

Initial consultation on a Joint Local Plan [JLP]

Set out below is an edited version of the content of a consultation exercise launched today by the three Councils now producing a JLP; WDBC, South Hams DC and Plymouth City Council. I have highlighted bits that I think are particularly relevant.

My initial thoughts are as follows:

Housing targets: Although the detail will no doubt follow later, at this stage the target of 20 homes for Milton Abbot in the draft of *Our Plan* has been replaced with a target of 20-30 homes or 10-20 homes depending on whether or not Milton Abbot is a '*larger village*' or a '*smaller village*'.

The *Village Networks* are described as comprising villages that all have some local facilities which come together to create a range of services that support sustainable development in rural locations. But, in the *Ensuring Delivery* section it refers to grouping *the villages, potentially by size and level of facilities, and allocate a target housing number to each village in that group*. It is unclear whether that means grouping only villages with some local facilities, or any local combination, whether capable of supporting sustainable development or not.

There are two proposed methods of ensuring new homes are delivered; via neighbourhood plans or via a *Village Site Allocation Development Plan Document*. I have considerable reservations about the ability of neighbourhood plans, which have to contain proposals for an agreed minimum number of new homes, actually being approved by local people in a referendum, when it is likely that most of those voting will be motivated to oppose development. The recent UK referendum has shown just how inadequate a simple Yes/No vote can be when dealing with a range of issues.

We also have to examine our ability to motivate a team of people to spend large amounts of time preparing complex documents like the Evidence Base, when ultimately they are gambling that the work they are doing will be approved by the public; something that no borough or county plan has to survive.

Conserving the landscape: As usual, this only focuses on the National Park and the AONB.

MAGPC's objections to *Our Plan*: There is no reference to the previous plan process, which is fair enough if *Our Plan* is being abandoned, but the impression given by WDBC is that the JLP will build on the work done in *Our Plan*. Other than an acknowledgement of receipt, there has been no response by WDBC to any of the objections we raised to *Our Plan* and we should establish what their current status is, as well as reviewing their relevance to the JLP as more details emerge in due course.

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Chair MACKPlan

1st July 2016

Extracts from consultation document:

Villages and Village Networks

When planning for new homes and jobs in rural areas, it is important to understand the relationship between our villages, the networks that they form and the range of facilities that can be accessed. It is not uncommon for example for a village to benefit from a pub and village hall, whereas a nearby village may have a post office and petrol station. A third village could offer a primary school

and between them the villages within the 'network' can make a valuable contribution to meeting the day-to-day needs of the combined communities.

Typically villages (on their own or as a network) will offer:

- A shop and/or Post Office
- A pub
- A village hall / community meeting place
- Some access to public transport, but maybe not frequent enough to enable access to employment centres
- A primary school or established public transport to a nearby primary school
- Allotments
- Cash point
- Access to walking and/or cycling networks

The proposal being promoted during this consultation is that allocations for housing and employment will not be included initially within the Joint Local Plan for the villages and the village networks. Instead, the allocations required to sustain these villages and networks, at least in the first instance, will be delivered through Neighbourhood Plans. Neighbourhood Plan groups are best placed to understand the individual and unique local issues.

For the purposes of identifying indicative housing numbers in this consultation it will be assumed that approximately 70% of village housing will be in South Hams (there being 52 identified settlements) and approximately 30% [300 homes] in West Devon (there being 20 identified settlements). This will be subject to refinement and review.

Development in Rural Areas Outside Development Boundaries

It is proposed that the Area Centres (towns), Local Centres and some of the villages will continue to have Development Boundaries drawn around them for planning purposes, as has been the case for a number of years. Development within these boundaries will be encouraged in accordance with the Development Management policies of the Joint Local Plan or an appropriate Neighbourhood Plan.

In the countryside, smaller villages and hamlets outside a Development Boundary, we do not propose to make allocations through this plan. Instead, a criteria-based policy approach will be applied, allowing development only in sustainable locations which have reasonable access to services and transport options that avoid reliance on the private car. It is considered that this approach accords to sustainable development set out in the National Planning Policy Framework.

Putting Housing Numbers Against the Strategy

These figures require further testing and analysis. They also give a figure that is somewhat in excess of the 8,700 housing target set out previously. It is considered important to consult on a figure at this level to allow the consultation to challenge, assess and refine the approach. What is essential is that by the time of submission of the formal Joint Local Plan that a robust and sound approach to identifying and delivering at least the 8,700 homes is established. The final approach will need to be informed by the further assessment of individual sites, refinements to evidence, the anticipated role of Neighbourhood Planning and the responses to this public engagement.

Finally, the numbers will need to take into account other issues – in particular, the approach to delivering affordable housing once the government's position on this becomes clear.

Ensuring Delivery

A key function of a Joint Local Plan is to provide certainty over where, and when, new development will occur. In the Area Centres and Local Centres, this is proposed to be through land allocation and monitoring of subsequent delivery.

The approach being proposed to development in the villages suggests devolving responsibility for allocating housing sites to Neighbourhood Plans to deliver a minimum requirement of 1,000 dwellings across the villages. This provides flexibility and opportunity for Neighbourhood Plan groups. However the LPAs still need to be able to demonstrate that housing will come forward in villages, and **this places an onus on Neighbourhood Plan groups to prepare robust plans that demonstrate how they will proactively bring forward new development in a timely fashion within the overall potential figure of 1,000.**

There is no statutory requirement for towns and parishes to prepare a Neighbourhood Plan and therefore the LPAs may need to take responsibility for ensuring delivery in the villages in some circumstances. The LPAs may need to allocate sites for development if a Neighbourhood Plan is not progressing in a timely fashion, or if the Neighbourhood Plan does not demonstrate how a sufficient level of new development will come forward.

There are two potential options to address this issue. These could be considered separately or in combination and we welcome your views on these options:-

- **Group the villages, potentially by size and level of facilities, and allocate a target housing number to each village in that group.** Under such an approach, larger villages with a wider range of facilities could have a higher target housing figure (say 20-30) and smaller villages, a lower target range (say 10-20). It would be down to individual neighbourhood plan groups to consider local site availability (with the SHELAA as the starting point) and put in place appropriate allocations and policies.

The LPAs would need to monitor overall delivery across all villages against the suggested 1,000 overall minimum requirement. This approach could be introduced in the Joint Local Plan, or a separate Development Plan Document.

- **The LPAs could prepare a Village Site Allocation Development Plan Document.** This could allocate sites in settlements where a neighbourhood plan is not being prepared, or in circumstances where neighbourhood plans have failed to provide sufficient certainty over delivery (by not allocating sites or failing to progress a neighbourhood plan in a timely manner).

The role of Neighbourhood Planning

Neighbourhood Plans feature heavily in this consultation – with the role of Neighbourhood Plans established in the Localism Act. Neighbourhood Plans are formal documents that, **when adopted following a local referendum**, become part of the overall Development Plan for an area. They sit alongside the Joint Local Plan.

Neighbourhood Plans shape their local areas and can include policies and land allocations to support locally appropriate growth. They cannot plan for less growth than required in the Joint Local Plan – but can help significantly in shaping where that growth should be to secure the quality and local distinctiveness that communities are seeking.

Neighbourhood Plans can also play a key role in securing and delivering community services, infrastructure and open space, sport and recreation facilities working alongside allocations, policies and funding mechanisms established in the Joint Local Plan.

In addition, Neighbourhood Plans are granted specific powers to designate sites as 'Local Green Space' where development will be prevented, except in very special circumstances. The National Planning Policy Framework indicates that such spaces are appropriate for local designation in Neighbourhood Plans where a green space is:-

- Close to a community
- Demonstrably special and holds particular significance
- Local in character and not extensive

In a similar vein, Neighbourhood Plans will have a role in defining Development Boundaries. Development Boundaries are lines drawn around towns, local centres and villages within which development is generally encouraged and outside of which it is encouraged only in locations that can demonstrate they are 'sustainable' when applying a specific set of criteria. The approach being considered during this consultation is that Development Boundaries will be retained in the Joint Local Plan but that Neighbourhood Plan groups could use a Neighbourhood Plan to amend the boundary if needed and justified.

In addition, Neighbourhood Plans have a key role in identifying opportunities for locally supported renewable energy schemes.

Neighbourhood Plans are clearly increasing in importance and gaining profile and credibility. Recent indications are that Local Plans should be shorter and concentrate on overarching policies and strategic land allocations for housing and employment – whereas Neighbourhood Plans should come forward to establish local detail. The recent Queen's speech included the intention to introduce a further 'Neighbourhood Planning and Infrastructure Bill' that will further strengthen Neighbourhood Planning and give even more power to local people. It will make the local government duty to support groups more transparent.

The three planning authorities working on the Joint Local Plan are committed to enabling and supporting neighbourhood planning. This has proved challenging against a backdrop of rapidly changing planning policy and guidance at a national level. Neighbourhood Plans also pose a conundrum for Local Planning Authorities, as the LPAs need to be able to demonstrate where and when new housing will be delivered, but at the same time allow flexibility for Neighbourhood Plans to identify sites themselves. Given that it is not a statutory requirement for town and parish councils to prepare a neighbourhood plan, nor is there a deadline for completion once a neighbourhood plan has been undertaken, the challenge of how to provide the most supportive environment for Neighbourhood Plans, whilst still providing the certainty over delivery of strategic housing numbers, will be a recurring issue.

Town Neighbourhood Plans would need to sit alongside land allocations and policies to be brought forward in the Joint Local Plan. Similar opportunities apply in the local centres where a combination of allocations in the Joint Local Plan alongside Neighbourhood Plans are seen as the best way of delivering sustainable development.

In the villages and other settlements, the suggested approach is that in the first instance the Joint Local Plan will not make allocations. The intention is to allow the scope and opportunity for Neighbourhood Plans to take up this role under the powers and funding being made available.

The councils are using this consultation to seek your views on creating an approach that combines certainty of delivery through the Joint Local Plan whilst giving a clear role, and incentives, to Neighbourhood Planning.

Conserving the natural environment and England's finest landscapes

Looking after the wider landscape that makes South Hams, West Devon and Plymouth feel and look the way it does is important. The Joint Local Plan area includes, or is alongside, three of England's finest protected landscapes:-

- *Dartmoor National Park*
- *South Devon Area of Outstanding Natural Beauty*
- *Tamar Valley Area of Outstanding Natural Beauty*

National Planning Policy gives these areas the highest level of protection and great weight should be given to conserving landscape and scenic beauty of these areas. The councils have given careful consideration to the importance of protection of these areas when considering potential sites for development. The only settlements within the AONB where potential allocations are being considered are:-

- ['Bere Alston'](#)
- ['Dartmouth \(including sites in Kingswear and Stoke Fleming\)'](#)
- ['Salcombe'](#)
- ['Stokenham/Chillington'](#)

We would welcome your views on the impact on the AONB of this potential development. We also need to consider the potential impact of development within the setting of the protected landscapes. A number of the sites identified as having potential for development are near to the National Park or AONB. We would also welcome your views on this issue.

In bringing forward the Joint Local Plan, particular attention has been given to the importance of the South Devon and Tamar Valley AONB. All three councils are directly involved in partnerships that manage the AONB – and are signatories to the AONB Management Plans. These Management Plans deal specifically with the issues of planning in and around the AONB. You may wish to refer to:-

- *Tamar Valley AONB Management Plan [on the Tamar AONB website](#)*
- *South Devon AONB Management Plan [on the South Devon AONB website](#)*

A commitment in the South Devon AONB Management Plan is to produce further detailed guidance on planning and development in, and around, the South Devon AONB. This draft guidance is being issued for comment by the AONB Partnership on the same timescale as this Joint Local Plan consultation. This is available on the [South Devon AONB website](#).

A range of other Natural Environment issues will be covered in further policy, not least the importance of Biodiversity, Trees, Ancient Woodlands and Hedgerows.