commercial property acquisition either within the Borough, the LEP area or the South West Peninsula (in that priority order).

5.5.5 A Commercial Development Financing Report was considered by the Hub Committee on 29th January 2019 which outlined the financing for three in-Borough developments. These were for a hotel development in Tavistock, a new leisure/hospitality/food retail unit in Okehampton (Okehampton Pod) and for new temporary accommodation provision in Tavistock.

<http://mg.swdevon.gov.uk/ieListDocuments.aspx?CIId=221&MIId=1209&Ver=4>

5.5.6 At the Council meeting on 12th February 2019, the Tavistock project and the Okehampton Pod were not approved (Council Minute CM 51) . The new temporary accommodation provision in Tavistock was approved and is included within the 2019/20 Capital Programme within Table 1.

5.5.7. Due diligence and risk assessment will be undertaken and a business case produced for each development or acquisition opportunity, when identified. It will also be assessed on meeting the above objectives and on delivering one or more of the following outcomes: job creation or safeguarding; health and wellbeing; town centre regeneration; tourism / increased footfall; business rate growth; improved asset utilisation.

5.5.8. A minimum net yield return of 1% is being targeted. However, in some circumstances, e.g. where there is a community benefit, a lower return may be acceptable. The Council will put in place contingency plans should expected yields not materialise.

5.5.9. Other borrowing: Officers are also currently working on Community Housing Schemes within the Borough and a report will be presented to the Hub Committee in the Summer regarding this. This is estimated to cost £4.7 million to build out two schemes delivering 30 residential units and would be funded in the short term by borrowing. A recommendation will be made to Council to approve the capital expenditure of £4.7m and it is included within the capital expenditure estimates in Table 1 for modelling purposes and for completeness. This borrowing, in aggregate with other borrowing, will not exceed the Authorised Limit and Operational Boundary in Table 7.

5.6. Governance

5.6.1. Details of the Council's commercial property strategy can be found in the report taken to the Hub Committee on 11th September 2018 (and subsequently approved by Full Council on 25th September 2018 - minute Reference CM34 and HC26). The Governance arrangements are set out within Appendix A of the Strategy.

<http://mg.swdevon.gov.uk/ieListDocuments.aspx?CIId=221&MIId=1206&Ver=4>

5.6.2 The strategy has two strands. The first is development within the Borough, the second is commercial property acquisition either within the Borough, the LEP area or the South West Peninsula (in that priority order). Acquisitions and developments must conform to the adopted commercial property strategy.

5.6.3. Property and most other commercial investments are also capital expenditure; purchases and development will therefore also be approved as part of the capital programme.

5.7. Risk management

5.7.1. The Council accepts there is higher risk on commercial investment than with treasury investments. Financial risk will be weighed up against the social and economic benefits of the investment. The principal risk exposures include vacancies resulting in a disruption or fall in income streams, fall in capital value which is either site-specific or due to general market conditions, deterioration in the credit quality of the tenant. These risks will be managed, for example by having an appropriate tenant mix for small start-ups where the creditworthiness tends to be lower, targeting tenants with strong financial standing for larger units or, where there is single occupancy, having long unexpired leases on the date of acquisition.

Proportionality

5.7.2. The commercial property strategy considers the risks of investment and the Council has engaged Treasury Management advisors to analyse the level of debt proportionality to the Council's finances (e.g. levels of reserves, asset base and level of interest costs as a percentage of income). Commercial property acquisitions expand the Council's balance sheet and interest costs will form a higher percentage of locally derived income. It would absorb a high level of reserves if there are shortfalls in or disruption to the income stream required to meet the additional expenditure.

5.8 Sensitivity analysis on the level of debt interest against the Council's level of reserves was considered as part of the Medium Term Financial Strategy and as part of the budget proposals for 2019/20. In order that commercial investments remain proportionate to the size of this Council, borrowing for the Commercial Investment Property Strategy is subject to an overall maximum limit of £50m.

5.9 The Council set an upper limit on External Borrowing (for all Council services) as part of the Medium Term Financial Strategy of £50 million. Interest payments at 2.5% would equate to 28.4% of available reserves. At an interest rate of 3%, interest payments would equate to 34.1% of available reserves (Appendix H to the Budget Proposals report for 2019/20 – Council 12th February 2019).

6. Liabilities

6.1. In addition to the current debt of £24.2m detailed above, the Council is committed to making future payments to cover its pensions liability. The Pensions Reserve for the net defined benefit liability was £24.4m at 31/3/2018.

6.2. As at 31st March 2018 the Council had no contingent liabilities.

Governance

6.3 Decisions on incurring new discretionary liabilities are taken by Heads of Practice in consultation with the Strategic Finance Lead (S.151 Officer). The risk of liabilities crystallising and requiring payment is monitored as part of budget monitoring and reported quarterly.

7. Revenue Budget Implications

7.1. Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 9: Prudential Indicator: Proportion of financing costs to net revenue stream

	2017/18 actual	2018/19 forecast	2019/20 budget	2020/21 budget	2021/22 budget
Financing costs (£m)	81,140	1,033,877	1,756,601	1,898,601	1,784,542
Proportion of net revenue stream	1.1%	14.1%	24.8%	26.1%	26.1%

Further details on the revenue implications of capital expenditure are included in the 2019/20 Revenue Budget.

7.2. Statement on Sustainability

7.2.1. Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 50 years into the future.

7.2.2. With £4.75m external debt at 31st March 2018, the Council is starting from a low base when comparing interest costs with income and reserves. It is anticipated that debt funded acquisitions will generate additional revenue above the capital funding costs. Based on reserves of £4.4m (£1.2m unearmarked and £3.2m earmarked), as shown in Appendix H of the Budget Proposals 2019/20 report to Council, an increase in debt to £50m will result in debt interest costs being equivalent to 28.4% of reserves (assuming an interest rate of 2.5%). Should average the average rate rise to 3%, then debt costs will be 34.1% of reserves. These costs do not include MRP which will also need to be considered.

7.2.3. The Strategic Finance Lead (S151 Officer) is satisfied that the proposed capital programme is prudent, affordable and sustainable and it is fully integrated with the Council's 2019/20 Medium Term Financial Strategy, Treasury Management Strategy and Investment Strategy and other strategic plans. The Capital Strategy is compiled in line with the requirements of the 2017 CIPFA Prudential Code and 2017 Treasury Management Code. The risks associated with the Commercial Property Strategy are covered within the Investment Strategy.

- 7.2.4. The delivery of the individual capital schemes on the plan is directly linked to the original approval of the capital project supported by each project having a project lead who is responsible for the delivery of the project (appropriate skills, contracting, planning etc.) and the subsequent achievement of the objectives of that project.
- 7.2.5 Members, via the Hub Committee meetings receive quarterly budget monitoring reports on the Council's Capital Programme. Through these updates, which are driven by the requirement of financial reporting, Members can review and challenge the delivery of projects and any changes to both the timing and expenditure of the capital project.
- 7.2.6 If subsequent to the capital project being completed there are variations to the income expected to be generated from that asset, this will be reported as a variance in the quarterly budget monitoring reporting and if ongoing will be included in the following year's revenue budget proposals.
- 7.2.7 The Council's Senior Leadership Team has oversight for the delivery of and challenge to the Capital Strategy and Capital Programme.

Affordability

- 7.2.8 Affordability is critical in applying the capital strategy and approving projects for inclusion in the capital programme. This is either demonstrated by a report on the project being presented to Hub/Council for approval supported by a business case identifying the expenditure and funding, appraisal of alternative options and the risks and rewards for the approval of the scheme, or by delegated procedures set out within the commercial property strategy (containing this information).
- 7.2.9 All projects need to have a clear funding source. If external funding such as an external grant is to be used, there needs to be a clear funding commitment.
- 7.2.10 Affordability of each project needs to be clear, not only for the funding of the capital spend, but also to cover any ongoing costs of the operation and funding of that capital spend.

7.2.11 Where borrowing is to be used the affordability is of greater importance and the affordability has to include the interest costs of that borrowing and the provision for the repayment of the borrowing (MRP). This repayment is matched to a prudent asset life and any income streams estimated to fund this asset must be sustainable. The rules around the governance of this borrowing are outlined in the Prudential Code (as summarised above).

7.2.12 At no stage should the asset value be lower than the value of outstanding debt unless there is a clear plan to mitigate that shortfall or to sell that asset.

Risks

7.3.1. The risks associated with a significant Capital Programme and a significant level of borrowing can be mitigated through all capital projects being supported by a business case, having adequate project management and/or project boards, suitable skills for the delivery of the project, tax planning, cash flow, clear operational plan for the use of the asset, security and due diligence on loans and purchases, use of external advice where appropriate, project contingencies, full tender process and regular and transparent reporting to Members.

7.3.2 There are clear links from the capital strategy to both the treasury management strategy, prudential indicators, authorised borrowing limits and the revenue budget. These are also subject to review and oversight by Members at the Audit Committee and Council. For any new borrowing, and this is a greater risk as the value of borrowing increases, this does increase the Council's overall liabilities that will need to be repaid in the future.

7.3.3. In addition, this increases the Council's level of fixed interest and repayment costs that it will incur each year. This is currently increasing by 2022 and could be up to a borrowing liability of £40.9m (see Table 6) and ongoing financing costs of the borrowing of approx. £1.89m by 2021/22. This is a clear risk that all Members need to be aware of.

7.3.4. However this risk for assets is mitigated by a robust business case and a MRP that will repay the borrowing costs over a (prudent) asset life. Any variations from this are set out in the MRP Policy (See section 2.18.4). Any variation in expected income is an issue, however given the wide range of operational assets and different income streams this helps to mitigate this risk.

7.3.5 As outlined above in the position statement, investment properties are a different type and level of risk. Risk arises from both variations in income streams (tenant non-renewal etc.) and from asset values (impact economic conditions and retail trends etc.). The Council has established a clear strategy, criteria and a governance route for these purchases which has included member training, second opinion on asset values, due diligence, site visits, surveys etc.

7.3.6 There are risks (and rewards) associated with the purchase of this type of assets, therefore all Members need to have sight of and understand the risks and rewards inherent in these commercial investments(development opportunities).

Knowledge and Skills

- 8.1 The Council employs professionally qualified and experienced staff in senior positions with responsibility for recommending capital expenditure, borrowing and investment decisions to Members.
- 8.2 The Group Manager of Business Development is a qualified Project Manager and Accounting Technician, with a RICS (Royal Institute of Chartered Surveyors) Accredited degree in Estates Management, incorporating Investment and Development. In addition, the Group Manager for Business Development also has 15 years of banking/lending experience, having worked on multi-million pound asset investment, disposal and development projects.
- 8.3 The Chief Executive has a MSc in Leadership of Public Services (2009) from UWE (Bristol Business School) and an IoD (Institute of Directors) Certificate of Directorship in 2016. In addition, the Chief Executive has been involved in the oversight of the Councils' interests (as shareholder) in its wholly owned companies when working as a Director for a Unitary Council.
- 8.4 The Strategic Finance Lead (S.151 Officer) is a Chartered Accountant (ICAEW) with 15 years of experience of being a S151 Officer (Chief Finance Officer). In addition, the Strategic Finance Lead holds a BSc in Mathematics and has previously worked in the private sector for accountancy firms.
- 8.5 The Head of Assets Practice is a Chartered Civic Engineer with sixteen years of experience. In addition, the Head of Assets holds a MSc in Construction Law.

- 8.6 The Estates Specialist is a Chartered Surveyor, qualified for over 13 years, with an Estate Surveying degree. In addition they are a Registered Valuer.
- 8.7 Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The appropriate expertise is always resourced in relation to any financial, legal and asset related due diligence required. A list is below:-
- Savills - Property agents
 - CCD Properties Limited - Development specialists
 - Arcadis – Building Surveyors and Engineers
 - Womble Bond Dickinson - Solicitors
 - Link Services – Treasury Management advice
 - Arlingclose – Treasury Management advice
- 8.8 This approach is more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.
- 8.9 In 2018 some external training from a LGIU (Local Government Information Unit) Associate on Local Government Finance (including commercialism) was arranged for all Members aswell as some internal training events facilitated by the S151 Officer and the Group Manager for Business Development on the Council's Medium Term Financial Strategy which included an update on commercial property investment. The Council's Members' Services are consulted when organising all training in order to maintain training and development plans for Councillors.
- 8.10 A comprehensive Members' Induction Programme, following the District Elections in May 2019 has been organised, this includes specific financial and treasury management training which will be undertaken as part of the induction. External treasury management training will be offered to all Members in June 2019 to ensure Members have up to date skills to continue to make capital and treasury management decisions.
- 8.11 The purpose of this training is to ensure elected Members involved in the investments decision making process have appropriate capacity, skills and information to enable them to: 1. take informed decisions as to whether to enter into a specific investment; 2. to assess individual assessments in the context of the strategic objectives and risk profile of the local authority; and 3. to enable them to understand how the quantum of these decisions have changed the overall risk exposure of the local authority.

Investment Strategy Report 2019/20

1. Introduction

- 1.1. The Authority invests its money for three broad purposes:
- because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**),
 - to support local public services by lending to or buying shares in other organisations (**service investments**), and
 - to earn investment income (known as **commercial investments**).
- 1.2. This investment strategy is a new report for 2019/20, meeting the requirements of statutory guidance issued by the Government in January 2018 and focuses on the second and third of these categories.

2. Treasury Management Investments

- 2.1. The Authority typically receives its income in cash (e.g. from taxes and grants) before it pays for its expenditure in cash (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy. The balance of treasury management investments is expected to fluctuate between £15m and £7m during the 2019/20 financial year.
- 2.2. Contribution
- 2.2.1. The contribution that these investments make to the objectives of the Authority is to support effective treasury management activities.
- 2.3. Further details
- 2.3.1. Full details of the Authority's policies and its plan for 2019/20 for treasury management investments are covered in a separate document, the treasury management strategy (Appendix C).

3. Service Investments: Loans

3.1. Contribution

3.1.1. The Council does not currently have investments assisting local public services, such as making loans to local service providers or to local small businesses to promote economic growth or to subsidiaries that provide services. However, it may do so in the future if required.

3.1.2. The Council does not currently make loans to employees (e.g. car loans).

3.2. Security

3.2.1. If loans were to be made in the future, they would remain proportionate to the size of the Council.

3.2.2. Accounting standards require the Authority to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Authority's statement of accounts from 2018/19 is currently nil. Should the Council make any loans in the future, this will be shown net of this loss allowance. However, the Authority makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments.

3.3. Risk assessment

3.3.1. The Authority will always assess the risk of loss before entering into and whilst holding service loans. Should the Council make service loans in the future, risk assessment will take various forms, for example assessing the nature and level of competition, assessing how the market/customer needs will evolve over time, barriers to entry and exit and any ongoing investment requirements. Where necessary, the Council will also engage use of external advisors.

4. Service Investments: Shares and Bonds

4.1. Contribution

4.1.1. The Council has approved to make a £50,000 investment in the South West Mutual Bank which takes the form of shareholding in the bank with the purpose of encouraging local economic growth.

4.2. Security

4.2.1. One of the risks of investing in shares is that they fall in value meaning that the initial outlay may not be recovered. In order to limit this risk, an upper limits on the sum invested in shares has been at set £50,000.

Category of company	31.3.2019 actual			2019/20
	Amounts invested	Gains or losses	Value in accounts	Approved Limit
Local business (South West Mutual Bank)	-	-	-	£50,000
TOTAL	-	-	-	£50,000

4.3. Risk assessment

4.3.1. As it does for service loans, the Council also assesses the risk of loss before entering into and whilst holding shares.

4.4. Non-specified Investments

4.4.1. Shares are the only investment type that the Authority has identified that meets the definition of a non-specified investment in the government guidance. The limits above on share investments are therefore also the Authority's upper limits on non-specified investments. The Authority has not adopted any procedures for determining further categories of non-specified investment since none are likely to meet the definition. Investments in the CCLA are no longer classified as a non-specified investment.

5. Commercial Investments: Property

5.1. Contribution

5.1.1. The Council invests in local commercial property which is held solely to earn rentals, which will be spent on local public services. As at 31st March 2019 the Council held four investment properties.

5.1.2. In addition, West Devon Borough Council owns a number of commercial units, industrial units, office accommodation, within the Borough valued at £6 million at 31/3/2018.

5.1.3. The Council leases various parcels of land and buildings to external organisations. This reflects the historic policy of supporting small start-ups which has proved and continues to be successful.

5.1.4 In September 2018 (Minute CM34) the Council approved an updated Commercial Property Strategy, which included multiple objectives: (a) to support regeneration and the economic activity of the Borough, the LEP area and the South West Peninsula (in that priority order) (b) to enhance economic benefit (c) to grow business rate income (d) to assist with the financial sustainability of the Council as an ancillary benefit and (e) to help continue deliver and/or improve frontline services in keeping with its adopted strategy and objectives.

5.1.5 At the date of writing this report, the Council has made four investments in commercial property, currently totaling £21.452 million as shown below.

Table 1: Property held for investment purposes in £ '000s

Property	Actual	31.3.2018 actual		31.3.2019 expected	
	Purchase cost plus acquisition costs	Gains or (losses)	Value in accounts	Gains or (losses)	Value in accounts*
Co-op (Okehampton) Investment Property	3,572	-	-	-	3,572
Bristol House (Bristol) Investment Property	12,360	-	-	-	12,360
Heron Road (Exeter) Investment Property	3,709	-	-	-	3,709
Plymouth Investment Property	1,811	-	-	-	1,811
TOTAL	21,452				21,452

*Note – all Investment Properties will be valued at 31st March 2019

5.1.6 Also in September 2018 Council approved an overall Borrowing Limit (for all Council services) of £50 million. It is estimated that there is approximately £16million left of this overall limit that could potentially be spent on commercial investments in 2019/20 or later years. This has been included within Table 1 of the Capital Strategy (Estimates of Capital Expenditure) for modelling purposes and completeness also.

5.2. Security

5.2.1. In accordance with government guidance, the Authority considers a property investment to be secure if its accounting valuation is at or higher than its purchase cost including taxes and transaction costs.

5.2.2. A fair value assessment of the Authority's investment property portfolio will be made at 31.3.2019 to assess that the underlying assets provide security for capital investment. Should the 2018/19 year end accounts preparation and audit process value these properties below their purchase cost, then an updated investment strategy will be presented to Full Council detailing the impact of the loss on the security of investments. This will include any revenue consequences arising therefrom, for example, from a change in MRP policy.

5.3. Risk assessment

5.3.1. The Authority assesses the risk of loss before entering into and whilst holding property investments by carrying out appropriate due diligence checks and implementing mitigation measures in managing risk:

- The tenants need to be of good financial standing (this is assessed using Dun & Bradstreet credit rating reports and annual accounts). The number of tenants e.g. sole tenant or multi tenanted will be assessed.
- The property condition such as date of construction and any imminent or significant refurbishment or modernisation requirements (forecast capital expenditure).
- How the property investment meets the Council's multiple objectives as set out in the Council's strategy e.g. economic regeneration, business growth.
- The lease must meet certain standards, such as being in a commercial popular location and have a number of years left on the lease providing a certain and contractually secure rental income stream into the future. Any break clauses will be assessed along with the number of unexpired years, bank guarantees and rent reviews.
- The location will be either within West Devon Borough Council's boundary, the LEP area or the South West Peninsula (in that priority order), as set out in the Commercial Property Strategy. The population of the catchment area, the economic vibrancy and known or anticipated market demand as well as proximity to travel infrastructure and other similar properties will be assessed.

- Rental income paid by the tenant must exceed the cost of repaying the borrowed money from the Public Works Loan Board (which is itself funded by the Government). The surplus is then an ancillary benefit which supports the Council's budget position and enables the Council to continue to provide services for local people.
- The gross and net yield are assessed against the Council's criteria.
- The prevailing interest rates for borrowing at the time.
- Debt proportionality considerations.
- The life and condition of the property is assessed by a valuer and the borrowing is taken out over the life of the asset. The amount of management and maintenance charges are assessed as well as the ease of in-house management. 10% of all rental income is put into a Maintenance and Management Reserve to cover any longer-term maintenance issues.
- The potential for property growth in terms of both revenue and capital growth will be assessed.
- The property sector e.g. office, retail, industrial will assist in deciding on the risks associated with specific properties and the mix of sectors within the Council's portfolio.
- Details of acquisition costs e.g. stamp duty land tax, legal costs
- The documented exit strategy for a purchase/new build.
- The legal and technical due diligence checks will also identify any specific problems such as anomalies in the title deed, restrictive use classes, indemnities, local competition, construction or refurbishment requirements.
- The Council engages the use of external advisors to assist in undertaking elements of the due diligence checks such as technical, legal, accounting, property and taxation advice.
- The Council undertakes sensitivity analysis of the interest repayments on its borrowing requirements as a percentage of its available reserves to ensure there is sufficient coverage in the event that rental income is below that forecasted. This ensures that the Council has the available reserves to enable service delivery to be maintained in the short to medium term, whilst alternative solutions are implemented.

Liquidity

- 5.3.2. Compared with other investment types, property is relatively difficult to sell and convert to cash at short notice and can take a considerable period to sell in certain market conditions. To ensure that the invested funds can be accessed when they are needed, for example to repay capital borrowed, the Authority will spread its liquidity profile across its portfolio and also have a spread of the sector in which the Council invests. The Council also documents potential exit strategies as part of its due diligence checks.

6. Loan Commitments and Financial Guarantees

- 6.1. Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the Authority and are included here for completeness.
- 6.2. The Council is committed to making future payments to cover its pensions liability. The Pensions Reserve for the net defined benefit liability was £24.4m at 31/3/2018.

7. Proportionality

- 7.1 The Authority is partly dependent on profit generating investment activity to achieve a balanced revenue budget. Table 2 below shows the extent to which the expenditure planned to meet the service delivery objectives and place making role of the Authority is dependent on achieving the expected net profit from investments over the lifecycle of the Medium Term Financial Plan.
- 7.2 Should it fail to achieve the expected net profit, the Authority's contingency plans for continuing to provide these services are/would be assessed at the appropriate time and this may involve the temporary use of reserves in the short term. The Council undertakes sensitivity analysis of the interest repayments on its borrowing requirements as a percentage of its available reserves to ensure there is sufficient coverage in the event that rental income is below that forecasted. This ensures that the Council has the available reserves to enable service delivery to be maintained in the short to medium term, whilst alternative solutions are implemented.
- 7.3 The Council set an upper limit on External Borrowing (for all Council services) as part of the Medium Term Financial Strategy of £50 million. Interest payments at 2.5% would equate to 28.4% of available reserves. At an interest rate of 3%, interest payments would equate to 34.1% of available reserves (Appendix H to the Budget Proposals report for 2019/20 – Council 12 February 2019).

Table 2: Proportionality of Investments

	2017/18 Actual	2018/19 Forecast	2019/20 Budget	2020/21 Budget	2021/22 Budget
Gross service expenditure	£28,085,013	£28,136,013	£27,948,813	£28,397,613	£28,766,413
Treasury income	£57,860	£80,321	£90,321	£110,321	£110,321
Commercial property income	-	£1,070,966	£1,186,419	£2,128,373	£2,128,373
Proportion	0.21%	4.09%	4.57%	7.88%	7.78%

7.4 The table shows in 2019/20 that the aggregate of commercial property income and treasury income equates to 4.57% of the Council's gross service expenditure. This is projected to increase to 7.78% by 2021/22.

8. Borrowing in Advance of Need

8.1. Government guidance is that local authorities must not borrow more than or in advance of their needs purely in order to profit from the investment of the extra sums borrowed. The Authority plans to borrow for its Commercial Investment Strategy either within the Borough, the LEP area or the South West Peninsula (in that priority order). The Authority's policies in investing the money borrowed, including management of the risks, for example, of not achieving the desired rental income or borrowing costs increasing are explained in section 5.3 Risk Assessment.

9. Capacity, Skills and Culture

9.1. Statutory Officers and Members

9.1.1. The Council employs professionally qualified and experienced staff in senior positions with responsibility for recommending capital expenditure, borrowing and investment decisions to Members.

9.1.2. The Group Manager of Business Development is a qualified Project Manager and Accounting Technician, with a RICS (Royal Institute of Chartered Surveyors) Accredited degree in Estates Management, incorporating Investment and Development. In addition, the Group Manager for Business Development also has 15 years of banking/lending experience, having worked on multi-million pound asset investment, disposal and development projects.

- 9.1.3. The Chief Executive has a MSc in Leadership of Public Services (2009) from UWE (Bristol Business School) and an IoD (Institute of Directors) Certificate of Directorship in 2016. In addition, the Chief Executive has been involved in the oversight of the Councils' interests (as shareholder) in its wholly owned companies when working as a Director for a Unitary Council.
- 9.1.4. The Strategic Finance Lead (S.151 Officer) is a Chartered Accountant (ICAEW) with 15 years of experience of being a S151 Officer (Chief Finance Officer). In addition, the Strategic Finance Lead holds a BSc in Mathematics and has previously worked in the private sector for accountancy firms.
- 9.1.5. The Head of Assets Practice is a Chartered Civil Engineer with 16 years of experience. In addition, the Head of Assets holds a MSc in Construction Law.
- 9.1.6. The Estates Specialist is a Chartered Surveyor, qualified for over 13 years, with an Estate Surveying degree. In addition they are a Registered Valuer.
- 9.1.7. Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field (see 9.2.2)
- 9.1.8. In 2018 some external training from a LGIU (Local Government Information Unit) Associate on Local Government Finance (including commercialism) was arranged for all Members aswell as some internal training events facilitated by the S151 Officer and the Group Manager for Business Development on the Council's Medium Term Financial Strategy which included an update on commercial property investment. The Council's Members' Services are consulted when organising all training in order to maintain training and development plans for Councillors.
- 9.1.9. A comprehensive Members' Induction Programme, following the District Elections in May 2019 has been organised, this includes specific financial and treasury management training which will be undertaken as part of the induction. External treasury management training will be offered to all Members in June 2019 to ensure Members have up to date skills to continue to make capital and treasury management decisions.

9.1.10. The purpose of this training is to ensure elected Members involved in the investments decision making process have appropriate capacity, skills and information to enable them to: 1. take informed decisions as to whether to enter into a specific investment; 2. to assess individual assessments in the context of the strategic objectives and risk profile of the local authority; and 3. to enable them to understand how the quantum of these decisions have changed the overall risk exposure of the local authority.

9.2. Commercial deals

9.2.1. The Council's negotiating team includes the Group Manager for Business Development and the S.151 Officer, who are both members of the Senior Leadership Team. Both Officers are aware of the core principles of the prudential framework and of the regulatory regime within which Local Authorities operate. These officers have attended specific treasury management training courses around the new MHCLG Guidelines on investments and the accounting treatment.

9.2.2. Where Council staff do not have the knowledge and skills required, use is made of external advisors and consultants that are specialists in their field. The appropriate expertise is always resourced in relation to any financial, legal and asset related due diligence required. A list is shown below:-

- Savills - Property agents
- CCD Properties Limited - Development specialists
- Arcadis – Building Surveyors and Engineers
- Womble Bond Dickinson - Solicitors
- Link Services – Treasury Management advice
- Arlingclose – Treasury Management advice

9.2.3 This approach is more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

9.3. Corporate governance

9.3.1. The Council has corporate governance arrangements to ensure transparency, accountability, responsibility and authority for decision making on investment activities within the context of the local authority's corporate values. The Head of Finance Practice invited bids for capital funding from all service areas, for a new capital programme during July 2018 on the strict proviso that all bids must go towards meeting a strategic priority.

9.3.2. All capital bids received were ranked against a prescribed priority criteria set out in the bid process. The submitted capital bids have been assessed against the categories in each priority. Priority 1 categories include meeting strategic priorities and statutory obligations (e.g. Health and Safety, DDA etc) and other capital works required to ensure the existing Council property assets remain open. For the purpose of this report, Priority 2 categories link to good asset management whereby the capital work proposed would either generate capital/revenue income or reduce revenue spending.

10. Investment Indicators

10.1. The Authority has set the following quantitative indicators to allow elected Members and the public to assess the Authority's total risk exposure as a result of its investment decisions.

10.2. Total risk exposure

10.2.1 The first indicator shows the Authority's total exposure to potential investment losses. This includes amounts the Authority is contractually committed to lend but have yet to be drawn down and guarantees the Authority has issued over third party loans.

Table 3: Total investment exposure in £ '000s

Total investment exposure	31.03.2018 Actual	31.03.2019 Forecast	31.03.2020 Forecast
Treasury management investments	6,700	6,500	7,000
Service investments: Shares and Bonds (see section 4.2 for details)	-	-	50
Capital investments: Commercial Property – new capital expenditure*		21,452	16,000
TOTAL INVESTMENTS	6,700	27,952	23,050
Commitments to lend	-	-	-
Guarantees issued on loans	-	-	-
TOTAL EXPOSURE	6,700	27,952	23,050

*Capital investments relate to areas such as capital expenditure on investment properties.

10.3. How investments are funded

10.3.1. Government guidance is that these indicators should include how investments are funded. Since the Authority does not normally associate particular assets with particular liabilities, this guidance is difficult to comply with. However, the following investments could be described as being funded by borrowing. The remainder of the Authority's investments are funded by usable reserves and income received in advance of expenditure.

Table 4: Investments funded by borrowing in £ '000s

Investments funded by borrowing	31.03.2018 Actual	31.03.2019 Forecast	31.03.2020 Forecast
Commercial investments: Property (new capital expenditure)	-	21,452	16,000
TOTAL FUNDED BY BORROWING	-	21,452	16,000

10.4. Rate of return received

10.4.1. This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred.

Table 5: Investment rate of return (net of all costs)

Investments net rate of return	2017/18 Actual	2018/19 Forecast	2019/20 Forecast
Treasury management investments	0.64%	0.80%	0.82%
Service investments: Shares	-	-	-
Commercial investments: Property	-	2.22%	2.00%
ALL INVESTMENTS	0.64%	3.02%	2.82%

Table 6: Other investment indicators

Indicator	2017/18 Actual	2018/19 Forecast	2019/20 Forecast*
Debt to Net Service Expenditure ratio – This indicator shows that debt is projected to be 6.62 times the net service expenditure of £7million.	63.99%	330.88%	661.86%
Net Commercial Income to Net Service Expenditure ratio * This will increase in 2020/21 as it has been assumed that acquisitions or developments will occur at the latter end of 19/20	-	3.06%	3.86%*
Interest cover ratio (this indicator shows the ratio of income from commercial property investments compared to the interest expense incurred by them) – This indicator shows that gross income from commercial property is over twice that of the interest expense.	-	225.51%	207.88%

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Treasury Management Strategy Statement 2019/20

1. Introduction

- 1.1. Put simply, treasury management is the management of the Council's cash flows, borrowing and investments and the associated risks. The pursuit of optimum performance will be consistent with the management of the associated risks.
- 1.2. Treasury management includes the funding of the Council's capital plans and as the Council is required to operate a balanced budget, to ensure that cash flow is adequately planned and that cash is available when it is needed. The successful identification, monitoring and control of financial risk are therefore central to the Council's prudent financial management.
- 1.3. Treasury risk management at the Council is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2017 Edition* (the CIPFA Code) which requires the Council to approve a treasury management strategy before the start of each financial year. This report fulfils the Council's legal obligation under the *Local Government Act 2003* to have regard to the CIPFA Code.
- 1.4. The Council has recently borrowed loans from the Public Works Loans Board and is likely to undertake further borrowing over the next few years. The Council also has investments and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates.
- 1.5. The Council holds treasury investments as Investments held for service purposes or to earn investment income (known as commercial investments). These are considered in a different report, the Investment Strategy (Appendix B).

2. External Context

2.1. Economic background

2.1.1. 2018 was a year which started with weak growth of only 0.1% in quarter 1. However, quarter 2 rebounded to 0.4% in quarter 2 followed by quarter 3 being exceptionally strong at +0.6%. Quarter 4 though, was depressed by the cumulative weight of Brexit uncertainty and came in at only +0.2%. Growth is likely to continue being weak until the Brexit fog clears.

2.1.2. The MPC has stated that future Bank Rate increases would be gradual and would rise to a much lower equilibrium rate, (where monetary policy is neither expansionary or contractionary), than before the crash; indeed they have given a figure for this of around 2.5% in ten years' time but have declined to give a medium term forecast. However, with so much uncertainty around Brexit, the next move could be up or down, even if there was a disorderly Brexit. While it would be expected that Bank Rate could be cut if there was a significant fall in GDP growth as a result of a disorderly Brexit, so as to provide a stimulus to growth, the MPC could also raise Bank Rate in the same scenario if there was a boost to inflation from increases in import prices, devaluation of sterling, and more expensive goods produced in the UK replacing cheaper goods previously imported, and so on. In addition, the Chancellor could provide fiscal stimulus to boost growth.

2.1.3. The Consumer Price Index (CPI) measure of inflation has been falling from a peak of 3.1% in November 2017 to 2.1% in December 2018. In the February Bank of England quarterly Inflation Report, inflation was forecast to still be marginally above its 2% inflation target two years ahead given a scenario of minimal increases in Bank Rate.

2.2. Credit outlook

2.2.1. The largest UK banks, (those with more than £25bn of retail/Small and Medium-sized Enterprise (SME) deposits), are required, by UK law, to separate core retail banking services from their investment and international banking activities by 1st January 2019. This is known as "ring-fencing". Whilst smaller banks with less than £25bn in deposits are exempt, they can choose to opt up. Several banks are very close to the threshold already and so may come into scope in the future regardless.

2.2.2. Ring-fencing is a regulatory initiative created in response to the global financial crisis. It mandates the separation of retail and SME deposits from investment banking, in order to improve the resilience and resolvability of banks by changing their structure. In general, simpler, activities offered from within a ring-fenced bank (RFB), will be focused on lower risk, day to day core transactions, whilst more complex and “riskier” activities are required to be housed in a separate entity, a non-ring-fenced bank (NRFB). This is intended to ensure that an entity’s core activities are not adversely affected by the acts or omissions of other members of its group.

2.3. Interest rate forecast

2.3.1. On the assumption that the UK and EU agree a Brexit deal in spring 2019 or soon after, then the Bank Rate is forecast to increase steadily but slowly over the next few years to reach 2.00% by quarter 1 2022. Bank rate forecasts for financial year ends (March) are:

- 2018/19 0.75%
- 2019/20 1.00%
- 2020/21 1.50%
- 2021/22 2.00%

2.3.2 The suggested budgeted investment earnings rates for return on investments placed for periods up to about three months during each financial year are as follows:

- 2018/19 0.75%
- 2019/20 1.00%
- 2020/21 1.25%
- 2021/22 1.75%
- 2022/23 2.00%
- 2023/24 2.25%

2.3.3 The overall balance of risks to economic growth in the UK is probably neutral. The balance of risks to increases in Bank Rate and shorter term PWLB rates, are probably also even and are dependent on how strong GDP growth turns out, how slowly inflation pressures subside, and how quickly the Brexit negotiations move forward positively.

2.3.4. A more detailed economic and interest rate forecast provided by Link Asset Services is attached at Appendix 1. For the purpose of setting the budget, it has been assumed that new investments will be made at an average rate of 0.82%, and that new long-term loans will be borrowed at an average rate of between 2.5% and 3%.

3. Local Context

3.1. As at 28th February 2019, the Council held £24.2m of borrowing and £10m of investments. This is set out in further detail at Appendix 2 of this report. Forecast changes in these sums are shown in the balance sheet analysis in table 1 below.

Table 1: Balance sheet summary and forecast

	31.3.18 Actual £'000s	31.3.19 Estimate £'000s	31.3.20 Forecast £'000s	31.3.21 Forecast £'000s	31.3.22 Forecast £'000s
General Fund CFR	4,240	26,432	47,164	46,429	40,967
Less: External borrowing	4,750	24,200	46,850	46,234	40,904
Internal/(over) borrowing**	-510	2,232	314	195	63
Less: Usable reserves	-5,681	-4,895	-5,015	-5,135	-5,255
Less: Working capital	-1,164	-2,275	-2,275	-2,275	-2,275
Investments (predicted investments at the year end)	7,355	4,938	6,974	7,215	7,467

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than the CFR by £0.51m but this was only a short term position as the gross debt of £4.75m has reduced in 2018/19.

3.2. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. Up to now the Council's Capital Programme has been funded by receipts, grants and contributions. Up until 2017/18, the strategy was to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing.

3.3. In September 2018 (Minute CM34) the Council approved an updated Commercial Property Strategy. At the date of writing this report, the Council has made four investments in commercial property, currently totaling £21.452 million as shown in Table 1 of the Investment Strategy. Also in September 2018, Council approved an overall Borrowing Limit (for all Council services) of £50 million. It is estimated that there is approximately £16million left of this overall limit that could potentially be spent on commercial investments in 2019/20.

3.4. CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the Council's total debt should be lower than its highest forecast CFR over the next three years. Table 1 shows that the Council expects to comply with this recommendation during 2019/20.

4. Borrowing Strategy

4.1 The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue that needs to be considered.

Against this background and the risks within the economic forecast, caution will be adopted with the 2019/20 treasury operations. The Strategic Finance Lead (S.151 Officer) will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- *if it was felt that there was a significant risk of a sharp FALL in long and short term rates, (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.*
- *if it was felt that there was a significant risk of a much sharper RISE in long and short term rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity, or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.*

Any decisions will be reported to the Audit Committee at the next available opportunity as part of the regular monitoring reports.

4.2 In 2016 the Council agreed to fund £1.5m for the new leisure contract through prudential borrowing. This expenditure has currently been funded through 'internal borrowing' and the position will be assessed regularly as in 4.1. The Council has external borrowing from the PWLB of £4.75 million at 31.3.18 which is attributable to Kilworthy Park and the waste fleet.

4.3. In September 2018 (Minute CM34) the Council approved an updated Commercial Property Strategy. At the date of writing this report, the Council has made four investments in commercial property, currently totaling £21.452 million. Also in September 2018 Council approved an overall Borrowing Limit (for all Council services) of £50 million. It is estimated that there is approximately £16million left of this overall limit that could potentially be spent on commercial investments in 2019/20 or later years. This has been included within Table 1 of the Capital Strategy (Estimates of Capital Expenditure) for modelling purposes and completeness also.

4.4 The Council has approved a Capital Programme for 2019/20 of £2.076 million all of which relates to general fund services. Officers are also currently working on Community Housing Schemes within the Borough and a report will be presented to the Hub Committee in the Summer regarding this. This is estimated to cost £4.7 million to deliver 30 residential units and would be funded in the short term by borrowing. A recommendation will be made to Council in the Summer to approve the capital expenditure of £4.7m.

4.5. Objectives

4.5.1. The Council's chief objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. (At the current time short-term debt is cheap whilst longer-term debt is expensive.) The flexibility to renegotiate loans should the Council's long-term plans change, whilst important, is a secondary objective.

4.6. Strategy

4.6.1. The Council's commercial property strategy will significantly change the Council's debt dynamics and its Balance Sheet position. The Council will only borrow as required when there is certainty to the specific acquisitions or development. The borrowing strategy will address the key issue of affordability without compromising the longer-term stability of the debt portfolio.

4.6.2. Matters to be considered before borrowing include, but not limited to, are affordability, maturity profile of existing debt, interest rate and refinancing risk and the borrowing source.

4.6.3. With short-term interest rates currently much lower than long-term rates, it is likely to be more cost effective in the short-term to use some internal resources, and in some instances borrowing short-term loans instead may be appropriate. Short-term loans are currently available at around 0.75% to 1% and long-term fixed rate loans where the future cost is known are higher (currently 2.0% to 3.0% from the PWLB). By doing so, the Council is able to reduce net borrowing costs (despite foregone investment income) in the near term and reduce overall treasury risk.

4.6.4. The benefits of internal / short-term borrowing will be monitored regularly against the potential for incurring additional costs by deferring borrowing into future years when long-term borrowing rates are forecast to rise modestly. The business case for each commercial property acquisition or development and the structure of the borrowing will be assessed on a case by case basis as well as considering the Council's overall debt portfolio.

4.6.5. The "cost of carry": Borrowing rates are higher than investment rates, and are expected to remain so, partly due to positive yield curve, also due to the increased PWLB margin. Borrowing money and re-investing it therefore leads to a cost of carry, at least in the early years. There is therefore a balance to be struck between borrowing now and borrowing later. The cost of carry will be weighed up against the interest rate risk on projects, particularly those where the asset has a 50 year asset life.

4.7. Short-term and variable rate loans

4.7.1. These loans leave the Council exposed to the risk of short-term interest rate rises and are therefore subject to the interest rate exposure limits in the treasury management indicators below. The Council currently has no short-term loans of less than 5 years or any variable loans.

4.8. Sources of borrowing

4.8.1. The approved sources of long-term and short-term borrowing are:

- i. Public Works Loan Board (PWLB) and any successor body
- ii. any institution approved for investments (see below)
- iii. any other bank or building society authorised to operate in the UK
- iv. UK public and private sector pension funds (except the Devon County Pension Fund)
- v. UK local authorities any other UK public sector body
- vi. capital market bond investors
- vii. UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues

4.9. Other sources of debt finance

4.9.1. In addition, capital finance may be raised by leasing which is not borrowing, but may be classed as other debt liabilities.

4.10. The PWLB remains an attractive source of borrowing, given the transparency and control that its facilities continue to provide. The types of PWLB loans are:

- Fixed rate Maturity loans borrowed on a Maturity ('bullet') or Equal Instalments of Principal (EIP) or Annuity basis – these are available for maturities ranging from 1 year to 50 years
- Variable rate loans on a Maturity or EIP basis - for periods up to 10 years (the Council has not entered into any variable loans to date and it is unlikely that variable rate loans will be used in the future).

4.11. Municipal Bonds Agency

4.11.1. The UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It plans to issue bonds on the capital markets and lend the proceeds to local authorities. This will be a more complicated source of finance than the PWLB for two reasons: borrowing authorities will be required to provide bond investors with a joint and several guarantee to refund their investment in the event that the agency is unable to for any reason; and there will be a lead time of several months between committing to borrow and knowing the interest rate payable. Any decision to borrow from the Agency will therefore be the subject of a separate report to Full Council and the appropriate due diligence, particularly regarding the joint and several guarantee.

5. Investment Strategy

5.1. As at 28th February 2019, the Council had £10m of invested funds, representing income received in advance of expenditure plus balances and reserves held. Of this, £0.5m was invested in the CCLA Local Authorities Property Fund. In the past 12 months, the Council's investment balance has ranged between £8m and £15m, and broadly similar levels are expected in the forthcoming year.

The Council's investments mid way through the year are always higher than that at the end of the year due to the cashflow advantage that the Council benefits from part way through the year. This is, in part, due to the timing differences between the Council collecting council tax income and paying this over to the major precepting authorities such as Devon County Council, the Police and the Fire Authority.

5.2. Objectives

5.2.1. The CIPFA Code requires the Council to invest its funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are

expected to be invested for more than one year, the Council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested.

5.3. Negative interest rates

5.3.1. There is significant uncertainty over Brexit. If the UK enters into a recession in 2019/20, there is a small chance that the Bank of England could set its Bank Rate at or below zero, which is likely to feed through to negative interest rates on all low risk, short-term investment options. This situation already exists in many other European countries. In this event, security will be measured as receiving the contractually agreed amount at maturity, even though this may be less than the amount originally invested.

5.4. Strategy

5.4.1. Given the increasing risk and very low returns from short-term unsecured bank investments, the Council aims to diversify into more secure and/or higher yielding asset classes during 2019/20. This is especially the case for the estimated £0.5m that has been invested in the CCLA Local Authorities Property Fund, for longer-term investment. The majority of the Council's surplus cash remains invested in short-term unsecured money market instruments and money market funds. This diversification will represent a partial change in strategy over the coming year.

5.5. Business models

5.5.1. Under the new IFRS 9 standard, the accounting for certain investments depends on the Council's "business model" for managing them. The Council aims to achieve value from its internally managed treasury investments by a business model of collecting the contractual cash flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.

5.6. Approved counterparties

5.6.1. The Council may invest its surplus funds with any of the counterparty types below, subject to the cash limits (per counterparty) and the time limits shown.

Table 3: Approved investment counterparties and limits

	<u>Minimum credit criteria/colour band</u>	<u>Limit per institution</u> <u>Max % of total investments</u>	<u>Maximum maturity</u>
DMADF	n/a	100%	6 months
Money Market Funds	AAA	£3m	Daily liquidity
Cash Plus Funds/ Ultra short bond funds	AAA, AA	£3m	T+1 to T+4
CCLA Local Authorities Property Fund	Not credit rated	£0.5m	Fund has a monthly dealing date. The council's intended investment period is around 5 years, but will depend on the statutory override provided by MHCLG
Local Authorities	n/a	£3m	5 years
Unsecured investments with banks and building societies	Yellow Purple Blue Orange Red Green No Colour	£3m (£4m for Lloyds plc)	Up to 5 years Up to 2 years Up to 1 years Up to 1 years Up to 6 months Up to 100 days Not for use

5.7. Credit rating

5.7.1. This Council applies the creditworthiness service provided by Link Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard & Poor's. The credit ratings of counterparties are supplemented with the following overlays:

- credit watches and credit outlooks from credit rating agencies;
- CDS spreads to give early warning of likely changes in credit ratings;
- sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, credit Watches and credit Outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments.

The Link Asset Services' creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

Typically the minimum credit ratings criteria the Council use will be a Short Term rating (Fitch or equivalents) of F1 and a Long Term rating of A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances, consideration will be given to the whole range of ratings available, or other topical market information, to support their use.

All credit ratings will be monitored weekly. The Council is alerted to changes to ratings of all three agencies through its use of the Link Asset Services' creditworthiness service.

- if a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
- in addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data on a daily basis via its Passport website, provided exclusively to it by Link Asset Services. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

Investment decisions are never made solely based on credit ratings and all other relevant factors including external advice will be taken into account.

5.8. Types of counterparty / investment instruments

5.8.1 **Banks unsecured:** call/notice accounts, deposits with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. See below for arrangements relating to operational bank accounts.

5.8.2. **Pooled funds:** These funds have the advantage of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a fee. Short-term Money Market Funds that offer same-day liquidity and very low or no volatility will be used as an alternative to instant access bank accounts, while pooled funds whose value changes with market prices and/or have a notice period will be used for longer investment periods.

5.8.2.1. Pooled funds whose value changes with market prices (i.e. variable net asset value) and/or have a notice period will be used for longer investment periods. Bond, equity and property funds offer enhanced returns over the longer term, but are more volatile in the short term. These allow the Council to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives will be monitored regularly. The Council has an £0.5m investment in the CCLA's Local Authorities' Property Fund.

5.9. Operational bank accounts

5.9.1. The Council banks with Lloyds Bank and will incur operational exposures, for example through current accounts, collection accounts and merchant acquiring services. These are not classed as investments, but are still subject to the risk of a bank bail-in, and balances will therefore be kept below £1m.

5.10. Risk assessment and credit ratings

5.10.1. Credit ratings are obtained and monitored by Link Asset Services, the Council's treasury advisers, who will notify changes in ratings as they occur.

Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:

- i. no new investments will be made,
- ii. any existing investments that can be recalled or sold at no cost will be, and
- iii. full consideration will be given to the recall or sale of all other existing investments with the affected counterparty.

5.10.2. Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as “rating watch negative” or “credit watch negative”) so that it may fall below the approved rating criteria, then only investments that can be withdrawn on the next working day will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.

5.11. Other information on the security of investments

5.11.1. The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential government support (if any), reports in the quality financial press and analysis and advice from the Council’s treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.

5.11.2 When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2011, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Council’s cash balances, then the surplus will be deposited with the UK Government via the Debt Management Office or invested with other local authorities. This will cause a reduction in the level of investment income earned, but will protect the principal sum invested.

5.12. Investment limits

5.12.1. The Council’s revenue reserves available to cover investment losses are forecast to be £4.895 million on 31st March 2019. In order that no more than 61% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £3 million (£4 million for Lloyds plc).

Table 4: Investment limits

	Cash limit
Any single organisation, except the UK Central Government	£3m each (£4m for Lloyds plc)
UK Central Government	unlimited
Any group of organisations under the same ownership	£3m per group
Any group of pooled funds under the same management	£0.5m per manager (CCLA current limit)
Money market funds	£15m in total (£3m per MMF)

5.13. Liquidity management

5.13.1. The Council uses cash flow forecasting to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Council's medium-term financial strategy and cash flow forecast.

6. Treasury Management Indicators

6.1. The Council measures and manages its exposures to treasury management risks using the following indicators.

6.2. Interest rate exposures

6.2.1. This indicator is set to control the Council's exposure to interest rate risk. The one-year revenue impact of a 1% rise or fall in interest rates will be:

Interest rate risk indicator	Limit
One-year revenue impact of a 1% <u>rise</u> in interest rates	£80,000
One-year revenue impact of a 1% <u>fall</u> in interest rates	£80,000

6.2.2. The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at current rates.

6.3. Maturity structure of all borrowing

6.3.1. This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of borrowing will be:

Refinancing rate risk indicator	Upper limit	Lower limit
Under 12 months	10%	0%
12 months and within 24 months	10%	0%
24 months and within 5 years	40%	0%
5 years and within 10 years	75%	0%
10 years and within 20 years	100%	0%
20 years and above	100%	0%

6.3.2. As the Council currently has a loans portfolio (currently £24.2m) but may borrow up to a total of £50m over the coming years, the limits in the table above will permit loans to be borrowed in the appropriate maturity band.

6.3.3. Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

6.4. Principal sums invested for periods longer than a year

6.4.1. The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

Price risk indicator	2019/20	2020/21	2021/22
Limit on principal invested beyond year end*	£0.5m	£0.5m	£0.5m
Limit on principal invested in bank and building societies beyond one year	£3m	£3m	£3m

**Monies already invested in the CCLA Property Fund (£0.5m).*

7. Related Matters

7.1. The CIPFA Code requires the Council to include the following in its treasury management strategy.

7.2. Financial Derivatives

7.2.1. Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in Section 1 of the *Localism Act 2011* removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment).

7.2.2. The Council will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Council is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be taken into account when determining the overall level of risk. Embedded derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

7.2.3. Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria. The current value of any amount due from a derivative counterparty will count against the counterparty credit limit and the relevant foreign country limit.

7.3. Markets in Financial Instruments Directive

7.3.1. The Council has opted up to professional client status with its providers of financial services, including advisers, banks, brokers and fund managers, allowing it access to a greater range of services but without the greater regulatory protections afforded to individuals and small companies. Given the size and range of the Council's treasury management activities, the Strategic Finance Lead (S151 Officer) believes this to be the most appropriate status.

8. **Financial Implications**

- 8.1. The budget for investment income in 2019/20 is £90,321 based on an average investment portfolio of £11 million at an interest rate of 0.8%.
- 8.2. The budget for debt interest paid in 2019/20 is £1.287 million based on an average debt portfolio of £46.85 million at an average interest rate of 2.7%.
- 8.3. If actual levels of investments and borrowing, or actual interest rates, differ from those forecast, performance against budget will be correspondingly different.

9. **Other Options Considered**

- 9.1. The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Strategic Finance Lead (S151 Officer), having consulted the Executive Member for Finance, believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

Alternative	Impact on income and expenditure	Impact on risk management
Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
Borrow additional sums at long-term fixed interest rates	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Borrow short-term or variable loans instead of long-term fixed rates	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long-term costs may be less certain
Reduce level of borrowing	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain

APPENDIX 1 – Link Asset Services Economic & Interest Rate Forecast

GLOBAL OUTLOOK. **World growth** has been doing reasonably well, aided by strong growth in the US. However, US growth is likely to fall back in 2019 and, together with weakening economic activity in China and the eurozone, overall world growth is likely to weaken.

Inflation has been weak during 2018 but, at long last, unemployment falling to remarkably low levels in the US and UK has led to an acceleration of wage inflation. The US Fed has therefore increased rates nine times and the Bank of England twice. However, the ECB is now probably unlikely to make a start on raising rates in 2019.

UK. 2018 was a year which started with weak growth of only 0.1% in quarter 1. However, quarter 2 rebounded to 0.4% in quarter 2 followed by quarter 3 being exceptionally strong at +0.6%. Quarter 4 though, was depressed by the cumulative weight of Brexit uncertainty and came in at only +0.2%. Growth is likely to continue being weak until the Brexit fog clears.

The MPC has stated that future Bank Rate increases would be gradual and would rise to a much lower equilibrium rate, (where monetary policy is neither expansionary or contractionary), than before the crash; indeed they have given a figure for this of around 2.5% in ten years' time but have declined to give a medium term forecast. However, with so much uncertainty around Brexit, the next move could be up or down, even if there was a disorderly Brexit. While it would be expected that Bank Rate could be cut if there was a significant fall in GDP growth as a result of a disorderly Brexit, so as to provide a stimulus to growth, the MPC could also raise Bank Rate in the same scenario if there was a boost to inflation from increases in import prices, devaluation of sterling, and more expensive goods produced in the UK replacing cheaper goods previously imported, and so on. In addition, the Chancellor could provide fiscal stimulus to boost growth.

Inflation. The Consumer Price Index (CPI) measure of inflation has been falling from a peak of 3.1% in November 2017 to 2.1% in December 2018. In the February Bank of England quarterly Inflation Report, inflation was forecast to still be marginally above its 2% inflation target two years ahead given a scenario of minimal increases in Bank Rate.

The **labour market** figures in November were particularly strong with an emphatic increase in total employment of 141,000 over the previous three months, unemployment at 4.0%, a 43 year low on the Independent Labour Organisation measure, and job vacancies hitting an all-time high, indicating that employers are having major difficulties filling job vacancies with suitable staff. It was therefore unsurprising that wage inflation continued at its high point of 3.3%, (3 month average regular pay, excluding bonuses). This means that in real terms, (i.e. wage rates less CPI inflation), earnings are currently growing by about 1.2%, the highest level since 2009. This increase in household spending power is likely to feed through into providing some support to the overall rate of economic growth in the coming months. This tends to confirm that the MPC was right to start on a cautious increase in Bank Rate in August as it views wage inflation in excess of 3% as increasing inflationary pressures within the UK economy.

In the **political arena**, the Brexit deal put forward by the Conservative minority government was defeated on 15 January. Prime Minister May is currently, (mid-February), seeking some form of modification or clarification from the EU of the Irish border backstop issue. However, our central position is that the Government will endure, despite various setbacks, along the route to reaching an orderly Brexit though the risks are increasing that it may not be possible to get full agreement by the UK and EU before 29 March 2019, in which case this withdrawal date is likely to be pushed back to a new date. If, however, the UK faces a general election in the next 12 months, this could result in a potential loosening of monetary and fiscal policy and therefore medium to longer dated gilt yields could rise on the expectation of a weak pound and concerns around inflation picking up.

Eurozone. Growth was 0.4% in quarters 1 and 2 but fell back to 0.2% in quarter 3, though this was probably just a temporary dip. In particular, data from Germany has been mixed and it could be negatively impacted by US tariffs on a significant part of its manufacturing exports e.g. cars. Current forward indicators for economic growth and inflation have now been on a downward trend for a significant period which will make it difficult for the ECB to make any start on increasing rates until 2020 at the earliest. Indeed, the issue now is rather whether the ECB will have to resort to new measures to boost liquidity in the economy in order to support growth. Having halved its quantitative easing purchases of debt in October 2018 to €15bn per month, the European Central Bank ended all further purchases in December 2018. In its January meeting, it made a point of underlining that it will be fully reinvesting all maturing debt for an extended period of time past the date at which it starts raising the key ECB interest rates.

INTEREST RATE FORECASTS

The Council has appointed Link Asset Services as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. The following table gives our central view.

Link Asset Services Interest Rate View													
	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22
Bank Rate View	0.75%	0.75%	1.00%	1.00%	1.00%	1.25%	1.25%	1.25%	1.50%	1.50%	1.75%	1.75%	2.00%
3 Month LIBID	0.70%	0.80%	1.00%	1.10%	1.20%	1.40%	1.50%	1.50%	1.60%	1.70%	1.80%	1.90%	2.00%
6 Month LIBID	0.80%	0.90%	1.20%	1.30%	1.40%	1.50%	1.60%	1.70%	1.80%	1.90%	2.00%	2.10%	2.20%
12 Month LIBID	1.00%	1.10%	1.40%	1.50%	1.60%	1.70%	1.80%	1.90%	2.00%	2.10%	2.20%	2.30%	2.40%
5yr PWLB Rate	1.80%	1.90%	2.00%	2.10%	2.20%	2.30%	2.30%	2.40%	2.50%	2.50%	2.60%	2.60%	2.70%
10yr PWLB Rate	2.20%	2.30%	2.40%	2.50%	2.60%	2.60%	2.70%	2.80%	2.90%	2.90%	3.00%	3.00%	3.00%
25yr PWLB Rate	2.70%	2.80%	2.90%	3.00%	3.10%	3.20%	3.20%	3.30%	3.40%	3.40%	3.50%	3.50%	3.60%
50yr PWLB Rate	2.50%	2.60%	2.70%	2.80%	2.90%	3.00%	3.00%	3.10%	3.20%	3.20%	3.30%	3.30%	3.40%

The interest rate forecasts provided by Link Asset Services are **predicated on an assumption of an agreement being reached on Brexit between the UK and the EU**. On this basis, while GDP growth is likely to be subdued in 2019 due to all the uncertainties around Brexit depressing consumer and business confidence, an agreement is likely to lead to a boost to the rate of growth in subsequent years which could, in turn, increase inflationary pressures in the economy and so cause the Bank of England to resume a series of gentle increases in Bank Rate. Just how fast, and how far, those increases will occur and rise to, will be data dependent. The forecasts in this report assume a modest recovery in the rate and timing of stronger growth and in the corresponding response by the Bank in raising rates.

- In the event of an **orderly non-agreement exit**, it is likely that the Bank of England would take action to cut Bank Rate from 0.75% in order to help economic growth deal with the adverse effects of this situation. This is also likely to cause short to medium term gilt yields to fall.
- If there was a **disorderly Brexit**, then any cut in Bank Rate would be likely to last for a longer period and also depress short and medium gilt yields correspondingly. Quantitative easing could also be restarted by the Bank of England. It is also possible that the government could act to protect economic growth by implementing fiscal stimulus.

However, there would appear to be a majority consensus in the Commons against any form of non-agreement exit so the chance of this occurring has now substantially diminished.

The balance of risks to the UK

- The overall balance of risks to economic growth in the UK is probably neutral.
- The balance of risks to increases in Bank Rate and shorter term PWLB rates, are probably also even and are broadly dependent on how strong GDP growth turns out, how slowly inflation pressures subside, and how quickly the Brexit negotiations move forward positively.

One risk that is both an upside and downside risk, is that all central banks are now working in very different economic conditions than before the 2008 financial crash as there has been a major increase in consumer and other debt due to the exceptionally low levels of borrowing rates that have prevailed for ten years since 2008. This means that the neutral rate of interest in an economy, (i.e. the rate that is neither expansionary nor deflationary), is difficult to determine definitively in this new environment, although central banks have made statements that they expect it to be much lower than before 2008. Central banks could therefore either over or under do increases in central interest rates.

Downside risks to current forecasts for UK gilt yields and PWLB rates currently include:

- **Brexit** – if it were to cause significant economic disruption and a major downturn in the rate of growth.
- **Bank of England** takes action too quickly, or too far, over the next three years to raise Bank Rate and causes UK economic growth, and increases in inflation, to be weaker than we currently anticipate.

Upside risks to current forecasts for UK gilt yields and PWLB rates

- **Brexit** – if both sides were to agree a compromise that removed all threats of economic and political disruption.
- **The Fed causing a sudden shock in financial markets** through misjudging the pace and strength of increases in its Fed Funds Rate and in the pace and strength of reversal of QE, which then leads to a fundamental reassessment by investors of the relative risks of holding bonds, as opposed to equities. This could lead to a major flight from bonds to equities and a sharp increase in bond yields in the US, which could then spill over into impacting bond yields around the world.
- The **Bank of England is too slow** in its pace and strength of increases in Bank Rate and, therefore, allows inflationary pressures to build up too strongly within the UK economy, which then necessitates a later rapid series of increases in Bank Rate faster than we currently expect.
- **UK inflation**, whether domestically generated or imported, returning to sustained significantly higher levels causing an increase in the inflation premium inherent to gilt yields.

Appendix 2 – Existing Investment and Debt Portfolio Position

	28th February 2019 Actual Portfolio £'000	28th February 2019 Average Rate %
External borrowing:		
Public Works Loan Board	24,200	2.6
Local authorities	-	-
Other loans	-	-
Total external borrowing	24,200	2.6
Other long-term liabilities:		
Private Finance Initiative	-	-
Finance Leases	-	-
Total other long-term liabilities		
Total gross external debt	24,200	-
Treasury investments:		
Banks and building societies (unsecured)	2,000	0.70
Government (incl. local authorities)	-	-
Money Market Funds	8,290	0.60
Other pooled funds (CCLA) Property Fund	500	4.22
Total treasury investments	10,790	-
Net debt	13,410	-

Report to: **Council**

Date: **26 March 2019**

Title: **Commercial Investment Property – Update and Monitoring Report**

Portfolio Area: **Assets – Cllr Neil Jory**

Wards Affected: **All Wards**

Relevant Scrutiny Committee: N/A

Urgent Decision: **N** Approval and clearance obtained: **Y**

Date next steps can be taken: **N/A**

Author: **Chris Brook** Role: **CoP Lead Assets**

Contact: **Telephone/email: Chris.brook@swdevon.gov.uk**

Recommendations:

That the Council NOTES the performance and risks of the commercial property portfolio to date.

1. Executive summary

- 1.1. On 5th December 2017, Council approved the recommendations of a report entitled "Commercial Property Acquisition Strategy Update". This agreed to borrowing of up to £37.45m to implement the strategy that was adopted.
- 1.2. The Strategy had an envisaged upper limit of £75m plus associated costs and gave a clear risk based approach to building a commercial portfolio of that value. Since 2017, new Government guidance was issued in February 2018 around proportionality of borrowing and subsequently the S151 Officer sought external specialist treasury management advice concerning borrowing limits.
- 1.3. In light of the external advice received, Full Council on 25/09/18 approved a strategy that blends in-area development and investment with those outside of area, all capped at a borrowing limit of £50m, which superseded the original strategy envisaged in 2017.
- 1.4. This report considers the performance of the portfolio to date and the risks associated therewith looking forward.
- 1.5. Four purchases have been made to date totalling £21.5m including costs representing 43% of the agreed borrowing for all Council services (£50m).
- 1.6. An income projection from Commercial Investment Property of £100k was built into the 2018/2019 budget. This projection has now been exceeded,

with the net revenue after allowing for management, maintenance and risk mitigation being £274,000 per full year.

- 1.7. The portfolio has achieved a geographic and sector balance in line with the strategy. It has not achieved a balance of spread between tenants and there are future pressure points in 2028 created by lease events.
- 1.8. It is noted that should the Council wish to mitigate these risks, it would need to continue to build the portfolio, which would now not necessarily be compatible with the new adopted strategy, as it would restrict in area developments, as a result of the overall Borrowing Limit of the Council for all services (£50m).

2. Background

- 2.1. On the 25th July and 5th December 2017 the Council agreed to borrow up to £35m plus associated costs to acquire commercial investment property. Full Council on 25/09/18 approved a strategy that blends in-area development and investment with those outside of area, all capped at a borrowing limit of £50m, which superseded the original strategy envisaged in 2017.
- 2.2. Four property acquisitions have now been made, totalling £21.5m including associated costs.
- 2.3. The project has met its initial projection of a net income of £100k this financial year and will generate £274k in the next financial year, which contributes to the financial sustainability of the Council, enabling it to continue to deliver, and where possible improve, frontline services.
- 2.4. As only £21.5m of the anticipated initial spend on commercial investment property has been made, the portfolio is currently un-balanced (explained in Sections 3 and 4) and further acquisitions should be considered to both mitigate the risk in the portfolio and further increase the ancillary revenue benefit for the Council.
- 2.5. In simple terms, the upper borrowing limit of £50m adopted and approved imposes a choice moving forward between in-area developments (if these can be sourced and achieve planning permission) which could offer both financial and social return, or, further commercial acquisitions providing a better risk profile to the portfolio and financial position.
- 2.6. This report sets out the risks, statistics and performance of the portfolio to date so as to provide Members with the ability to make informed decisions going forward.

3. Outcomes/outputs

- 3.1. The average yield of the portfolio is 5.5% which is lower than the 5.85% target for the end of the project but reflects the current 'appetite for risk' of the Council through the Invest to Earn Group. Further purchases can look to raise this percentage if 5.85% remains as the target. This target may be reviewed against the level of risk the Council is content to accept.

- 3.2. An income of £274,000 (for a full year) after deducting an allowance of 10% for the management, maintenance and risk mitigation fund (a fund set up to deal with maintenance, repairs or unforeseen risks).
- 3.3. The project has a property in each of the main asset classes – Office, Industrial and Retail.
- 3.4. A geographical spread within the SW peninsular has been achieved; Regional - Bristol, Sub-regional – Exeter & Plymouth, Local – Okehampton. Following government guidance the portfolio has been restricted to the South West Peninsular.
- 3.5. Single and Multi-let opportunities have been acquired, with a mix of tenants (15 in total), including those with the strongest covenant strength. One tenant does represent a significant percentage of the rental income (55%), they are assessed (by a Dun and Bradstreet credit rating report) as having a Risk Indicator of 1, which represents a minimum risk of business failure.
- 3.6. A spread of lease expiries and breaks have been achieved, however, there are certain points at which there is a concentration of lease events (2028/2029). Any future purchases need to avoid having similar lease event dates.
- 3.7. The acquired properties have various unexpired lease terms – these are shown in Appendix A (page 5).
- 3.8. The management, maintenance and risk mitigation (MMRM) fund currently stands at Circa £423k. 10% of rent from the portfolio goes into the MMRM which will fund void periods and repairs as and when they arise, as well as any difference between the 7% acquisition costs envisaged and actual costs.
- 3.9. The project has included the successful delivery of the refurbishment of Bristol House office building (circa £2m), required to trigger an increased rental level.
- 3.10. Further acquisitions will mitigate the risk within the portfolio, by increasing the number of rental streams, spreading the points at which the income into the portfolio ceases (e.g. lease ends and break clauses) and increasing the diversity of tenants.
- 3.11. Committing to further purchases would increase the likely success of the overall commercial property strategy, due to the balancing of risk, and make these risks easier to manage over the life of the strategy.
- 3.12. Full details of the portfolio performance can be found in Appendix A.

4. **Options available and consideration of risk**

- 4.1. Rather than committing to further purchases, the strategy could end at its current position. This would leave the portfolio unbalanced with the risks as highlighted above.
 - 4.1.1. As an example, if one of our tenants did not renew their lease and another served a break clause, 73% of the current rental income could end in 2028. Alternative tenants would be sought, however, this is one of the risks that would be mitigated by further purchases.

- 4.1.2. As a further example, 55% of the rental income is currently paid by one tenant (also one of the tenants mentioned in 4.1.1), again this could be mitigated by further purchases.
- 4.1.3. Therefore the net income into the Council's budget from the strategy could be significantly affected should it suffer a tenant default or tenancies ending coinciding with each other.
- 4.1.4. The project has a management, maintenance and risk mitigation (MMRM) fund to help off-set the above situations. However depending on the income shortfall encountered, this may just cover debt repayments rather than contribute to the income budget.
- 4.2. If the strategy commits to further acquisitions, the following could be considered. These are examples rather than requirements/targets as the strategy can only acquire those properties that are available.
 - 4.2.1. Avoid properties with significant lease events in years 2028/2029 and balance the portfolio with expiry dates before and after.
 - 4.2.2. The Bristol office is quite a high proportion of the income, particularly being single let. Look to acquire further offices, but to alternative tenants and consider multi-let offices.
 - 4.2.3. Balance the portfolio with further industrial/logistic property – however, noting that this sector is particularly difficult to buy at the moment, particularly within our yield and geographic requirements.
 - 4.2.4. Continue to consider retail, but recognise the structural changes in the retail market. If there is not an appetite for retail, begin to seriously consider alternatives such as leisure or renewables opportunities.

5. **Proposed Way Forward**

- 5.1. It is recognised that the Council has other demands on the level of funds it can prudently borrow. Therefore further funds for this strategy will be balanced against the requirements of other projects.
- 5.2. When considering how to invest up to the permitted maximum, the Council must recognise that from a commercial property perspective, the acquisition of further properties would help achieve a more balanced portfolio and risk position. Furthermore, a diversification in the portfolio into other types of asset class (within the approved Strategy) will also assist in balancing risk.
- 5.3. If in area development projects are considered instead (such as employment assets), the Council should consider this impact on the portfolio balance and remain true to the risk based approach set out in the commercial property strategy, so as not to over expose the Council to one sector or area.
- 5.4. That the MMRM fund continues to be set aside for its intended purpose; to ensure there is a buffer against any significant unforeseen events and to deal with future likely points of expected expenditure.

6. Implications

Implications	Relevant to proposals Y/N	Details and proposed measures to address
Legal/Governance		N/A
Financial		The commercial property strategy was implemented in April 2018 and four commercial properties have been purchased to date in 2018/19. The net income is anticipated to be £195,000 in 2018/19 (against budgeted net income of £100,000 in 2018/19). In a full year the net income from the four properties would equate to £274,000. Further details are shown in Appendix A.
Risk		Refer to section 4 and Appendix A
Comprehensive Impact Assessment Implications		
Equality and Diversity		N/A
Safeguarding		N/A
Community Safety, Crime and Disorder		N/A
Health, Safety and Wellbeing		N/A
Other implications		

Supporting Information

Appendices:

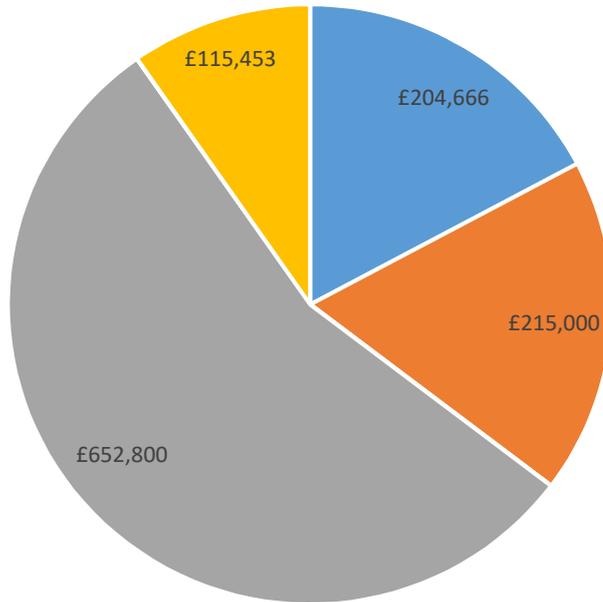
Appendix A – Portfolio performance reports

Background Papers:

- Commercial Investment Property update and monitoring report presented to the Audit Committee 9th October 2018
- Commercial Property Strategy Amendment, presented to Hub Committee September 11th 2018
- Commercial Property Acquisition Strategy Update, presented to Council March 27th, 2017
- Commercial Property Acquisition Strategy Update, presented to Council December 5th, 2017
- Investment in Commercial Property, presented to Council July 25th 2017
- Investment in Commercial Property, presented to Hub Committee June 20th 2017

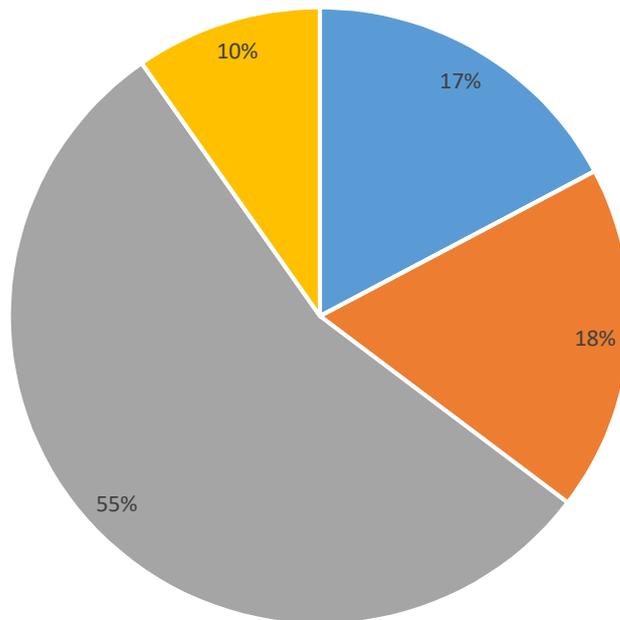
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Rental value by property



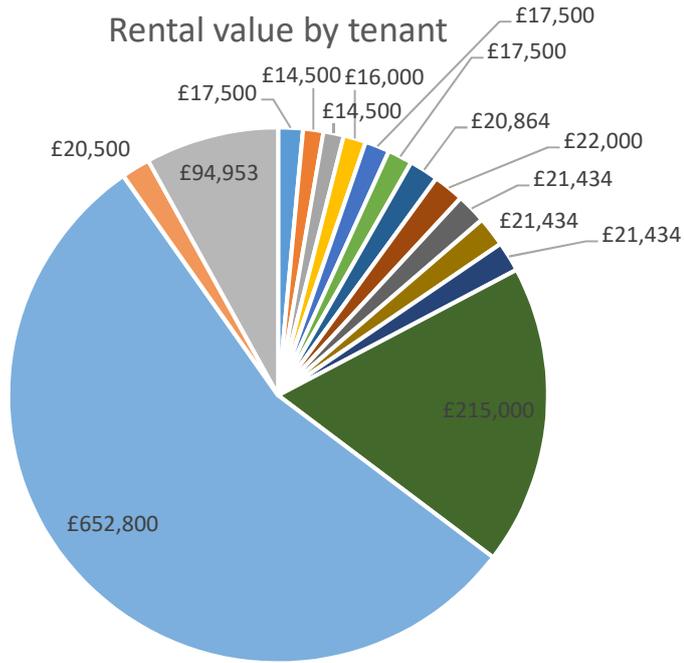
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- Supermarket, Okehampton
- Bristol House, Bristol
- St Modwen Rd Units, Plymouth

Rental % by property



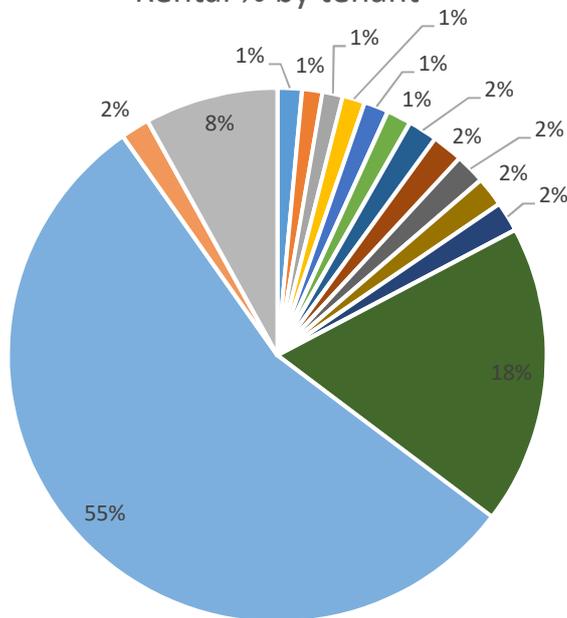
- Heron Road Units, Exeter
- Supermarket, Okehampton
- Bristol House, Bristol
- St Modwen Rd Units, Plymouth

Rental value by tenant



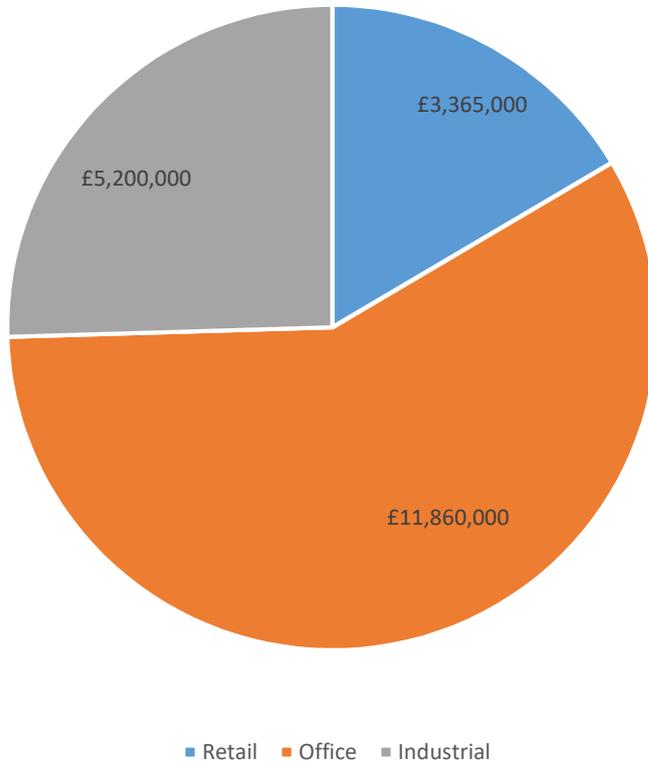
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- Heron Tenant 5 ■ Heron Tenant 6 ■ Heron Tenant 7 ■ Heron Tenant 8
- Heron Tenant 9 ■ Heron Tenant 10 ■ Heron Tenant 11 ■ Supermarket Tenant
- Bristol House Tenant ■ St Modwen Tenant 1 ■ St Modwen Tenant 2

Rental % by tenant

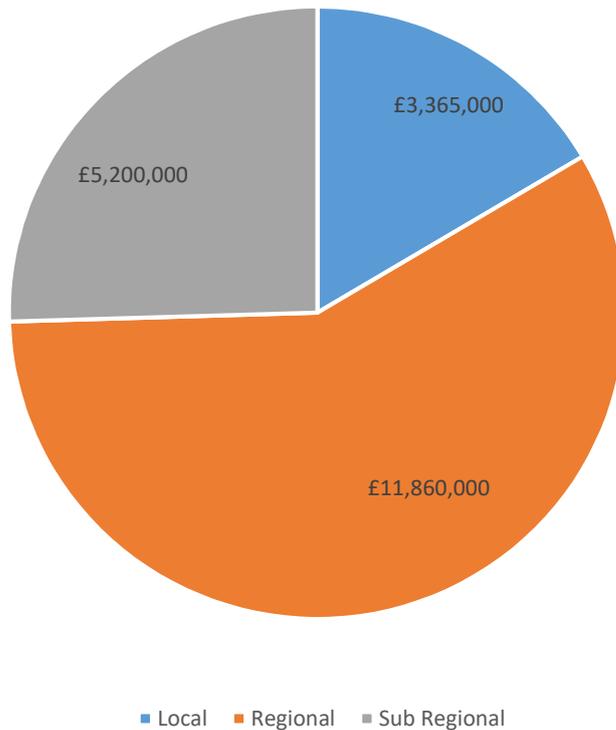


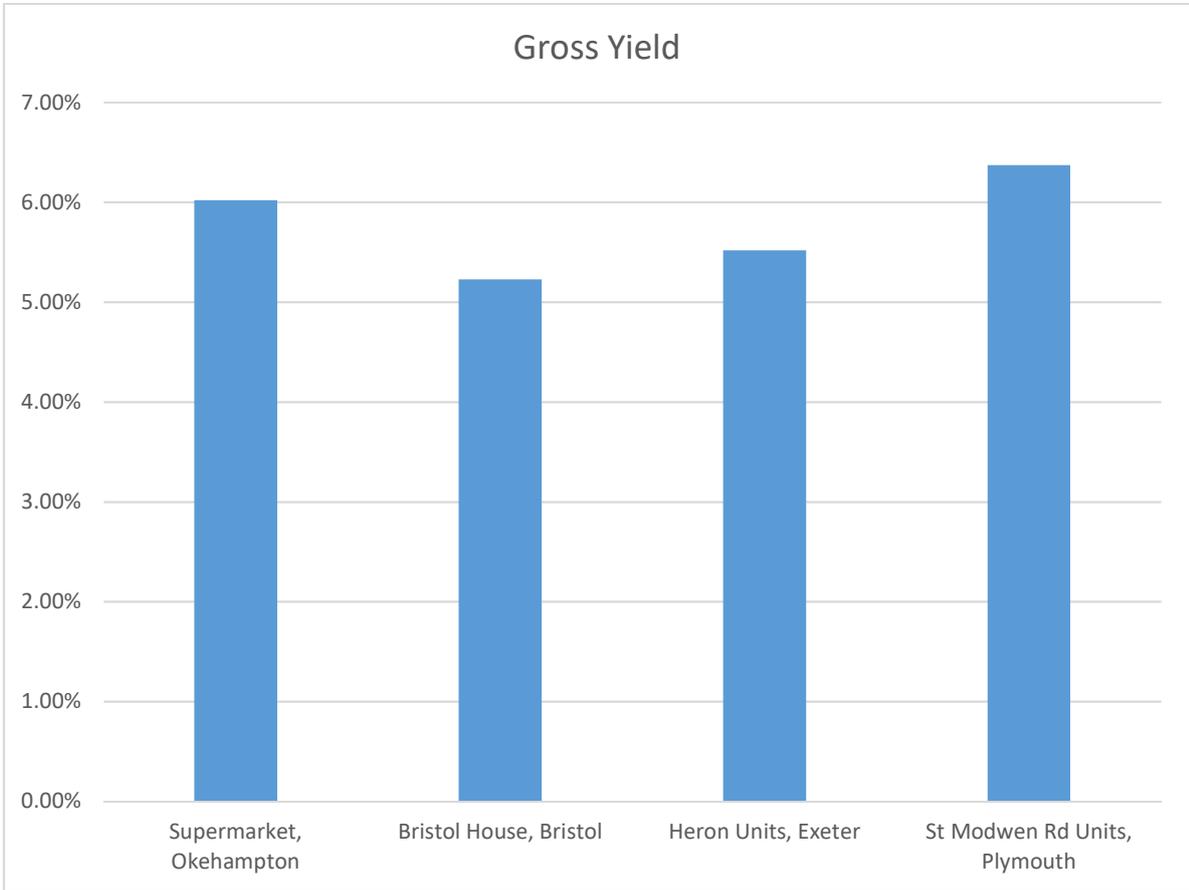
- Heron Tenant 1 ■ Heron Tenant 2 ■ Heron Tenant 3 ■ Heron Tenant 4
- Heron Tenant 5 ■ Heron Tenant 6 ■ Heron Tenant 7 ■ Heron Tenant 8
- Heron Tenant 9 ■ Heron Tenant 10 ■ Heron Tenant 11 ■ Supermarket Tenant
- Bristol House Tenant ■ St Modwen Tenant 1 ■ St Modwen Tenant 2

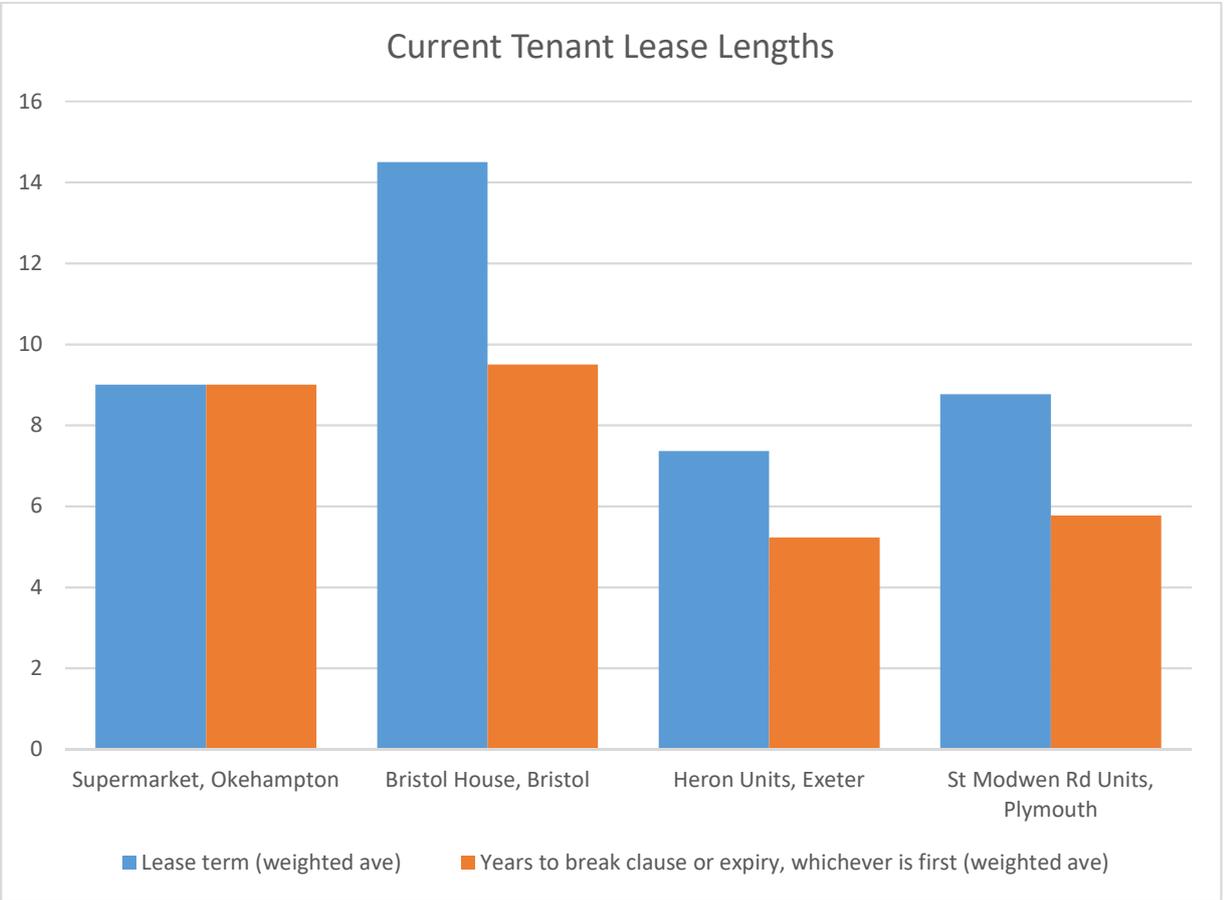
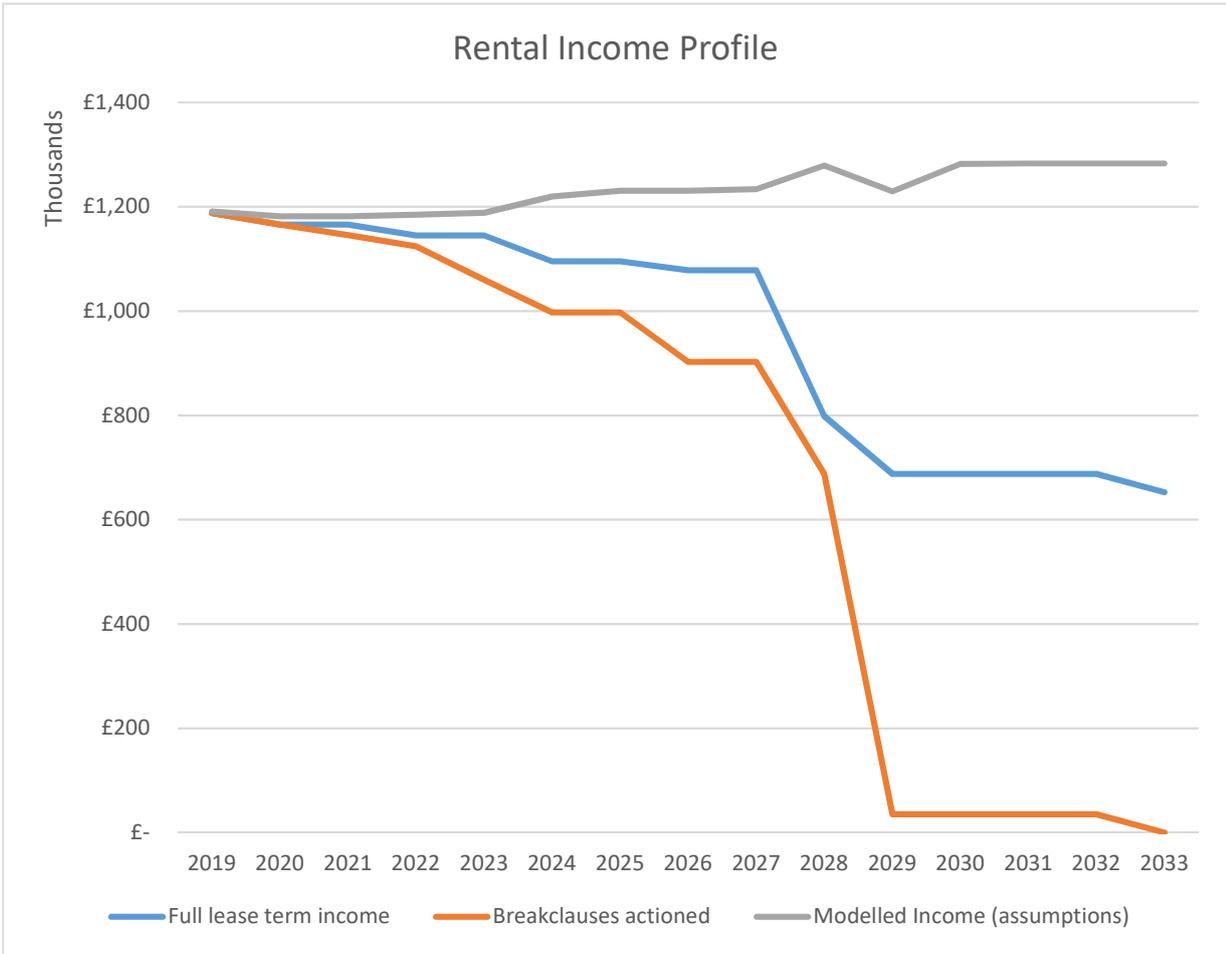
Sector split by property value



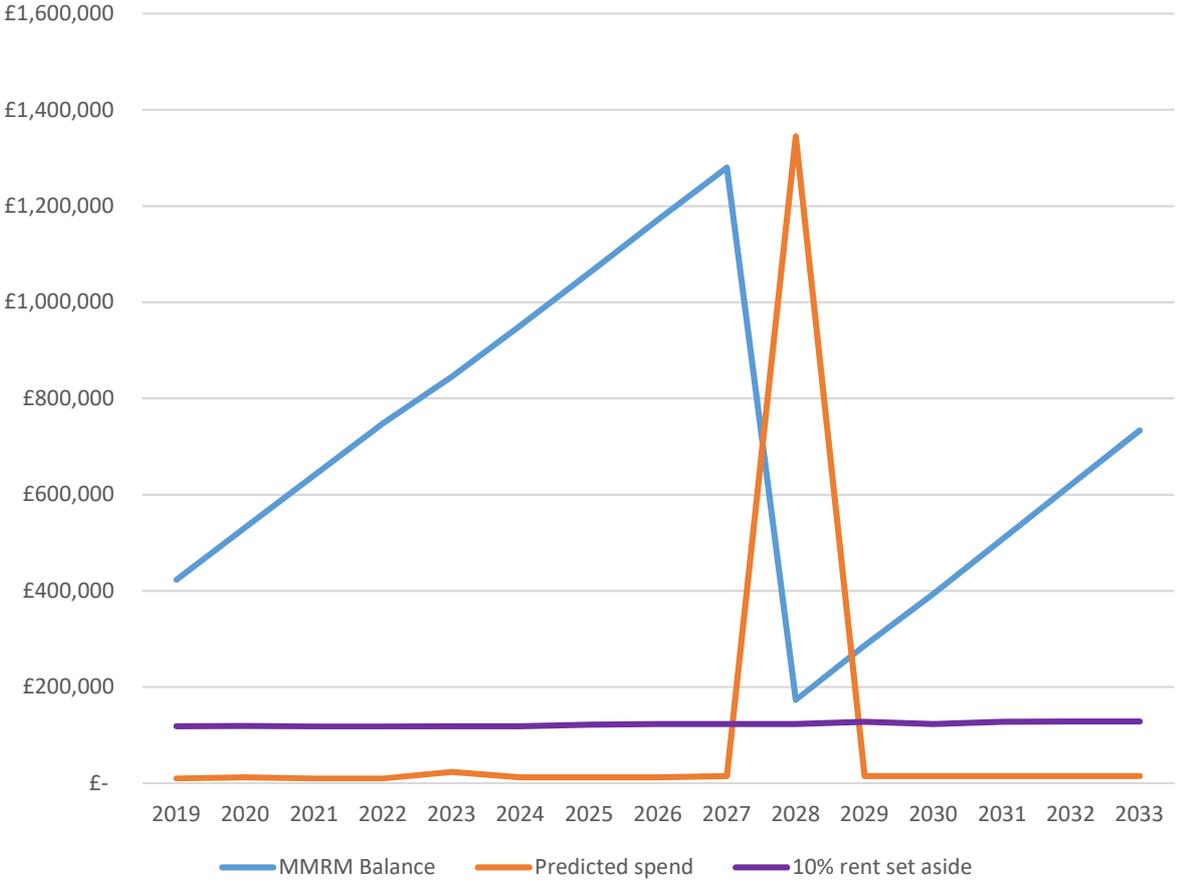
Geographic split by property value







MMRM Reserve Profile



Report to: **Full Council**
Date: **26 March 2019**
Title: **Pay Policy Statement and Pay and Reward Strategy 2019/20**
Portfolio Area: **Support Services**

Wards Affected: **All**

Relevant Scrutiny Committee: **Overview and Scrutiny Panel**

Urgent Decision: **Y** Approval and clearance obtained: **Y**

Date next steps can be taken: Immediately following this meeting.

Author: **Michelle Hodgkiss** Role: **Interim Head of Human Resources Practice**

Contact: **01803 861397: Michelle.hodgkiss@swdevon.gov.uk**

RECOMMENDATIONS

That the Council RESOLVES to adopt

- 1. the attached Pay Policy Statement for 2019/20 (Appendix A refers); and**
- 2. the attached Pay and Reward Strategy 2019/20 (Appendix B refers).**

1. Executive summary

- 1.1. The report proposes that the Council adopts the Pay Policy Statement (attached at Appendix A) and the Pay and Reward Strategy (attached at Appendix B).
- 1.2. The Council is required under the Localism Act 2011 to agree and publish a Pay Policy Statement each year.
- 1.3. The Pay Policy Statement sets out the authority's policies for the financial year relating to the remuneration of its chief officers, the remuneration of its median and lowest-paid employees and the relationship between the salary of the Head of Paid Service and the salaries of the median and lowest paid employees.

- 1.4. Under the provisions of the Pay Policy Statement, full Council approval is required to review the salaries of a Chief Officer.
- 1.5. The Pay and Reward Strategy sets out the authority's overall approach to the pay and reward of its staff.

2. Background

- 2.1. Section 38 of the Localism Act 2011 requires local authorities in England and Wales to produce and publish a statutory pay policy statement for 2012/2013 and each financial year thereafter. Once approved, the policy will be published on the Council's website.
- 2.2. The pay policy statement must be approved by a resolution of the Council before it comes into force and each subsequent statement must be prepared and approved before the end of the 31 March immediately preceding the financial year to which it relates.
- 2.3. The Political Structures Working Group recommended that Council received an annual report setting out the Council's Pay and Reward Strategy in conjunction with the annual Pay Policy Statement.

3. Outcomes/outputs

3.1. Pay Policy Statement

- 3.2. The Hutton Report identified that the most appropriate way of measuring pay dispersion within an organisation is the multiple of Head of Paid Service to median earnings. Tracking this multiple will ensure that the Council is accountable for the relationship between the pay of its executives and the wider workforce. Through the pay policy statement, the Council can track this multiple on an annual basis.
- 3.3. If the relationship between the salary of the Head of Paid Service and the lowest paid employee exceeds a factor of 10, the Leader is required by the Localism Act to bring a report to Full Council for consideration.
- 3.4. With effect from 21 February 2019, the Executive Director and Head of Paid Service was appointed Chief Executive. The interim salary is £110,840 including a special additional responsibility allowance following the resignation of the Executive Director for Strategy and Commissioning. The interim salary arrangements are effective from 18 February 2018 until a further report is brought before Council within 6 months of the election of a new Council in May 2019.
- 3.5. The annual median salary of all employees is £28,221.
- 3.6. The annual salary of the lowest paid employee is £17,972.
- 3.7. The relationship between the remuneration of the Head of Paid Service and the median salary of all employees is 3.93.

3.8. The relationship between the remuneration of the Head of Paid Service and the salary of the lowest paid employee is 6.17.

3.9. Pay and Reward Strategy

3.10. The Pay and Reward Strategy sets out the Council’s approach to the pay and reward of its employees and sets out details of the overall reward philosophy, pay design and structure, applicable rates of pay and other financial and non-financial benefits available to staff.

4. Options available and consideration of risk

4.1. The Council has a legal requirement under the Localism Act 2011 to publish a Senior Pay Policy each year.

5. Proposed Way Forward

5.1. Council is asked to adopt the Pay Policy Statement at Appendix A and publish it on its website to meet its statutory requirements.

5.2. Council is asked to adopt the Pay and Reward Strategy at Appendix B.

6. Implications

Implications	Relevant to proposals Y/N	Details and proposed measures to address
Legal/Governance	Yes	The Localism Act 2011 requires the Council to adopt and publish a Pay Policy Statement. The Pay Policy Statement requires the Leader to make a recommendation to Full Council to change the salary payable to a Chief Officer.
Financial	Y	The joint interim savings following the resignation of the Executive Director for Strategy and Commissioning, taking into account the cost of the special responsibility allowance for the remaining Executive Director, Group Manager for Customer First, Group Manager for Business Development and S151 is £67,373pa (£33,686pa for each Council). In setting the revenue budget for 2019/20, each Council has included this saving of £34,000 (a total of £68,000 across both Councils) within the 2019/20 Revenue Base Budget, which has been built in as a recurring annual saving.
Risk	N	There are no risks associated with the report, Pay Policy Statement or the Pay and Reward Strategy.

Comprehensive Impact Assessment Implications		
Equality and Diversity	N	There are no Equality or Diversity implications associated with the report, Pay Policy Statement or the Pay and Reward Strategy.
Safeguarding	N	There are no Safeguarding implications associated with the report, Pay Policy Statement or the Pay and Reward Strategy.
Community Safety, Crime and Disorder	N	There is no positive or negative impact on crime and disorder reduction associated with the report, Pay Policy Statement or the Pay and Reward Strategy.
Health, Safety and Wellbeing	N	There are no Health, Safety and Wellbeing implications associated with the report, Pay Policy Statement or the Pay and Reward Strategy.
Other implications	N	There are no other implications associated with the report, Pay Policy Statement or the Pay and Reward Strategy.

Supporting Information

Appendices:

A: Pay Policy Statement 2019/20

B: Pay and Reward Strategy 2019/20

Background Papers:

- The Localism Act 2011
- Code of Recommended Practice for Local Authorities on Data Transparency (published by the Secretary of State on 29 September 2011)
- Hutton Report (published in March 2011)



**West Devon
Borough
Council**

PAY POLICY STATEMENT 2019/20

Purpose and scope of the Policy

1. Section 38 of the Localism Act 2011 (the Act) requires local authorities in England and Wales to produce a statutory pay policy statement for 2012/2013 and each financial year thereafter.
2. The pay policy statement must be approved by a resolution of the Council before it comes into force and each subsequent statement must be prepared and approved before the end of the preceding financial year to which it relates.
3. The Council may by resolution amend this pay policy statement at any time during the year, subject to the amended statement being published as soon as is reasonably practicable.
4. The Act requires local authorities to have regard to the guidance issued by the Secretary of State. The guidance draws upon the Code of Recommended Practice for Local Authorities on Data Transparency published by the Secretary of State on 29 September 2011, the commitment in the Coalition Agreement to strengthen councillors' powers to vote on large salary packages for council officers and the recommendations made by the Hutton Report published in March 2011 for promoting fairness in the public sector by tackling disparities between the lowest and highest paid in public sector organisations.
5. The pay policy statement brings together these strands of increasing accountability, transparency and fairness in the setting of chief officer pay.
6. The pay policy must set out the authority's policies for the financial year relating to—
 - 6.1. the remuneration of its chief officers,
 - 6.2. the remuneration of its lowest-paid employees, and
 - 6.3. the relationship between—
 - 6.3.1. (i) the remuneration of its chief officers, and
 - 6.3.2. (ii) the remuneration of its employees who are not chief officers.

7. For the purposes of this pay policy, and in accordance with section 43 (2) of the Act, the following officers are considered to be relevant chief officers and deputy chief officers within scope of the Councils' statutory obligation:
 - Chief Executive
 - Group Managers
 - Section 151 Officer
 - Monitoring Officer
8. The above officers are collectively known as Chief Officers for the purpose of this pay policy statement.
9. In addition, the pay policy sets out the council's overall pay strategy that is applicable to all employees.

Shared Services

10. For the purposes of this pay policy statement, it should be noted that all of the identified chief officers operate under a shared service agreement with South Hams District Council and their salary costs are shared on an agreed basis. For the purpose of this pay policy statement, all shared chief officers are shown, notwithstanding the identity of their employing authority.

Current Senior Leadership Arrangements

11. With effect from 1 January 2014, West Devon Borough Council and South Hams District Council agreed to adopt interim arrangements for an Executive Director model following the retirement of the Shared Chief Executive on 31 March 2014.
12. The permanent new senior management structure was approved by Full Council as part of the Councils' Transformation Programme and consisted of 2 Executive Directors and 4 Group Managers.
13. Since 31 January 2016, the role of Customer First Group Manager has been vacant and duties allocated to the Group Managers for Support Services and Commercial Services.
14. Following the resignation of the Executive Director for Strategy and Commissioning and Head of Paid Service with effect from 18th February 2018, further interim arrangements were approved by Council until the election of a new administration in May 2019. The Council resolved to jointly set aside £53,000pa with South Hams District Council (£26,500 per Council) of the interim savings to finance interim senior management arrangements.
15. Following a review of the interim arrangements by the Review Panel, and building on the recommendations of the Local Government Association Peer Review, Council appointed the Executive Director for Service Delivery as the Chief Executive with effect from 21 February 2019. The post of Executive Director for Strategy and Commissioning will remain vacant.

16. The Chief Executive will implement a new senior leadership structure no later than 6 months after the election of a new Council in May 2019.
17. Under the interim arrangements, the Chief Executive will continue to receive a special responsibility allowance of £13,200 per annum, including the £3000 per annum allowance payable to the Head of Paid Service.
18. The Group Manager for Customer First and Support Services will take on interim additional responsibilities and act as an interim deputy to the Chief Executive and will receive a special responsibility allowance of £8160pa until the interim arrangements end within 6 months of the election of a new Council in May 2019. This allowance also includes recognition of the additional duties as the Council's Senior Information Risk Officer.
19. The Group Manager for Business Development will take on interim additional responsibilities, including becoming the Council's Data Protection Officer, and will continue to receive a special responsibility allowance of £2040pa until the interim arrangements end within 6 months of the election of a new Council in May 2019.
20. The S151 Officer will take on interim additional responsibilities and become Group Manager for Strategic Finance and S151 Officer and will receive a special responsibility allowance of £8,643pa until the interim arrangements end within 6 months of the election of a new Council in May 2019.
21. The role of Executive Director for Strategy and Commissioning will remain vacant during the interim period.
22. The salaries of the Senior Leadership Team were agreed by the Council on the recommendation of the Leader after taking advice on comparable salary levels in other organisations.
23. The salary of the Monitoring Officer includes an additional responsibility allowance, set at 17.5% of their substantive salary, in recognition of carrying out the duties of the Monitoring Officer.
24. The final salaries of the senior leadership team will be agreed by Council within 6 months of the election of a new Council in May 2019 and will take into consideration recommendations made by an independent body.

Remuneration for Chief Officers

25. The council has chosen to introduce local arrangements for the Senior Leadership Team pay because it believes that this delivers a better outcome in terms of managing performance and flexibility.
26. The Leader of the Council may recommend to Full Council changes to the remuneration package following a review and after taking independent pay advice from South West Councils or a similar body. Any changes to the remuneration packages will be subject to Full Council approval.

27. Salary increases in relation to cost of living will be made in line with the relevant recommendation of the National Joint Council for Local Government Services (the NJC), the Joint Negotiating Committee for Chief Executives (the JNC) or other relevant national negotiating body for each chief officer.
28. The salary for the relevant chief officers will be 'spot' salaries, that is to say all officers will be paid in accordance with a fixed salary within an agreed range upon appointment and there will be no further incremental progression as a result of seniority, experience or performance.
29. Where possible, salary levels will be consistent with similar organisations, although the Council will retain the right to have due regard to market forces that may affect its ability to recruit and retain high quality officers, whilst balancing this against the need to ensure value for money for residents.
30. The 'spot salaries', including the special responsibility allowances paid to the Head of Paid Service, Group Manager and the Monitoring Officer, are the only remuneration for work carried out. At present, there are no additional payments made to chief officers relating to performance or any other matters and no bonus is payable.
31. Additional payments are made by Central Government to officers carrying out additional duties at elections. The determination of the allowance is made by the Government and these payments are not within the scope of this policy. There are no payments made by the Council for election duties.
32. In accordance with the provisions of the Council's Travel and Subsistence Policy, that applies equally to all employees, the relevant chief officers may attract an essential car user lump sum allowance and be reimbursed with business expenses subject to the submission of a claim with receipts. For 2018/19, all of the Chief Officers are designated as casual car users and will not receive an essential car user lump sum allowance.
33. From 1 April 2013, all business mileage will be reimbursed in accordance with the approved HMRC rates, currently 45p per mile. This replaces the previous policy under which business mileage was reimbursed at the higher rate agreed by the NJC, currently 50.5p per mile for essential users and 65p per mile for casual users.

Severance payments

34. Any termination payments payable to the relevant chief officers will be in accordance with the Council's Redundancy and Interests of Efficiency Policy. All such payments are equally applicable to all employees and no additional payments will be made without the express approval of the Full Council. All severance payments are subject to the provisions of the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006, as amended.

Relationship with the remuneration of other employees of the Council

35. The Hutton Report identified that the most appropriate way of measuring pay dispersion within an organisation is the multiple of highest earnings to median earnings. Tracking this multiple will ensure that the Council is accountable for the relationship between the pay of its executives and the wider workforce. Through this pay policy statement, the Council will track this multiple on an annual basis and will publish the following information on its website each year (see Appendix A):

- The level and elements of remuneration to each relevant chief officer
- The remuneration of the lowest paid employees
- The relationship between the remuneration of the Head of Paid Service and the median earnings of all employees
- Other specific aspects of relevant chief officer remuneration

36. Each year the published data will be reviewed by the Leader of the Council and if the multiplier between the highest and the lowest paid employee within the Council exceeds a factor of 10, the Leader shall present a report to the Full Council for consideration.

37. For the purposes of this pay policy statement, the 'lowest paid employees' are identified as those employees carrying out a substantive role within the Council's established workforce with the lowest annual full-time equivalent salary.

38. The 'median earnings' have been identified by listing all salaries paid to employees in ascending order and finding the salary paid to the employee ranked in the middle of the list.

The Council's overall pay strategy

39. In determining the pay and remuneration of its employees, the council will comply with all relevant employment legislation. This includes the Equality Act 2010, the Part Time Employment (Prevention of Less Favourable Treatment) Regulations 2000, the Agency Worker Regulations 2010, the Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002 and, where relevant, the Transfer of Undertakings (Protection of Earnings) Regulations. With regard to the Equal Pay requirements contained in the Equality Act, the council ensures that all pay arrangements are fair and transparent through the use of Job Assessment methods.

40. The council takes the following approach to assessing individual and overall pay levels:

- Defining the role – a job description is produced that describes the activities, responsibilities and accountabilities which relate to each job within the council. This helps to ensure that the role and its requirements are fully understood by the individual and the manager and enables the council to assess the performance of its staff and so improve efficiency and effectiveness.

- Determining the job size – the council has developed its own job assessment technique that enables the direct comparison of jobs across the council in a fair, transparent and consistent way.
41. The council's pay structure is based on the pay spine agreed by the NJC. Employees receive 'cost of living' increases in pay in line with NJC Agreements. The headline cost of living increase awarded in April 2018 was 2% on all spinal column points above 28, with progressively larger increases on descending spinal column points. There is a further headline pay increase of 2% from 1 April 2019 on spinal column points above 28 and the corresponding greater increases on points below 28.
 42. The terms and conditions of employment for Executive Directors are in accordance with the Joint Negotiating Committee (JNC) for Executives of Local Authorities. There was a 2% increase payable from April 2018 and a further 2% increase payable from April 2019.
 43. Using the nationally agreed NJC pay spine, the council determines locally the appropriate grading structure, taking into account the need to ensure value for money in respect of the use of public finances balanced against the need to recruit, retain and motivate employees who are able to provide high quality and efficient services to the community.
 44. To encourage employees to develop in their role and to improve their performance, the council has arranged its pay levels within a series of pay grades. Each grade typically contains between 4 and 5 pay levels or increments. Progression through the pay grade is dependent on meeting identified performance targets and is assessed through the council's staff appraisal scheme.
 45. The council uses fixed spot salary pay rates for some groups of workers where there is no opportunity for significant improvement in performance related to length of service.
 46. From time to time, the council may pay special allowances to an employee in specific circumstances and in accordance with its policy, such as to reward an employee who temporarily takes on additional responsibilities.
 47. From time to time, the council may make a one-off merit pay award to an employee in specific circumstances and in accordance with its policy, such as to reward exceptional performance.
 48. Subject to qualifying conditions, employees have a right to belong to the Local Government Pension Scheme. The employee contribution rates, which are defined by statute, currently range between 5.5% for those on the lowest incomes to 12.5% for the highest income earners. The Employer contribution rates are set by Actuaries and are reviewed on a triennial basis to ensure the scheme is appropriately funded.

49. The Council's Pay and Reward Strategy contains further information relating to the overall approach to rewarding employees.

Appendix A

1. The levels and elements of remuneration for each Chief Officer are as follows:

Post	Salary (£) per annum	Comments
Executive Director (Strategy and Commissioning) and Head of Paid Service	Vacant	Vacant from 18 th February 2018. Previous salary was £98,847
Chief Executive*	£110,640	Including a special interim responsibility allowance of £13,200pa payable from 18 th February 2018 to no later than 6 months after May 2019.
Commercial Services Group Manager	£74,174	
Customer First and Support Services Group Manager*	£82,334	Including a special interim responsibility allowance of £8160pa payable to no later than 6 months after May 2019.
Business Development Group Manager	£65,511	Including a special interim responsibility allowance of £2040pa payable to no later than 6 months from May 2019.
Monitoring Officer	£55,182	Including a 17.5% Responsibility Allowance
Group Manager for Strategic Finance and Section 151 Officer	£65,511	Including a special interim responsibility allowance of £8643pa payable to no later than 6 months from May 2019.
* employed by South Hams District Council		

Please note: All chief officers operate under a shared service agreement with South Hams District Council and all salary and associated costs are shared on an agreed basis between the two councils.

The Senior Leadership Team (SLT) consists of a Chief Executive, the 3 Group Managers and the S151 Officer, but excludes the Monitoring Officer. Previously, the s151 Officer was not considered part of the SLT.

The total annual salary cost of the SLT at 31 March 2019 is £398,170. This cost is shared with South Hams District Council.

In April 2017, the cost of the SLT was £451,720 (adjusted to include the salary of the s151 Officer for comparative purposes).

The total salary cost of the previous shared management structure across the two councils in 2010/11 was £1,277,812 pa. This was reduced following major organisational change in April 2011 and the adoption of the interim Executive Director model in January 2014 to £612,340pa. This salary cost includes the Executive Directors and Heads of Service (including s151 Officer) but excludes the Monitoring Officer.

2. The full-time equivalent annual salary of the lowest paid employee is a Case Manager, paid in accordance with spinal column point 15 of the National Joint Council for Local Government Services pay spine, currently £17,972pa.
3. The annual median salary of all employees £28,221pa.
4. The Chief Executive's salary is a pay multiple of 3.93 times the median earnings.
5. The Chief Executive's salary is a pay multiple of 6.17 times the lowest paid employee.

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PAY AND REWARD STRATEGY 2019/20



West Devon
Borough
Council



South Hams
District Council

Introduction

1. The primary aim of the Councils' Pay and Reward Strategy (PRS) is to attract, retain and motivate staff so that the organisation can perform at its best.
2. The PRS sets out the Councils' overall reward philosophy and the design and implementation of its pay and grading structure, including financial and non-financial benefits.
3. South Hams District Council and West Devon Borough Council have developed a fully integrated and joint approach to pay and reward to all roles across both organisations and the PRS is a joint strategy.

Reward Philosophy

4. A coherent approach to rewarding staff is central to the Councils' commitment to continually improve productivity and to sustain the delivery of excellent services to our customers and communities.
5. Financial and non-financial reward are significant factors in helping the Councils attract and retain the right people and to keep them motivated, performing to the very best of their abilities and receptive to changing environment in which we operate.
6. The Councils' PRS is designed to be fully compliant with all of the statutory requirements, including the Equality Act 2010, the Part Time Employment (Prevention of Less Favourable Treatment) Regulations 2000, the Agency Worker Regulations 2010, the Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002 and, where relevant, the Transfer of Undertakings (Protection of Earnings) Regulations.
7. The Councils believe in the principle of national and local collective bargaining, supports the role of trade unions as representatives of the workforce and is committed to reaching agreement to changes affecting terms and conditions of employment through negotiation and consultation wherever possible.
8. The Councils' draw significant benefits from being a member of the Local Government Association, including the provision of national and regional advice and access to innovation and best practice in employee relations.
9. Through its membership of the National Joint Council for Local Government Services (NJC) and Joint Negotiating Committee for Chief Officers (JNC), the Councils participate in national negotiations on pay and conditions of service.
10. In accordance with its commitment to national collective bargaining and the NJC Agreement (the Green Book), the Councils utilise the nationally agreed pay spine as the basis of its locally designed pay and grading structure.

11. The Councils are fully committed to a fair, open and equitable approach to pay and reward and meets its equal pay responsibilities by using the locally designed Job Level Assessment tool to make sure all roles are allocated the appropriate reward in comparison to other roles in the organisation.
12. The Councils keep the pay and grading structure under review and carry out audits to make sure discrepancies does not arise on the basis of any characteristic protected by the Equality Act 2010.
13. The Councils use its Managing Performance framework, including the Personal Continuous Improvement appraisal tool to link performance to reward. Annual increments are only awarded once the line manager has certified that performance and conduct is satisfactory.

Pay Design and Structure

14. In order to reflect and distinguish between the wide range of duties and responsibilities carried out in the organisation, the Councils use 9 hierarchical Levels (or grades). Different roles are allocated to a Level using the Job Level Assessment tool and are considered to be of equal value to other roles in the Level.
15. The design of the grading structure and the associated rates of pay provide a hierarchical framework that enables roles to be rewarded in comparison to other roles.
16. Levels 3 to 9 are built upon the NJC pay spine and each Level has 5 spinal column points, with the exception of Level 9 which from 1 April 2019 has 3 spinal column points. The use of incremental points within each Level is designed to reward higher performance associated with more experience and is a common feature across local government and many other organisations across all sectors of the economy. Where experience is unlikely to lead to an improvement in performance, such as in low or semi-skilled roles, a spot salary is used.
17. Employees with roles within Levels 3-9 are awarded an annual increment in April each year until the top of the Level is reached, subject to satisfactory performance. Each year, line managers are asked to confirm the satisfactory performance of every individual and the Councils retain the contractual right to withhold an increment in the event of unsatisfactory performance, including where performance is affected by unsatisfactory conduct.
18. Where an employee joins the organisation between September 1 and 31 March, an increment will only be payable after 6 months' service. Thereafter, increments will be due in April each year until the top of the Level is reached.
19. Levels 1 and 2 are reserved for members of the Councils' Senior Leadership Team (SLT) and the salaries are based upon a spot salary within a salary range agreed by Full Council. A spot salary is used for SLT because employees appointed to senior roles are considered to be fully competent upon appointment.
20. The salary for people joining the organisation is set at the entry spinal column point of the appropriate Level. In exceptional circumstances, SLT may agree to appoint to a

higher point within the Level.

21. The salary for an employee moving to a higher Level following promotion or a regrading will join the new Level at the entry spinal column point.

Rates of Pay

22. The Councils pay and grading structure is attached at Appendix A.
23. The Councils are members of the National Joint Council for Local Government Services (NJC) and Joint Negotiating Committee for Chief Officers (JNC) and participate in national negotiations on pay and conditions of service with the recognised trade unions through its membership of the Local Government Association.
24. The NJC and JNC are committed to an annual review of pay and, from time to time, agree an increase in pay. The Council is contractually committed to implementing this nationally negotiated and agreed increase in pay and applies the changes to its pay structure and to each individual employee's rate of pay.
25. Every role in the organisation is accompanied by a Job Description (JD). The JD is used to determine the appropriate Level within the pay and grading structure using a local Job Level Assessment (JLA) tool.
26. The Councils keep the Level of each role under review and, where there is some evidence that a role has changed, carries out a Job Level Assessment to determine whether a role should be regraded to a higher or lower Level.
27. The JLA tool measures the size of a Role by considering the level of Responsibility carried out, the degree of Discretion exercised, the Resources used or managed and the impact the role has on our customers and communities.
28. The Councils have access to a national pay benchmarking service supported by the LGA. The database enables the Councils to compare its rates of pay for job families and specific roles with other local government and wider public sector organisations to make sure the rates of pay are competitive and broadly comparable with similar organisations.

Senior and Low Pay

29. The Councils are required to adopt and publish an annual Pay Policy Statement (PPS). The PPS sets out the remuneration of Chief Officers (currently the Chief Executive, Group Managers, Monitoring Officer and S151 Officer) and the rate of pay of the lowest paid member of staff and the median earnings of the workforce.
30. The Councils are required to publish the PPS and it is available on the Council websites.

Gender Pay Gap

31. Under the provisions of the Equalities Act 2010 (Gender Pay Gap Information) Regulations 2017 all organisations that employ more than 250 employees are required to publish annually a report showing the gender pay gap. Although West Devon Borough

Council currently employs less than 250 employees, it will publish the data in accordance with the Regulations.

32. The information will be published on the Council's websites and, in the case of South Hams District Council, the government's gender pay gap website.

Other financial and non-financial reward benefits for staff

33. The Councils provide a wide range of financial and non-financial benefits to its staff to help attract and retain the right people. The following list is not exhaustive:

I. Membership of the Local Government Pension Scheme (LGPS)

It is statutory requirement that all employees with more than 3 months service are automatically enrolled into the LGPS. The LGPS is a defined benefit scheme that provides a pension based on career average earnings. The LGPS is a contributory scheme and the employee contribution rate is dependent on income, ranging from 5.5% to 12.5%. The contributions made by the Councils are determined by Actuaries and are reviewed every three years. Employees retain the right to opt out of the scheme.

II. Bonus Payments

The Councils have removed all historic bonus payments and have successfully consolidated bonus payment previously payable to employees working in Waste and Recycling, Public Convenience, street cleaning, craft workers and at the Dart Lower Ferry.

III. Premium Payments

Under the terms of the NJC Agreement, premium payments are payable when an employee works additional hours (overtime) or outside of normal working hours, such as evenings, weekends and public holidays. All payments are in accordance with the NJC Agreement or local agreements. Under the terms of individual contracts of employment (and in accordance with the NJC provisions), overtime pay is normally only payable to officers on Level 6-9. Officers at Level 1 – 5 are offered time off in lieu if they work additional hours.

IV. Special Responsibility Allowances, Secondments and Acting Up

From time to time, the Councils will need to make interim appointments to cover a short-term demand for a particular role, task or activity. The Councils are committed to providing opportunities for staff to gain experience of different roles and levels of responsibility within the organisation and will offer interim opportunities to staff unless there is a business imperative to make external arrangements.

Where an employee is carrying out a Secondment or is Acting Up, and is expected to carry out the full range of duties of a Role at a higher Level, salary will be paid in accordance with the entry point to the appropriate Level.

Where the employee is expected to carry out some additional duties and/or responsibilities, an additional increment will be awarded within their existing substantive Level, or, where the employee is at the top of the Level, SLT will determine an appropriate salary uplift.

In exceptional circumstances and with the agreement of SLT, an additional increase in salary may be awarded.

V. Merit Pay and Honorariums

Where an employee undertakes temporary additional responsibilities or performs exceptionally, a payment can be made by SLT in accordance with the Councils' Merit Pay and Honorarium Policy.

VI. Accelerated incremental progression

In exceptional circumstances, SLT may award an accelerated increment to an employee.

VII. Out of Hours Payments

The Council delivers a number of functions, including statutory duties, that need to be accessed out of hours and provides a payment to appropriate employees to deliver the out of hours service in accordance with its Out of Hours Policy.

VIII. Market Supplements

Although the Council does not currently pay a market supplement to any employee, it retains the ability to make a market supplement payment where it is demonstrated to SLT that there is a clear business case to support a supplementary payment. Any market supplement should be based on empirical evidence and kept under review.

IX. Commercial Delivery or Community Benefit Supplement

From time to time, the Councils can deliver product(s) and / or services to third parties or external organisations in order to generate a commercial return and can also be responsible for the delivery of externally funded services that can have a significant benefit on the communities we serve.

From time to time, SLT may agree to award a Commercial Delivery or Community Benefit Supplement to an employee(s) where it considers the success of the commercial venture or externally funded project will be enhanced in accordance with the agreed policy.

X. Relocation Allowance

From time to time, SLT may determine that a relocation allowance should be made available to attract the right candidate to the organisation. All payments will be made in accordance with the Councils' Relocation Policy up to a maximum payment of £5000.

In exceptional circumstances, the Council may offer a financial incentive to attract candidates to apply for hard to fill vacant posts. In the past 12 months, a 'golden hello' of £5000 was offered to attract candidates to apply for roles as a Planning Specialist and a suitable candidate was identified and offered the role.

XI. Membership Professional Fees

The Council is committed to supporting the highest level of professional and technical competence within its workforce and will financially support an employee's membership of a relevant professional body.

XII. Leave and Flexible working

The Council recognises that it is important for its employees to strike an effective work life balance and operates Annual Leave and Special Leave Policies to make sure employees are able to take appropriate breaks from working for both rest and recreation and to manage unforeseen events in their personal life.

The Council also recognises that flexible working practices can help employees manage the work life balance and encourages the use of agile working. The Council's Ways of Working

Policy sets out the overall approach to agile working and seeks to find an appropriate balance between the needs of our customers and communities and the ability of employees to structure their working pattern and environment in a manner that supports their personal life.

XIII. Volunteering

The Council encourages and supports its employees to do voluntary work. It can help the Councils build relationships and improve its reputation within the local community and can directly support initiatives that enhance the communities in which we live and work.

By volunteering, employees can share their talent for the benefit of the community, learn new skills and encounter new experiences. Volunteering can help enhance a person's self-esteem and improve their health and well-being.

In accordance with the agreed policy, an employee may be granted up to 3 days paid leave and unlimited unpaid leave per year to carry out voluntary work.

XIV. Salary Sacrifice Schemes

The Council promotes a healthy lifestyle by offering employees the opportunity to purchase a bicycle for the purpose of cycling to work through salary sacrifice arrangements that allow the cost to be deducted before national insurance contributions are calculated in accordance with HMRC rules. The Councils can no longer offer a child care voucher scheme to employees as individuals now need to enrol on the government Tax-Free Childcare scheme. However, for employees who were previously registered, we can continue to offer child care vouchers through our payroll.

XV. Severance Payments

From time to time, the Council's requirement for particular activities and functions to be carried out can diminish and may result in a redundancy situation. Where a redundancy cannot be avoided, all severance payments are made in accordance with the Council's Redundancy and Interests of Efficiency Policy. The policy is agreed by Full Council and is compliant with the Local Government (Discretionary Payments) Regulations 1996 and Employment Rights Act 1996.

XVI. Sickness absence and pay

The Councils are committed to the well-being of its employees and to providing the right working environment, working practices and healthcare support to help employees to be healthy and able to work. On occasions, however, employees will be unable to attend work due to illness and the Councils adhere to the Green Book Sickness Scheme.

XVII. Occupational Health, Counselling and Employee Assistance Programme

The Councils provide access to an Occupational Health Service to help understand what it can do to support employees with longer term sickness absences and to help facilitate an earlier return to work.

The Councils provide access to a range of support networks and advisory services through its partnership with an Employee Assistance Programme and offer an anonymous self-referral service to a Counselling Service to help employees with a wide range of work and non-work related issues.

XVIII. Maternity, paternity and parental leave and pay

The Councils adhere to the Green Book Maternity, Paternity and Parental Leave and Pay policies for eligible employees.

XIX. Travel and subsistence expenses

The Councils will reimburse employees for all reasonable and authorised expenditure, including mileage, occurred on Council business in accordance with the Travel and Subsistence Policy.

APPENDIX A – PAY AND GRADING STRUCTURE with effect from 1 APRIL 2019

SPINAL COLUMN POINTS 2019-2020 (WEF 01/04/2019)				
SALARY LEVEL	SCP	ANNUAL SALARY	MONTHLY RATE	HOURLY RATE
Scale 1	1	17,364	1447.00	9.00
	2	17,711	1475.92	9.18
	3	18,065	1505.42	9.36
9	4	18,426	1535.50	9.55
	5	18,795	1566.25	9.74
	6	19,171	1597.58	9.94
8	7	19,554	1629.50	10.14
	8	19,945	1662.08	10.34
	9	20,344	1695.33	10.54
	10	20,751	1729.25	10.76
	11	21,166	1763.83	10.97
7	12	21,589	1799.08	11.19
	14	22,462	1871.83	11.64
	15	22,911	1909.25	11.88
	17	23,836	1986.33	12.35
	19	24,799	2066.58	12.85
6	21	25,801	2150.08	13.37
	22	26,317	2193.08	13.64
	23	26,999	2249.92	13.99
	24	27,905	2325.42	14.46
	25	28,785	2398.75	14.92
N/A	26	29,636	2469.67	15.36
	27	30,507	2542.25	15.81
5	28	31,371	2614.25	16.26
	29	32,029	2669.08	16.60
	30	32,878	2739.83	17.04
	31	33,799	2816.58	17.52
	32	34,788	2899.00	18.03
4	33	35,934	2994.50	18.63
	34	36,876	3073.00	19.11
	35	37,849	3154.08	19.62
	36	38,813	3234.42	20.12
	37	39,782	3315.17	20.62
3	41	43,662	3638.50	22.63
	42	44,632	3719.33	23.13
	43	45,591	3799.25	23.63
	44	46,728	3894.02	24.22
	45	47,903	3991.94	24.83

Report to: **Council**
Date: **26 March 2019**
Title: **Revised Political Composition of the Council**
Portfolio Area: **Support Services**
Wards Affected: **All**

Urgent Decision: **N** Approval and clearance obtained: **N/A**

Date next steps can be taken: **Immediately following this meeting**

Author: **Darryl White** Role: **Senior Specialist – Democratic Services**

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RECOMMENDATION

That, for the remainder of the 2018/19 Municipal Year:

- 1. the Political Composition of the Council be noted as follows:**
 - **Conservative Group: 19 Members;**
 - **Independent Group: 10 Members; and**
 - **Non-Aligned: 2 Members; and**
- 2. the membership of Council Committees be unchanged, with the political balance rules being disapplied for the Development Management and Licensing and Standards Committees.**

1. Executive summary

1.1 Members will be aware that the Council has received notification that the following West Devon Borough Councillors have resigned from the Conservative Party to become Non-Aligned Members:

- Cllr Parker (with effect from 6 March 2019); and
- Cllr Baldwin (with effect from 10 March 2019).

1.2 This report outlines the revised political composition of the Council for the remainder of the 2018/19 Municipal Year.

2. Background

2.1 Following these resignations from the Conservative Party, the political composition of the Council is now as follows:

- Conservative Group: 19 Members;
- Independent Group: 10 Members; and
- Non-Aligned: 2 Members;

2.2 There is a consequent impact on the political balance that is summarised as:

- The Conservative Group now being entitled to 6 seats (instead of 7) on the Development Management and Licensing Committee;
- The Conservative Group now being entitled to 3 seats (instead of 4) on the Standards Committee, with the Independent Group now entitled to 2 seats (instead of 1); and
- The two Non-Aligned Members being entitled to 1 seat on the Development Management and Licensing Committee;

2.3 Both Group Leaders have been consulted on the impact and have concluded that, in light of the 2018/19 Municipal Year reaching its conclusion, there is little value in changing the membership of these two Committees;

2.4 To therefore disapply the rules on political balance for these two Committees requires the approval of Full Council, with no Member voting against.

3. Proposed Way Forward

3.1 Both Group Leaders consider it to be pragmatic to retain the current membership of the Development Management and Licensing and Standards Committees for the remainder of the 2018/19 Municipal Year.

4. Implications

Implications	Relevant to proposals Y/N	Details and proposed measures to address
Legal/Governance	Y	The Local Government (Committees and Political Group) Regulations 1990 and the Local Government and Housing Act 1989 require the Council to appoint to Committees that are politically balanced. To disapply the rules on political balance, it is a requirement that no Member votes against such a proposal.
Financial	N	There are no direct financial implications arising from

		this report.
Risk	Y	There are no additional risks directly related to this report.
Comprehensive Impact Assessment Implications		
Equality and Diversity		None arising from this report
Safeguarding		n/a
Community Safety, Crime and Disorder		n/a
Health, Safety and Wellbeing		n/a
Other implications		n/a

Supporting Information

Appendices:

None

Background Documents:

The Council Constitution; and
Political Balance Provisions.

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