

Plymouth and Southwest Devon Joint Local Plan

Background

At its last meeting the PC received an initial report from Cllr Asbridge, as Chair of MACKPlan, regarding the proposed Joint Local Plan [JLP] covering the areas of WDBC, South Hams DC and Plymouth City Council. Cllr Asbridge has since attended a consultation meeting on 12th and will attend another on the 26th. If necessary, a supplementary report will be issued after the latter meeting. In the light of the consultation exercise to date and after further study of the document 'Thriving Towns and Villages', the PC is requested to consider the following report and determine what action it wishes to take regarding representations on the proposals released so far.

'Thriving Towns and Villages' is contained in Annex 1 to this report which can be accessed at <http://plymouth.objective.co.uk/portal/planning/jlp/>

In March 2015, the PC submitted its response to the formal consultation by WDBC on *Our Plan*. That stage in the process is known as a Regulation 19 consultation. However, the work done on *Our Plan* has to be amalgamated with previous efforts by South Hams and Plymouth to produce their own plans. As Plymouth had only reached the Regulation 18 stage, where consultation takes place on the scope and content that will be in the final version released for Regulation 19 consultation, the JLP [including the *Our Plan* element] is now back at the Regulation 18 stage and the PC has again been asked to comment.

Previous representations

The PC's views on *Our Plan* were sent to WDBC in March 2015, since when no response has been received from the Council. As those representations were about specific policies in *Our Plan* and we do not know what WDBC reactions were, nor do we have the latest version of those policies because the JLP is only at the Regulation 18 stage, it is not appropriate to simply re-submit those representations at this point.

However, Cllrs may wish to refer to those representations when considering this report. They were set out in the Appendix to the Minutes of the PC of 4th March 2015 and are contained in Annex 2 to this report which can be accessed at

http://www.magpc.co.uk/C5/application/files/5114/6885/2360/Minutes_2015_03_04_-_Appendix.pdf

Current proposals

The PC has to consider both the content of 'Thriving Towns and Villages' and the July 2016 version of the Site Information Pack concerning Milton Abbot Parish, which is contained in Annex 3 to this report which can be accessed at

http://www.magpc.co.uk/C5/application/files/1014/6885/2614/Site_Information_Pack_Milton_Abbot_Parish_1.pdf. The pack contains details of the sites produced in various 'Calls for land' undertaken by WDBC. This was considered by the PC on 2nd July 2014 and its comments and WDBC's response are in the latest version.

‘Thriving Towns and Villages’

All Cllrs are commended to read this publication as it may be that there are other issues to consider than those highlighted in the following analysis, which focuses on key differences between the draft JLP and *Our Plan* and the specific issues on which views are sought, whilst having regard to the previously expressed views of the PC.

Number of new homes: One of the key benefits of having a JLP and its common housing pool across the three authorities, is that some of the pressure for new homes in WDBC can be met through Plymouth’s desire to expand its housing stock significantly. The draft JLP envisages 21,000 new homes will be built in or around Plymouth, with just over 3,600 in West Devon – a significant reduction in the number proposed in *Our Plan*. About 300 homes would be built in about 20 villages across West Devon.

It is not proposed that the JLP will allocate new homes targets to villages, that being done through neighbourhood plans [NP]. Whilst that allows for local determination of where new homes may go, it does not provide certainty over the achievement of the overall target for WDBC, as NPs are not mandatory and do not have to achieve a specific completion date.

The JLP proposes two ways of dealing with this:

- Grouping villages and allocating a target to each village in the group [say 20-30 for larger villages, 10 – 20 for smaller ones]. The NP teams would then find suitable sites and make allocations.
- Should NPs not be commissioned or are delayed, then WDBC could produce Village Site Allocation Plans, which would create more certainty over the delivery of new housing.

In smaller villages and hamlets, housing allocations would not be made via the JLP, but would allow development only in sustainable locations and in accordance with a ‘criteria-based’ policy.

Comment: The decrease in pressure on WDBC to provide new homes and the more flexible approach to housing targets in villages envisaged in the draft JLP, should create the opportunity to allocate new homes targets based on criteria that are more sensitive to local circumstances than the standard targets included in *Our Plan*.

They should include different values being accorded to different types of local assets, so that their contribution to sustainability is more realistically acknowledged. For example, greater value could be placed on the availability of public transport or a village shop, than on a village hall, given the far greater frequency with which the first two facilities provide the means of avoiding private car journeys. Whether or not a local school is over-subscribed is also relevant in terms of whether it can provide a realistic option for the children of new village residents.

A points-based system as proposed above could then be linked to specific minimum targets for villages, giving greater certainty to both the work of NP teams and the requirement that the JLP demonstrates how overall targets are to be reached. It would also provide a more practical approach than the ‘grouping’ of villages, which does not seem to deliver a solution to the problem being addressed – the lack of certainty over the achievement of targets – and adds an additional complex

and potentially stressful task for NP teams; the allocation of new homes to villages competing not to have them.

The proposed Village Site Allocation Plans are not an alternative to grouping villages, as suggested in the consultation document; they are a supplement to the NP process where that is not in place. In villages where there are no long-standing development problems, no employment site opportunities or brownfield sites and no current expectation of development, NPs are likely to be seen as the catalyst for new homes.

That makes them particularly vulnerable to rejection in a local referendum, where people who believe they would be adversely affected by a development site are more motivated to vote than those who aren't bothered either way.

Therefore, if Village Site Allocation Plans were supported by a constructive dialogue between WDBC and the individual PC's concerned, who could set up local consultation arrangements with residents, they could be seen as a positive alternative to NPs. Without the vulnerability of a referendum, they would deliver greater certainty over the achievement of targets, but still provide effective local influence over the choice of development sites.

Where would new homes be built?

PCs have been asked to look again at the potential development sites identified in 'Calls for land'. Annexe 3 contains the latest version.

Comment: A brief summary of the status of each site together with suggested further comments to WDBC is set out below:

WD_42_07_08/13 Land west of 1 Springfield Cottages, Chillaton

The site was not considered by WDBC as suitable for development at this time, but it now states that 'there will be further opportunity through the NP or an allocations process to explore the potential for development on this site'. Given that the reason WDBC considers the site is unsuitable is the narrowness of the access road, why does the NP or an allocations process create further opportunities to develop the site? That statement is inconsistent with WDBC's assessment of the site and should be removed.

WD_42_08_13 Land east of Marlow Crescent Chillaton

The site was not considered by WDBC as suitable for development at this time, 'due to significant constraints relating to the character of the village'. The statement that 'there will be further opportunity through the NP or an allocations process to explore the potential for development on this site' has again been added and as the character of the village is not likely to change, that statement is inconsistent with WDBC's assessment of the site and should be removed.

WD_42_09_13 Land between Sunway and Marlow Crescent, Chillaton

This site is considered by WDBC to have some potential for development. The PC previously stated that a development of 10 houses along the road frontage was excessive, represented a significant

extension of the village boundary and the topography and drainage of the site created substantial practical constraints. Other than a sales and service garage, Chillaton has no local facilities and it is therefore difficult to reconcile the idea of development on this scale with the statement in 'Thriving Towns and Villages' that development in smaller villages 'would only be allowed in sustainable locations which have reasonable access to services and...avoid reliance on the private car.'

Sites in Milton Abbot Village fall into two groups, those where both WDBC and the PC have agreed that there is no potential for development at this time [WD_42_03_08/13 Land adjoining Milton abbot primary school and WD_42_10_13 Land at Endsleigh House] and no further comments need to be made.

The other group is as follows:

WD_42_01_08/13 Land adjoining Fore Street
WD_42_05_08/13 Allotment Gardens Fore Street
WD-42_06_08/13 Land adjacent to Vicarage Gardens

The PC has previously expressed reservations about the scale of development on each of these sites and of the cumulative effect of the development of all of them. Those issues, combined with a more realistic assessment of the respective contributions to sustainability provided by different village facilities, as referred to above, make it essential that there is a review of the likely new homes target of 20-30 for this village. That target was objected to in the Regulation 19 consultation on *Our Plan* and if sustained, is likely to be the subject of a formal objection to the JLP when that stage is again reached.

Environment and Landscape

Comment: The only protection offered by the draft JLP is to conserving the landscape and scenic beauty of the Dartmoor National Park and the Tamar Valley and South Devon AONBs. There is no mention of any measures to acknowledge the value of the wider landscape outside those areas. The PC did object to the draft landscape policies in *Our Plan* on the basis of the inadequate level of protection that they offered to non-statutorily protected landscapes and the omission of Landscape Sensitivity Assessments.

Given the previous concern and the current initiative by a local residents' group to seek better protection for the landscape, a dialogue with WDBC over the best way forward on this issue would be welcomed.

Howard Asbridge

Chair
MACKPlan

14th July 2016