Oversight and Governance
Chief Executive's Department
Plymouth City Council
Ballard House
Plymouth PL1 3BJ

Please ask for Claire Daniells
T 01752 305155
E democraticsupport@plymouth.gov.uk
www.plymouth.gov.uk
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CABINET – Supplement Pack

Tuesday 8 October 2019
2pm
Council House, Plymouth

Members:
Councillor Evans OBE, Chair
Councillor Pete Smith, Vice Chair
Councillors Coker, Dann, Haydon, Laing, Lowry, Penberthy, Jon Taylor and Kate Taylor.

Members are invited to attend the above meeting to consider the items of business overleaf.

Please find additional information in relation to items 11, 13 and 14.

For further information on attending Council meetings and how to engage in the democratic process please follow this link - Get Involved

Tracey Lee
Chief Executive

Cabinet

11.	**Plymouth and South West Devon Supplementary Planning Document - Consultation Draft**	**(Pages 1 - 490)**
13.	**The Box - Finance Update**	**(Pages 491 - 494)**
14.	**Public Health Annual Report**	**(Pages 495 - 536)**

Cabinet

Date of meeting:	08 October 2019
Title of Report:	**Plymouth and South West Devon Supplementary Planning Document (SPD) – Consultation Draft**
Lead Member:	Councillor Mark Coker (Cabinet Member Srategic Planning and Infrastructure)
Lead Strategic Director:	Anthony Payne (Strategic Director for Place)
Author:	Richard Grant, Strategic Planning Manager, Joint Local Plan
Contact Email:	richard.grant@plymouth.gov.uk
Your Reference:	RGSPD191008
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of Report

The purpose of this report is to seek Plymouth City Council (PCC) approval for consulting on the draft Plymouth and South West Devon Supplementary Planning Document (SPD). This will also need to be approved by South Hams District Council (SHDC) and West Devon Borough Council (WDBC). The purpose of the SPD is to add further detail and guidance to the policies in a local plan and are material considerations when making decisions on planning applications. In March 2019, PCC, SHDC and WDBC adopted a new local plan, the Plymouth and South West Devon Joint Local Plan (JLP) and a new SPD was needed to help support the implementation of the JLP. This report sets out a proposal to consult on a draft SPD which covers the development management policies within the JLP, planning obligations and a limited number of specific Plymouth Policy Area and Thriving Towns and Villages Policy Area policies. The new SPD, once adopted, will supersede all currently adopted SPDs across the three authorities. The SPD will require separate adoption by the three JLP Councils and, following a public consultation, a final version of the SPD will return to Cabinet and Full Council for formal adoption.

Recommendations and Reasons

1. To approve, for consultation purposes, the Plymouth and South West Devon Joint Local Plan Supplementary Planning Document and its two companion documents, the Developer Contributions Evidence Base and the Traditional Farm Buildings: Their adaptation and re-use (Barn Guide)

Reason: To support the implementation of the JLP by putting in place supplementary planning guidance.

2. To delegate authority to the Service Director for Strategic Planning and Infrastructure for presentational and minor amendments to the SPD for consultation.

Reason: To enable the efficient consultation on a matching Joint SPD between the three Councils.

Alternative options considered and rejected

1. To produce and adopt a Plymouth only SPD

Reason: The majority of the policies within the JLP, particularly the development management policies, are policies which apply across the whole Joint Local Plan area. It would be more costly and unnecessary to have separate guidance for the same policies and could cause significant confusion and duplication.

Relevance to the Corporate Plan and/or the Plymouth Plan

The SPD is directly supportive of the Council's values and priorities. It demonstrates the support for a growing city by supporting and adding guidance to the development management policies of the JLP. It clearly sets out how the Council will use the JLP policies to make fair and clear decisions, working pro-actively with our neighbours, partners and developers to ensure planning decisions which are made supports the cities growth agenda and vision.

The SPD sets out clear guidance as to how the policies within the JLP (part of the Plymouth Plan) are to be implemented, supporting Plymouth's vision and strategic outcome to be a growing city with a strong spatial strategy.

Implications for the Medium Term Financial Plan and Resource Implications:

The costs of preparing the Plymouth and South West Devon Supplementary Planning Document and public consultation are covered within the existing Joint Local Plan budget, through which costs are shared between the three councils.

Setting out clear guidance on how to implement policies saves both time and money for the Councils as it adds clarity to the planning officer, the developer and planning inspectors.

Carbon Footprint (Environmental) Implications:

The SPD provides guidance as to how the JLP strategy for sustainable development and a low carbon economy will be supported through the development management process. It acknowledges, up front, the recent declarations by the three councils of a climate emergency, and provides guidance to ensure that relevant policies of the JLP are implemented in a way which supports the reduction of carbon and mitigates the unavoidable impacts of climate change. Additionally, it amplifies the policies of the JLP that require developers to implement low carbon building techniques (Policy DEV32), which enable the provision of local renewable energy projects (Policy DEV33), and support community-led energy efficiency and energy generation projects (Policy DEV34).

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

** When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*

Equality and Diversity

The SPD gives guidance to policies in the JLP which went through a rigorous process and included the production of an Equality Impact Assessment (EqIA) as part of an integrated assessment. The inspectors examining the JLP concluded that the Plan's approach met the Equality Act considerations.

Appendices

**Add rows as required to box below*

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) *If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.*						
		1	**2**	**3**	**4**	**5**	**6**	**7**
A	Joint Local Plan Supplementary Document – Background Report							
B	Joint Local Plan Supplementary Planning Document – Consultation Draft							
C	Developer Contributions Evidence Base							
D	Traditional Farm Buildings: Their adaptation and re-use (Barn Guide)							

Background papers:

**Add rows as required to box below*

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) *If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.*						
	1	**2**	**3**	**4**	**5**	**6**	**7**

Sign off:

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Originating Senior Leadership Team member: Paul Barnard

Please confirm the Strategic Director(s) has agreed the report? Yes

Date agreed: 23/09/2019

Cabinet Member approval: Cllr Mark Coker *'approved by email'*

Date approved: 17/09/2019

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PLYMOUTH AND SOUTH WEST DEVON SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Background Report

1. Introduction

1.1. Supplementary Planning Documents (SPDs) add further detail and guidance to the policies in a local plan and are material considerations when making decisions on planning applications pursuant to Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In March 2019, Plymouth City Council (PCC), South Hams District Council (SHDC) and West Devon Borough Council (WDBC) adopted a new local plan, the Plymouth and South West Devon Joint Local Plan (JLP). This prompted a review of the current SPDs adopted across the three JLP authorities to ensure current guidance helps support the implementation of the JLP.

1.2. The Plymouth and South West Devon Joint Local Plan SPD has been prepared across the three JLP authorities with input from Devon County Council (DCC), who, for South Hams and West Devon only, has the role of: the Minerals and Waste Planning Authority; the Highways Authority; the Education Authority and the lead Local Flood Authority. DCC also has a wide variety of responsibilities in relation to social care and infrastructure provision through which it engages with the planning system and it maintains the Historic Environment Record for South Hams and West Devon.

1.3. The SPD provides guidance for:

- All development management (DEV) polies within the JLP;
- The following Plymouth Policy Area (PPA) only policies:
  - Improving Plymouth's city centre (PLY6); and,
  - Plymouth airport (PLY42).
- The following Thriving Towns and Villages (TTV) Policy Area only policies:
  - Prioritising growth through a hierarchy of settlements (TTV1);
  - Delivering sustainable development in the Thriving Towns and Villages Policy Area (TTV2);
  - Development in Sustainable Villages (TTV25);
  - Development in the countryside (TTV26);
  - Meeting housing needs in rural areas (TTV27);
  - Horse related developments in the countryside (TTV28); and,
  - Residential extensions and replacement dwellings in the countryside (TTV29).
  - In addition to the above, specific design guidance is also available for sites in Tavistock and Okehampton, incorporated from the previous East of Okehampton Masterplan SPD and the South and South West of Tavistock Masterplan SPD. Specific detail is available for the following JLP policies:
    - Policy TTV13 - Land at Exeter Road, Okehampton
    - Policy TTV14 - East of Okehampton
    - Policy TTV15 - Land at Stockley
    - Policy TTV16 - Callington Road, Tavistock
    - Policy TTV17 - Plymouth Road, Tavistock
- Planning obligations, conditions, the Community Infrastructure Levy and development viability, including policy DEL1

1.4. The Joint Local Plan SPD also sets out the context of the JLP and its policies in the Climate Emergency, which has been recently declared by each of the three Councils.

1.5. Once adopted the new Joint Local Plan SPD will supersede the following SPDs which were previously adopted across the three local authorities:

Adopted SPD to be superseded	Adoption date
Plymouth	
Sustainable Design SPD	07/2009
Planning Obligations and Affordable Housing SPD 2nd Review	07/2012
Shopping Centres SPD	07/2012
Development Guidelines SPD (First Review) including Coastal Planning	04/2013
South Hams	
Open Space, Sport and Recreation Supplementary Planning Document	06/2006
Affordable Housing Supplementary Planning Document	09/2008
Planning Obligations Supplementary Planning Document	12/2008
West Devon	
Reuse of Rural Buildings SPD	03/2006
Infrastructure and Facilities to Support New Development SPD	06/2007
Affordable Housing Code of Practice	03/2012
Assessing the Impact of New Retail Development in West Devon SPD	04/2013
South and South West of Tavistock Masterplan SPD	04/2013
East of Okehampton Masterplan SPD	01/2014

2. Structure and content of the Joint Local Plan SPD

2.1. The Joint Local Plan SPD is intended to be used by all members of the community, as well as those directly involved in the development industry.

2.2. For ease of use, the SPD has been divided into the following sections, following the structure of the JLP itself:

1. Introduction
2. The Joint Local Plan – A sustainable spatial strategy
3. Healthy communities (DEV1-DEV6)
4. Housing (DEV7-DEV13)
5. Economy (DEV14-DEV19)
6. Place shaping and heritage (DEV20-DEV22)
7. Natural environment (DEV23-DEV28)
8. Transport and infrastructure (DEV29-DEV31)
9. Climate change, flooding, and coastal change (DEV32-DEV36)
10. Detailed provisions relating to the Plymouth Policy Area

11. Detailed provisions relating to the Thriving Towns and Villages Policy Area
12. Planning obligations, the Community Infrastructure Levy and development viability (DEL1)

2.3. As part of the SPD, a set of appendices have also been produced which gives further detail and guidance on specific topics:

- APPENDIX 1: Residential extensions and alterations
- APPENDIX 2: Specific materials for the PPA and TTV Policy Area
- APPENDIX 3: Shop fronts, including ATMs
- APPENDIX 4: Primary shopping boundaries and frontages
- APPENDIX 5: New work in conservation areas
- APPENDIX 6: Additional guidance for DEV26
- APPENDIX 7: Open space assessment form

2.4. As part of this consultation, two background documents have also been produced/updated to support the guidance in the SPD, these are:

- Developer Contributions Evidence Base; and,
- Traditional Farm Buildings: Their adaptation and re-use (Barn Guide)

2.5. The Developer Contributions Evidence Base document informs Section 12 (Planning obligations, conditions, the Community Infrastructure Levy and development viability of the SPD. It presents methodologies used to calculate the value of developer contributions, in particular via planning obligations, required to mitigate the impacts of new development proposals on key infrastructure provision, such as transport, education, health, green space.

2.6. The Barn Guide is previous guidance from SHDC and WDBC which aids developers looking to adapt or re-use traditional farm buildings which are common in rural areas. This document has only been amended so that it now also covers Plymouth. This is guidance which details how the buildings character and interest can be successfully conserved through the planning process.

3. Next Steps

3.1. Following approval by Cabinet and the relevant executive decisions in South Hams and West Devon there will be further discussions with key stakeholders and an opportunity for public involvement through a public consultation which will run for six weeks.

3.2. Amendments may be made to the SPD as a result of this process and the SPD will go to Cabinet and Full Council in the Spring of 2020 for formal adoption.

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Contents

APPENDIX 1: Residential extensions and alterations....2
Introduction....2
Residential extensions....2
Front extensions....10
Side extensions....11
Corner plot extensions....12
Rear extensions....13
Roof extensions....13
Dormer windows....13
Boundary walls and fences....15
Off-road parking considerations....17
Garages and car ports....17
Hard standings....19
Dropped kerbs (Domestic Vehicle Crossings)....20

Table of figures

Figure 1: Technical terms for house design....3
Figure 2: Technical terms for roof designs....4
Figure 3: Minimum distance between habitable rooms....5
Figure 4: Distance between habitable room window and blank facing wall....7
Figure 5: Difference in ground level....8
Figure 6: The 45 degree guideline....9
Figure 7: The 25 degree guideline....10
Figure 8: Front extensions....11
Figure 9: Side extensions and terracing effect....12
Figure 10: Dormer windows....14
Figure 11: Boundary walls and fences....16
Figure 12: Garages....18
Figure 13: Garages in sloping front garden....19
Figure 14: Hard standings....20
Figure 15: Individual crossing....22
Figure 16: Shared crossing....23

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APPENDIX 1: Residential extensions and alterations

Introduction

1. House extensions and other alterations can provide valuable additional space for households and improve the quality of accommodation. However, if not thoughtfully designed and carried out, they can lead to problems for adjoining householders and can contribute to a decline in residential amenity.

2. In some cases planning permission is not needed due to permitted development rights. The Town and Country Planning (General Permitted Development) (England) Order 2015[1] is the principal order which sets out when planning permission is not needed, provided that no restrictive condition is attached or that the development is exempt from the permitted development rights through an 'Article 4' or 'Article 3' direction.

3. Although not definitive, it is recommended that in the first instance the Planning Portal[2] is looked at, to review guidance on permitted development and further information on residential alterations and extensions.

4. To view guidance on extensions for houses which are listed or within a conservation area please see Section 6.

5. If an extension is for someone with a disability it is best to consult with planning officers at an early stage through the LPA's pre-application services. Wherever possible, the LPAs will support proposals that are for the sole benefit of someone with a disability. However, applications will still need to apply the design principles in this SPD to ensure neighbours are not adversely affected by the proposals.

Residential extensions

Visual impact

6. Extensions and alterations should relate well to the main dwelling and character of the area. They should generally follow the same architectural style and use the same materials as the original dwelling. Proposals should also respect the character of the area, including building form and layout, architectural style and materials.

7. Occasionally, extensions which differ or even contrast with the original property can be acceptable. However, even where materials or designs contrast there should still be a harmonious relationship with the main body of the property being extended.

[1] http://www.legislation.gov.uk/uksi/2015/596/contents/made
[2] https://www.planningportal.co.uk/

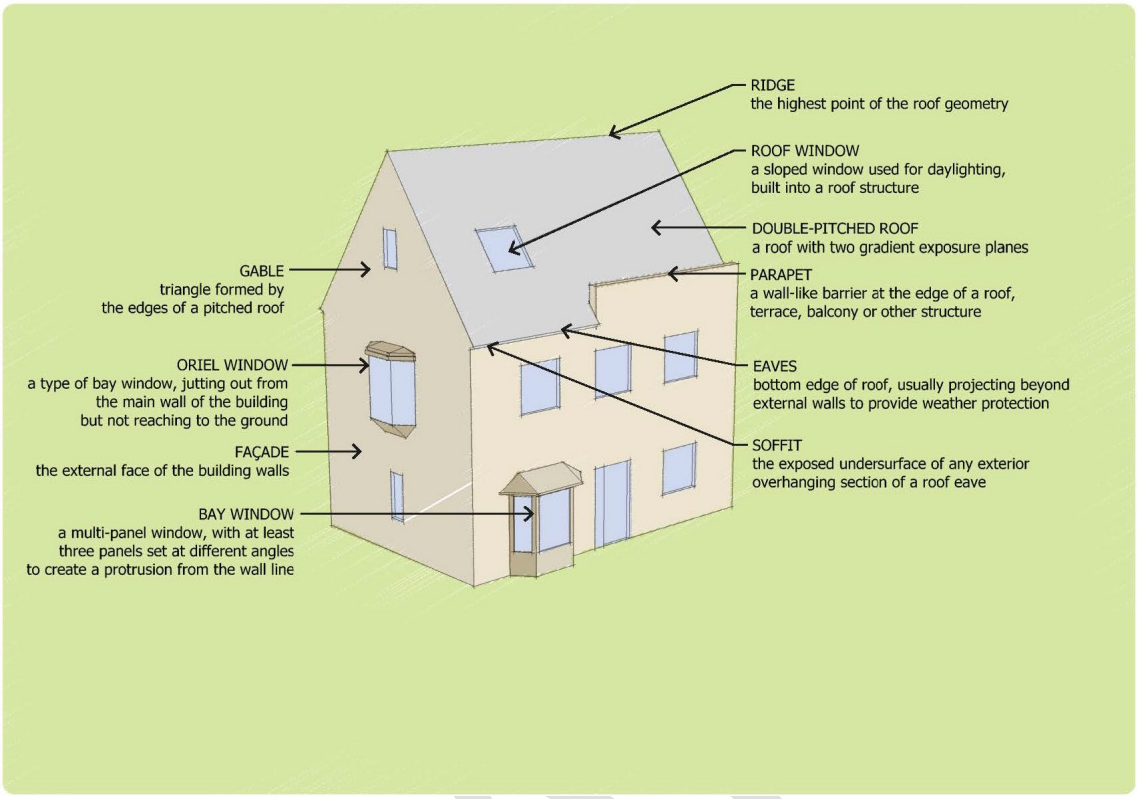

Figure 1: Technical terms for house design

Materials

8. Materials used in house alterations or extensions should generally match those of the existing house and relate to the surrounding area. In particular it is important to consider the impact of exposure and weathering on materials to ensure they will weather attractively. For example, in the PPA specifically, when using render, silicone render should be used to reduce the risk of staining and algae growth that has affected many buildings completed in recent years.

9. It is also important to ensure that small but important details, such as mortar colour and bonding style, are correct.

10. A condition may be applied to a planning permission to require particular materials to be used. For further guidance please see APPENDIX 2: Specific materials for the PPA and TTV.

Roofs

11. The shape, pitch and colour of roofs (and the roofing materials) on house extensions should normally mirror those of the original home unless there are clear reasons why this is not reasonable or practicable.

12. Flat roofs will be discouraged where they are not a feature of the original house although they can sometimes be acceptable at the rear of properties, particularly where they are not prominent and help to reduce the height of an extension.

13. Green roofs will be encouraged where appropriate to support biodiversity, rainwater run-off attenuation and visual amenity etc.

14. When considering the roof design and orientation, the LPAs will also consider the potential for installing solar photovoltaic or thermal renewable energy.

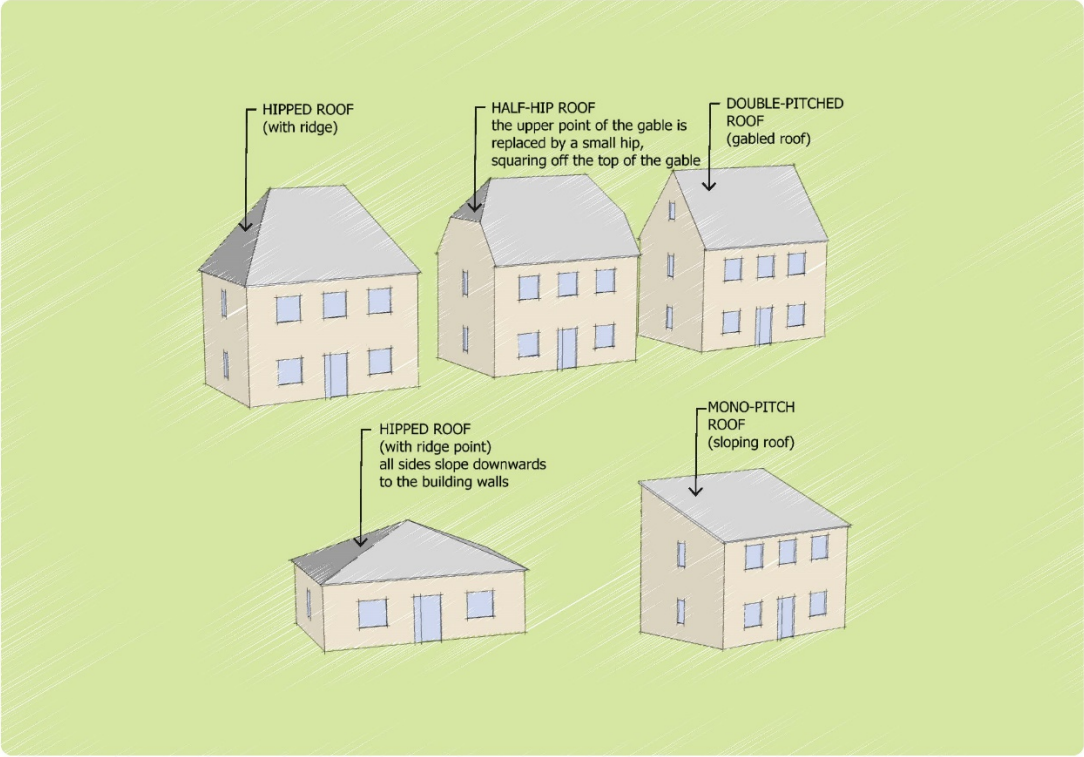

Figure 2: Technical terms for roof designs

Windows

15. The positioning and design of windows is crucial to achieving a unified exterior. The windows in an extension should reflect the proportions of the existing windows. The size, shape and materials of windows should correspond with the existing windows and the horizontal and/or vertical divisions of individual windows should match.

16. Habitable room[3] windows should be positioned to maximise available daylight and sunlight and should normally be located to the front or rear of the dwelling.

Privacy

17. The LPAs have a responsibility to protect the existing amenities of all residents. Any alteration or extension should not have an unacceptable effect on the

[3]For the purposes of this document a habitable room is defined as a room used, or intended to be used, for dwellinghouse purposes (such as a livingroom, bedroom or kitchen).

standard of living offered to occupants of homes that are to be extended and their neighbouring properties.

18. The levels of privacy expected from a residential environment will differ depending upon the location. For example, within densely developed contexts such as city, town or neighbourhood centres, or areas with a medieval street pattern, it is reasonable to assume that privacy might be less than in lower-density neighbourhoods and in these circumstances other design solutions may be appropriate such as oriel windows for habitable rooms and obscured glazing in other rooms.

19. Habitable room windows facing directly opposite one another should be a minimum of 21m apart for a two-storey development, as shown below. This distance should be increased to when one or more of the buildings are three-storeys in height or there is a drop in levels. An exception may be allowed where the proposed extension is a single storey, and/or there is a boundary wall between the properties.

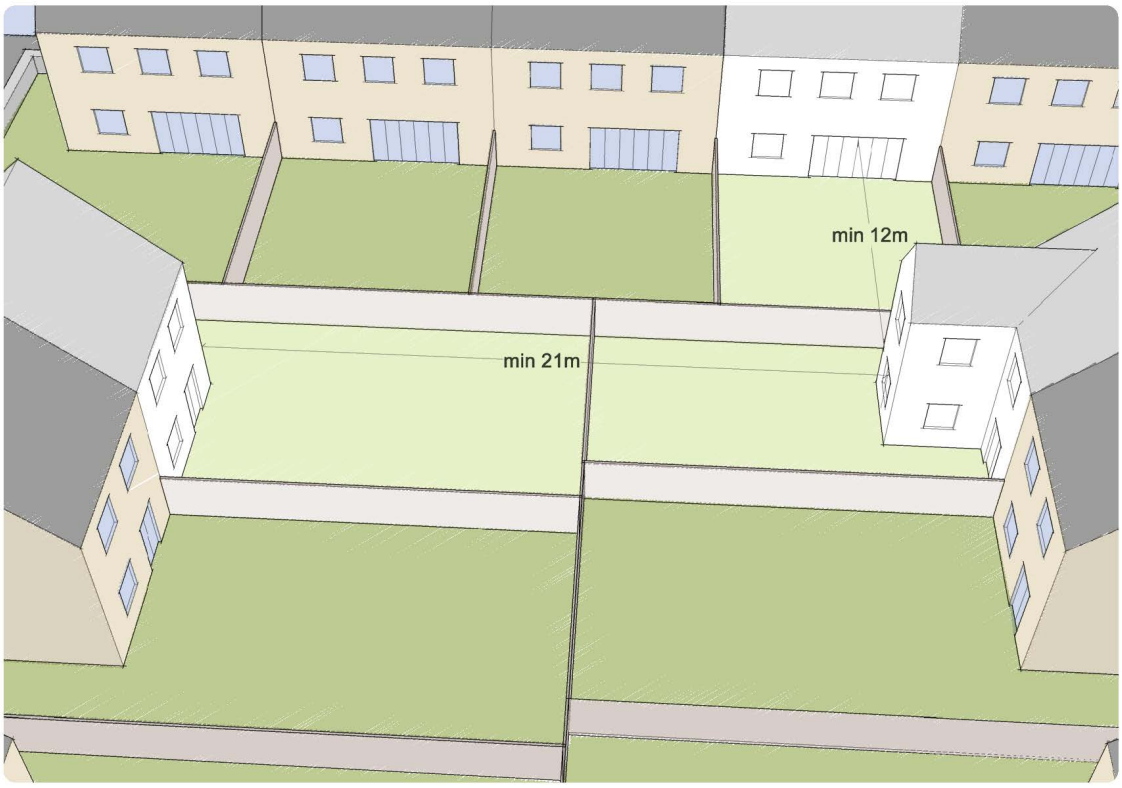

Figure 3: Minimum distance between habitable rooms

20. Overlooking of gardens may be unacceptable where it would result in an intrusive, direct and uninterrupted view from a main room to the most private area of the garden. This is often the main sitting out area adjacent to the property of the neighbours' house. In predominantly urban areas, as a general rule this area is the first 3-4 metres of a rear garden closest to the residential property.

21. Problems concerning privacy can sometimes be overcome by relocating windows or by the installation of roof lights. Obscure glass can be an appropriate solution if the facing window serves a non-habitable room. Planning conditions may be applied by the LPAs to planning permissions so that these solutions continue to protect neighbouring resident's amenity once the development is complete.

Balconies and roof gardens

22. Balconies and roof gardens can be unacceptable in higher density areas because of the impact they can have on the privacy of neighbours' gardens or habitable rooms. In assessing a proposal for a balcony or roof garden the degree of overlooking will be considered.

23. As well as overlooking, balconies can also create generate additional amenity impacts if they are positioned close to the site boundary such as noise. Consideration should be given to the location of any proposed balcony to prevent amenity impact to neighbouring properties.

24. Alternative designs, such as setting back the balcony/roof garden in rear extensions to reduce overlooking or a privacy screen will be considered on a case by case basis.

Decking, terraces and patios

25. Decking and other similar developments can lead to problems of overlooking and affect the amenity of neighbours, particularly in sloping gardens, and will therefore be resisted if they would create an unacceptable loss of privacy for neighbouring properties. However it is also important to note that decking, particularly in sloping gardens, could be classed as permitted and therefore cannot be controlled through planning legislation.

26. Screening or fencing may be used to overcome any overlooking problems but should be of a scale that does not unreasonably affect the outlook or daylight of the neighbouring property. Overlooking can also be reduced by positioning decking, a terrace or patio away from the property boundary.

Outlook

27. While views from a private house or garden are not safeguarded by planning legislation, an extension should not be constructed in close proximity to either a habitable room window of a neighbouring property or its private garden where it would have an unacceptable overbearing effect on a household's outlook.

28. In order to protect the outlook of neighbouring properties, the minimum distance between a main habitable room window and a blank wall, should be at least 12m. This distance should be increased for a three-storey development, normally to at least 15m.

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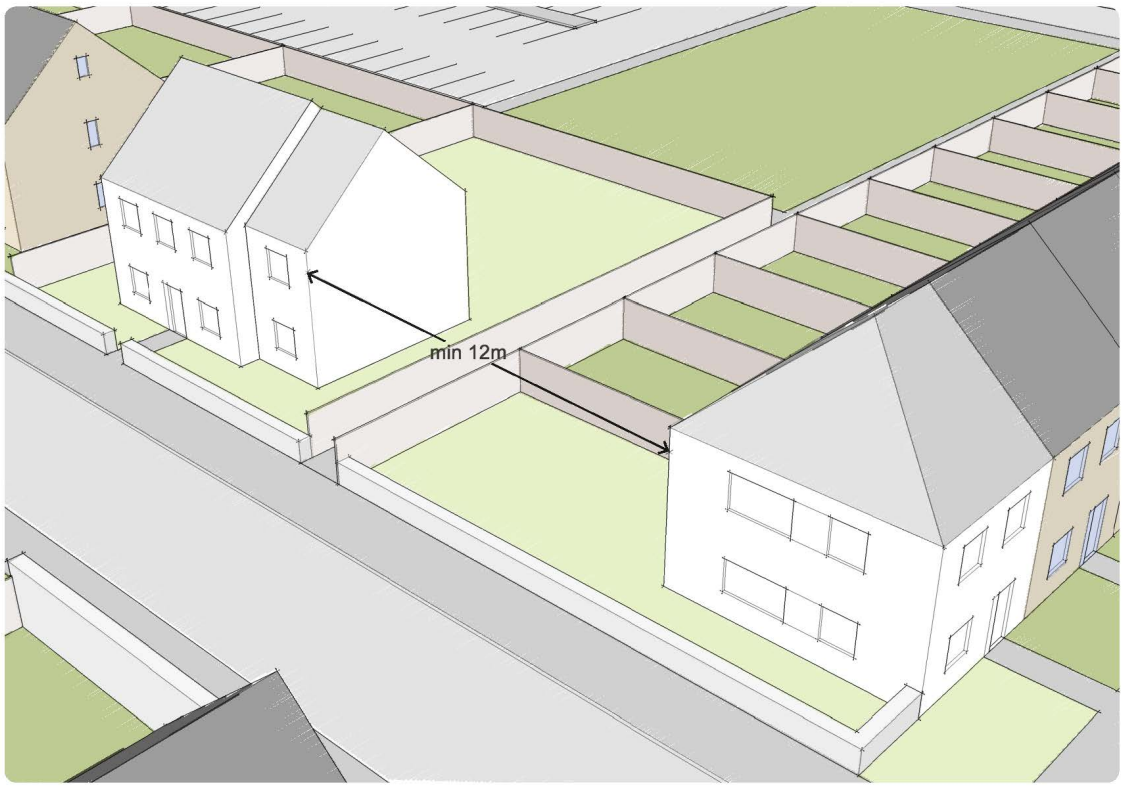

Figure 4: Distance between habitable room window and blank facing wall

29. Where there is a difference in ground levels these should be taken into account and the distance increased, normally by an extra 3 meters for every 2 meters increase in height.

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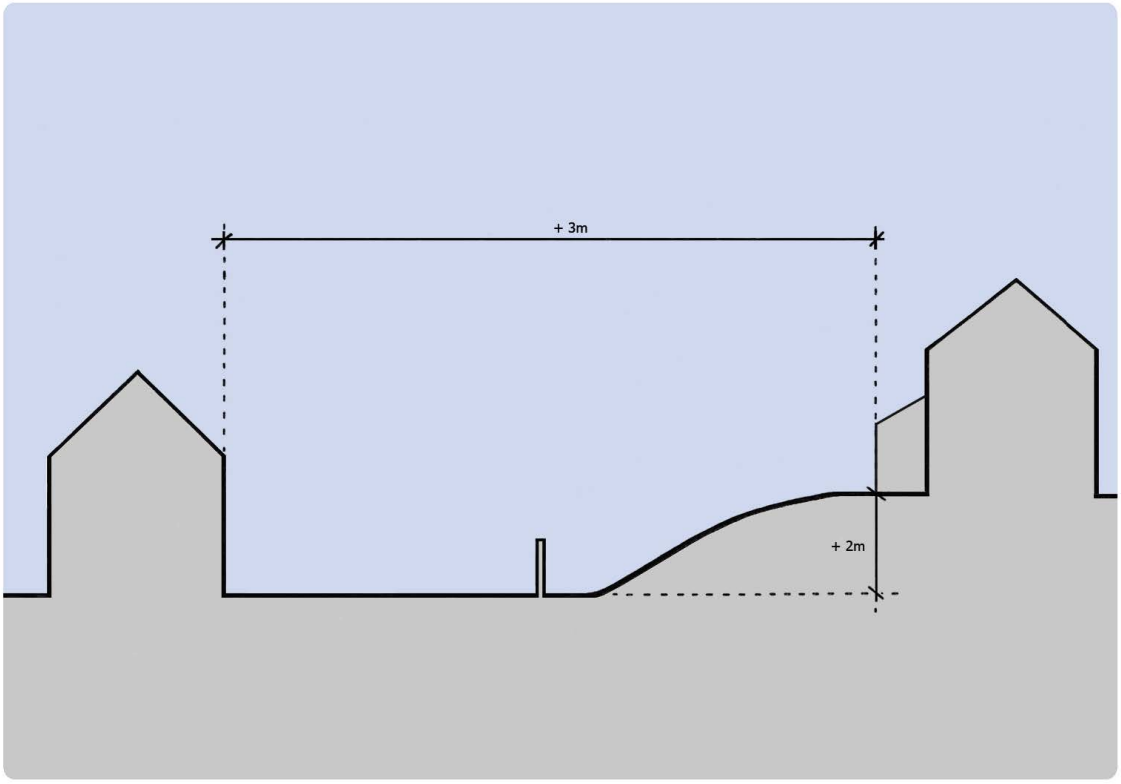

Figure 5: Difference in ground level

Daylight and sunlight

30. Extensions should not result in a significant loss of daylight or sunlight to habitable rooms of neighbouring properties, such as kitchens, living rooms or bedrooms. An extension should also not lead to an unsatisfactory loss of light to the property being extended.

31. Proposals which would result in a harmful loss of daylight or sunlight to a neighbouring property will be refused. In order to ensure that a proposed development will not cause a harmful loss of daylight the 45 degree guideline should be followed.

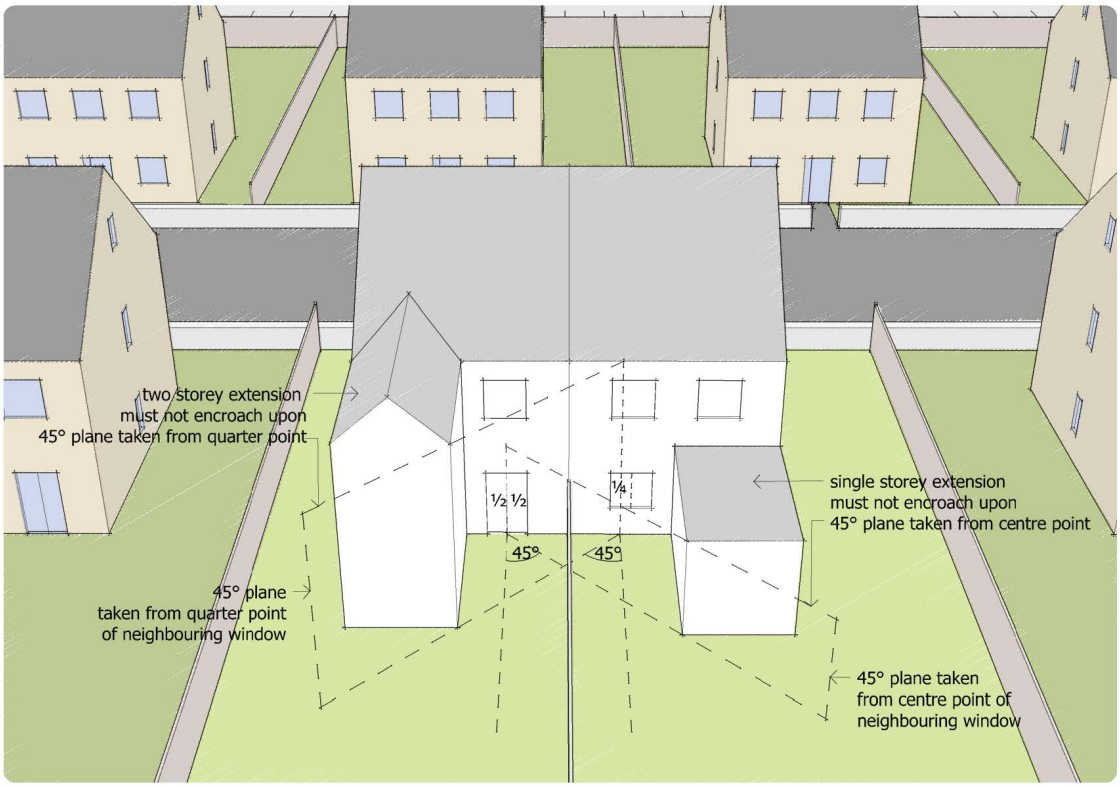

Figure 6: The 45 degree guideline

32. An imaginary line at an angle of 45 degrees is drawn from a point within the window of the closest ground floor habitable room of the neighbouring property towards and across the site of the proposed extension or new development. If there is more than one window lighting this room, the line is taken from the window which is the main source of light. When elevated to an angle of 25 degrees above horizontal, this line will show the maximum width and/or depth that a proposed extension can build up to without unreasonably obstructing light or views to a neighbouring property.

33. The 45 degree guideline is relevant to both single and two-storey house extensions. For a single-storey extension, the line is drawn from the mid-point of the window. For a two-storey extension, the line is taken from the quarter point closest to the boundary.

34. House extensions are normally only considered acceptable if they do not cross the 45 degree line when elevated to 25 degrees. Relaxation of this guideline may be considered for light-weight, transparent structures such as conservatories, or where the orientation of the properties concerned means that the guideline can be relaxed. Relaxation may also be considered where there is a difference in ground levels between adjacent sites or where there is a high boundary wall between two properties.

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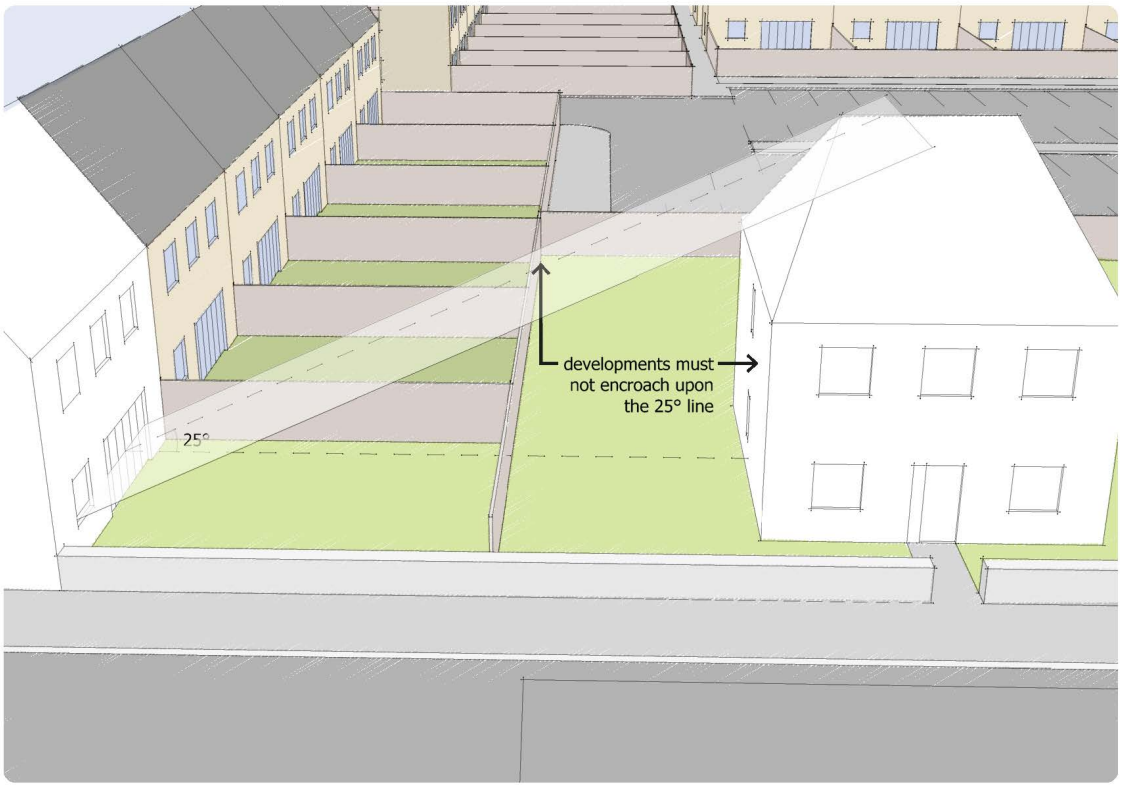

Figure 7: The 25 degree guideline

Front extensions

35. The front of a dwelling is usually the most visible part of the building. It often follows a clear/defined building line, helping to define the character of the street.

36. Extensions that project forward of the existing house will generally be resisted. Where a street has a clear established building line, the only development that might be acceptable at the front is likely to be a small, sympathetically designed porch. In certain circumstances, an exception may be allowed where there is no obvious building line, where the property is set back from other houses, or where front extensions are a feature of houses in the street or dwellings in more rural locations where there is no 'street scene'.

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Figure 8: Front extensions

Side extensions

37. In order to ensure that a side extension does not over-dominate the existing house or street-scene, it should generally be subordinate (smaller) in scale to the original dwelling and set back from the front of the property, especially in a street characterised by regularly spaced properties of similar design and scale.

38. The individual characteristics of the site and proposal will determine the exact set back distance required, however a distance less than 1m will rarely be considered acceptable.

39. Where an extension is set back, the roof of the extension should be lower than that of the main house. This ensures that the extension is subordinate. Side extensions should also be of a width to ensure they appear less important that the original dwelling.

40. In some situations the erection of a two-storey side extension could create or contribute to an effect known as 'terracing'. This is where side extensions almost link up with neighbouring properties, leading to the appearance of a terraced street. Piecemeal joining up of individual properties is also likely to appear visually obtrusive and the loss of space can be harmful to the whole character and amenity of an area.

Figure 9: Side extensions and terracing effect

41. To avoid a terracing effect, a gap should be left between the extension and the boundary with the neighbouring property. This gap should generally be at least 1.5m wide. Where it is not feasible to leave a gap, an alternative is to set the extension further back from the front of the house. The required set-back distance to avoid the appearance of terracing will vary, however a set-back distance of at least 2m may be necessary.

42. Where there is an existing ground floor extension that is not set back from the front of the house, then a proposed first floor extension should normally be set back by at least 2m to ensure that subordination is maintained and terracing avoided.

43. Exceptions to these guidelines may be allowed in detached buildings which have their own individual design or can demonstrate exceptional architectural merit.

Corner plot extensions

44. A corner extension should demonstrate that it will have a positive effect on the street-scene. Blank walls should be avoided, as they detract from the street-scene and reduce natural surveillance.

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Rear extensions

45. An extension at the rear of a dwelling is usually less visible than a side or front extension; however it can sometimes be seen from public areas. A rear extension should be in keeping with the main dwelling and the character of the area. An extension that follows an unusual layout may affect the character of the area and will therefore need careful consideration. In addition, the need to retain external amenity space should also be considered.

Roof extensions

46. Extending into roof space is a popular way of creating more residential accommodation and most roof extensions are permitted development as long as the ridge height is not changing. Where permission is needed, it is important to consider the height and ensure all roof alterations are of a high quality and relate well to the original home and the street-scene.

47. Wherever possible, a roof extension should be located at the rear of the property to minimise its impact on the street. Where the rear of the building is very prominent, such as at the end of a terrace or street, roof extensions should be of exceptional quality to be acceptable and conditions on planning applications may be necessary to limit the impact on neighbour privacy. Side extensions on hipped roofs are also particularly sensitive because of their prominence and impact on the symmetry of a building.

48. Roof windows and skylights usually lie flush with the profile of the roof. Providing enough head room can be created, these are normally the best option for roof extensions as they allow the profile of the roof to remain intact and are likely to have less visual impact on neighbouring properties.

Dormer windows

49. Proposals for dormer windows will be considered in the context of their impact on the dwelling, the street-scene and neighbours' amenity. Dormer windows should not dominate a building and should sit comfortably within the roof space. If it is necessary to create a large area in the roof space, it is generally preferable to construct a number of small dormers rather than a single large roof extension.

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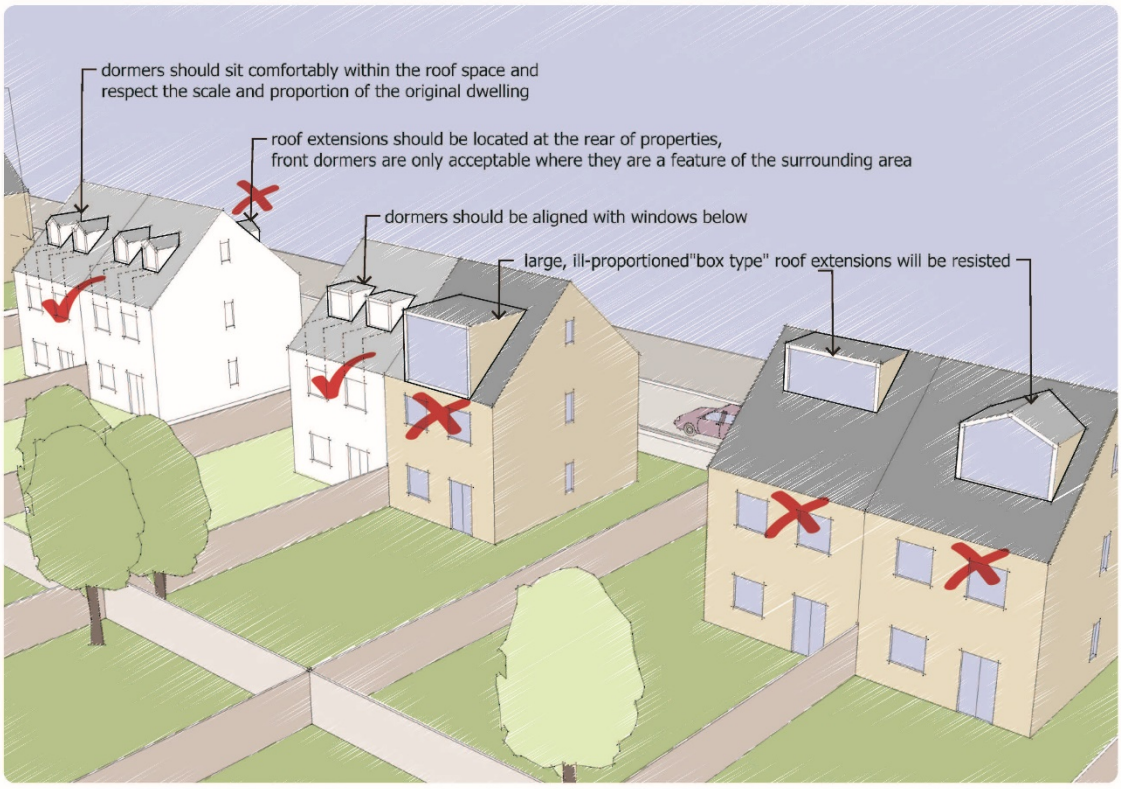

Figure 10: Dormer windows

50. Dormer windows should relate well to the building with respect to materials, scale, shape and angle of roof. The front and sides of the dormer should be covered in a material that matches, or is in harmony with, that of the existing roof. The style and sub-division of windows should relate to those that exist elsewhere on the building.

51. The positioning of dormer windows is important. They should not appear squashed towards any of the roof edges, and should be proportionate to the existing windows below.

52. Dormer windows are only acceptable on the front roof of a property if this is a feature of nearby properties and if they are sensitively designed and located.

53. Dormer windows on side roofs are particularly sensitive because of their prominence and impact on the symmetry of a building. Side dormers that unbalance the symmetry of a building are generally unacceptable. Only small, appropriately designed and positioned dormers are likely to be acceptable.

54. Dormer windows are generally more appropriate at the rear of a property providing they are located below ridge height and are sympathetically designed. Where the rear of the building is very prominent, such as at the end of some terraces, design criteria will be stricter.

55. It is particularly important to ensure that the positioning of dormer windows does not cause harm to the privacy of neighbouring properties and conditions may be added to planning applications with regards to obscure glazing and non-opening windows.

Boundary walls and fences

56. Boundary walls and fences mark the boundary of a property and maintain the privacy and security of occupiers. The design and location of walls and fences can however have a significant impact on the appearance of the street scene and on highway safety.

57. Whether a planning application needs to be submitted when building or replacing a fence, garden wall or gate depends on a number of factors, including the height and position. However, many modern dwellings also have permitted development rights removed.

Visual impact

58. The height and appearance of walls and fences should reflect the character of the existing street-scene. Materials should relate to their surroundings in respect of colour and texture.

59. Removal of any enclosure such as walls within a Conservation Area can have a negative impact on its setting, and may be resisted in the case of historic stone walls, for example, or boundaries which contribute the character of the Conservation Area. Examples and descriptions of walls of particular importance can be found in Conservation Area Appraisals which have been carried out in some towns and villages.

60. For further information on the historic environment please see guidance at DEV21 and APPENDIX 5: New work in conservation areas.

61. A wall or fence positioned at the front of the property is usually sensitive and should not normally be of a height or material that would appear bland, intimidating or out of character with its surroundings.

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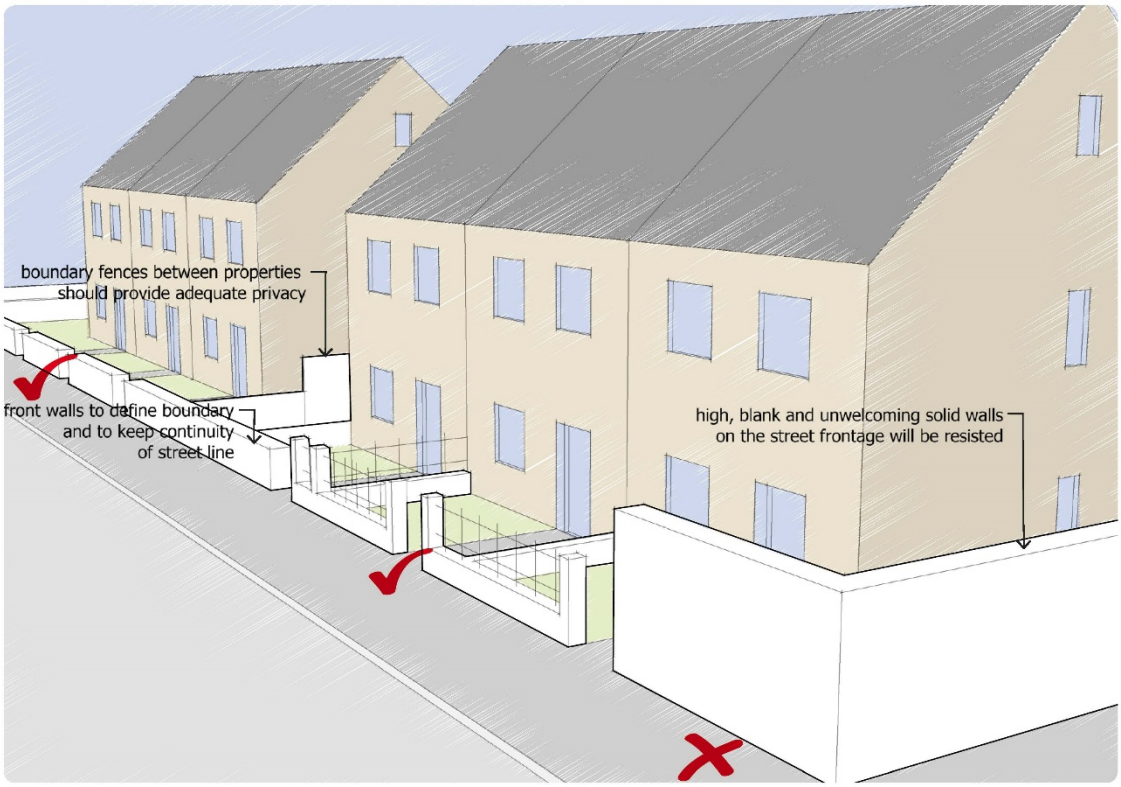

Figure 11: Boundary walls and fences

62. In residential streets the erection of front walls or other means of enclosure will be carefully considered to ensure it is not too high and relates well to the surrounding area. A previous planning condition or covenant may also have a restriction on front enclosures.

63. Walls or fences over 1m in height at the front of a property or at the side where the property is a corner plot may reduce natural surveillance and are likely to be resisted.

Highway safety

64. The height and positioning of walls or fences should not impinge on highway safety and particular care should be taken at junctions and bends in the highway. Walls or fences which restrict visibility for road users will be unacceptable. Details of specific requirements can be found in Highways Standing Advice, available from the relevant Highways Authority.

Impact on neighbours

65. Fences and walls should be designed and located so that they do not unreasonably restrict light entering a neighbouring property or have an unacceptable effect on outlook.

Off-road parking considerations

66. Provision for off-road car parking should be carried out in a sensitive way so as not to detract from the character of the area or reduce highway or pedestrian safety. It should also not lead to any substantial reduction in existing on-street provision where it is in limited supply.

67. In certain urban areas only, it is sometimes preferable to provide open fronted parking areas so as to encourage their use for vehicle parking as is their intended purpose and a justification will be required from the applicant if open fronted parking areas are not included. However, in high density urban areas, such as city, town or neighbourhood centres, or in strategically important and prominent locations, such as along the waterfront and in historic streets and Conservation Areas, open fronted parking areas may have a negative impact on the attractiveness of the street and could be resisted. Similarly, ground floor car parking that generates blank or unattractive street-facing building elevations in such locations will be resisted.

68. In more rural areas, car ports and garages should try and reflect the style of more traditional outbuildings in the countryside. This would include pitched roofs, rather than flat roofs, careful consideration of placement within the site, and use of appropriate materials, particularly if the site has a historic agricultural character.

Garages and car ports

Garages vs car ports

69. As garages are normally used as storage and not for parking, the LPAs may encourage the use of car ports as an alternative.

Highway safety

70. When determining planning applications, safety for pedestrians, cyclists and vehicles is paramount and obstruction should not be caused to the highway. For example, garage doors should not project over a pavement or road either during opening or when open.

71. Off-road car parking should be designed so that cars do not overhang the highway, for example when a car is parked prior to a garage being opened. To overcome this, when a driveway is in front of a garage, it should be a minimum of 5.5m long. Where a driveway is used by pedestrians to gain access to a property, it should be at least 3.2m wide.

72. To enable easy manoeuvring in and out of a garage or car parking area entrances should be designed so that a vehicle can enter or exit in a single turning movement. Where the entrance is on to a classified road then there should be room within the site for the vehicle to enter and exit the public highway in a forward gear.

Impact on neighbours

73. The construction of an off-street parking area should not negatively affect occupants of neighbouring properties. Proposals which are likely to create a disturbance in a residential area will be refused permission.

74. For garages, particular attention needs to be paid to the impact on neighbour's outlook and light, guidance is available above.

Visual amenity/street-scene

75. The design of a garage, whether attached to the property or freestanding, should relate well in scale and proportion to the original dwelling and to the surrounding area. Attention should be paid to the design of all parts of the structure including doors, walls and roofs. Where a garage is attached to a house it is usually preferable to set it back from the front of the property:

Figure 12: Garages

76. In urban areas, garages in front gardens will generally be resisted as these are prominent sites and can detract from the street-scene. In exceptional circumstances, garages in sloping front gardens may be allowed if the majority of the garage can be built into the garden. Garage doors should not open over the public highway to ensure there is no obstruction.

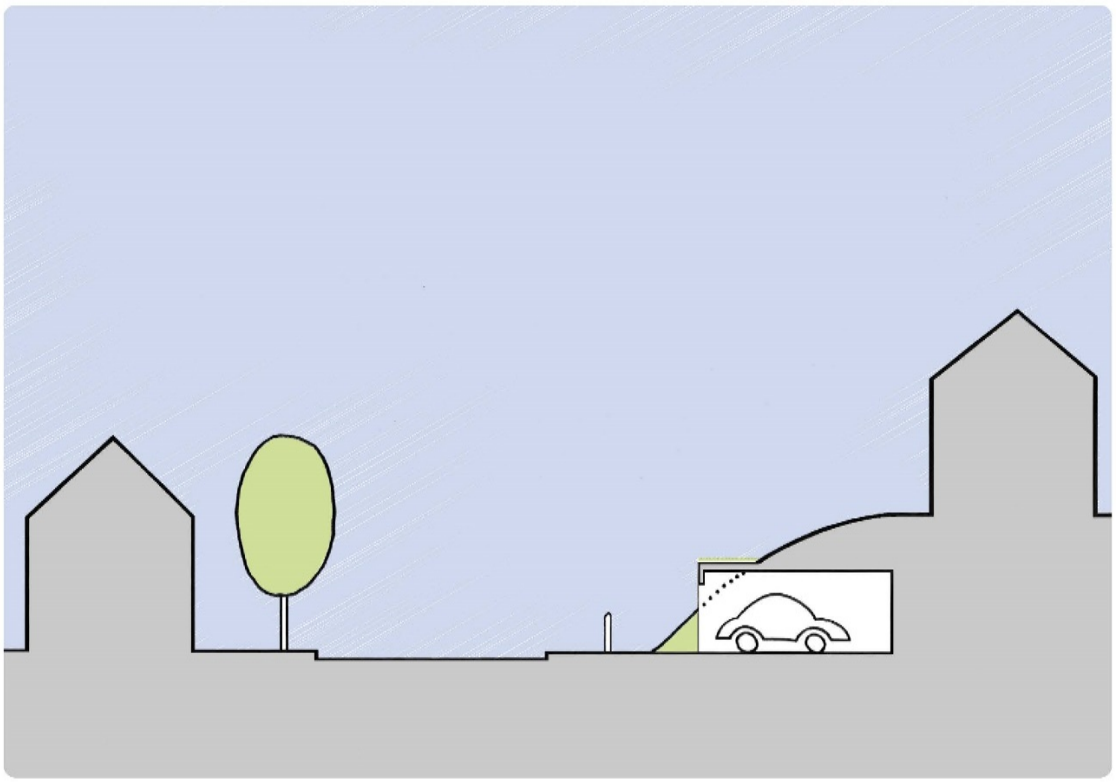

Figure 13: Garages in sloping front garden

Hard standings

77. It has become popular to pave over front gardens to provide parking space. Although this may be a convenient way of providing off-street parking, proposals need to be considered carefully to ensure there is no negative impact on residential amenity, safety, and environmental grounds as well as the character and attractiveness of the street. In many Conservation Areas, historic towns, villages and rural areas new hardstandings may be unacceptable due to the adverse impact on the character of the street scene.

78. In assessing proposals, the LPAs will have regard to the impact of the proposal on the street scene, highway safety and drainage.

79. When designing a hard standing the following guidelines should be adhered to:
    - Retain as much original walling, fencing or railings as practical to ensure the appearance of enclosure is preserved. Full frontage crossings will not generally be permitted;
    - Incorporate sufficient space for soft landscaping to screen cars and minimise the visual impact of the hard surfaced area; and,
    - The hard standing should be constructed of permeable material so that water can soak into the surrounding ground. If it is intended to construct a hard standing using gravel, a 1m tarmac or concrete apron is required adjacent to the public highway to prevent gravel coming onto the highway;

- The proposed hard standing should not drain onto the public highway. If the hard standing slopes/drains towards the highway, a channel should be installed to prevent run off onto the highway.

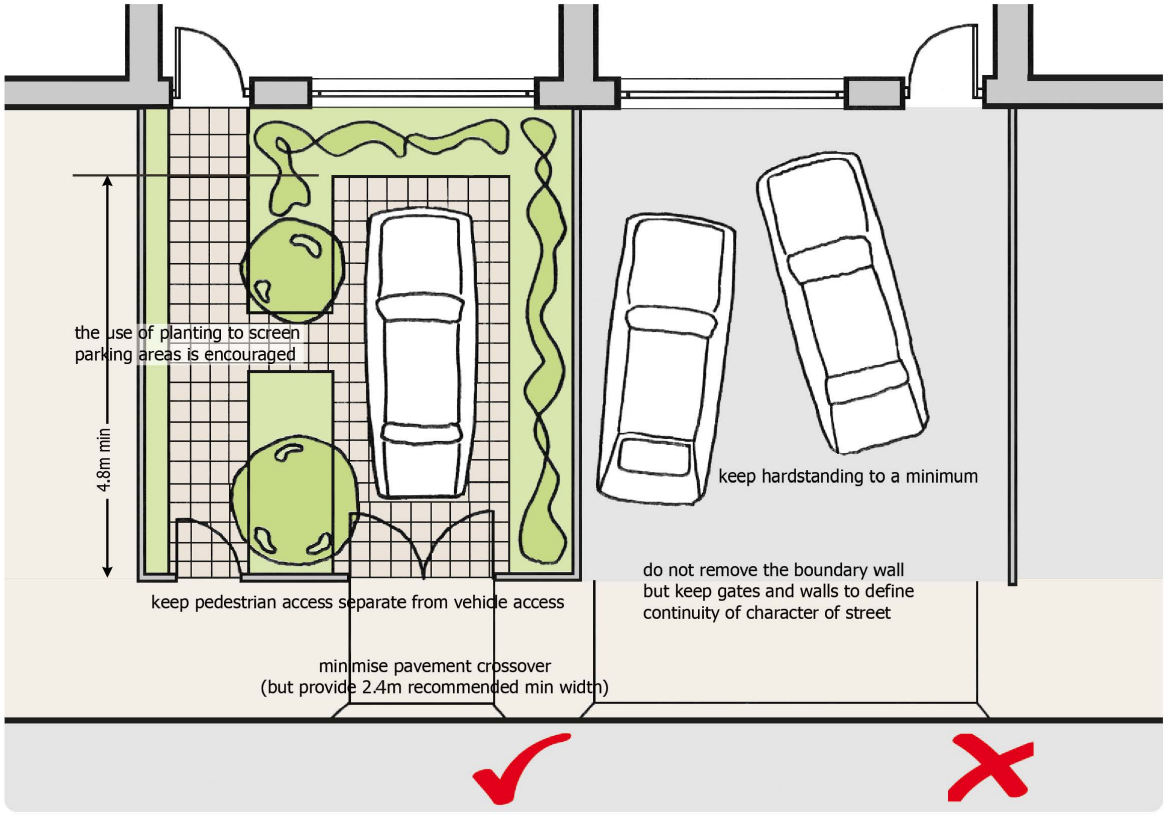

Figure 14: Hard standings

80. Further guidance on how to pave a front garden in a sustainable way is available on the Planning Portal[4] and in government guidance: Permeable surfacing of front gardens: guidance[5].

Parking to the rear of a property

81. The LPAs will resist any planning applications which proposes the total removal of rear boundary walls and/or opening up of rear curtilages to accommodate off-street parking where this would be prejudicial to security and visual amenity.

Dropped kerbs (Domestic Vehicle Crossings)

82. Driving a vehicle over a verge or footpath to access a property, without an appropriate vehicle crossing or without lawful authority from the LHA, is an offence under Section 184 of the Highways Act 1980 and may result in prosecution.

[4] https://www.planningportal.co.uk/
[5] https://www.gov.uk/government/publications/permeable-surfacing-of-front-gardens-guidance

83. Agreement from the local highways authority (LHA) is needed before you do anything on the highway. This consent procedure is separate from obtaining planning permission and the highway service applies its own guidelines in respect of the width and separation of pavement crossover points:
    - Plymouth City Council[6]
    - Devon County Council (South Hams and West Devon)[7]

84. To find out whether planning permission is needed for a dropped kerb, please contact the relevant LPA.

85. If planning permission for a new access onto a highway has been granted planning approval through the submission and determination of a planning application then permission to drop the kerbs and lower the footway has been accepted in-principle.

86. The following guidance has been adapted from the highway service guidelines.

87. The standard recommendation for any access onto a classified road is that the turning provision for a car should be provided within a private property. The vehicle should be able to enter and leave the property in a forward gear.

88. However, depending on the nature of the classified road (onto which access would be obtained), in terms of the volume and speed of traffic travelling along it, a new access without on-site turning provision may be acceptable to the LPA and each case will be considered on its' own merit.

89. When applying for planning permission the following guidelines should be adhered to:
    - A property is only allowed to have one functioning domestic vehicle crossing, except in extenuating circumstances and applications to provide more than 1 crossing shall be considered on a case-by-case basis;
    - Vehicles are not permitted to park on the crossing;
    - Applications should provide sufficient room on the property to prevent a vehicle from protruding onto the footway/verge when parked. The minimum parking standards are 2.4m by 4.8m and the minimum crossing width shall be 2.7m (3 kerb lengths);
    - A vehicle should be able to cross the footway/verge at right angles (90 degrees) to the road;

[6] https://www.plymouth.gov.uk/roadsandpavements/droppedkerbs
[7] https://new.devon.gov.uk/roadsandtransport/make-a-request/vehicle-crossing-or-dropped-kerb/

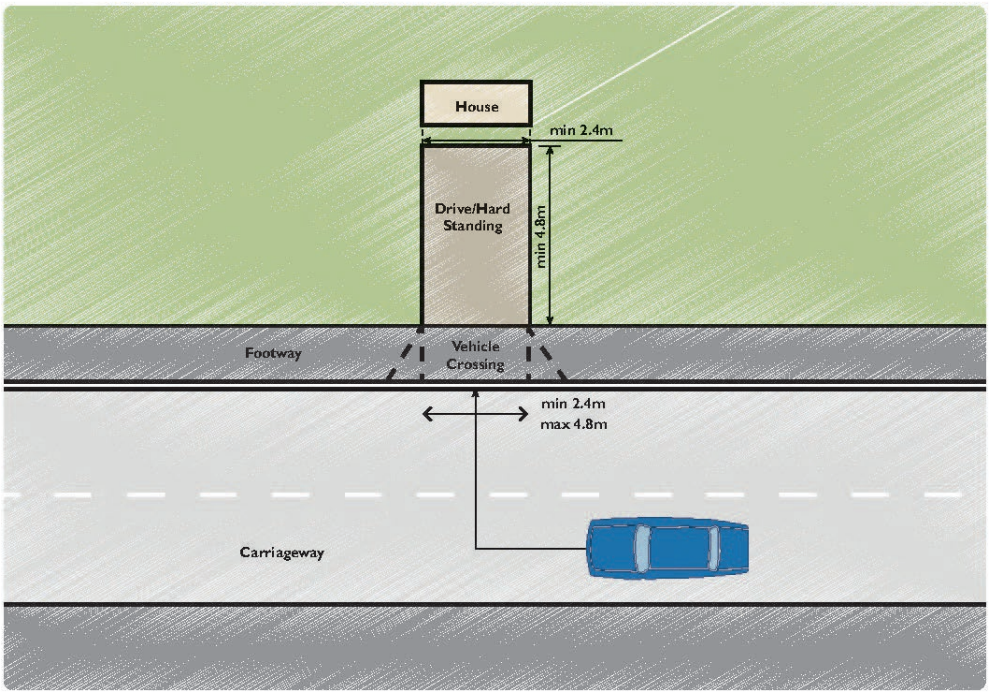

Figure 15: Individual crossing

Any gates accessing the property are not permitted to open outwards onto the highway;

- If the proposed crossing is within 10m (or 15m on a classified road) of a junction or roundabout then the application will likely be refused;
- The proposed channel should be connected to the resident's private drainage system/soak away;
- Driver and pedestrian visibility should not be impeded by any of the following:
    - Walls, fences, or hedges along the frontage of the property or the neighbouring properties;
    - Street furniture or trees in the highway; and,
    - Vehicles parked on the highway.
- If any of the above are blocking access to the crossing or visibility they may need to be moved or removed any may incur an increased cost, in cases where these cannot be moved the application will likely be refused.
- If an inspection cover or telephone pole is present then, should planning permission or LHA agreement be secured then the application will need to arrange with the utility companies for these to be moved/lowered;
- It will not be possible to construct a vehicle crossing where a BT or similar communications chamber is present. The levels of these covers cannot be changed;
- If any of the following is present in the area of the proposed crossing the application will likely be refused:

- Pedestrian crossing;
- Disabled bays
- Residents parking zones; and/or,
- Pay and Display.

- Where two adjoining properties share an existing driveway or crossing or an application wishes to construct a new crossing to serve two properties:
  - A crossing covering the whole frontage of both properties will not be allowed.
  - The maximum overall width for the shared crossing will be 5.6m.

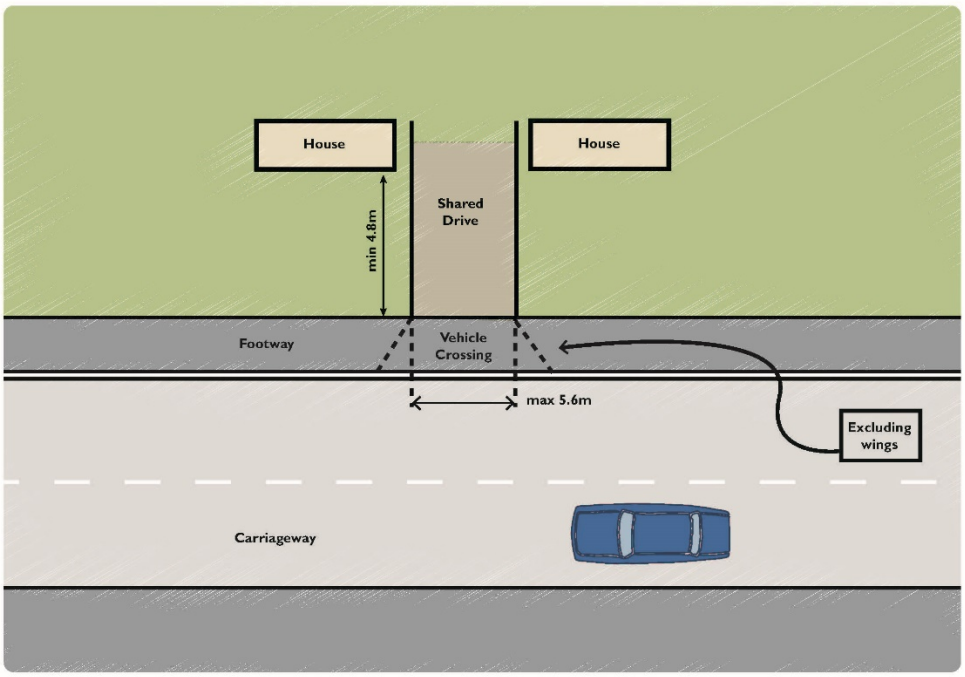

Figure 16: Shared crossing

- If there are neighbouring crossings, an additional dropped crossing will only be granted if there is a minimum of 6m distance between any existing access and the proposed crossing in order to preserve existing on-street kerbside car parking. However this will be subject to review and considered on a case-by-case basis.
- Existing crossings/drives, junctions and service lanes are all considered accesses.

90. For further guidance on transport and infrastructure please see Section 8.

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Contents

APPENDIX 2: Specific materials for the Plan Area 2
Introduction 2
Render/stucco 2
Cladding 3
Weatherboarding 3
Stone and brick 4
Slate hanging 4
Cob 5
Colour 5
Roofs 5
Metal roofing 6
Living roofs 6
Eaves and verge details 6
Rainwater goods 7

DRAFT

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APPENDIX 2: Specific materials for the Plan Area

Introduction

1. Building material is any material which is used for construction purposes. Policies DEV10 (Delivering high quality housing) and DEV20 (Place shaping and the quality of the built environment) of the JLP sets out the expectation that materials should be of high quality, resilient to their context, endure over time and have proper regard to the wider development context.

2. Materials used in the Plan Area should be specified accordingly to have longevity, and be able to weather attractively, particularly as Building Regulations Approved Document C[1] identifies the area as being in a "very severe" weather zone.

3. Whilst materials and building techniques may not always be specified before planning permission is granted, the quality, deliverability and the functions they will be expected to perform should be clarified early in the process.

4. The materials characteristic of the Plan Area are set out below. Across the Plan Area a variety of different materials are used and some are more acceptable in certain areas than others. The local context and the different ways in which materials are used needs to be considered early in the design evolution of proposals.

Render/stucco

5. Render (or stucco) is a traditional construction material used as an external coating for walls. It is applied wet and hardens to a dense solid. It can be given the process of applying cement mixture to external, or sometimes internal walls to achieve a smooth or textured surface.

6. In the PPA severe local weather conditions have led to the dominant use of render or stucco as elevation finish for buildings, particularly on historic buildings. In the TTV render varies according to the construction material and the status of the building. Generally, the higher the status, the smoother and more refined the finish.

7. Traditional colours vary. On vernacular buildings colour only came from whatever was picked up in the limewash from the substrate so earthy off-white colours were the norm. On the town houses of wealthier inhabitants, colour was sometimes used as a status symbol – blue, green and yellow pigments were used for example. This reflection of status is characteristic and should inform colour choices for new development.

8. However, as locally distinctive as render is, there have been problems with render weathering unattractively on many recently completed buildings which

[1] https://www.gov.uk/government/publications/site-preparation-and-resistance-to-contaminates-and-moisture-approved-document-c

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have been subject to staining and algae growth, particularly within the PPA. The use of render within the PPA is therefore considered inappropriate on tall buildings and buildings in particularly exposed locations or next to busy roads and will normally be resisted in these circumstances.

9. On low to medium-rise buildings in the PPA, the use of render will only be supported if it is a high quality silicone system, with water and dirt repellence, to avoid problems with staining and algae growth. Render with a textured finish is particularly vulnerable to dirt adherence and should be avoided in the PPA.

Cladding

10. Metal, ceramic and composite/laminate cladding may be supported, subject to agreement of appropriate quality, colour, detailing and finish and in compliance with Building Regulations. On medium-rise and tall buildings and in exposed locations a glossy finish may be sought to minimise dirt adherence.

11. Copper sheet cladding has historically been used to accent buildings of civic or strategic importance and can be obtained pre-patinated to its characteristic blue-green verdigris colour or left to weather to this finish naturally. It must be noted that it may take several decades to weather from its initial bright finish and this may be considered too long a process in some circumstances.

12. Within the PPA, industrial sheet-cladding materials, for example, those that link with ship-building and marine infrastructure, can be supported in appropriate locations, provided they are well detailed and sufficiently robust. A maintenance plan will need to be agreed to ensure they are maintained in good appearance throughout the life of the development.

Weatherboarding

13. Weatherboarding is a form of external cladding and has been used significantly around the PPA's waterfront neighbourhoods because of its connection with the marine context. Its use may also be appropriate in rural areas where it can link to an agricultural/barn aesthetic.

14. Untreated timber shiplap weatherboarding (such as cedar or larch, for example) has often been used on the basis that it requires no chemical preservatives and requires little maintenance, eventually weathering to a silver grey of a similar colour to local stone. However, care needs to be taken in specifying untreated timber weatherboarding, particularly on north-facing elevations, or where it can be difficult for the material to dry out, as this can create a darker appearance than may have been intended. There is also a susceptibility to moss and algae growth. There also needs to be an acceptance that the untreated timber may be considered unsightly by some people before it reaches its weathered state.

15. Painted fibre-cement shiplap weatherboarding has been used successfully on recent developments in PPA waterfront neighbourhoods, including at Devonport

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and Millbay. Its use will be supported in similarly appropriate contexts, subject to agreement on colour and detailing.

16. Weatherboarding is considered less appropriate in inland urban situations or in inappropriate historic contexts. It would be discouraged in Plymouth City Centre, for example.

17. UPVC cladding will generally be discouraged because of its poor quality appearance and negative environmental impact.

Stone and brick

18. Historic buildings reflect the geology of the locality and that varies tremendously. Slate is the bedrock across much of the TTV but that is found in many different colours and ranges considerably in quality. The spectrum covers various shades of grey, green, brown and even purple. There are many distinctive local stones including some unusual igneous rocks, from the green schist on the southern coast to the lamprophyres in the northern parishes and the green Hurdwick stone of Tavistock. In any location it is seldom necessary to look far to see what the local materials are and the challenge is then to complement them. The Strategic Stone Study[2] led by Historic England, working with the British Geological Survey is a useful reference point.

19. The PPA's geology in the waterfront areas to the south is predominantly limestone, whilst the areas to the north are mostly slate and shale. Many of the PPA's historic buildings and fortifications are constructed of Plymouth limestone which was quarried locally, sometimes with granite added for plinths and features. The use of Plymouth limestone in building elevations is therefore encouraged, particularly in the south of the area because it is robust, weathers attractively and has a strong connection to place. Local slate is more appropriate in the north of the area.

20. Plymouth's mid-20th Century Beaux-Arts City Centre precinct is characterised by the use of Portland Stone on building elevations. It is important that new development responds to this legacy positively.

21. In the PPA's townscape, the use of brick is the exception rather than the rule. However, it is acknowledged that some brick is present on mostly 20th Century buildings and has been used in some recent development in areas such as Millbay. The use of brick will normally only be supported where it links to a positive existing use of brick in an area.

Slate hanging

Slate hanging is a feature across the TTV and some examples are centuries old. Two notable features of historic slate hanging are that the slates are usually smaller than roofing slates and they are also commonly laid back-to-front so that

[2] https://www.bgs.ac.uk/mineralsuk/buildingStones/StrategicStoneStudy/EH_project.html

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the riven edge forms a natural drip. These characteristic details may usefully be adopted in new work as well.

Slate hanging is commonplace on timber framed buildings and is sometimes very decorative, as seen in Dartmouth. Its use on solid walls is normally a response to extreme exposure in order to stop penetrating damp so its use on new build ought to reflect either orientation or construction type. As a locally distinctive feature it has considerable potential for use in retrofitting of external insulation to reduce energy use.

Cob

The use of earth in building is an ancient tradition in Devon and cob buildings are found throughout the TTV area. The amount of cob found is usually inversely proportionate to the easy availability of stone and there are more cob buildings in the north of the area. Earth construction is part of many stone and timber framed buildings in the form of wattle and daub, earth mortars etc. In recent years there has been a revival of interest in this low impact form of construction and in rural locations it will be a welcome approach to sustainable design.

Colour

22. Colour selection methodologies for building elevations should have a strong link to place, local character and geology.

Roofs

23. Roof designs and coverings should respond positively to local character. Traditionally across the Plan Area they have been very simple, either slate or thatch.

24. The production of roofing slate in south Devon traces back to medieval times, but by 1910 had effectively ended due to cheaper Welsh slate arriving by railway. The greatest number of surviving roofs are those with slate from Mill Hill quarry near Tavistock. Whilst colours and quality varied, the prevalent characteristic was a blue grey colour and that will generally be the favoured type, wherever it may be sourced from.

25. In accordance with advice in BS 5534[3] fully metamorphosed slates will be favoured over the lesser items now being imported and nail fixing is preferred to clips unless local conditions justify an exception.

26. Whilst new thatch buildings will usually be welcomed in the TTV area they are a rare proposition and only a few exceptional hamlets or village locations where its use would be essential.

[3] https://shop.bsigroup.com/ProductDetail?pid=000000000030363747

Metal roofing

27. Lead has long been used for roofing works but mostly on high status buildings and is seldom readily visible.

28. Zinc galvanised sheet has had occasional uses since the early 19th century and can be acceptable in some situations dependent on context. It can be an effective choice where a low pitch is needed.

29. The PPA's roof-scape is predominately grey in colour, with slate traditionally used on historic buildings and more recently grey metal cladding (e.g. aluminium or zinc).

30. Corrugated iron has been in widespread use across the TTV area since the mid-19th century. It is closely associated with the mining activities in the Tamar valley where it was often tarred. There are also notable examples of pre-fabricated buildings including chapels and village halls. Its most common use has been through the 20th century either covering or replacing thatch on rural buildings and so it has become an integral part of the local scene. Authentic '3 inch' corrugated is still available and lends itself to many uses for functional buildings, including garages, and on conversion projects. It may occasionally be used as an 'architectural' material as well. If used it is best left 'raw' or coated black.

31. Copper has been used successfully as an accent material on buildings in the PPA from the mid-20th Century onwards, marking the roofs of key buildings such as the Plymouth Guildhall, the Royal Bank of Scotland and the Roland Levinsky Building. Its use as a roof material will be supported in the PPA where it highlights important landmarks, buildings and townscape features and contributes towards way-finding and city legibility.

Living roofs

32. Technological advances make living roofs an attractive option and their use is encouraged wherever appropriate. These are positive in terms of rainwater run-off attenuation, biodiversity and visual amenity, a particularly important consideration where the roof plane is overlooked or visible from key public spaces. Green roofs and living walls can also assist in moderating extreme temperatures and enhancing air quality.

33. Mixed sedum roofs incorporating selected wild flower types should be considered.

34. Where green roofs and walls are proposed, a maintenance plan will be sought, to ensure they are kept in good order throughout the life of the development.

Eaves and verge details

35. The majority of historic buildings have simple eaves details. A large overhang is associated with thatched roofs whereas slate commonly has little overhang with

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fascia boards small or absent. Slate clad verges are locally distinctive and require no maintenance.

36. Designers of new developments should demonstrate how locally distinctive detailing such as this has influenced a proposal.

37. For further guidance on development in the historic environment please see Section 6 and APPENDIX 4.

Rainwater goods

38. In historic contexts the traditional materials should be respected, in the TTV area this has traditionally been cast iron and the most common gutter profiles half round or ogee.

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Contents

APPENDIX 3: Shop fronts, including ATMs 2
Shop fronts and ATMs 2
Fascia and pilasters 3
Cornice 5
Stall riser 5
Windows and displays 5
Doors 7
Blinds and canopies 7
ATMs and security 8
Historic shop fronts 9
Plymouth City Centre shop fronts 9

Table of figures

Figure 1: Traditional shop front elements 3
Figure 2: Modern shop fronts showing good and poor examples of shop front design 4
Figure 3: How to design a false ceiling without increasing fascia depth 5
Figure 4: Shop front with active ground floor 6

DRAFT

APPENDIX 3: Shop fronts, including ATMs

Shop fronts and ATMs

1. Shop fronts, advertisements and ATMs play a key role in parts of the public realm as they contribute to the character and appearance of the street-scene as well as attracting customers. This section provides specific guidance and is also applicable to other uses such as: banks; estate agents; restaurants; public houses; and other food and drink establishments, etc. Developments should give particular consideration to the robustness of materials and design detailing when considering development of shopfronts.

2. If a shop front is installed, altered, or replaced planning permission will generally be required and may also need separate Advertisement Consent.

3. Shop fronts should not be designed in isolation, but considered as part of the architectural composition of the building. The character of an area should be respected and care needs to be taken to ensure that standard designs are not imposed on areas with distinct architectural, historic or social character. The LPAs will expect corporate styles and branding to be adapted and modified to suit each particular location and will refuse proposals which seek to impose standard, corporate solutions at the expense of distinctive local characteristics.

4. Where existing shop fronts are a distinctive and original element of the building, the LPAs encourage them to be retained, or replicated, using good quality materials.

5. Shop fronts are commonly made up of several different components and it is important to ensure these they work together and are in proportion with the scale and architectural style of the building:

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Figure 1: Traditional shop front elements

Fascia and pilasters

6. The fascia of a shop front provides the backdrop for the shop sign, and the pilasters define the shop width and support the upper floors.

7. The design of a fascia needs to be sympathetic to the shop front and building. If oversized, the fascia will unbalance the elevation composition of the shop front. There should be a visual gap between the top of the fascia and the window sills above:

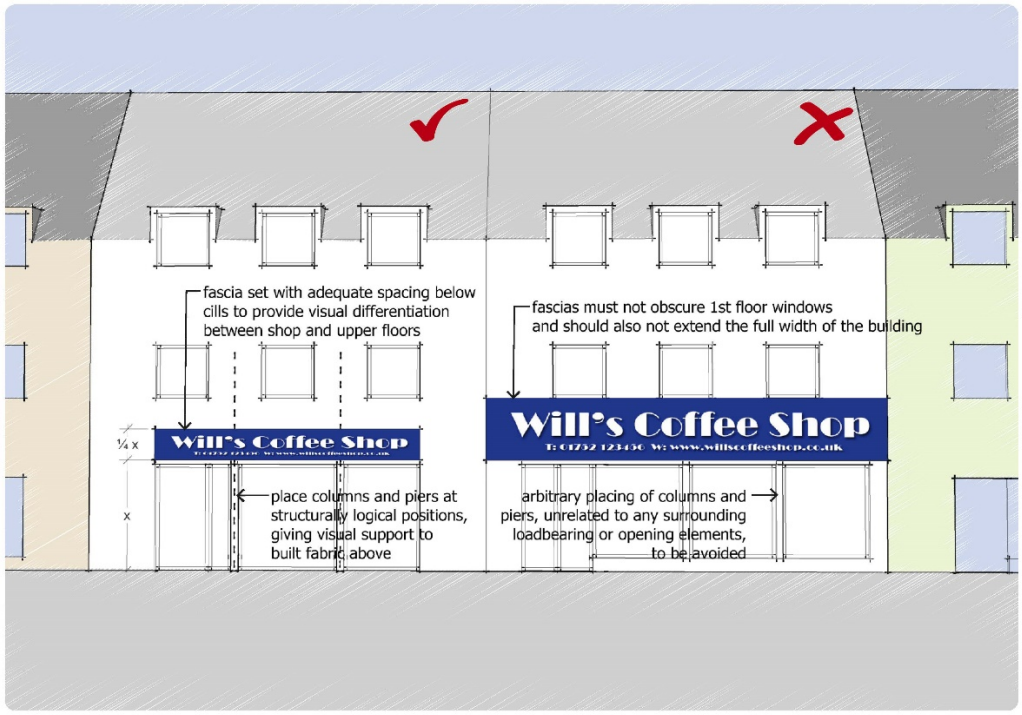

Figure 2: Modern shop fronts showing good and poor examples of shop front design

8. Where the existing shop front would be considered unacceptable according to the above guidelines, the replacement design will be expected to rectify the shop front.

9. Where there is a false ceiling inside a shop, it will not be acceptable to increase the height of the fascia in line with this. The change in level can be dealt with through careful detailing of the shop window itself, for example through transom lights with opaque glass or by setting the false ceiling back within the shop:

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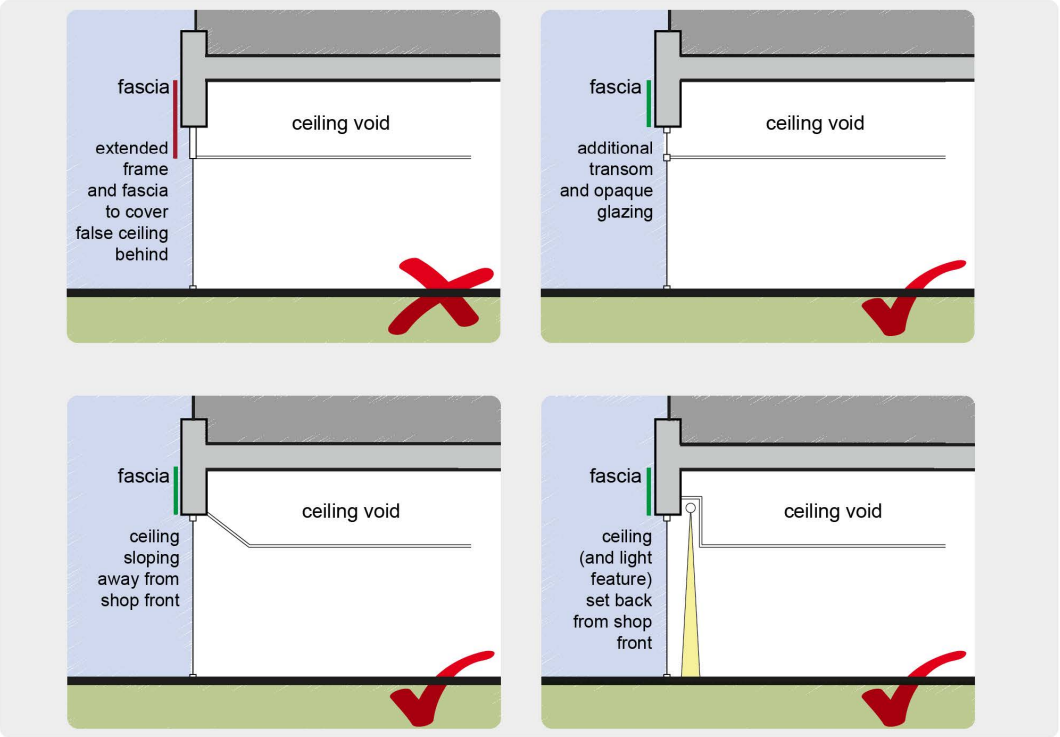

Figure 3: How to design a false ceiling without increasing fascia depth

Cornice

10. The cornice is a horizontal molding featured in some traditional shop fronts. It serves a practical purpose and also provides a visual break between the shop front and the upper floors. A cornice may be applied to a modern building and can be useful in providing an upper frame to the fascia and shop sign. Fascia signs should not obscure a cornice when it is a feature of the building and/or the street frontage.

Stall riser

11. The stall riser anchors the shop front to the ground. Shop fronts with no stall riser may appear top heavy. The design of the stall riser should reflect the character of the area. Where there is a common height or material used, this should be replicated and/or preserved.

Windows and displays

12. Interior signage that can be seen from the highway may require permission. The LPAs will encourage traders to ensure window displays assist in an attractive street-scene, even if the shop does not have goods to display. The appearance of above-ground windows should also be given attention, where windows serve as storage areas traders should consider introducing display windows or obscuring windows so that storage is not visible.

13. Window displays fronting highways should not endanger public safety.

14. The method of subdivision of windows should reflect the scale and style of the building. In general, there is more subdivision in traditional shop fronts than modern shop fronts.

15. A shop front design should ensure that activities within the property can be seen through a substantial proportion of clear glazed windows to enliven the street scene and promote natural surveillance, although it is acceptable for part of the shop front to include a window display area.

16. A minimum of two thirds of the shop front should be clear glazed to provide an active frontage (as illustrated below). However, each proposal will be considered on its own merits, taking into account the prominence of the shop front, its position in the street, the amount of existing ground floor frontage in the area, and the width of the shop front.

Figure 4: Shop front with active ground floor

17. A planning condition may be attached to require the ground floor commercial windows, or specified windows, to remain as active windows or window displays unobscured by the addition of vinyl or any other obstruction which restricts the visual transparency into and out of the window.

18. High quality materials and finishes are required for all shop fronts. In designing a shop front, consideration should be given to:
    - The sustainability and longevity of materials;
    - Their appropriateness to the character of the area and building;
    - Visual relationship with the upper floor and adjacent buildings (particularly if part of a terrace).

Doors

19. Shop front doors and entrances should meet the specified Building Regulation standards for accessibility: Access to and use of buildings: Approved Document M[1]. Doors must not open over the highway. Recessed entrances that create opportunities for antisocial behavior outside of opening hours should be avoided.

20. In the case of a long shop front, such as for a department store, frequent openings should be provided to keep a vibrant, lively shop frontage.

21. In conservation areas and/or on listed buildings, door furniture (handles, hinges, design) should be appropriate to the character of the door, shop front, building and context.

22. For further guidance on the historic environment please see Section 6. For guidance on historic shop fronts please see below.

Blinds and canopies

23. Blinds or canopies can be useful in protecting goods from direct sunlight, as well as providing shade and shelter to shoppers. They should be designed as an integral part of the shop front and relate satisfactorily to the features of a building and the character of the area and street-scene in both open and retracted state.

24. The following guidelines for blinds and canopies should be followed:
    - A blind/canopy should cover the full width of the shop front between pilasters;
    - A blind/canopy should be made of canvas or similar non-reflective material unless a solid canopy is considered part of the architectural design;
    - In sensitive locations such as conservation areas traditional awning type designs are usually more appropriate than curved ‘Dutch’ blinds;
    - A blind/canopy should sit beneath fascia level and constructed so that when fully open it will not cause obstruction to passers-by;
    - Where a blind or canopy overhangs the public highway, it should have a minimum clearance of 2.4m;

[1] https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m

- Whether modern or traditional, the blind box must be incorporated into the shop design and not simply applied;
- Fixed ‘Dutch’ blinds, the use of plastic and blinds over upper storey windows, basement windows or over doors alone will not normally be acceptable as they can look unattractive and permanently obscure the shop front; and,
- Any lettering/design on the canopy/blinds should not be allowed to dominate it and the style should relate to the design of the whole shop front, especially the fascia sign.

26. Where a shop front blind or canopy overhangs a public highway a licence will be required under the Highways Act.

ATMs and security

27. The installation of a cash machine (ATM) should be considered as an integral part of the design of the shop front, using materials that are sympathetic to the building. It should be well-lit and positioned where there is a sufficient degree of natural surveillance and where users will not impede pedestrian movement. Where cash machines are designed into the facade, only a maximum of one third of the width of the shop front will be permitted to ensure an active frontage, natural surveillance, and to reduce the impact on the visual amenity of the street-scene.

28. Careful thought must be given to the need, design and siting of alarms and CCTV systems, specifically avoiding being sited on architectural features such as pilasters or decorative moldings.

29. In order to maintain active frontages and street-scenes outside of business hours, security should be sensitively designed to ensure minimal visual impact and should be integrated into the design of shop fronts at the outset. Planning permission is unlikely to be granted for external solid or perforated metal shutters and grilles as they present a blank frontage to the street and can be subject to graffiti and vandalism. The following alternative means of security are recommended (in order of preference):
    - Security glass/glazing – this is usually laminated with the capacity to remain intact, even when broken;
    - Internal shutter grilles – these can be fitted discreetly behind the shop window and are retractable. These should be open mesh if feasible;
    - External open mesh grilles – these would be subject to planning and should be incorporated in the shop front design and building. Where possible it should only cover the glazed areas and not the whole shop front. The window display must still be visible and the housing box should be integrated within the shop front (recessed or flushed with the façade).

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Historic shop fronts

30. Shop fronts of listed buildings, in conservation areas, or in other areas with historic character, need to respect the historic setting and it is recommended that this section is read in alongside guidance in Section 6.

31. The height of the fascia should be in proportion to the width of the pilasters and sit below the cornice. Above the pilasters, corbel brackets should be used to frame the fascia and support the cornice.

32. Large undivided areas of glass are not considered in-keeping with traditional shop fronts, and should be avoided. Vertical divisions with mullions, and in some cases horizontal divisions with a transom (a horizontal beam that separates the door from the fanlight or window above it) may be supported.

33. Over-lights are often placed above the door and in some cases the doors are set back from the shop windows. If a setback is needed in a new doorway, this should be no more than 1.5 meters in depth, incorporating sensitive lighting.

34. Traditional fittings should be considered.

35. If historic blinds/awnings (traditionally made of canvas) or a blind box exists then consideration should be given to repairing these or reinstatement.

36. Materials and finishes should be in keeping with the historic character of the building and area. The use of uPVC will not be acceptable on shop fronts of listed buildings, or in conservation areas.

Plymouth City Centre shop fronts

37. The guidance in this section is for Plymouth City Centre only and is in addition to the guidance set out in this appendix. All proposals will also be considered in the context of additional guidance contained within the Plymouth City Centre Masterplan and within the context of the City Centre's conservation area status.

38. Within the conservation area, the LPA will aim to restore and reveal original shopfronts which complement the centre's conservation area status.

39. Stall risers should be designed to take account of floor levels and form a suitable plinth to the shop front, but should not be excessively large. The use of natural stone such as granite, local limestone, Portland Stone or local slate should be used to create a high quality, sustainable, and long-lasting, stall riser. Other materials, such as high quality metal, will be considered if it can be demonstrated that they relate well to the wider building and to the composition of the shop front as a whole.

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40. In many instances fascia and pilasters form part of the original building design are finished in stone. Where possible these original features should be retained. New windows should be inserted within the openings framed by the original fascia and pilasters.

41. The area between the top of the stall riser and bottom of the original fascia must have an overall appearance that is ‘light-weight’. This should be achieved by:
    - Maximising the height of the display windows or glazing;
    - Avoiding the installation of box fascias;
    - Using clerestories (high-level windows) of clear/translucent/obscure glazing or other light-weight treatments to minimise the extent of solid in the frontage; and,
    - Framing elements (glazing bars, door frames, etc.) should form an integral part of the structure of the shop front employing high quality materials. The extent of framing should be minimised to ensure that shop fronts are of a suitable scale.

42. Materials appropriate for framing include metals such as bronze, or stainless steel, or contemporary style timber. Plastic framing will generally not create an appropriate finish.

43. Many buildings have solid canopies between the ground and first floor. These are part of the original building design and provide important shelter. Within solid canopies roller blind boxes for canvas awnings are housed. The use of traditional roller blinds in these positions is acceptable. Where traditional-style canvas awnings are proposed in other locations, the LPA will have regard to the individual characteristics of the building.

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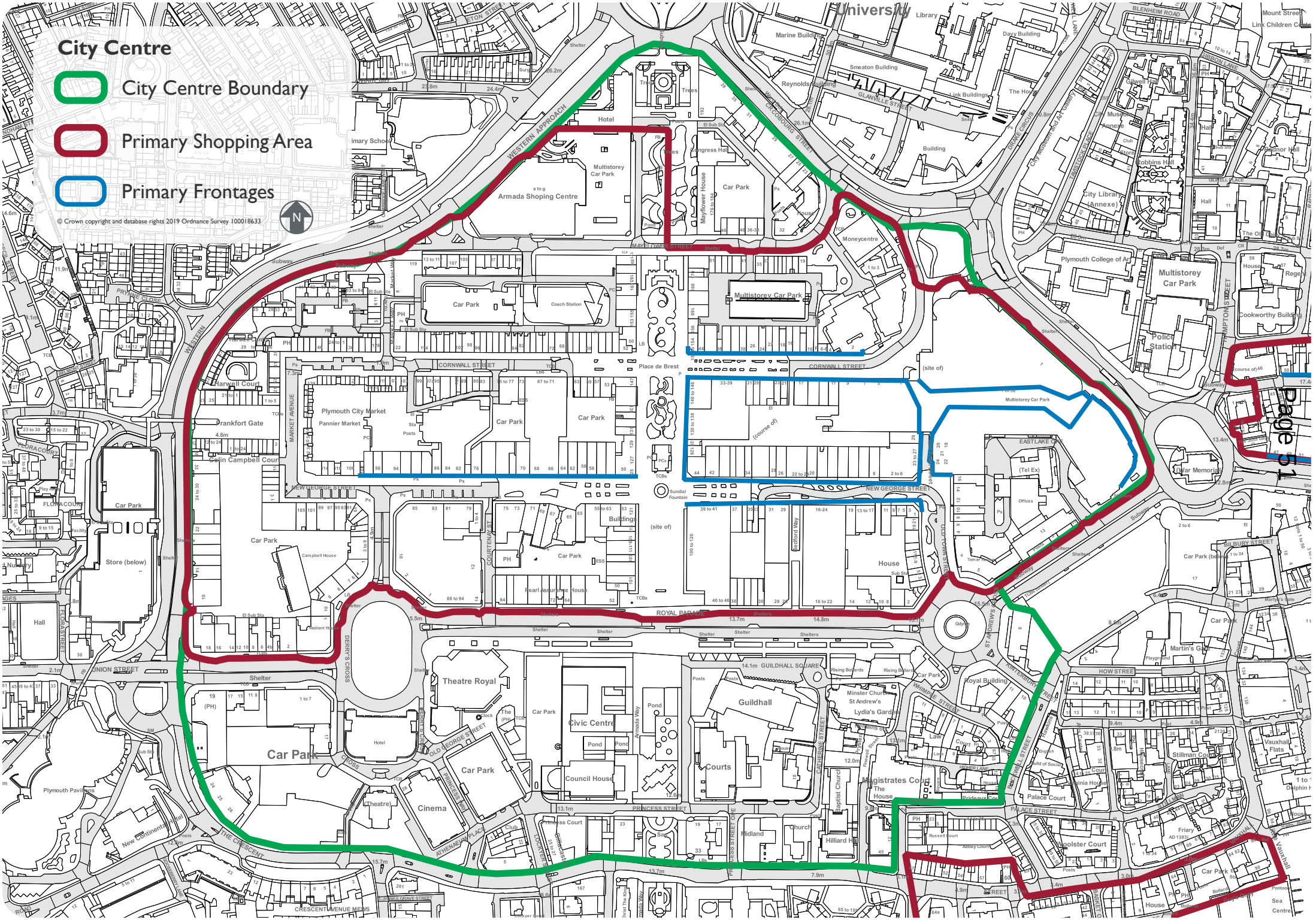
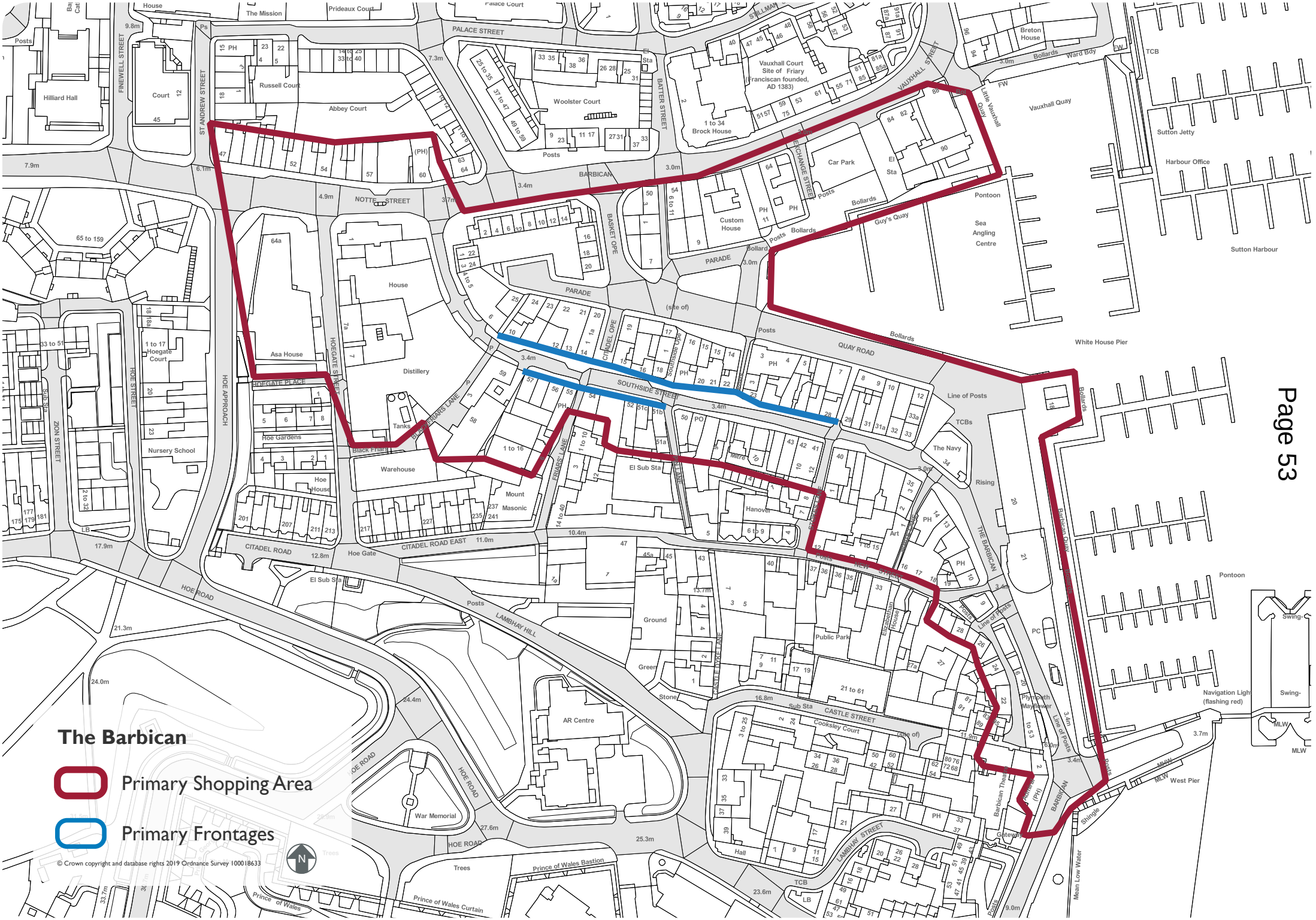

City Centre
City Centre Boundary
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Armada Shoping Centre
Multistorey Car Park
Mayflower House
Car Park
Coach Station
Plymouth City Market
Pannier Market
Harwell Court
Frankfort Gate
Colin Campbell Court
Campbell House
Store (below)
Theatre Royal
Civic Centre
Council House
Guildhall
Courts
Cinema
Hotel
Place de Brest
Sundial Fountain
Moneycentre
Police Station
Cookworthy Building
Plymouth College of Art
City Library (Annexe)
Robbins Hall
Marine Building
Smeaton Building
Reynolds Building
Link Buildings
Davy Building
The House
Library
University
Building
Congress Hall
Trees
Hotel
Offices
House
Buildings
Rearl Assurance House
Minster Church
St Andrew's
Lydia's Garden
Royal Building
Magistrates Court
The House
Palace Court
Woolster Court
Vauxhall Flats
Stillman Court
Martin's Gate
Car Park (below)
Sea Centre
Pontoon
Baptist Church
Midland
Church
Hilliard House
Princess Court
Abbey Court
Russell Court
Friary
AD 1383
Tamar House
Bedford Way
Courtenay Street
Derry's Cross
Old George Street
Princess Street
Princess Square
Princess Street One
Whimple Street
Catherine Street
Armada Way
Looe Street
Gdynia Way
Tothill Avenue
Millbay Road
Western Approach
Western Approach Subway
Market Avenue
Cornwall Street
New George Street
Royal Parade
Union Street
Eastlake Quay
Tavistock Place
Glanville Street
Gibbon Lane
Blenheim Road
Mount Street
Link Children Centre
Gilwell Place
Gilwell Hall
Hall
Hall

Albert Road
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
ROSS STREET
HEALY PLACE
ALBERT ROAD
PYM STREET
154 to 158
30.8m
20.4m
Latitude 52
(1 to 102)
Posts
TCB
LB
PH
Shelter
Trees
Pym Arms
(PH)


The Barbican
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
PALACE STREET
VAUXHALL STREET
BARBICAN
NOTTE STREET
PARADE
QUAY ROAD
SOUTHSIDE STREET
CITADEL ROAD
CITADEL ROAD EAST
HOE ROAD
LAMBHAY HILL
CASTLE STREET
LAMBHAY STREET
HOE APPROACH
HOE STREET
ST ANDREW STREET
FINEWELL STREET
BATTER STREET
EXCHANGE STREET
BASKET OPE
CITADEL OPE
HOEGATE STREET
HOEGATE PLACE
FRIARS LANE
ST LANE
CASTLE DYKE LANE
ZION STREET
THE BARBICAN
Vauxhall Quay
Sutton Harbour
White House Pier
Sutton Jetty
Harbour Office
Guy's Quay
Sea Angling Centre
Pontoon
Custom House
Car Park
Vauxhall Court Site of Friary (Franciscan founded, AD 1383)
Woolster Court
Abbey Court
Russell Court
Prideaux Court
The Mission
Hilliard Hall
Court
Asa House
Distillery
Warehouse
Nursery School
Hoe Gardens
Hoe House
Mount Masonic
Black Friars
Tanks
Public Park
Ground
Green
Stone
AR Centre
War Memorial
Trees
Prince of Wales Bastion
Prince of Wales Curtain
Prince of Wales
Cooksley Court
Barbican Theatre
Gateway
Plymouth Mayflower
Navigation Light (flashing red)
West Pier
Shingle
Mean Low Water
Swing-
MLW
Page 53

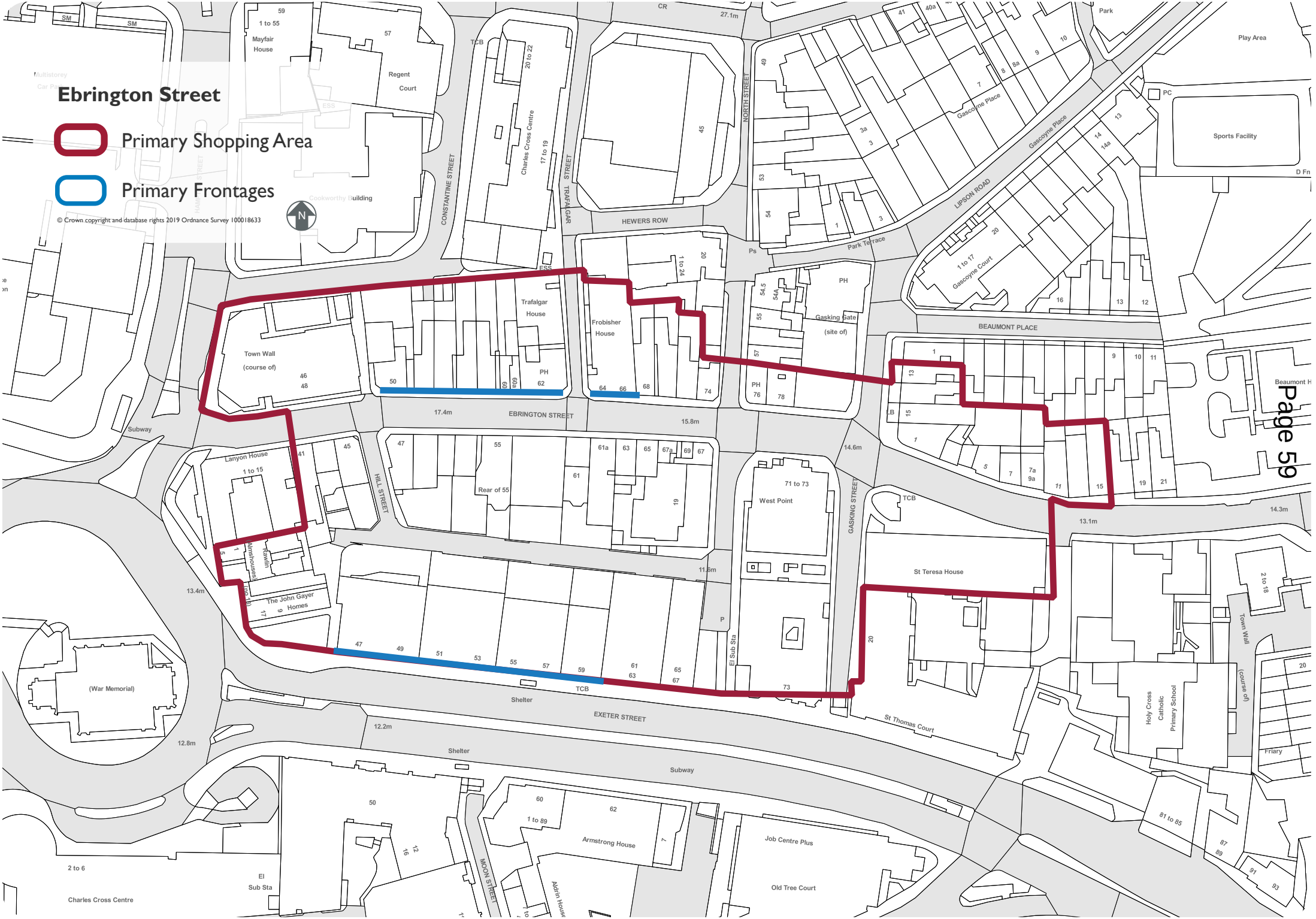
Issues
Chaddlewood
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
CAMPION
CLOSE
Childrens
Nursery
BRANSON
Chaddlewood
PO
LB
GG
El Sub Sta
Skatepark
12
14
1
18
17
2
25
24
12
24
18
El Sub
14
12
10
86
92
98
100

Colebrook
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
COLEBROOK ROAD
COLEBROOK
LINKADELLS
GLEN ROAD
Cycle Tk
Footpath
Island Cottage
Stonehaven
Moss Lodge
Cliff Cottages
Toopes
Garage
Leeds House
Leeds Cottages
Lilac Cottage
Colebrook Inn (PH)
Colebrook Methodist Church
Nursery Cottages
Greenbank Terrace
Abbott Place
Rose Cottage
Starkwell Lodge
Sparkwell Villas
Sparkwell House
Sandpiper
Hemerdon Lodge
Hemerdon Villas
Toriane Place
Belstone
Summer Hayes
Hazeldene
Redlands
St Hilary
Linkadell Villas
Shiralee
The Orchard
Car Park
L Twr
Depot
Warehouse
8 to 10
Tory Brook
WB
LB
9.8m
12.8m
MP 241.75

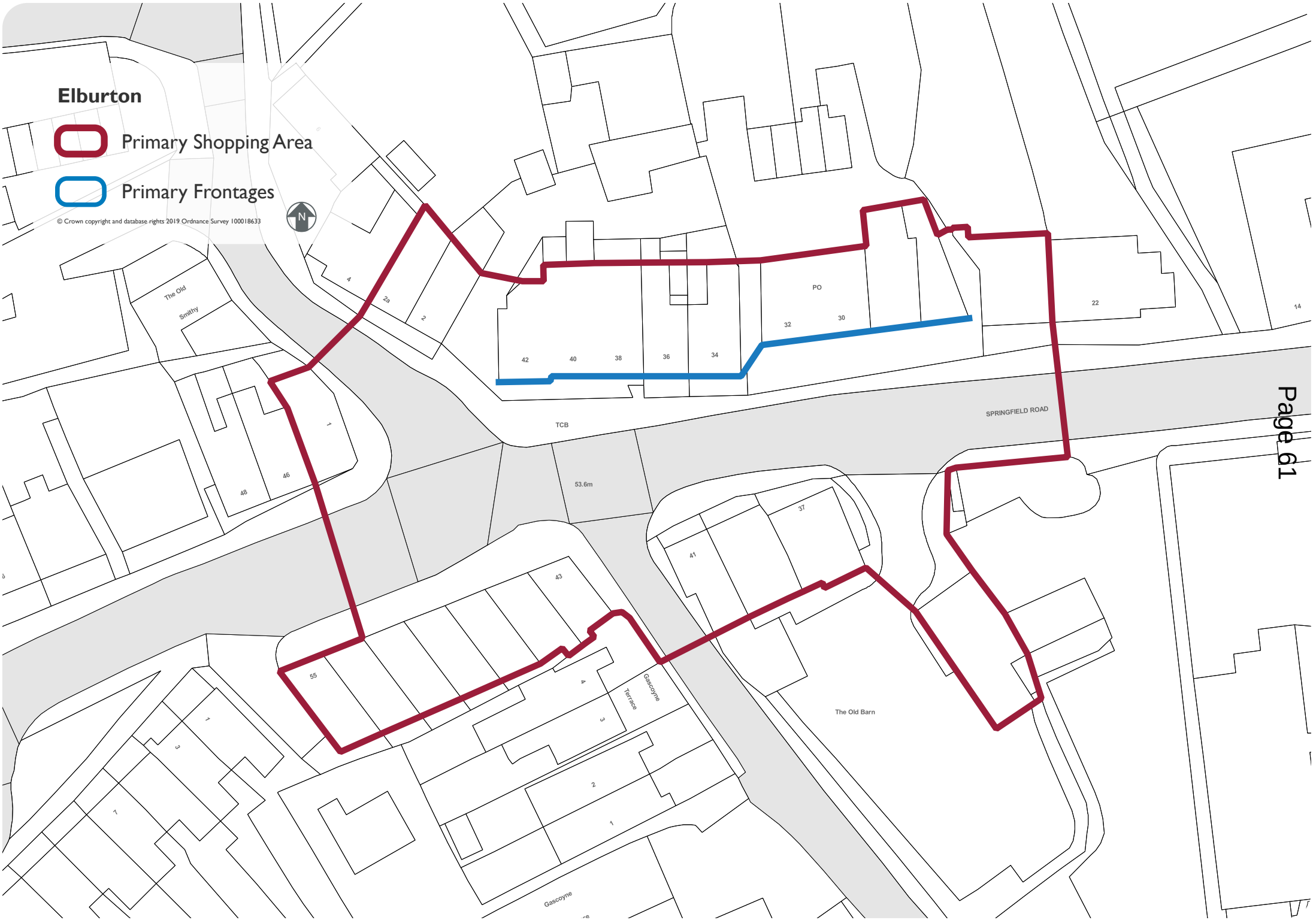
Crownhill
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
CROWNHILL ROAD
Shelter
Subway
Surgery
Car Park
Crownhill Methodist Church
Bank
Plumer House
Ward Bdy
CR
101.8m
102.7m
100.5m
105.0m
98.7m
106.1m
TAVISTOCK ROAD
WHITLEIGH AVENUE
Mast (Telecommunication)
Issues
PC
ALEXANDRA ROAD
MORSHEAD ROAD
Garage
Tamar Hotel (PH)
PO
TCBs
Library
12 to 14
COLERIDGE AVENUE
FORT AUSTIN AVENUE

Cumberland Street
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
CUMBERLAND STREET
DUKE STREET
KER STOPE
Posts
Club
PH
ESS
The
Routeway
Centre
TCB
TCBs
22.6m
21.9m
1 to 17
21
25
31
44
41 to 43
15
10
6
2
20
18
16
12
8
4
19
11
5
3
1

Delamere Road
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
ETL
24
28
32
36
41
55
57
61
63
65
67
71
73
75
LB
25.6m
25.0m
Hall
86

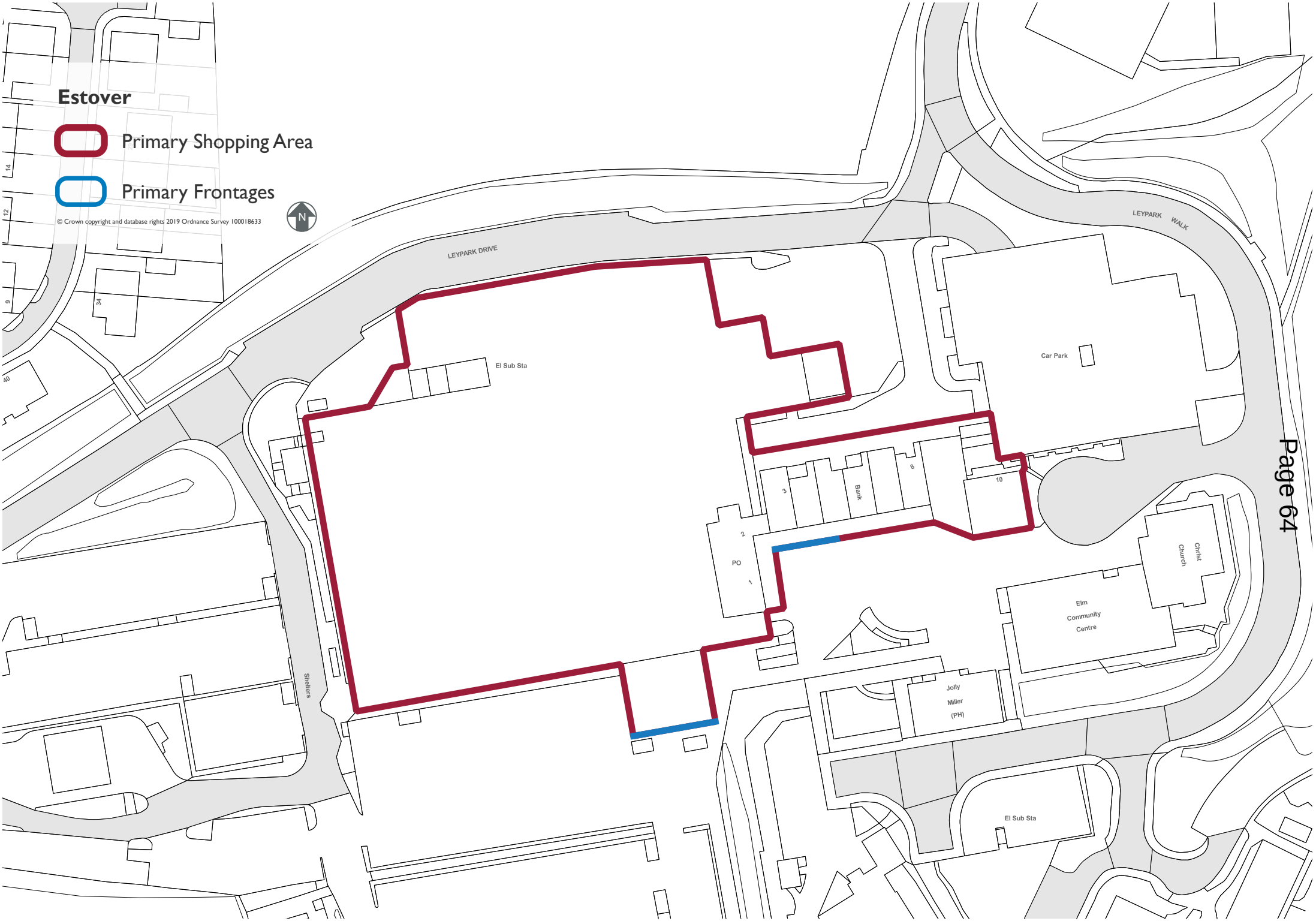

Ebrington Street
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
EBRINGTON STREET
EXETER STREET
HEWERS ROW
BEAUMONT PLACE
LIPSON ROAD
Park Terrace
Gascoyne Place
CONSTANTINE STREET
TRAFALGAR STREET
NORTH STREET
HILL STREET
GASKING STREET
MOON STREET
Mayfair House
Regent Court
Charles Cross Centre
Trafalgar House
Frobisher House
Gasking Gate (site of)
Gascoyne Court
Town Wall (course of)
Lanyon House
Rear of 55
West Point
St Teresa House
St Thomas Court
Holy Cross Catholic Primary School
Armstrong House
Job Centre Plus
Old Tree Court
Aldrin House
The John Gayer Homes
Almshousses
Rawlin
(War Memorial)
Sports Facility
Play Area
Park
Subway
Shelter
TCB
PC
PH
El Sub Sta
Charles Cross Centre
Friary
Page 59

Efford
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
BLANDFORD ROAD
84.1m
Shelter
88.4m
TCB
LB
PO
Vic
ST PAULS CLOSE
WITHAM GARDENS
YEO CLOSE
WELLAND
TORRIDGE WAY
Library
21 to 27
St Paul's
Shelter
Shelter
Tank
El Sub Sta
78.3m
205
213
210
194
214
224
234
Page 60

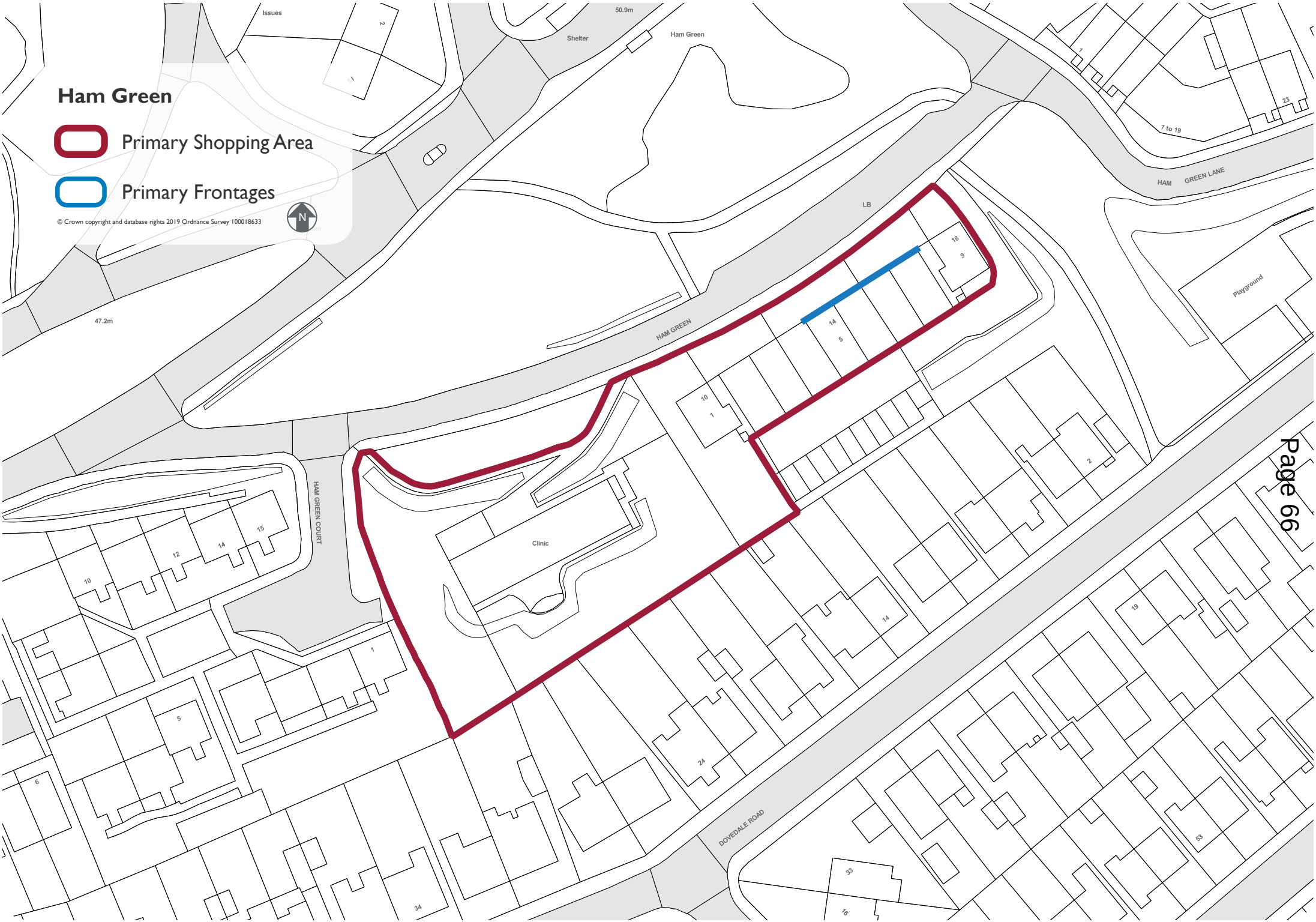

Elburton
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
The Old Smithy
4
2a
2
PO
42
40
38
36
34
32
30
22
14
TCB
SPRINGFIELD ROAD
53.6m
1
48
46
37
41
43
55
4
3
2
1
Gascoyne Terrace
The Old Barn
Gascoyne
7
3
1

Embankment Road
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
LAIRA STREET
HIGHER STERT TERRACE
LAIRA PLACE
EMBANKMENT ROAD
EMBANKMENT ROAD LANE SOUTH
COTEHELE AVENUE
TINTERN AVENUE
COLLINGWOOD AVENUE
ST LEONARD'S ROAD
Surgery
Shelter
Bank
Club
LB
TCB
17.1m
17.7m
18.9m
14.6m

Ernesettle
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
1 to 12
Drake Court
HORNCHURCH LANE
LB
PO
Liby
Trees
Shelter
21.6m
72
70
38
40
8
18
20
12
7
15
5
11a
3
11
1
9


Estover
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
LEYPARK DRIVE
LEYPARK WALK
El Sub Sta
Car Park
Bank
PO
Christ Church
Elm Community Centre
Jolly Miller (PH)
Shelters
El Sub Sta

Glenholt
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
32
5
3d
PO
3a
LB
Shelter
23
22
21
10
2
5
4
25
27
31


Ham Green
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Issues
Shelter
50.9m
Ham Green
HAM GREEN LANE
7 to 19
LB
HAM GREEN
47.2m
Playground
Clinic
HAM GREEN COURT
DOVEDALE ROAD

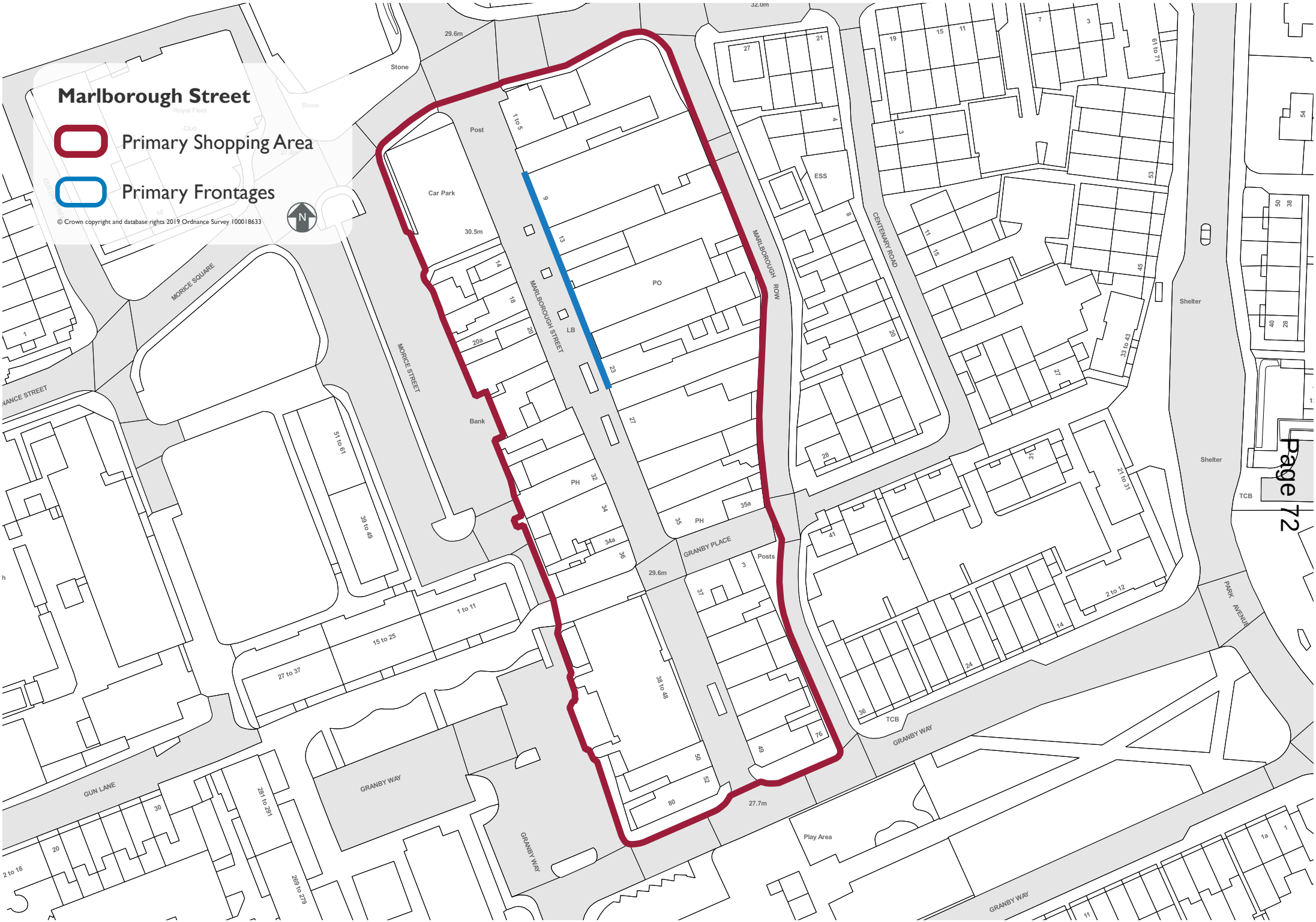
Higher Compton
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
BRYNMOOR WALK
Gas
Distribution Sta
HOLLYCROFT ROAD
INGTON ROAD
137
El
Sub Sta
133
135
74.1m
72.5m
Shelter
146
148
147
147a
149
151
153
TCB
76.2m
71.6m
71.6m
Shelter
INGRA ROAD
PH
PO
LB
73.2m
Shelter
Stone
Compton Methodist Church
11a
15
Page 67

Honicknowle Green
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
GUY MILES WAY
HONICKNOWLE GREEN
1
to
25
LB
Youth
Centre
Trees
94
88
84
76
72
Page 68

Hooe
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
HOOE ROAD
Shelter
El Sub Sta
Hooe Primary School
20
2
40
42
44
7
26
8
28
10
32
14
16
34
18
43b
45a
45c
43a
45
45b

Hyde Park Road
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
LANGHILL RD
Sewell Court
Hyde Park Social Club
El Sub Sta
47.6m
HYDE PARK ROAD
COLLEGE PARK PL
Lodge
Hyde Park Junior School
Hyde Park Infants School
50.6m

Leigham
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Thurlestone
Walk
Hall
Vicarage
67
Surgery
2
12
73
137
101
99
65
53
33
41
11
9
17
1
31
29
27
26
23
21
25
19
LB
Ps
The Windmill
(PH)
Subway
Shelter
BAMPTON ROAD
63
61
2
12
11
16


Marlborough Street
Primary Shopping Area
Primary Frontages
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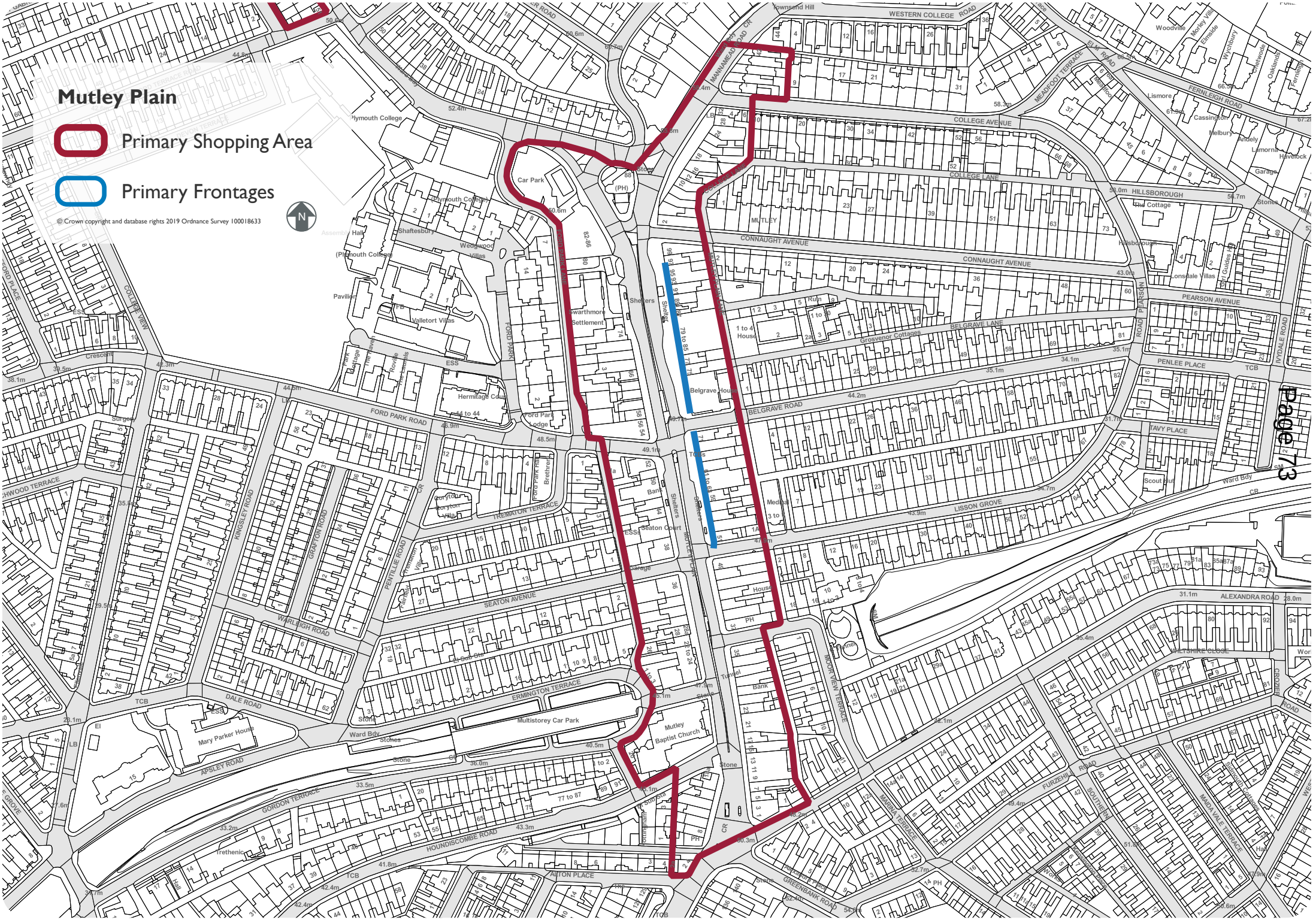
N
MARLBOROUGH STREET
MARLBOROUGH ROW
MORICE SQUARE
MORICE STREET
CENTENARY ROAD
GRANBY PLACE
GRANBY WAY
GUN LANE
PARK AVENUE
Car Park
Post
Bank
PO
PH
LB
ESS
Shelter
TCB
Play Area
Posts
Stone
29.6m
30.5m
27.7m
32.0m
1 to 5
9
13
23
27
14
18
20
20a
32
34
34a
35
35a
36
37
38 to 48
49
50
52
76
80
51 to 61
39 to 49
1 to 11
15 to 25
27 to 37
281 to 291
269 to 279
2 to 18
30
20
1
19
15
11
7
3
21
27
4
8
28
29
31
33 to 43
41
45
53
61 to 71
54
50
38
40
28
2 to 12
14
24
1a
11


Mutley Plain
Primary Shopping Area
Primary Frontages
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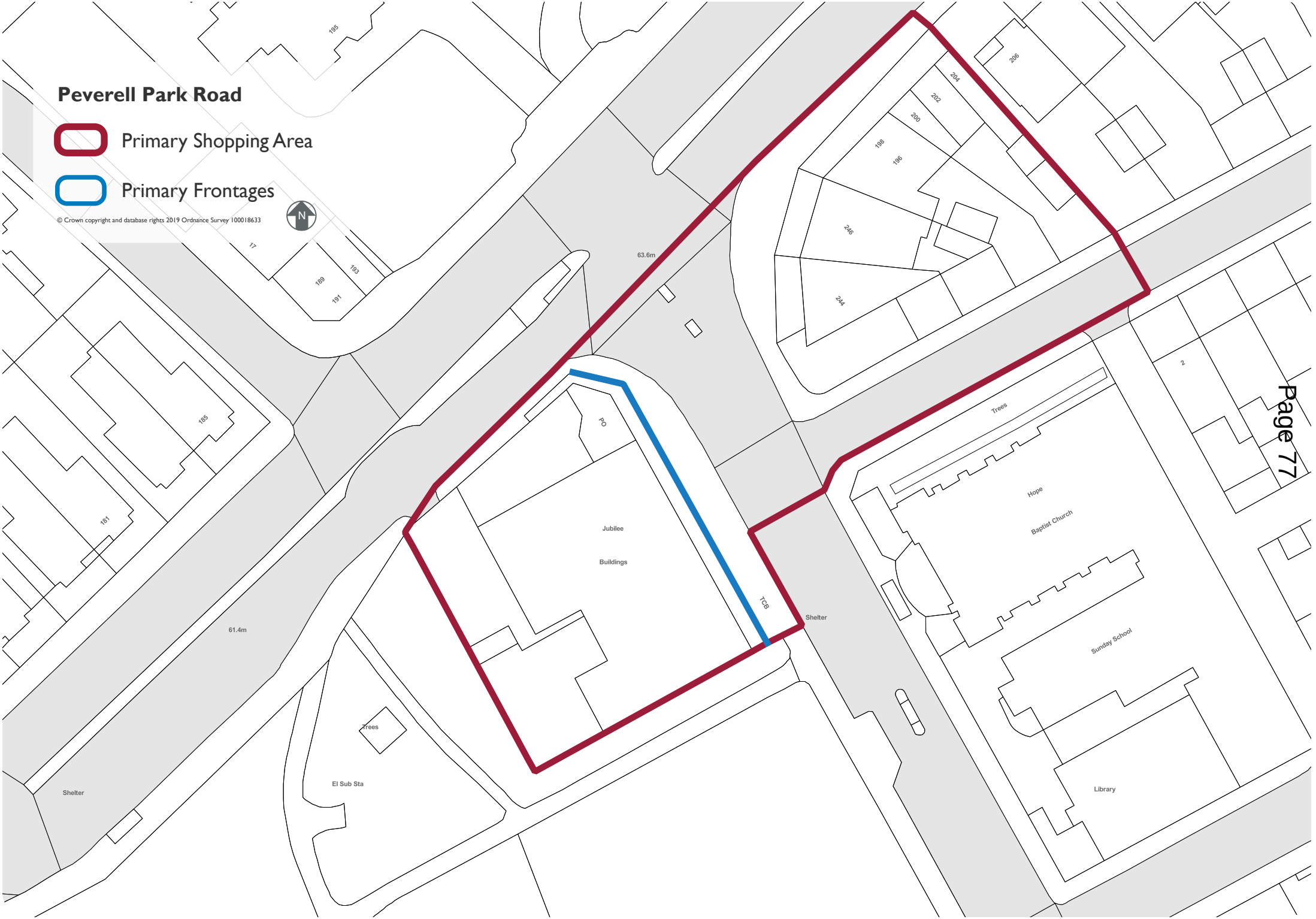
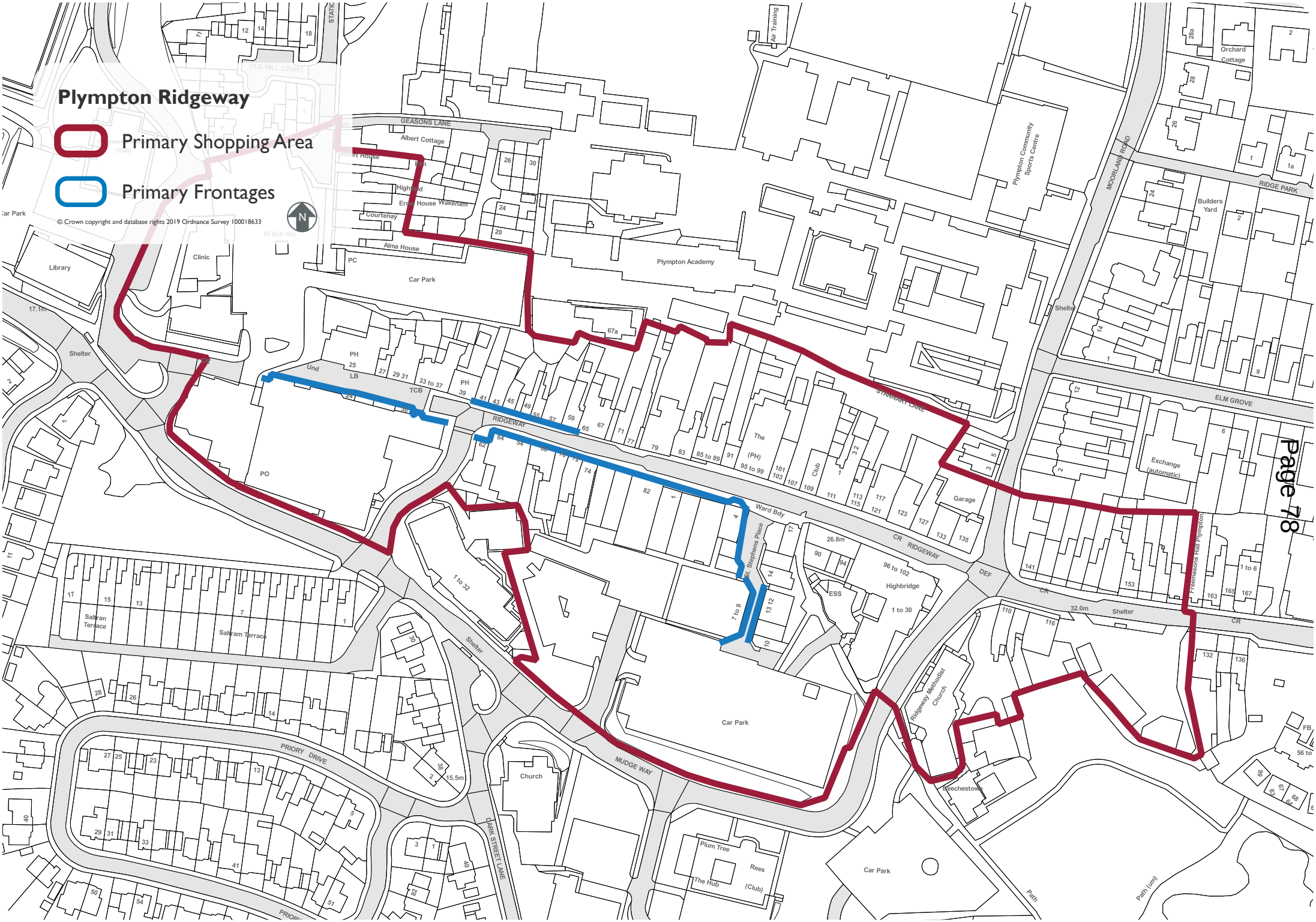
N
Plymouth College
Car Park
Shaftesbury
Wedgwood Villas
Pavilion
Valletort Villas
Swarthmore Settlement
Hermitage Court
Ford Park Lodge
Townsend Hill
WESTERN COLLEGE ROAD
MANNAMEAD ROAD
COLLEGE AVENUE
COLLEGE LANE
MUTLEY
CONNAUGHT AVENUE
HILLSBOROUGH
Thd Cottage
Hillsborough
Lonsdale Villas
PEARSON AVENUE
WYDALE ROAD
Grosvenor Cottages
BELGRAVE LANE
Belgrave House
BELGRAVE ROAD
PENLEE PLACE
TAVY PLACE
Scout Hut
LISSON GROVE
ALEXANDRA ROAD
WILTSHIRE CLOSE
MEADFOOT TERRACE
FERNLEIGH ROAD
Woodville
Morley Villa
Elmside
Wyncbury
Glenwood
Oaklands
Fernleigh
Lismore
Cassington
Melbury
Amdely
Lamorna
Havelock
Garage
FORD PARK ROAD
Bretheneck
Fremeron
Fremeron Villa
Bank
Seaton Court
SEATON AVENUE
TREMATON TERRACE
ERMINGTON TERRACE
Multistorey Car Park
Mutley Baptist Church
Medical
House
PH
MOORVIEW TERRACE
Tunnel
Mary Parker House
DALE ROAD
APSLEY ROAD
GORDON TERRACE
HOUNDISCOMBE ROAD
Trethenic
AUTON PLACE
GREENBANK ROAD
Patterson Place
MARINA TERRACE
FURZEHILL ROAD
SOUTHERN
MARINAVALE TERRACE
CROZIER ROAD
KINGSLEY ROAD
GRAFTON ROAD
WARLEIGH ROAD
PENTILLE ROAD
COLLEGE VIEW
Crescent
HOOD TERRACE
Stores
Shelters
Ward Bdy
Toilets
Ramp
Run
1 to 10
1 to 4 House
3 to 5
1 to 24
2 to 24
1 to 2
77 to 87
79 to 85
44 to 44
99 to 91
93 to 83
81 to 69
67 to 57
55 to 51
TCB
ESS
LB
CR
PH
El
Hall
Garage
Stone
Ward Bdy
Shelters
Toilets
Ramp
Run
1 to 10
1 to 4 House
3 to 5
1 to 24
2 to 24
1 to 2
77 to 87
79 to 85
44 to 44
99 to 91
93 to 83
81 to 69
67 to 57
55 to 51
TCB
ESS
LB
CR
PH
El
Hall
Garage
Stone

North Prospect
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
El
Sub
Sta
117
33
48.6m
2
102
113
111
48
Shelter
NORTH PROSPECT ROAD
Larks
Childrens
Centre
99
101
92
61
93
91
59
BEACON PARK ROAD
46.3m
LB

Oreston
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
1 to 19 (odd)
ESS
WOBURN TERRACE
PW
5.5m
ORCHARD CRESCENT
183b
183a
183
65
63
164
162
156
169
167
161
154
165
163
157
159a
1
2
4
6
10
3
28
26

Peverell Corner
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
ARK ROAD
WESLEY AVENUE
Wesley Cottages
WESLEY PLACE
Shelter
Shelter
Garage
LB
63.2m
59.5m
54.6m
56.8m
51.8m


Peverell Park Road
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
195
17
189
193
191
63.6m
206
204
202
200
198
196
246
244
185
181
61.4m
PO
Jubilee
Buildings
TCB
Shelter
Trees
Hope
Baptist Church
Sunday School
Library
2
Trees
El Sub Sta
Shelter


Plympton Ridgeway
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
GEASONS LANE
RIDGEWAY
STRAWBERRY LANE
ELM GROVE
RIDGE PARK
MOORLAND ROAD
MUDGE WAY
PRIORY DRIVE
CLARK STREET LANE
Plympton Academy
Plympton Community Sports Centre
Car Park
Library
Clinic
PO
Church
Ridgeway Methodist Church
Freemasons Hall Plympton
Exchange (automatic)
Builders Yard
Orchard Cottage
Albert Cottage
Alma House
Courtenay
Highbridge
Ward Bdy
St Stephens Place
Saltram Terrace
Shelter
Beechestowe
Plum Tree
The Hub
Rees
(Club)
Garage
ESS
Page 78

Plymstock Broadway

Primary Shopping Area

Primary Frontages

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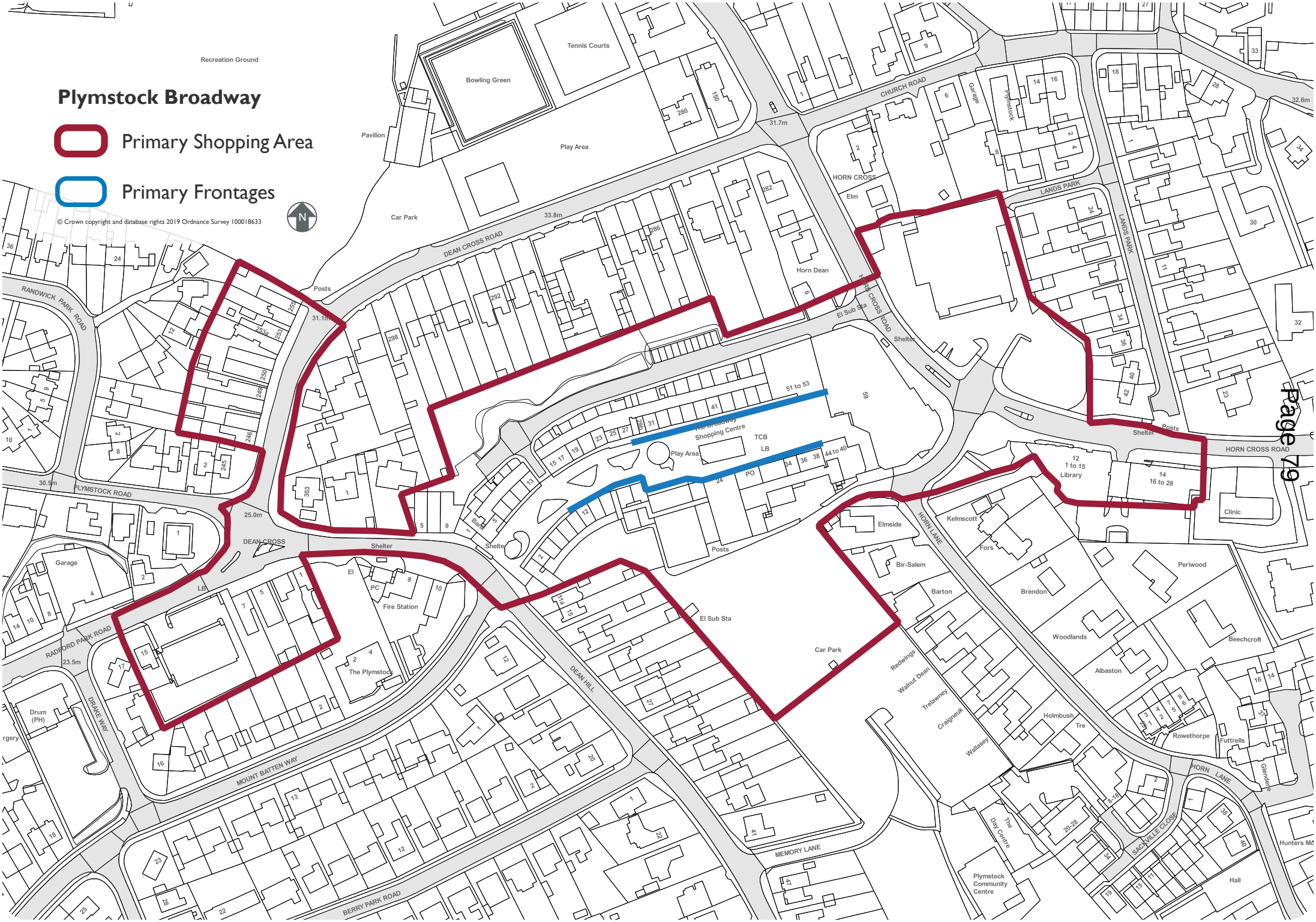
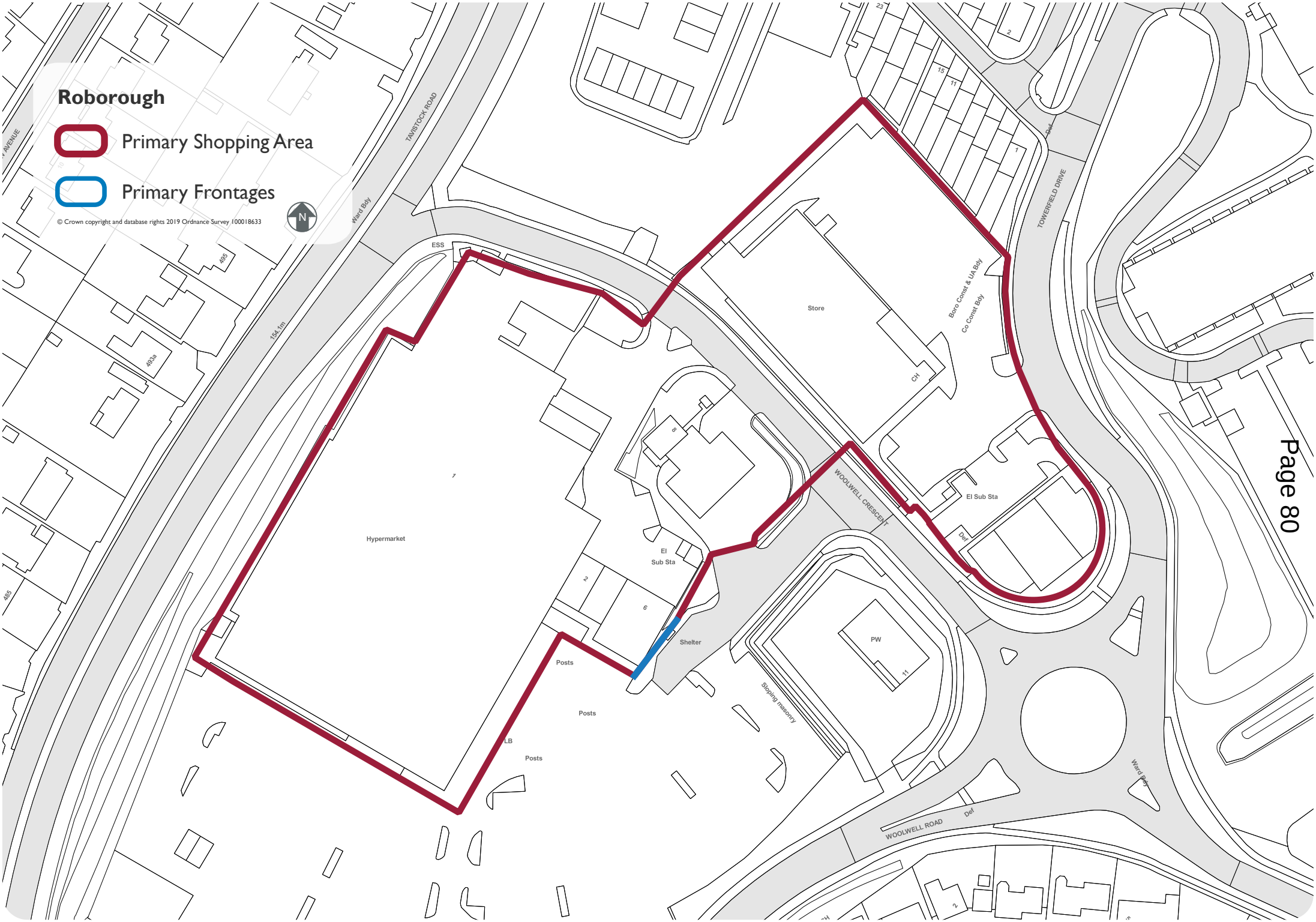
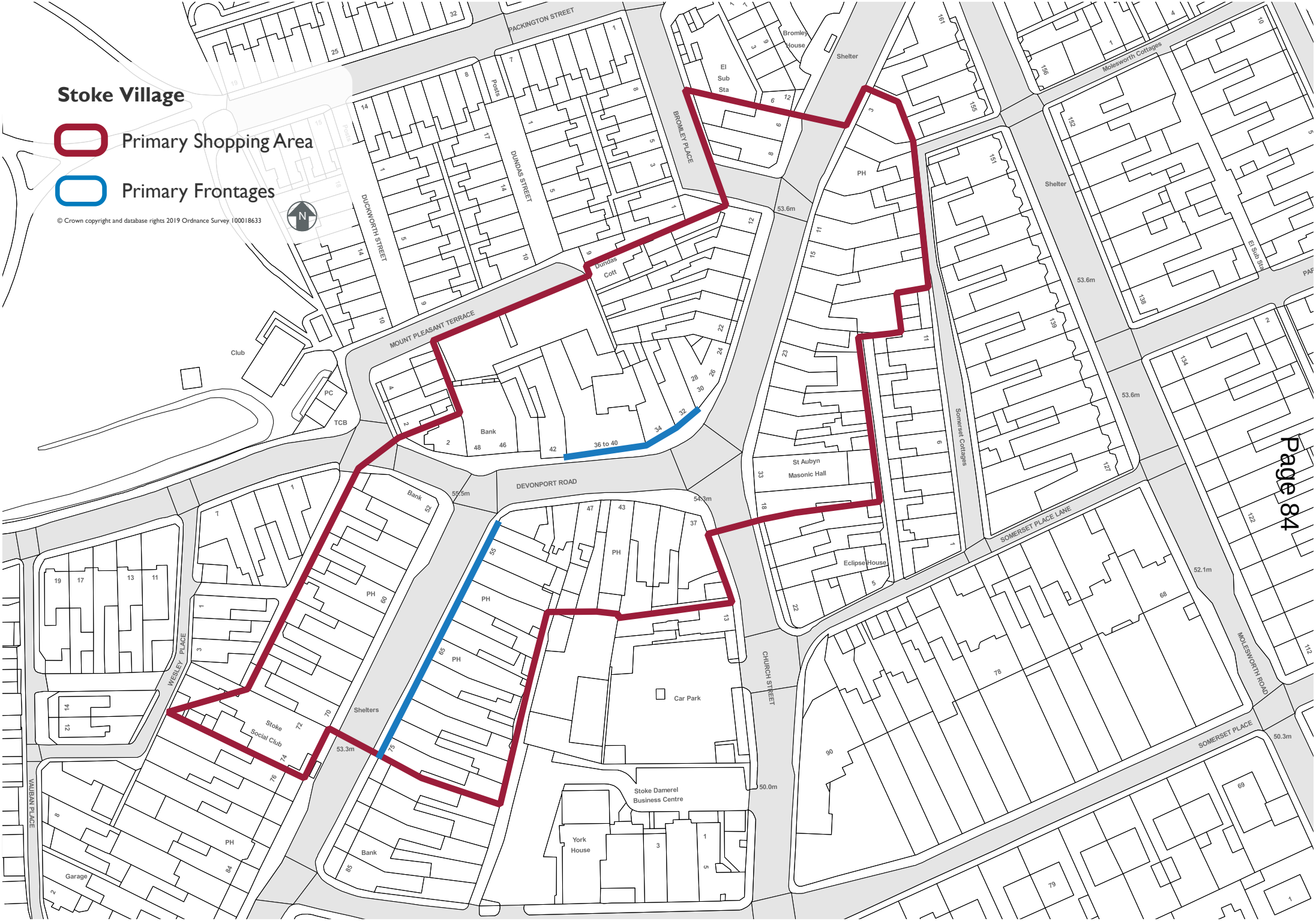



Roborough
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
TAVISTOCK ROAD
Ward Bdy
ESS
154.1m
493a
495
Hypermarket
Store
Boro Const & UA Bdy
Co Const Bdy
CH
TOWERFIELD DRIVE
WOOLWELL CRESCENT
El Sub Sta
El
Sub Sta
Shelter
PW
Posts
Posts
Posts
LB
Sloping masonry
WOOLWELL ROAD
Def
Ward Bdy

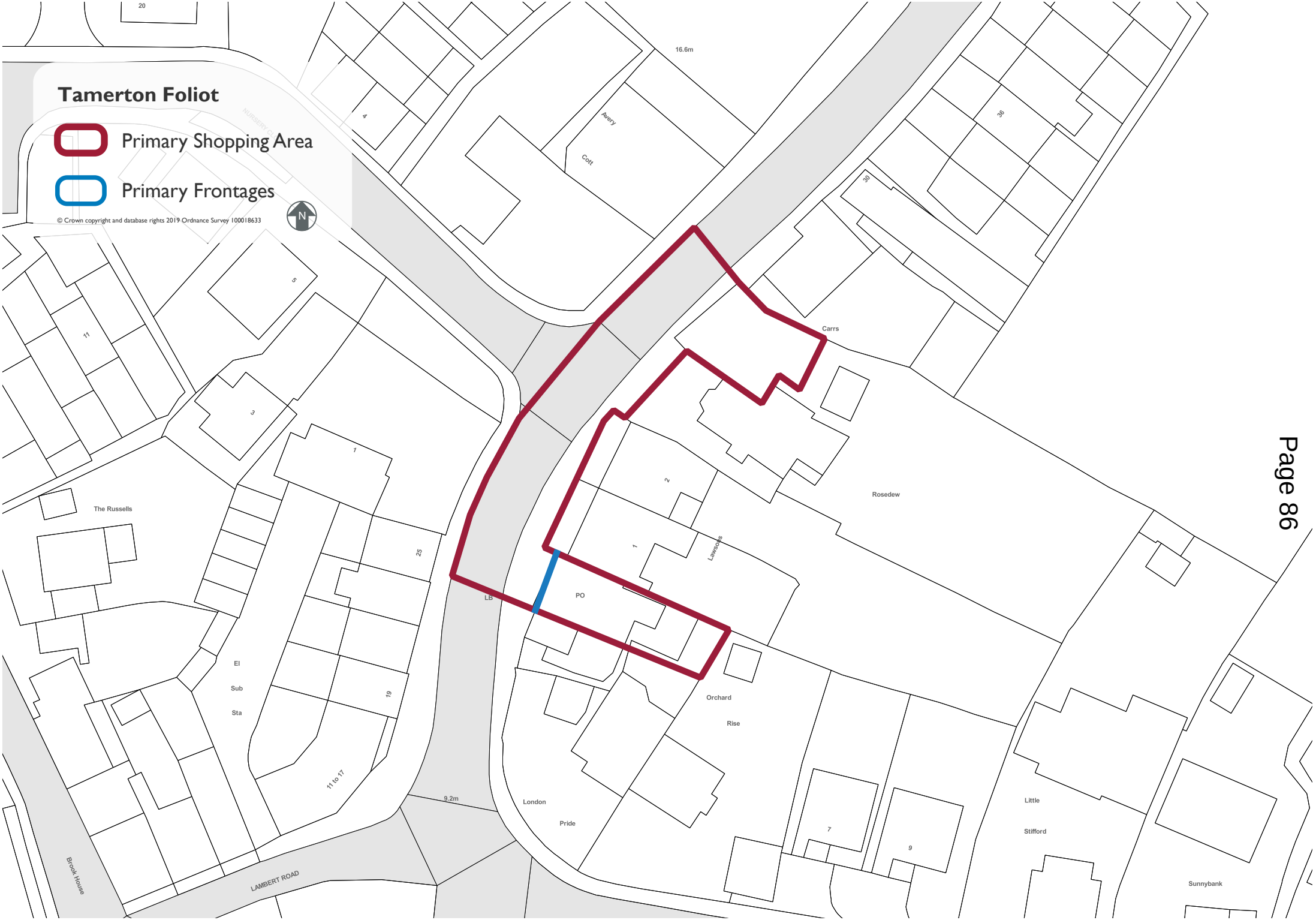
Salisbury Road
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
CECIL AVENUE
CRAVEN AVENUE
32.6m
31.1m
Club

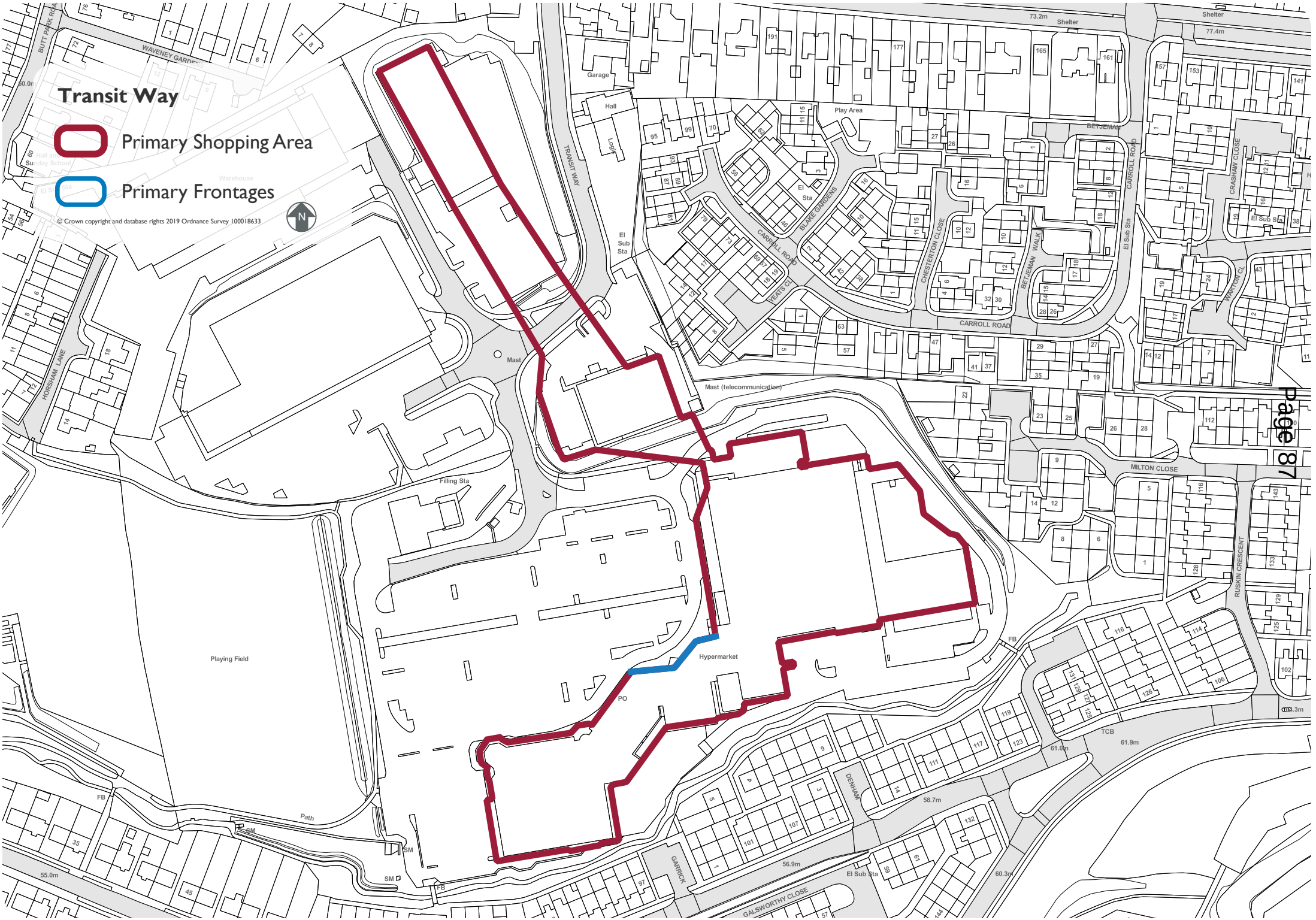
Southway
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
INCHKEITH ROAD
FLAMBOROUGH ROAD
SOUTHWAY DRIVE
Car Park
PO
Library
Clinic
TCB
ESS
LB
PC
Mast
Shelter
Shelters
El Sub Sta
116.4m
114.0m
118.9m
64
66
62 to 56
44
46
40
42
56 to 48
59
49
43
317
295
309
307
305
335
337
375
339
377
341
379
343
381
345
383
347
385
333
373
331
371
329
369
367
325
327
365
321
361
349
351
389
355
353
284
280
270
268
33
2
1
7
8

St Budeaux
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Glencairn
PERCY STREET
St Paul's RC Church
St Boniface Church
El Sub Sta
Shelter
Library
Victoria Road Primary School
Tamar Folk Childrens Centre
COLEBROOK ROAD
TAMERTON AVENUE
CLEARBROOK AVENUE
Tamar House
TRELAWNEY AVENUE
PH
Church
HEYBROOK AVENUE
TRESLUGGAN ROAD
KITLEY WAY
FLETEMOOR ROAD
VINSTONE WAY
Stone
St Budeaux Victoria Road Station
MP 227.0
MP 250.25
Masts
WOLSELEY
WOLSELEY ROAD
Shelters
St Budeaux Ferry Road Station
Community Centre
COLDRENICK STREET
BARNE ROAD
1 to 11
Sports Facility
Play Area
FB
Hall
BRIDGE VIEW
GARDENS
BORINGDON AVENUE
CORONATION PLACE
CARDINAL AVENUE
Garage
LB
SL
PO
ESS
TCB


Stoke Village
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
PACKINGTON STREET
DUCKWORTH STREET
DUNDAS STREET
BROMLEY PLACE
MOUNT PLEASANT TERRACE
DEVONPORT ROAD
SOMERSET PLACE LANE
SOMERSET PLACE
MOLESWORTH ROAD
CHURCH STREET
WESLEY PLACE
VAUBAN PLACE
Molesworth Cottages
Somerset Cottages
Bromley House
El Sub Sta
Shelter
PH
Dundas Cott
Club
PC
TCB
Bank
36 to 40
St Aubyn Masonic Hall
Eclipse House
Car Park
Stoke Damerel Business Centre
York House
Stoke Social Club
Shelters
Garage
53.6m
55.3m
54.3m
53.3m
52.1m
50.3m
50.0m

Stone Barton
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
LB
67
1c
1b
1a
19
15
3
1
7
28

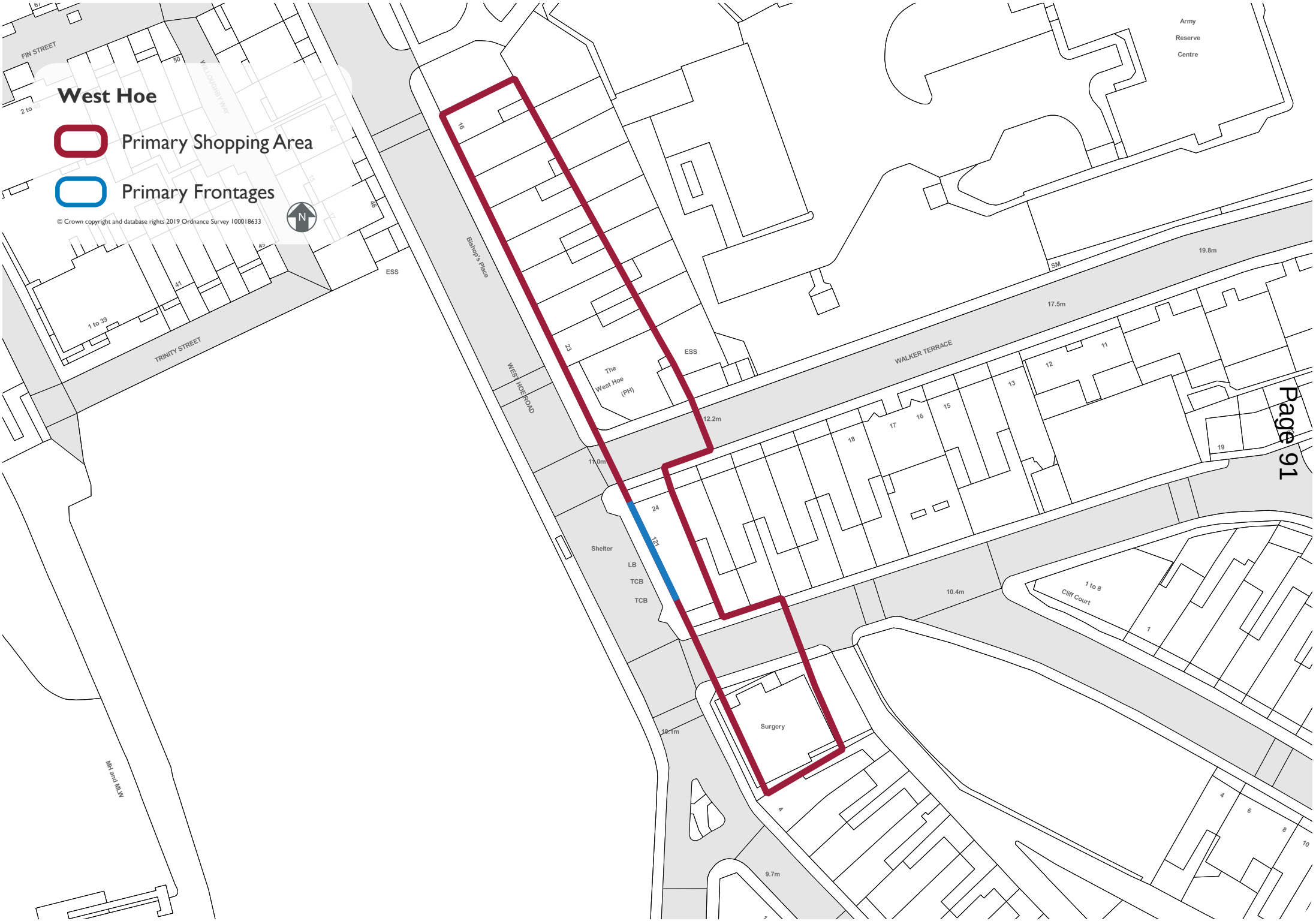

Tamerton Foliot
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
20
16.6m
4
Avery
Cott
36
30
5
11
3
1
Carrs
2
Rosedew
The Russells
25
1
Lawcotts
LB
PO
El
Sub
Sta
19
11 to 17
Orchard
Rise
9.2m
London
Pride
7
9
Little
Stifford
Sunnybank
Brook House
LAMBERT ROAD

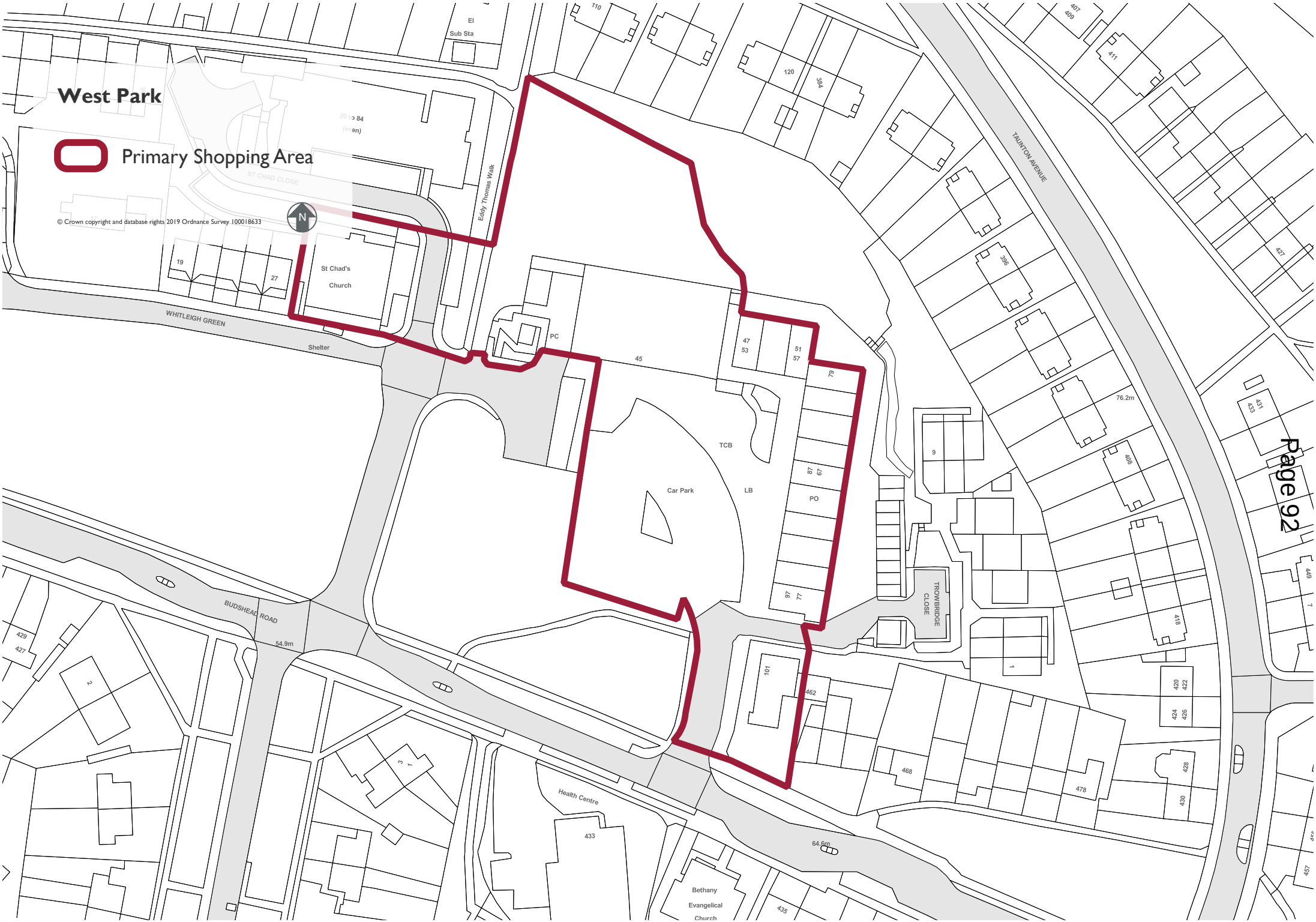

Transit Way
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
TRANSIT WAY
CARROLL ROAD
BLAKE GARDENS
CHESTERTON CLOSE
BETJEMAN WALK
CRASHAW CLOSE
WARTON CL
MILTON CLOSE
RUSKIN CRESCENT
DENHAM
GARRICK
GALSWORTHY CLOSE
HORSHAM LANE
BUTT PARK ROA
WAVENEY GARDE
Hypermarket
Filling Sta
Playing Field
Mast
Mast (telecommunication)
Play Area
Garage
Hall
Shelter
El Sub Sta
PO
TCB
FB
SM
Path
73.2m
77.4m
61.9m
61.0m
58.7m
56.9m
60.3m
55.0m

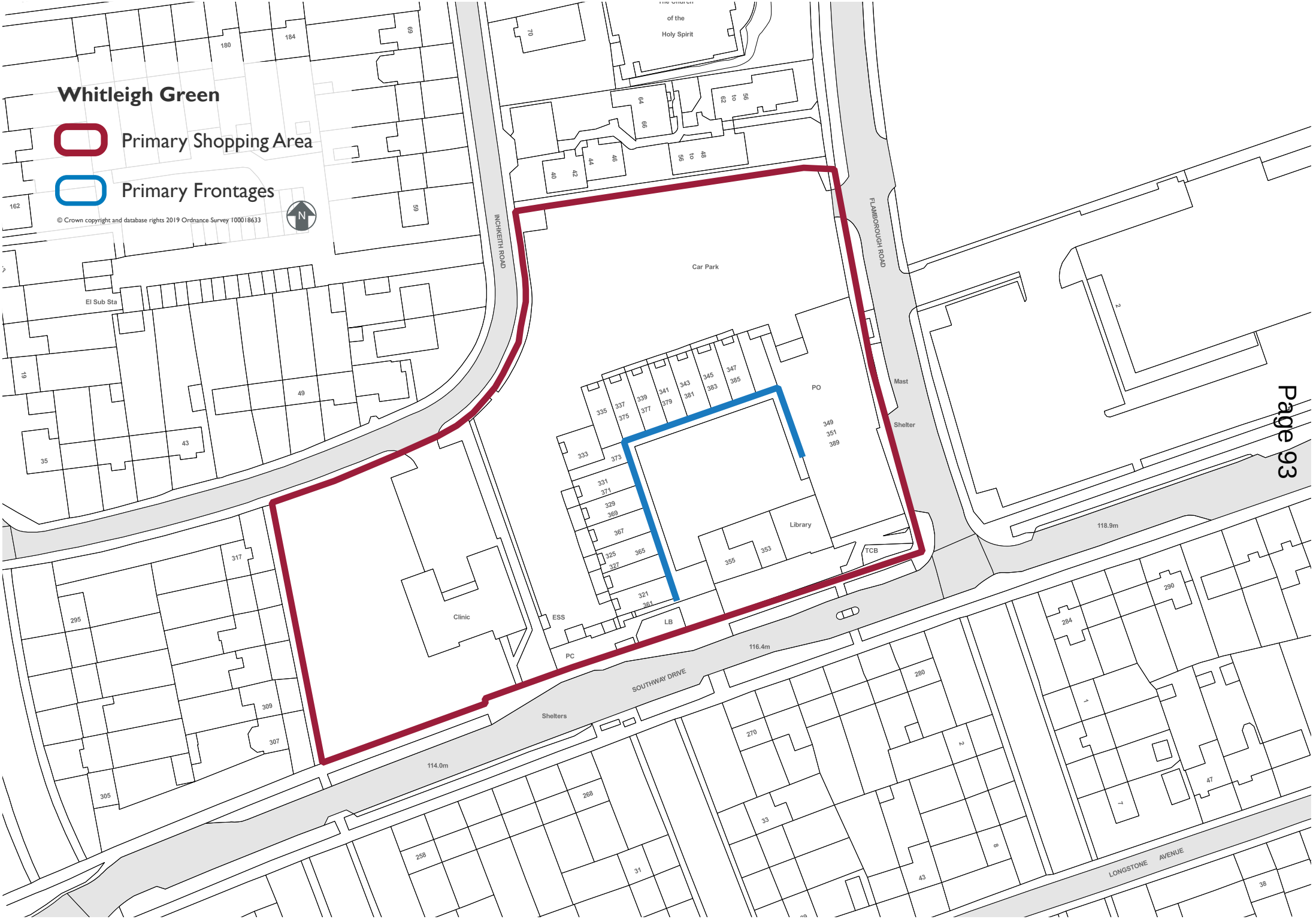
Union Street
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
MARY SEACOLE ROAD
CLARENCE PLACE
ADELAIDE PLACE
BATTERY STREET
ADELAIDE STREET OPP
MANOR STREET
ADELAIDE LANE
UNION PLACE
UNION STREET
ST MARY STREET
PEEL STREET
EAST STREET
GEORGE PLACE
HOBART STREET
PHOENIX STREET
STONEHOUSE
Clarence Court
Athlone House
Valletort House
Childrens Centre
Business Centre
Eleanor House
Brunel House
Factory
Warehouse
Depot
Works
Club
Car Park
Play Area
Sub Sta
PO
LB
TCBs
Shelter
Telecommunication
El Sub Sta
Mast
Posts
PH
Court
Nursery
Surgery
Oxford House
Police Community Office
Sports Centre
Primary School
HIGH STREET
1 to 14
75 to 121
123 to 169
238 to 316
5 to 18
10 to 22
17 to 27
24 to 42
30 to 34
15 to 31
8 to 14
2 to 6
117 to 195
141
131
129
299
301
235
237
Page 88

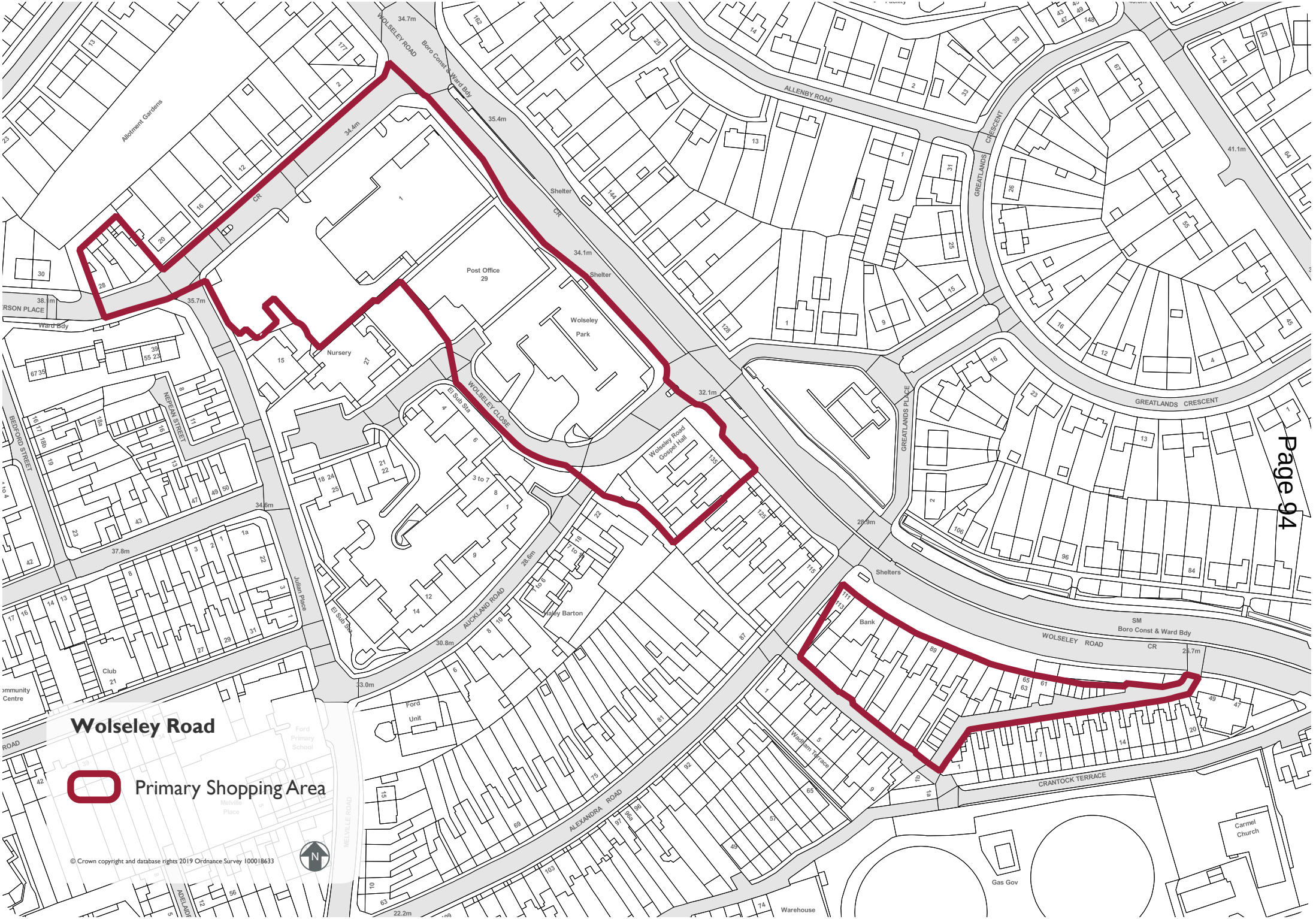
Upland Drive
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
AVENUE
LB
65
71
75
77
77a
79
79a
81
109
El Sub Sta

Victoria Road
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
WESTCROFT ROAD
STIRLING ROAD
IVANHOE ROAD
LYNHER ST
Stirling House
Hall
Methodist Church
The Queen Victoria Masonic Hall
Shelter
Shelter
El Sub Sta
Health Centre
44.5m
40.7m
30
16
5
3
1
111
107
103
8
2
93
15
13
8
1
4
112
100
96
94
1
90
88
50
48
45
44
40
76
1
13
15
17
72
2
14

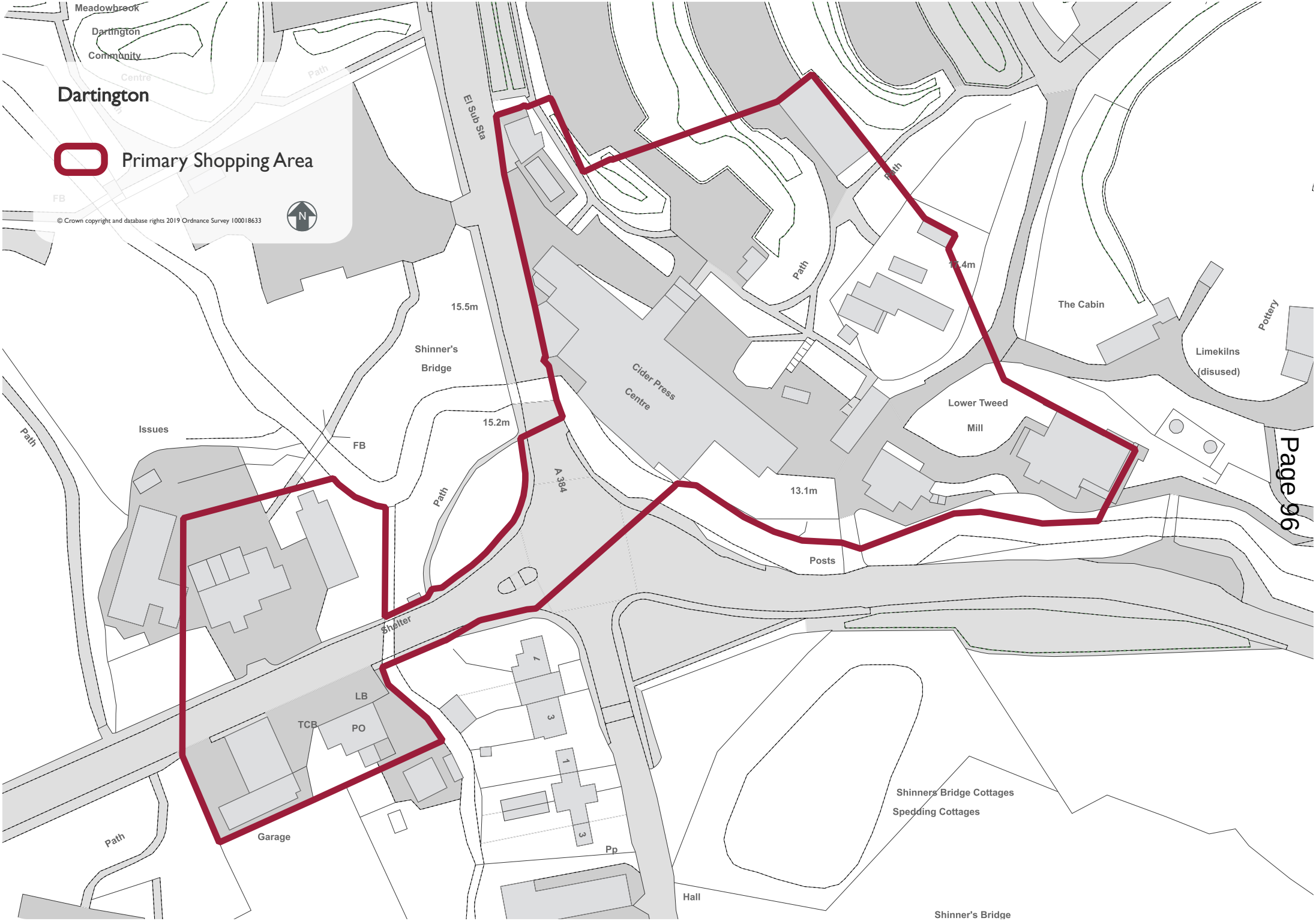

West Hoe
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
FIN STREET
TRINITY STREET
1 to 39
ESS
Bishop's Place
WEST HOE ROAD
WALKER TERRACE
The West Hoe (PH)
Army Reserve Centre
19.8m
17.5m
12.2m
11.0m
10.4m
10.1m
9.7m
Shelter
LB
TCB
TCB
Surgery
1 to 8 Cliff Court
MH and MLW

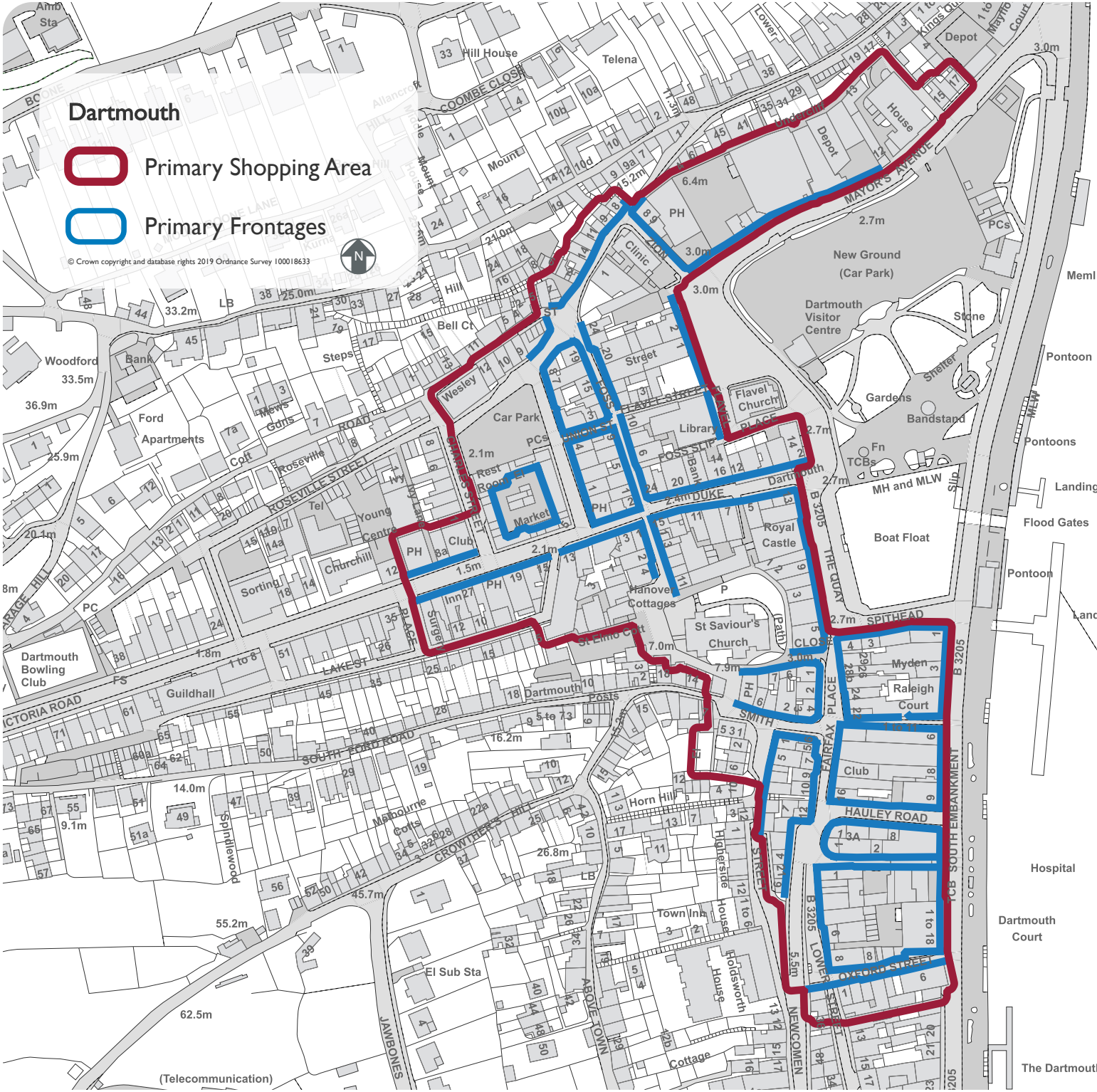

West Park
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
El Sub Sta
ST CHAD CLOSE
Eddy Thomas Walk
St Chad's Church
WHITLEIGH GREEN
Shelter
PC
45
TCB
Car Park
LB
PO
TAUNTON AVENUE
TROWBRIDGE CLOSE
BUDSHEAD ROAD
54.9m
64.6m
76.2m
Health Centre
Bethany Evangelical Church
110
120
384
407
409
411
427
396
431
433
406
449
476
420
422
424
426
428
430
468
478
462
101
19
27
47
53
51
57
79
97
77
9
1
2
3
429
435
457

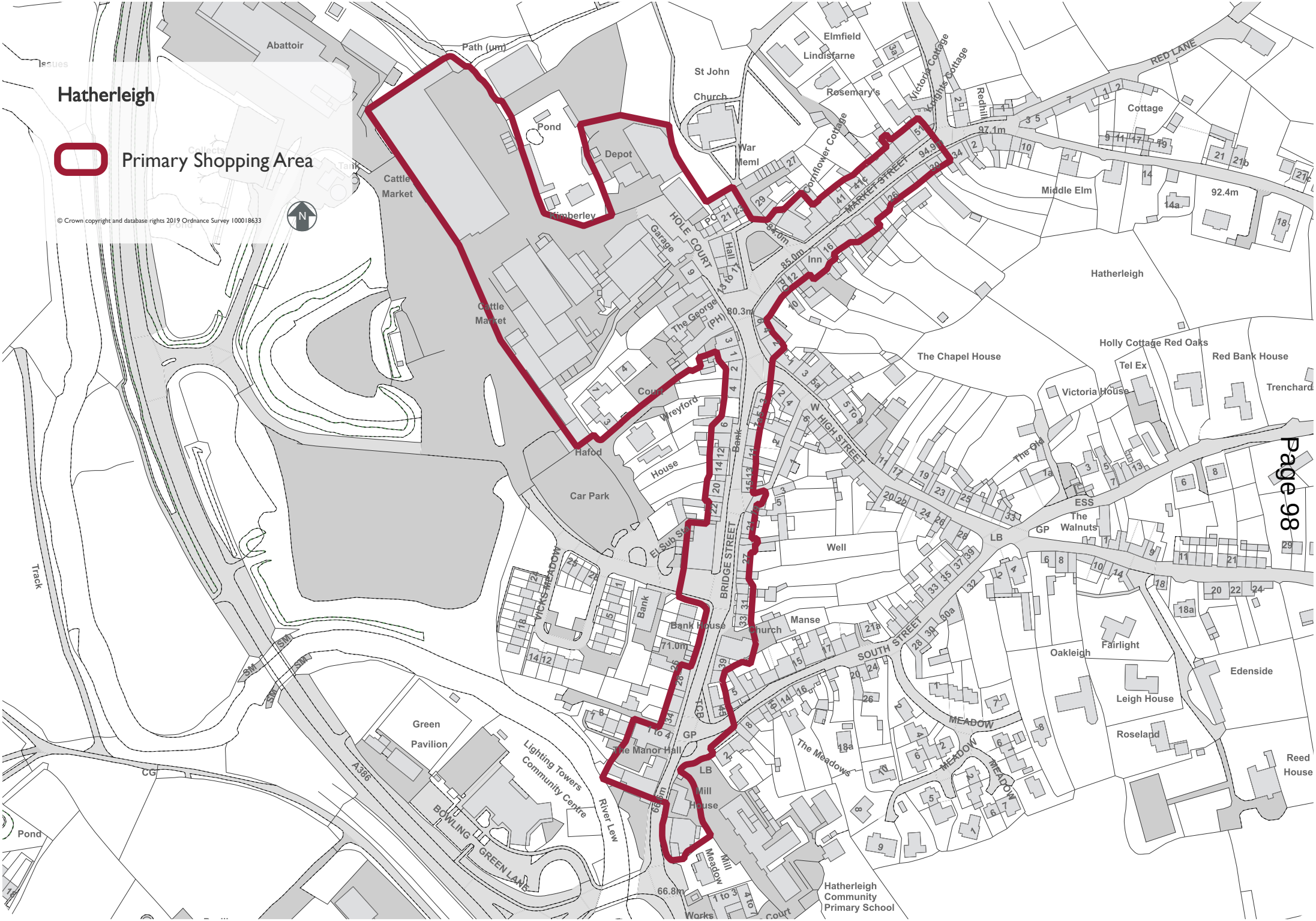

Whitleigh Green
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
INCHKEITH ROAD
FLAMBOROUGH ROAD
SOUTHWAY DRIVE
LONGSTONE AVENUE
Car Park
PO
Mast
Shelter
Library
TCB
Clinic
ESS
LB
PC
Shelters
El Sub Sta
The Church of the Holy Spirit
118.9m
116.4m
114.0m

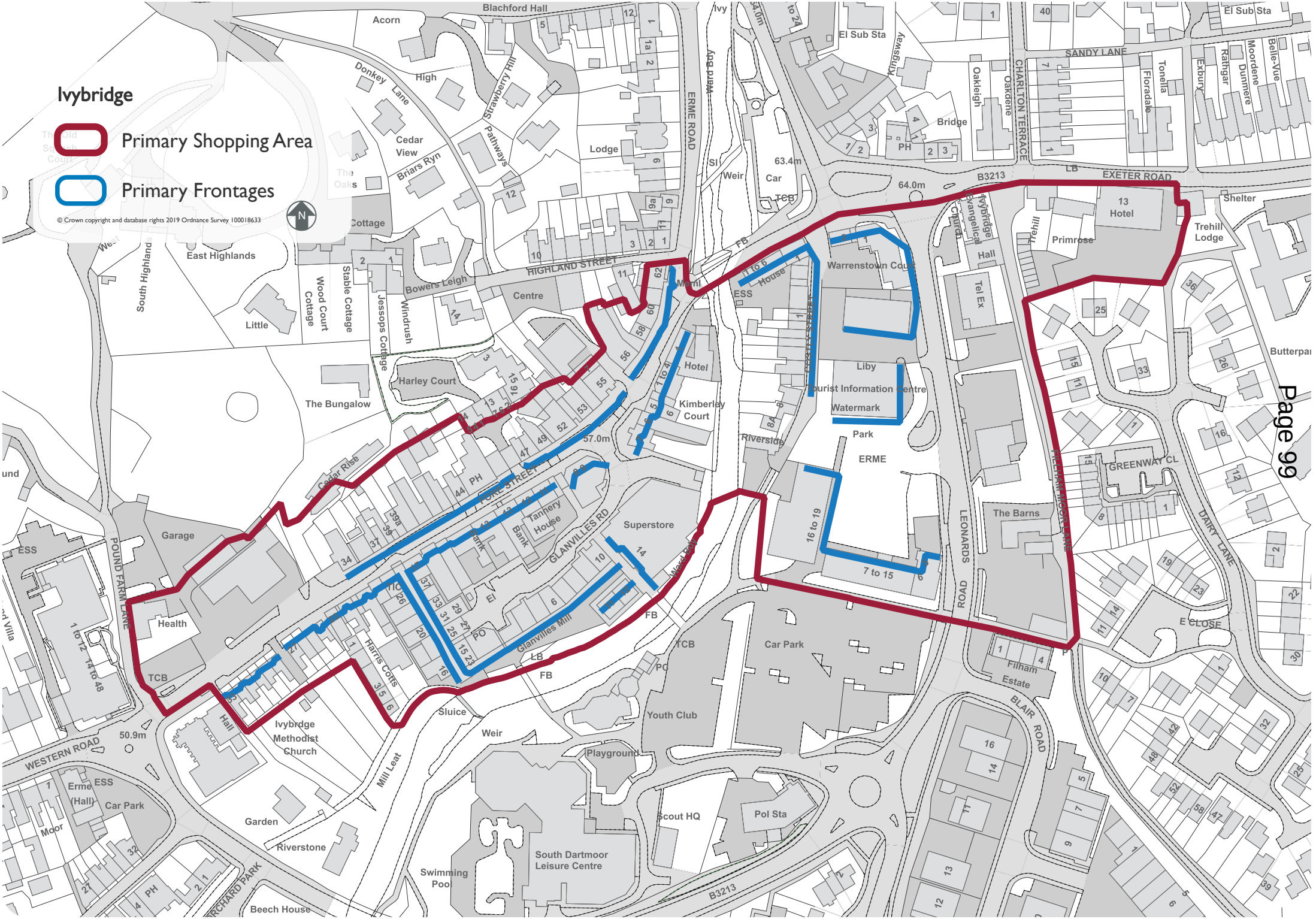

Wolseley Road
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
WOLSELEY ROAD
ALLENBY ROAD
GREATLANDS CRESCENT
GREATLANDS PLACE
WOLSELEY CLOSE
AUCKLAND ROAD
ALEXANDRA ROAD
CRANTOCK TERRACE
BEDFORD STREET
NEFEAN STREET
Julian Place
Allotment Gardens
Post Office
29
Wolseley
Park
Nursery
Wolseley Road
Gospel Hall
Valley Barton
Ford
Unit
Bank
Shelters
Shelter
Club
Gas Gov
Carmel
Church
Warehouse
Wadham Terrace
Boro Const & Ward Bdy
SM
Boro Const & Ward Bdy
El Sub Sta
CR
Ward Bdy
34.7m
34.4m
35.4m
34.1m
32.1m
28.9m
26.6m
30.8m
33.0m
34.6m
37.8m
35.7m
38.1m
41.1m
25.7m
22.2m

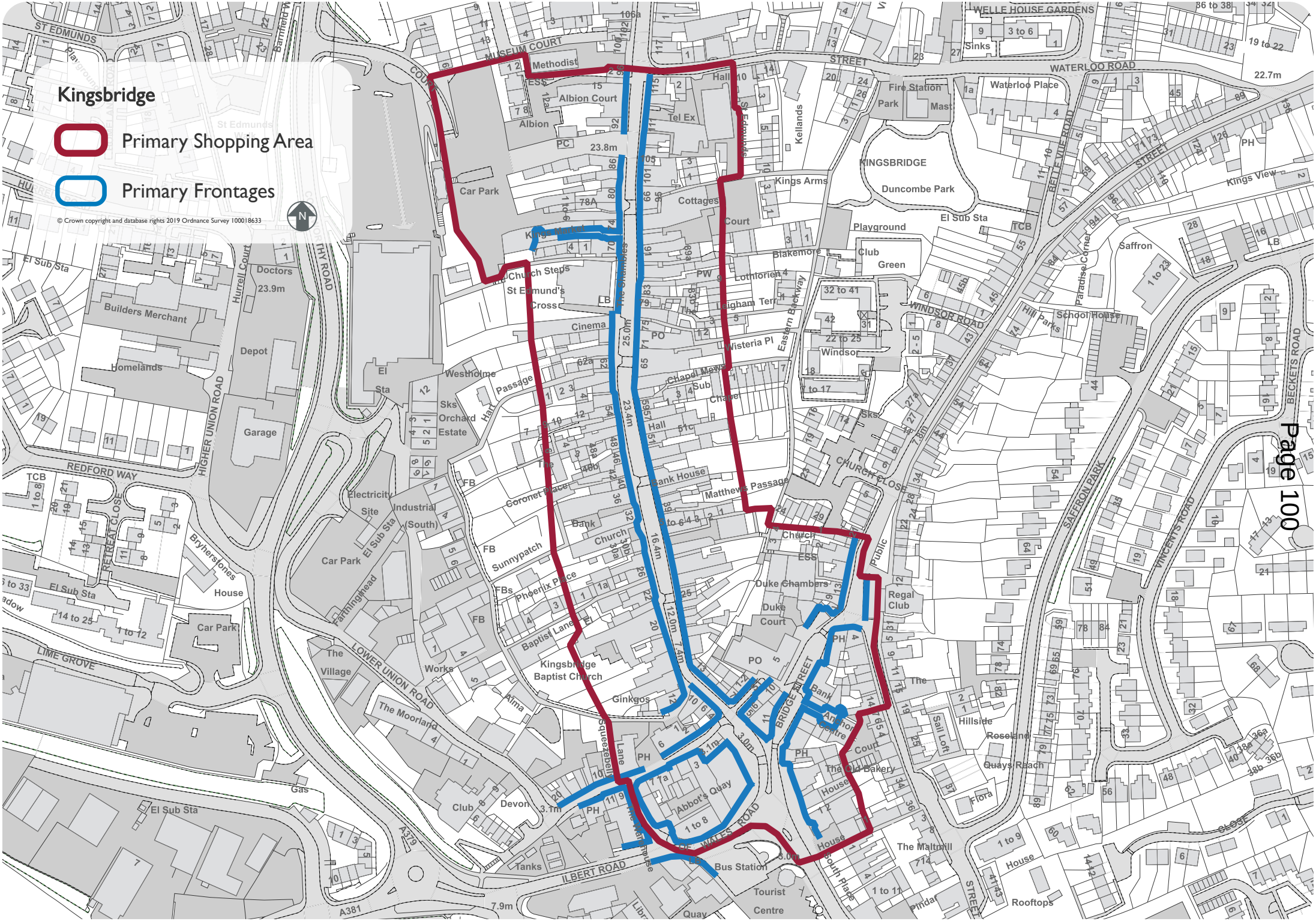
Bere Alston
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
War Meml
PC
TCB
119.3m
The Old Forge
Firslea
Hall
Car Park
Play Area
Victoria Social Club
Issues
Bk
PH
B3257
Bakery
127.7m
Pilgrim Ct
Car Park
Langman Court
El Sub Sta
PO
PW
The Close
CORNWALL
STREET
LB
121.5m
126.9m
Issues


Dartington
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Meadowbrook
Dartington
Community
Centre
Path
FB
El Sub Sta
15.5m
Shinner's
Bridge
Issues
FB
Path
15.2m
A 384
Path
Cider Press
Centre
Path
17.4m
The Cabin
Pottery
Limekilns
(disused)
Lower Tweed
Mill
13.1m
Posts
Shelter
LB
TCB
PO
Garage
Path
Pp
Hall
Shinners Bridge Cottages
Spedding Cottages
Shinner's Bridge


Dartmouth
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Dartmouth Harbour
Pontoon
Pontoons
Landing Stage
Flood Gates
Boat Float
Dartmouth Visitor Centre
New Ground (Car Park)
Gardens
Bandstand
Stone Shelter
Dartmouth Bowling Club
Guildhall
Young Centre
Royal Castle
St Saviour's Church
Hospital
Dartmouth Court
The Dartmouth Yacht Club
Ferry (F)
Page 97


Hatherleigh
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Abattoir
Path (um)
Pond
Depot
Timberley
Cattle Market
St John Church
War Meml
Elmfield
Lindisfarne
Rosemary's
Victoria Cottage
Knights Cottage
Redhill
RED LANE
Cottage
97.1m
Middle Elm
92.4m
MARKET STREET
Cornflower Cottage
94.9m
Garage
HOLE COURT
PO
Hall
84.0m
85.0m
Inn
Hatherleigh
80.3m
The George (PH)
Court
Wreyford
Hafod
House
Car Park
Bank
W
HIGH STREET
The Chapel House
Holly Cottage
Red Oaks
Tel Ex
Red Bank House
Trenchard
Victoria House
The Old
ESS
The Walnuts
GP
LB
Well
BRIDGE STREET
El Sub Sta
WICKS MEADOW
Bank House
71.0m
Manse
Church
SOUTH STREET
Oakleigh
Fairlight
Edenside
Leigh House
Roseland
Reed House
MEADOW
The Meadows
Green Pavilion
Lighting Towers Community Centre
BOWLING GREEN LANE
A386
River Lew
The Manor Hall
Mill House
Mill Meadow
66.8m
Works
Court
Hatherleigh Community Primary School
Track
Pond
CG
SM
TCB


Ivybridge
Primary Shopping Area
Primary Frontages
© Crown copyright and database rights 2019 Ordnance Survey 100018633
N
Blachford Hall
Acorn
Donkey Lane
High
Strawberry Hill
Pathways
Cedar View
Briars Ryn
Lodge
ERME ROAD
Ward Bdy
Ivy
Weir
63.4m
Car
TCB
El Sub Sta
Kingsway
Oakleigh
Oakdene
CHARLTON TERRACE
SANDY LANE
Tonella
Floradale
Exbury
Rathgar
Moordene
Dunmere
Belle-Vue
Bridge
PH
B3213
LB
EXETER ROAD
64.0m
Shelter
13 Hotel
Trehill Lodge
Primrose
Trehill
Ivybridge Evangelical Church
Hall
Tel Ex
Warrenstown Court
Cottage
West
South Highland
East Highlands
Little
Wood Court Cottage
Stable Cottage
Jessops Cottage
Windrush
Bowers Leigh
HIGHLAND STREET
Centre
Memi
FB
ESS
1 to 6
House
EGGBUCKLAND ROAD
Harley Court
The Bungalow
Hotel
Kimberley Court
1 to 4
Liby
Durist Information Centre
Watermark
Park
ERME
Riverside
57.0m
Butterpar
Cedar Rise
FORE STREET
PH
Tannery House
Bank
GLANVILLES RD
Superstore
Garage
POUND FARM LANE
Health
TCB
Glanvilles Mill
Harris Corts
PO
El
Mace Post
16 to 19
7 to 15
The Barns
LEONARDS ROAD
FREEMANMOOR LANE
GREENWAY CL
DAIRY LANE
E CLOSE
Filham Estate
BLAIR ROAD
Car Park
Youth Club
Playground
Sluice
Weir
Mill Leat
Ivybridge Methodist Church
Hall
Garden
Riverstone
Erme (Hall)
Moor
WESTERN ROAD
50.9m
1 to 12
14 to 48
Villa
South Dartmoor Leisure Centre
Swimming Poo
Scout HQ
Pol Sta
B3213
ORCHARD PARK
Beech House
Page 99


Kingsbridge
Primary Shopping Area
Primary Frontages
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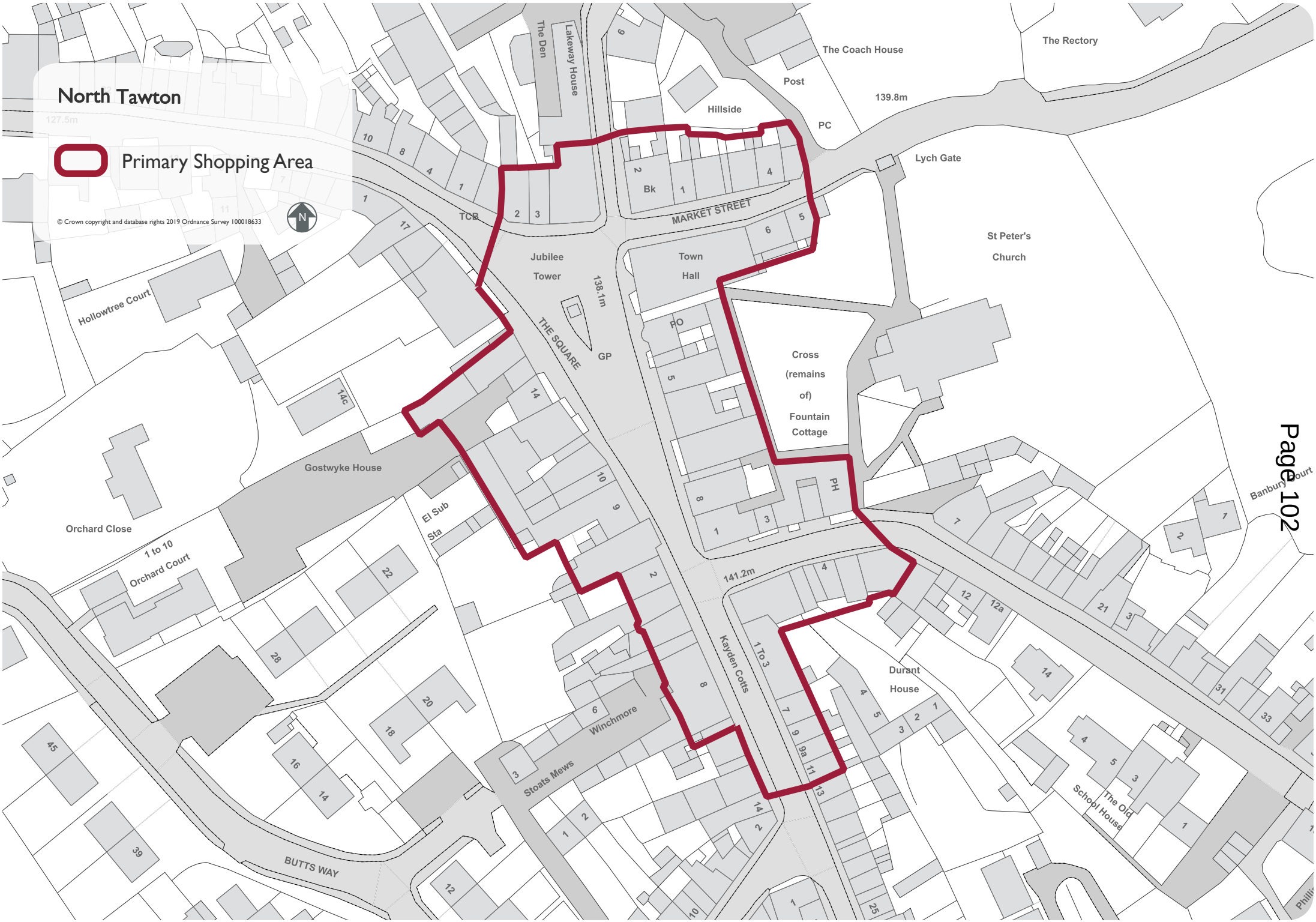
N
Page 100

Modbury
Primary Shopping Area
© Crown copyright and database rights 2019 Ordnance Survey 100018633
The Shambles
Moorsmead
CHURCH STREET
36.2m
Exeter Inn
PC
38.5m
BROAD STREET
35.0m
PH
PO
Car Park
POUNDWELL STREET
Church Lane House
Poundwell Cottage
The Boat House
Chene Court
Poundwell Meadows
Old Wheelrights
Red Devon Court
1 to 6
7 to 10
The Barn
The Courtyard Cottage
The Old Byre
Arch Cottage
1 to 4 The Court
Burns Court
BURNS LANE
A379
34.4m
1 to 3
Brooke Barn
Brooke House
Dairy House
Rose Cottage
TCB
Car


North Tawton
Primary Shopping Area
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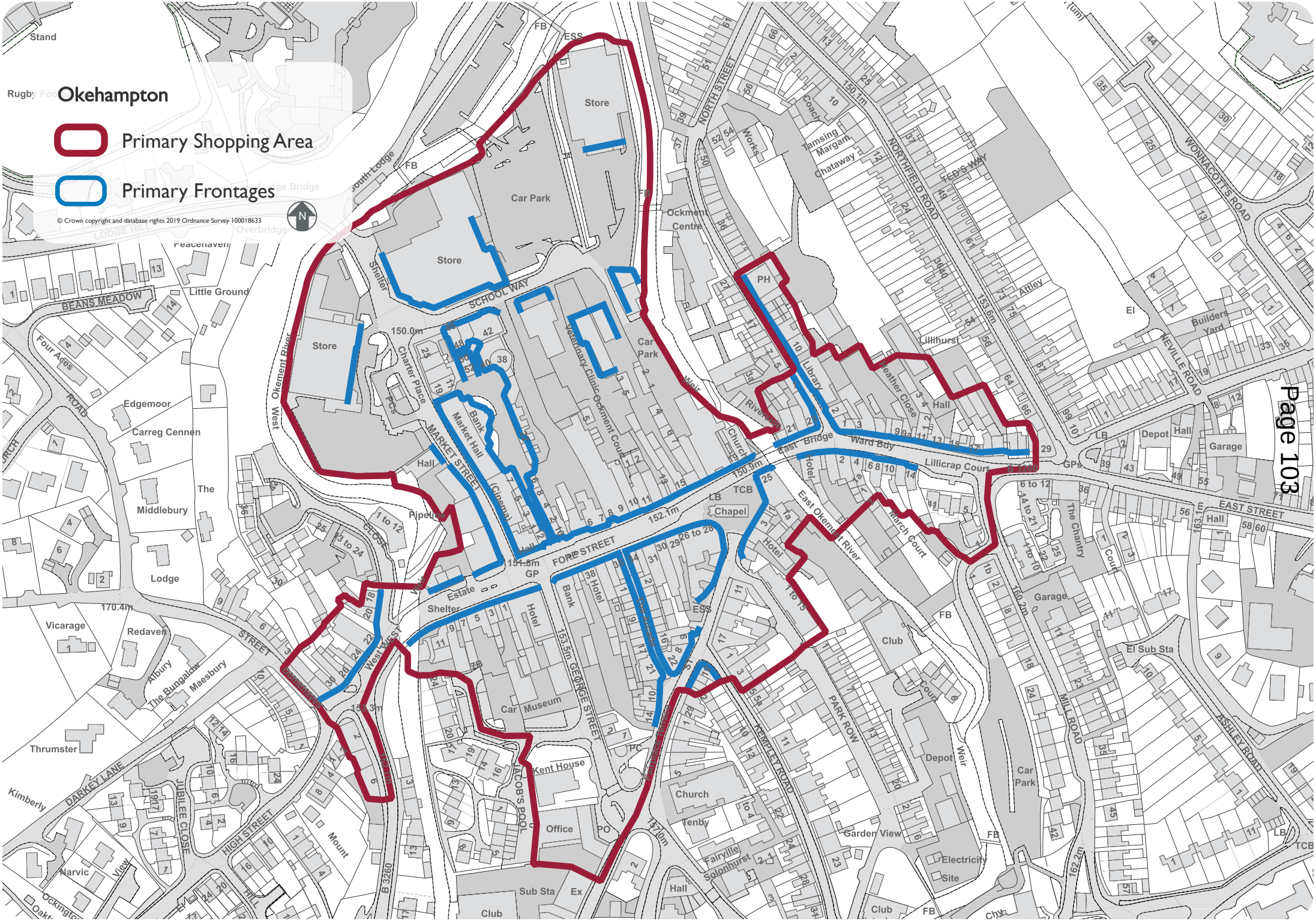
N
The Den
Lakeway House
The Coach House
Post
PC
Hillside
139.8m
The Rectory
Lych Gate
MARKET STREET
TCB
Jubilee
Tower
138.1m
Town
Hall
St Peter's
Church
THE SQUARE
GP
PO
Cross
(remains
of)
Fountain
Cottage
PH
Hollowtree Court
Gostwyke House
El Sub
Sta
Orchard Close
1 to 10
Orchard Court
Banbury Court
141.2m
Kayden Cotts
1 To 3
Durant
House
Winchmore
Stoats Mews
BUTTS WAY
The Old
School House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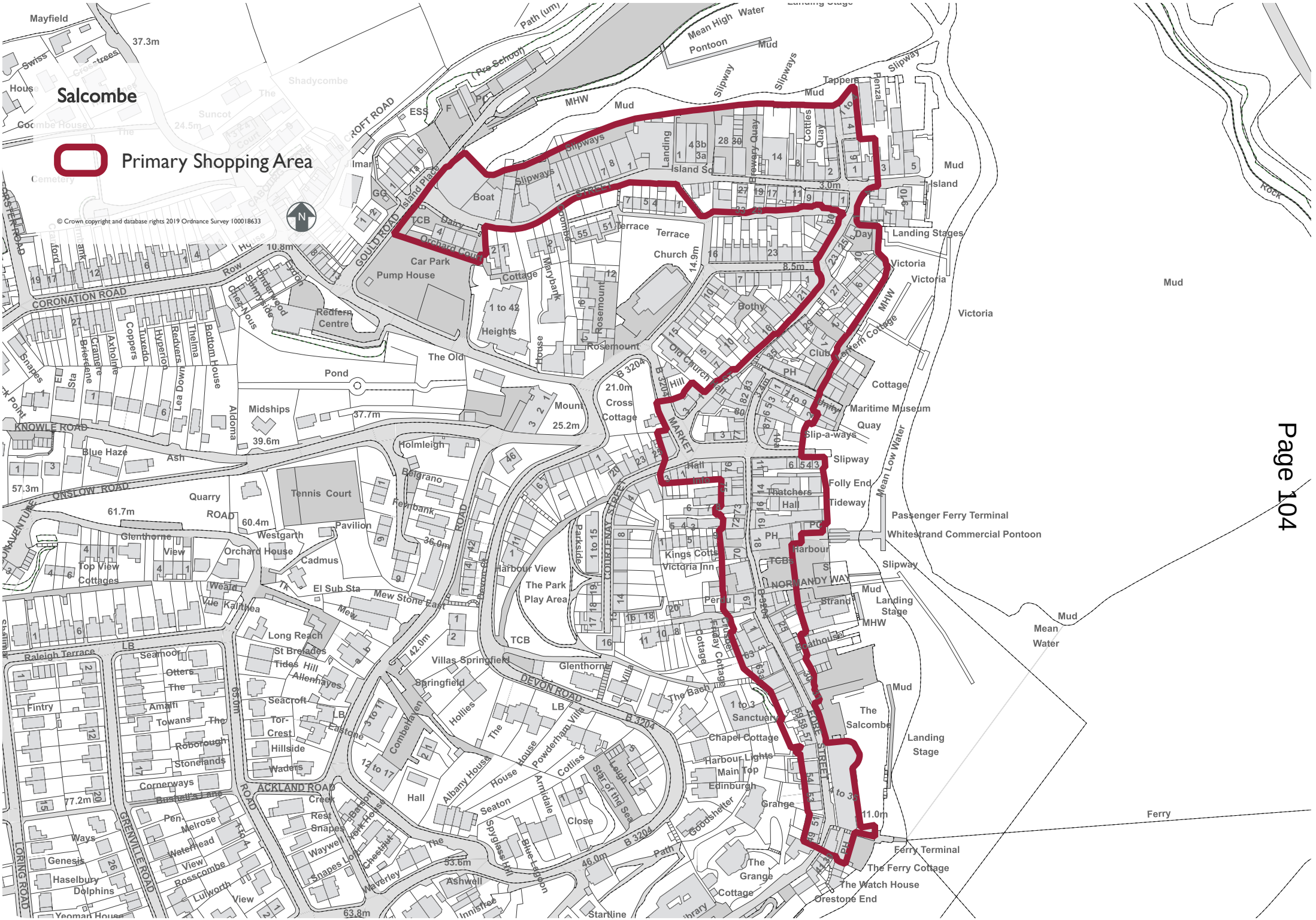
Page 103


Salcombe
Primary Shopping Area
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Mayfield
Shadycombe
Suncot
Cemetery
CORONATION ROAD
GOULD ROAD
Island Place
Island Street
Island Sq
Landing Stages
Victoria
Victoria
Victoria
Car Park
Pump House
Redfern Centre
Heights
1 to 42
Rosemount
Marybank
Terrace
Terrace
Church
Cottage
Pond
The Old
Midships
KNOWLE ROAD
ONSLOW ROAD
Tennis Court
Pavilion
Quarry
ROAD
Westgarth
Orchard House
Cadmus
Glenthorne
Top View Cottages
Blue Haze
Ash
Holmleigh
Belgrano
Fernbank
Mount
Cross
Cottage
Hall
Inn
MARKET
Old Church
Bothy
Club
PH
Cottage
Maritime Museum
Quay
Slip-a-ways
Slipway
Folly End
Tideway
Thatchers
Hall
Passenger Ferry Terminal
Whitestrand Commercial Pontoon
Harbour
Slipway
NORMANDY WAY
Strand
Landing Stage
MHW
Mud
Mean Water
Mean Low Water
Boathouse
Lifeboat House
Lifeboat Cottage
The Back
1 to 3 Sanctuary
Chapel Cottage
Harbour Lights
Main Top
Edinburgh
Grange
Goodshelter
The Salcombe
Landing Stage
Ferry
Ferry Terminal
The Ferry Cottage
The Watch House
Orestone End
The Grange
Cottage
Path
B 3204
DEVON ROAD
COURTENAY STREET
FORE STREET
1 to 15 Parkside
Harbour View
The Park
Play Area
TCB
Kings Cotts
Victoria Inn
Perrau
Rose Cottage
Villas Springfield
Springfield
Glenthorne
Hollies
The House
Powderham Villa
Cotliss
Star of the Sea
Leigh
Armidale
Albany House
Seaton
Spyglass Hill
Blue Lagoon
Hall
Close
Combe Haven
3 to 11
12 to 17
Eastone
LB
Raleigh Terrace
Searnoor
Otters
The
Amalfi
Towans
The
Roborough
Stonelands
Cornerways
Bastwell Lane
Fintry
Seacroft
Tor-Crest
Hillside
Waders
Long Reach
St Brelades
Tides Reach
Allenmayes
ACKLAND ROAD
GRENVILLE ROAD
LORING ROAD
Pen-Melrose
Waterhead View
Rosscombe
Lulworth
Haselbury
Dolphins
Genesis
Ways
Yeoman House
Waverley
Ashwell
Innisfree
Starline
Snapes Loft
Waywell
Chestnut
Rest
Snapes
Creek
Bat & Ball
York House
Mew Stone East
Mew
Weald Vue
Kalithea
El Sub Sta
Tk
Aldoma
Bottom House
Thelma
Redvers
Hyperion
Tuxedo
Coppers
Axholme
Cramore
Briardene
Sunnyside
Underwood
Chez Nous
Row
Snapes
Point
Ferry Cottage
Rock
Mud
Island
Tappers
Renzal
Slipways
Slipway
Mean High Water
Pontoon
Mud
MHW
Pre School
Path (um)
Brewery Quay
Cottles Quay
Day
Bothy
Old Church
Hill
Cross
Cottage
Maritime Museum
Quay
Slip-a-ways
Slipway
Folly End
Tideway
Thatchers
Hall
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Whitestrand Commercial Pontoon
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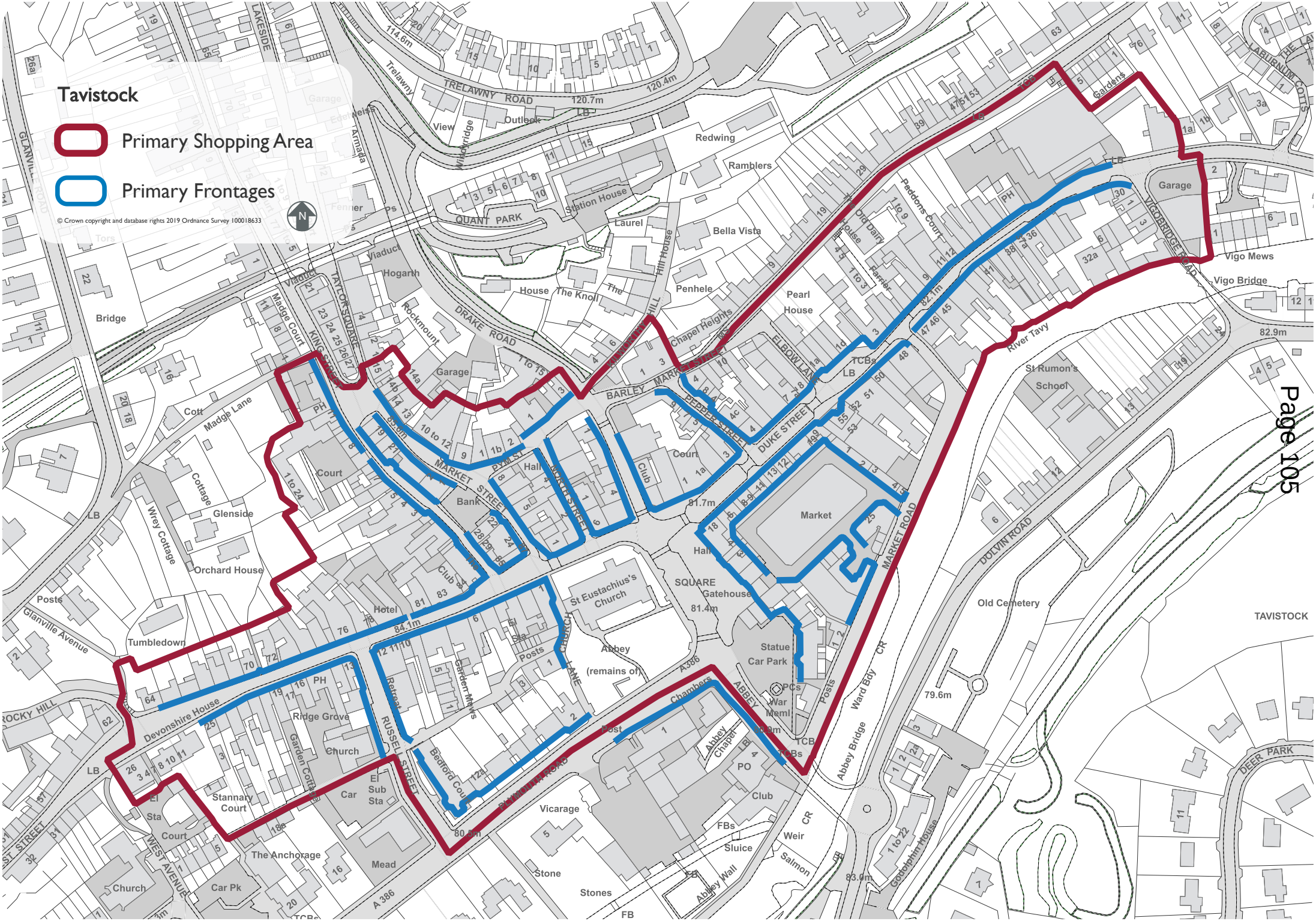
Slipway
NORMANDY WAY
Strand
Landing Stage
MHW
Mud
Mean


Tavistock
Primary Shopping Area
Primary Frontages
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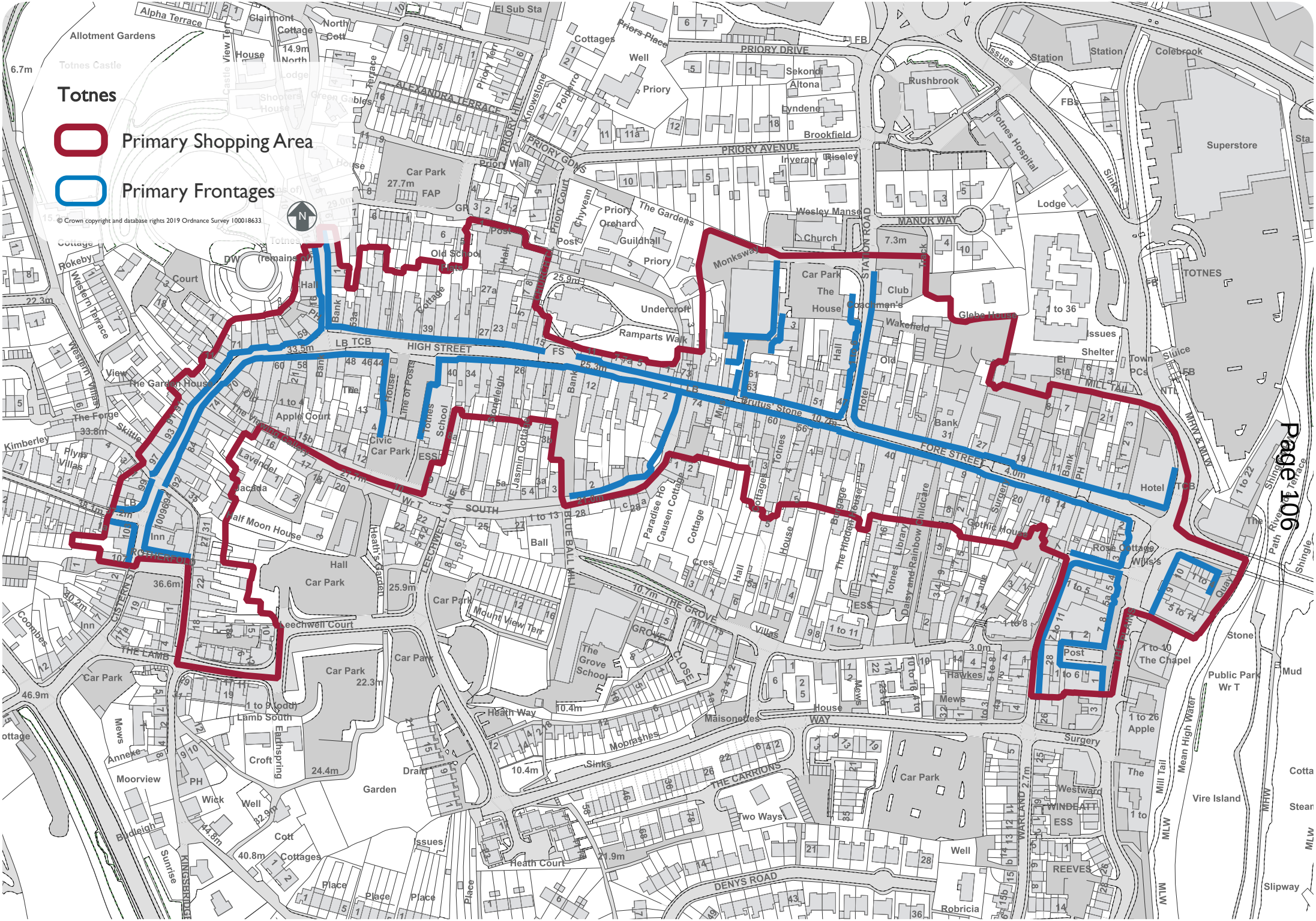
TRELAWNY ROAD
QUANT PARK
DRAKE ROAD
BARLEY MARKET
PEPPER STREET
DUKE STREE
MARKET ROAD
MARKET STREET
KING STREET
TAYLOR SQUARE
Madge Lane
Madge Court
Rockmount
Chapel Heights
ELBOW LA
Pearl House
Penhele
Hill House
The Knoll
House
Hogarth
Viaduct
Redwing
Ramblers
Station House
Laurel
Bella Vista
Old Dairy House
Paddons Court
Garage
PH
Vigo Mews
Vigo Bridge
VIGO BRIDGE ROAD
River Tavy
St Rumon's School
Bridge
Cott
Cottage
Glenside
Wrey Cottage
Orchard House
Court
Hall
Bank
Club
Market
Gatehouse
SQUARE
St Eustachius's Church
Abbey
(remains of)
Statue
Car Park
PCs
War Meml
Chambers
ABBEY
Abbey Chapel
PO
Club
TCBs
TCB
Vicarage
FBs
Weir
Sluice
Salmon
Stone
Stones
Abbey Wall
Abbey Bridge
Ward Boy
CR
Old Cemetery
TAVISTOCK
DOLVIN ROAD
DEER PARK
Gotdolphin House
1 to 22
Tumbledown
Glanville Avenue
Posts
Hotel
Devonshire House
Ridge Grove
Church
Garden Mews
Garden Cotts
RUSSELL STREET
Retreat
Bedford Court
Stannary Court
Car
El Sub Sta
Mead
The Anchorage
Car Pk
WEST AVENUE
ROCKY HILL
PLYMOUTH ROAD
CHURCH LANE
NORTH STREET
PYM ST
Lakeside
Trelawny
Outlook
View
Windbridge
Armada
Tors
Garage
Gardens
LABURNUM COTTS
THE LA
1 to 15
1 to 24
1 to 9
1 to 3
10 to 12
1 to 6
114.6m
120.7m
120.4m
82.7m
82.9m
81.7m
81.4m
84.1m
80.5m
79.6m
83.0m
A386
LB
Page 105


Totnes
Primary Shopping Area
Primary Frontages
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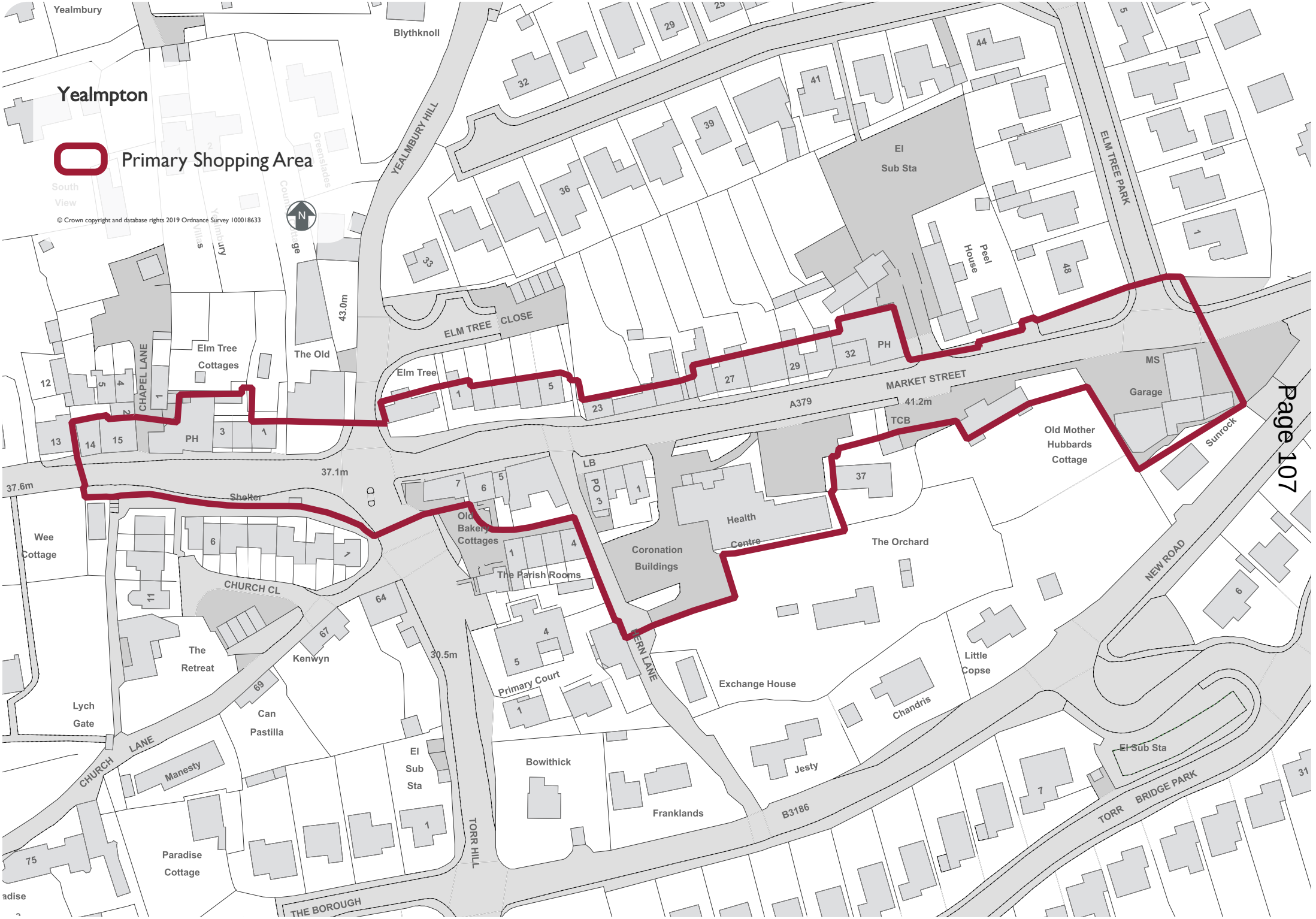
HIGH STREET
FORE STREET
PRIORY DRIVE
PRIORY AVENUE
PRIORY HILL
ALEXANDRA TERRACE
STATION ROAD
MANOR WAY
LEECHWELL LANE
BLUE BALL HILL
THE GROVE
THE CARRIONS
DENYS ROAD
Totnes Castle
Allotment Gardens
Alpha Terrace
Glairmont
Cottage
North Cott
El Sub Sta
Priors Place
Cottages
Well
Priory
Sekondi
Altona
Lyndene
Brookfield
Rushbrook
Totnes Hospital
Colebrook
Station
Superstore
Car Park
27.7m
FAP
Priory Wall
Priory Court
Chyvean
Priory Orchard
Guildhall
The Gardens
Wesley Manse
Church
Inverary
Riseley
Old School
Undercroft
Ramparts Walk
Monkswell
Car Park
The House
Club
Coachman's
Glebe House
1 to 36
Wakefield
Shelter
Town PCs
Sluice
TOTNES
Rokeby
Western Terrace
The Garden House
The Forge
Kimberley
Flynn Villas
Apple Court
Civic Car Park
Totnes School
Jasmin Cottage
Paradise Ho
Causen Cottage
Cottage
Brutus' Stone
Bank
Hotel
Gothic House
Surgery
Rose Cottage
Wyse's
Quay
Path
River
Shingle
Half Moon House
Rosmerian
Inn
Hall
Car Park
Leechwell Court
Heath's Garden
Ball
Mount View Terr
Cres
Totnes Library
Daisy and Rainbow Childcare
The Hidden House
Buggage
Villas
The Grove School
GROVE CLOSE
Maisonettes
Hawkes Mews
1 to 10 The Chapel
Public Park
Wr T
Stone
Mud
Coombes
THE LAMB
Car Park
22.3m
Lamb South
Mews
Anneke
Moorview
Croft
Earthspring
Garden
Drain
Wick
Well
Budleigh
Sunrise
Cott
Cottages
Issues
Heath Court
Mobrashes
Sinks
Two Ways
Westward
TWINDEATT
ESS
REEVES
Robricia
Warland 2.7m
Vire Island
Mean High Water
MLW
MHW
Slipway
Cotta
Steam
Page 106


Yealmpton
Primary Shopping Area
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Yealmbury
Blythknoll
YEALMBURY HILL
ELM TREE PARK
ELM TREE CLOSE
CHAPEL LANE
Elm Tree Cottages
The Old
Elm Tree
MARKET STREET
A379
41.2m
TCB
PH
MS Garage
Peel House
El Sub Sta
Old Mother Hubbards Cottage
Sunrock
Shelter
37.6m
37.1m
43.0m
30.5m
Wee Cottage
Old Bakery Cottages
The Parish Rooms
Coronation Buildings
Health Centre
The Orchard
CHURCH CL
NEW ROAD
The Retreat
Kenwyn
Lych Gate
Can Pastilla
Manesty
CHURCH LANE
Paradise Cottage
Primary Court
Exchange House
Chandris
Little Copse
Bowithick
Franklands
Jesty
TORR HILL
THE BOROUGH
B3186
TORR BRIDGE PARK
FORE STREET
Page 107

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Contents

APPENDIX 5: New work in conservation areas 3
Introduction 3
Who is response? 3
New buildings in conservation areas 5
New buildings on vacant sites or in the grounds of existing buildings 5
New building as extensions to existing buildings 8
New buildings as replacements to existing buildings 8
Making changes in conservation areas 10
Making changes to the outside appearance of existing buildings 10
Making changes to frontage areas and boundary structures 11
Making changes to intensify or alter the use of existing buildings 11
Considering detail in conservation areas 12
The characteristics of siting and alignment 14
The characteristics of materials 16
The characteristics of scale and form 19
The characteristics of style and detailing 20

Table of figures

Figure 1: Before (left) and after (right) restoration 4
Figure 2: Plymouth City Centre 6
Figure 3: Examples where open space is a positive contributor to an area's special interest and character. 6
Figure 4: Plymouth Hoe Registered Park and Garden within the Hoe Conservation Area. 7
Figure 5: Examples of new buildings in conservation areas making a positive contribution to setting 9
Figure 6: Before (left) and after (right) photos of the impact of unsympathetic changes on an area's historical and architectural character 10
Figure 7: The uniform treatment of the boundaries make a significant contribution to the character of the street. 11
Figure 8: Royal William Yard, Plymouth 12
Figure 9: Examples of changes which can enhance the character of a street 13
Figure 10: Examples of changes which can harm the character of a street 14
Figure 11: Before (left) and after (right) example of redevelopment where siting was a key consideration 15
Figure 12 Dense layouts, characteristic of historic urban areas 16
Figure 13: This prominent slate cladding is attractive, but its use can be rare and needs to remain so to preserve its particular identity 18

DRAFT

Figure 14: Narrow cobbled roads and stone buildings are characteristic of Plymouth's historic Barbican area 18
Figure 15: Renewing the render of this cottage was appropriate, but not the added patterning 19
Figure 16: Examples of good siting and form 20
Figure 17: The 'vernacular' style of these 17th century cottages derives mainly from the informality of their appearance 21
Figure 18: The 'polite' style of this 19th century house derives from the formality of its architectural treatment which creates a dignified and refined appearance . 22
Figure 19: The formal style of this building reflects its status as an important corner of the Abercrombie plan for Plymouth 22
Figure 20: The new staircase linking the Royal William Yard to Devils Point successfully introduced a distinctly modern architectural style and materials to the historic victualling yard. Image © Jay Stone 23
Figure 21: This small development is modern, but it is suited to its village setting, both in terms of its overall vernacular styling as well as the quality and subtle detailing of its parts. Note, for example, the softened corners to the rendered walls and the appearance of the roof with its traditional 'mitred' hips (right) in comparison to the existing tiled ones (left). 23

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APPENDIX 5: New work in conservation areas

Introduction

1. Conservation areas are designated by LPA's and are special places due to the survival of their authentic architectural and historic qualities. They vary greatly in nature and character and in the features which have historical significance. This is particularly true of the conservation areas within the Plan Area as they cover a range of areas in different shapes and sizes, from the very rural to the very urban.

2. Within conservation areas, a sense of history as well as identity prevails, and by designating conservation areas the LPAs are sharing the belief that these areas ought to be preserved and reinforced.

3. The LPAs have a statutory duty to ensure that developments requiring planning permission in conservation areas are approved only if they preserve or enhance the character or appearance of the area's features of special architectural or historic interest. Policy DEV21 of the JLP sets out the LPA's approach to the historic environment and additional guidance on designated and non-designated heritage assets is available within this SPD.

4. Describing and defining the features in conservation areas are usually done through Conservation Area Appraisals and Management Plans (CAAMPs). However, this is not always the case and, due to the number conservation areas across the Plan Area, a CAAMP may not have been produced for every conservation area. This guidance has been produced to explain what the features are in any of the conservation areas that demand such statutory respect and should be considered during the planning process.

5. Conservation areas are 'heritage assets' and all decisions made on planning applications affecting them will have to respond to whether the 'significance' of the asset would be impacted upon and whether the proposed impact is harmful.

Who is response?

6. Everyone who makes decisions about how the built and natural environment in conservation areas are treated has a shared responsibility towards their care. They, in particular, hold the key to successfully achieving those statutory conservation aims. The challenge is to do what can be done to ensure this part of our heritage is handed on to future generations, intact and enhanced.

7. When permission isn't required to carry out works to non-listed buildings, like repairs and redecorations and the replacement of windows and doors, it will be for individual owners to decide whether or not their proposals are 'conservation friendly'. Regardless of size, for advice and assistance on any project which has a

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structural or architectural impact within a conservation area, please contact the relevant LPA's Heritage Specialists/Officers.

8. For example, owners of the below unlisted house reversed its negative contribution to a conservation area by reinstating a solid timber panelled door and the vertical-sliding, single-glazed, painted timber sashes that had been previously removed.

Figure 1: Before (left) and after (right) restoration

9. When planning permission is required, the decision will be based on how well the works respect the features and characteristics described in this guidance and the CAAMPs. Applicants will need to demonstrate how their proposals will preserve or enhance the interest and character of the conservation area, showing respect for, and compatibility with, all that contributes in a positive sense towards their creation. This doesn't mean, however, that new buildings must copy their older neighbours in detail but their design should represent an imaginative and contemporary interpretation of the quality and qualities of the buildings and spaces around them, for example, in certain circumstances modern, contemporary designs may be appropriate.

10. Although conservation areas aren't designated to bring change to a halt, there will be times when particular proposals affecting particular buildings or sites will be inappropriate in principle, even if all aspects of their detailed design can be satisfactorily resolved.

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New buildings in conservation areas

11. The below gives guidance for proposals which are introducing new buildings into conservation areas including:
    - New buildings on vacant sites or in the grounds of existing buildings;
    - New building as extensions to existing buildings; and,
    - New buildings as replacements to existing buildings.

New buildings on vacant sites or in the grounds of existing buildings

12. When new buildings are proposed for sites, the first consideration will be whether any part of the site, or indeed the site as a whole, should be built on at all. This is because the absence of buildings can itself be a positive contributor towards a conservation area's special interest and character.

13. An open and undeveloped site, for example, might evidence and visually 'characterise' an important aspect of an area's historic development pattern or its relationship with the surrounding landscape. Within settlements these special spaces include greens or commons, squares and market places, parks and gardens, allotments, quaysides and courtyards, the cultivated parts of ancient burgage plots, surviving apple orchards, the landscaped gardens of higher status houses and Plymouth City Centre Precinct. The last are somewhat different to the rest as their special interest isn't based on a total absence of buildings but on their density, which is characteristically low. In addition, such gardens sometimes evidence the development of English garden design, and can include any number of important specimen trees.

14. For example, wide open spaces are associated with the iconic Abercrombie design for Plymouth post-war city centre regeneration:

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Figure 2: Plymouth City Centre

15. And in the images below, an apple orchard within a village (left) survives to a remarkable extent and are especially characteristic of its setting and the open field (right) preserves and characterises the commanding nature of the settlement's original siting in the landscape.

Figure 3: Examples where open space is a positive contributor to an area's special interest and character.

16. Outside settlements (and sometimes entering them too) such special spaces can include the adjacent fields of the open countryside. Although distinct from the settlement they often help to define its layout form (linear, nucleated, dispersed

etc.) and its relationship with the landscape setting. These spaces are more common around smaller rural settlements where twentieth century development hasn't encroached into the countryside, leaving them still confined, for example, to the floor or one side of a valley or to the crest of a ridge. In larger towns and cities, parks and green spaces often perform the same function.

17. An absence of buildings can also contribute positively when it permits views of important buildings or features, or indeed other undeveloped spaces that are special. These views needn't be confined to the conservation area itself and can also be from the outside in or the inside out; in other words from wherever the more significant features that contribute towards the area's interest, setting and character can be seen to advantage. These views can range from the tightly framed, as glimpsed between buildings, to the panoramic, as observed across a foreground of open land. Blocking these views completely would be undesirable, but even a partial block, or the introduction of new buildings into a scene, could be equally undesirable if this harmed an otherwise agreeable composition, visual effect or a setting with historic significance.

Figure 4: Plymouth Hoe Registered Park and Garden within the Hoe Conservation Area.

18. There are other conservation reasons why an absence of buildings from a site will be an important consideration when assessing its suitability for new buildings. The existence of important trees, landscaping features or archaeological remains are perhaps the more significant, and also the foreground or frontage of a building

where its open or uncluttered appearance is an essential aspect of its authentic character.

New building as extensions to existing buildings

19. When a new building is proposed that will extend an existing one, two considerations are fundamental. The first is the same as above, which is whether all or part of the site chosen for the extension should be built on at all. Again this depends on what contribution the current 'absence of buildings' makes, and, whilst extensions are less likely to affect most of the 'open and undeveloped' spaces already listed, their impact on important views, trees, landscaping features and archaeological remains can be just as significant.

20. The second consideration is whether the existing building should be extended on the elevation proposed or extended. This is because a building's existing form can be essential to its character and setting. An absence of enclosed front porch extensions in a terrace of cottages, or side extensions in a series of semi-detached pairs are characteristics that preserve authenticity and create harmony. Where visible, the absence of extensions at the rear can do the same, as can their existence in a pattern and form that's repeated.

21. Where other types of buildings occupy a conservation area, such as farm buildings or warehouses, their characteristic forms and the desirability for preserving them, will influence their suitability for extension. This would be the case too with buildings such as toll houses and lodges which, although usually singular in their existence and style, add considerable interest to a conservation area, especially in their original form.

New buildings as replacements to existing buildings

22. When a new building is proposed which involves the demolition of an existing building, the first consideration will be whether the demolition works should be undertaken. This is because the vast majority of buildings in conservation areas have been purposefully included in them on account of the positive contributions they make. The presumption for most buildings, therefore, is that they should not be demolished but retained with their interest and character preserved or reinforced.

23. The special qualities of historic buildings are often unique and derive mainly from their patina of age, their style and the idiosyncrasies and sensibilities of their construction and siting. Replicating these is rarely possible today as modern standards relating to the siting, servicing and construction of new buildings must be met. In addition, old buildings may possess other values that would be lost completely through demolition, such as being the work of a particular architect or estate, having associations with past events or people, or providing tangible evidence of how a settlement has developed.

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24. The demolition and replacement of a building is likely to be acceptable, therefore, only if it's historic form and characteristics have been eroded by less than sympathetic, irreversible, changes. On the other hand, if a building isn't historic at all, and doesn't relate in any positive way to its historic neighbours, or the conservation areas as a whole, demolition may well be considered positively desirable. In this case the challenge will be to make sure the replacement is suited to its setting.

25. For example, the new buildings shown below were designed and sited to respect their different settings. The new rendered cottage range (left) is in a local village whilst the warehouse style apartment block (right) occupies a historic waterfront. The new development (below) also compliments the Grade 1 listed building at Devonport, Plymouth.

Figure 5: Examples of new buildings in conservation areas making a positive contribution to setting

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Making changes in conservation areas

26. The below gives guidance for proposals which are making changes to buildings within conservation areas including:
    - Making changes to the outside appearance of existing buildings;
    - Making changes to frontage areas and boundary structures; and,
    - Making changes to intensify or alter the use of existing buildings.

Making changes to the outside appearance of existing buildings

27. When changes to the outside of buildings are proposed in conservation areas, the first consideration will be whether the change should be made. This is because nearly every aspect of a building can create interest and character, from its overall form to the arrangement and detailing of its parts. Even minor changes can erode the positive contribution they make, and because most buildings are part of a group, their impact can be widespread and not just effect the building itself.

28. The changes which most erode interest and character are those that involve the loss of genuine authentic features, be they windows and doors, bargeboards and chimneys or the claddings and treatments of walls and roofs. Repair will preserve their originality and the building's integrity too, but if repair isn't practical, like-for-like replacement will minimise the loss. Replacements that aren't like-for-like can do significant damage if they introduce different designs or materials to the ones being lost, since their characteristics may not suit the building or the setting it's in. The unique identity it has, as well as its historic character, might both be eroded; and this would be true whether the changes replaced something existing or added something new.

29. For example, the below shows before and after photos of the impact replacements windows which are not like-for-like can have on a building's historic and architectural character. The new windows are painted timber, recessed in their wall openings, have glazing bars and have equally-sized, flush-fitting casements.

Figure 6: Before (left) and after (right) photos of the impact of unsympathetic changes on an area's historical and architectural character

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Making changes to frontage areas and boundary structures

30. When changes are proposed to the frontage areas of buildings, or to the treatment of their boundaries, the first consideration will be whether these should be made. This is because the way boundaries are formed, the line they follow, and the way the private area behind it is used and treated, can all contribute towards interest and character.

31. Different frontage and boundary treatments usually characterise particular periods in the development of settlements and, indeed, the status of the buildings they serve. They also create a whole range of positive visual effects, like enclosure and identity. By changing the use or appearance of the frontage area (for example, from garden or cobbles to tarmac for parking) or the boundary structure if there is one (for example, from ornamental railings to fence panels, or by removing or realigning any of its length) not only is this likely to erode the historic interest of a setting but its characteristics too, in what is the most prominent of locations.

Figure 7: The uniform treatment of the boundaries make a significant contribution to the character of the street.

Making changes to intensify or alter the use of existing buildings

32. When proposals are made to change the use of a building, or alter and maybe extend it to continue an existing use, the first consideration will be whether these should be made. This is because particular uses may contribute towards the interest and character of a conservation area but they will only remain so for as long as they can be accommodated without causing harm.

33. Uses are rarely static in nature, and the time may come when a building is no longer capable of accommodating the evolving demands of even a long established use without major changes to its fabric and appearance. Where these will be damaging to an area's interest and character, relocation might be the more appropriate solution. Further, because it is not just the host building a use needs to be compatible with, but the host area as well, a proposal for a new use or the intensification of an existing one may not be appropriate where this would generate levels of traffic, parking, noise or any other environmental effects that could harm

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the established character of a conservation area or prejudice its future preservation or enhancement.

34. The Royal William Yard in Plymouth is a good example of sensitive regeneration of historic buildings to accommodate new uses.

Figure 8: Royal William Yard, Plymouth

Considering detail in conservation areas

35. When proposals are fine in principle the real challenge is to make sure they're appropriate in detail too. Achieving this requires skill, as they're less likely to preserve interest and character, and strengthen identity, if they introduce characteristics that aren't already established. Attention to detail is therefore essential, first when analysing an area's existing characteristics, and then in translating them into proposals that are imaginative and contemporary and show a respectful eye for what's gone before.

36. The below diagrams show examples of both good and bad examples of how changes can enhance or destroy the character of a street:

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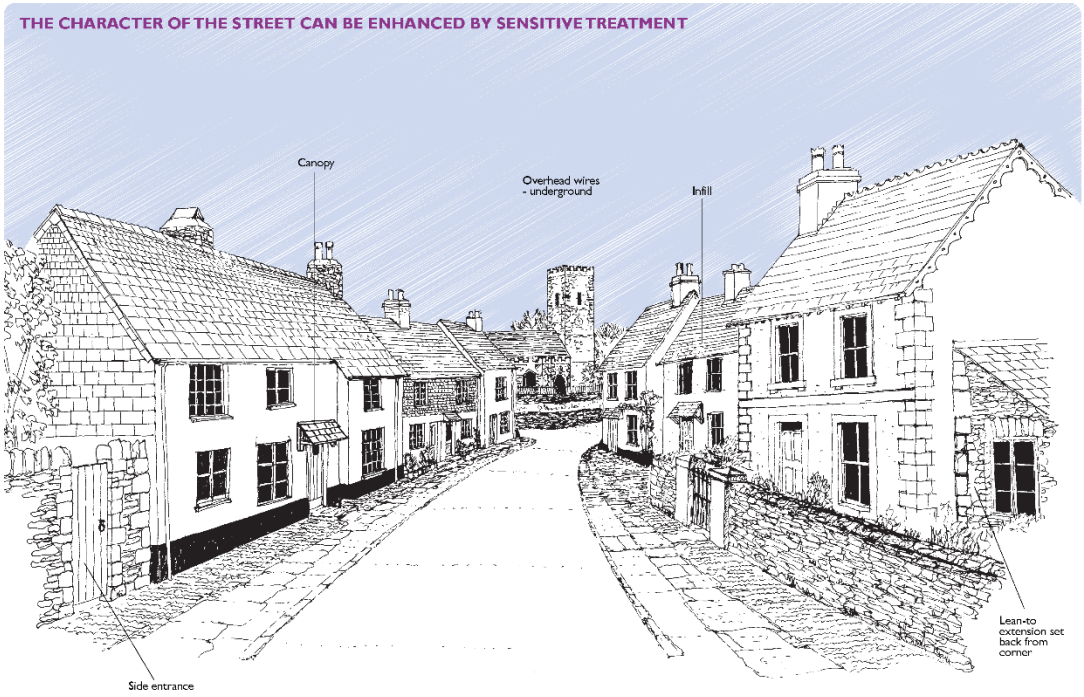

Figure 9: Examples of changes which can enhance the character of a street

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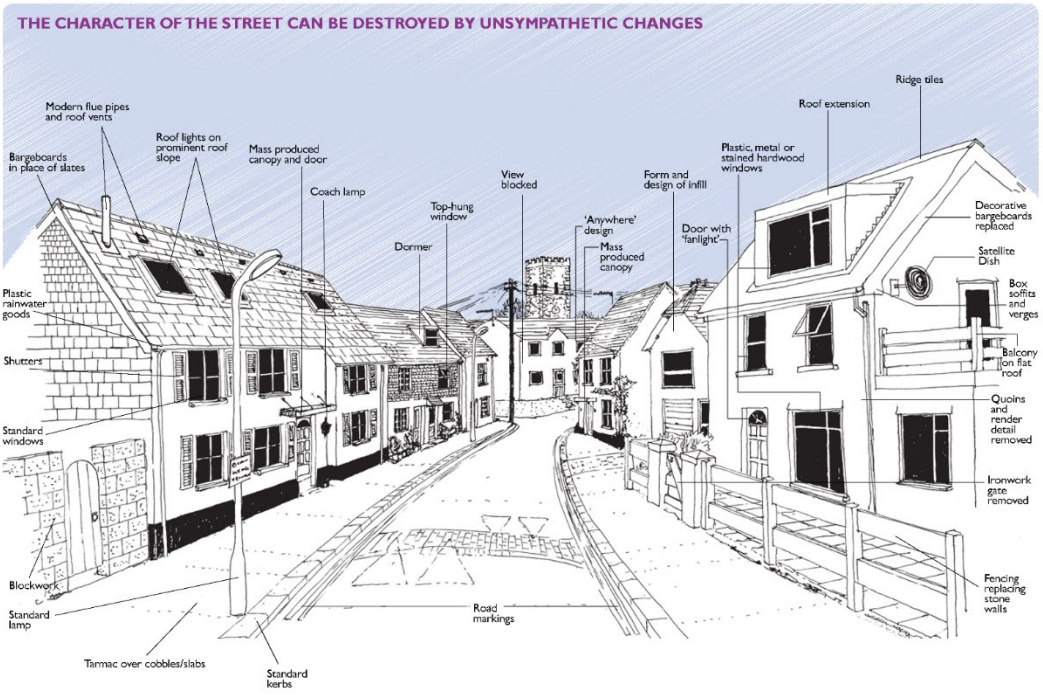

Figure 10: Examples of changes which can harm the character of a street

37. The below gives additional guidance on the detail which needs to be considered when proposing development in conservation areas including:
    - The characteristics of siting and alignment;
    - The characteristics of materials;
    - The characteristics of scale and form; and,
    - The characteristics of style and detailing.

The characteristics of siting and alignment

38. New buildings are more likely to look as if they belong to a conservation area if they're sited and arranged in much the same way as those already there. In recent years common practice has been to set new buildings back from the highway, with 'open plan' gardens or parking areas in front, but this isn't a pattern that's typical of historic areas in the area. Here, most buildings relate to the highway in one of three distinct ways, each telling something about their age, status and use:
    - The first is where buildings are sited directly on the highway, at the back of the pavement if there is one or behind an 'unprotected' strip of land belonging to them. From roof to doorstep, therefore, their fronts are very much part of the street scene.
    - The second is where buildings are set back from the highway behind private front gardens with waist high boundary walls. Although usually facing the

highway, the prominence of these buildings in the street scene will depend on the depth of the garden and how densely it is planted.

- The third is where buildings are set back from the highway within private gardens ‘protected’ by high level walls. As a result, these buildings, as well as their gardens, may not form part of the street scene at all.

39. The below example shows the sensitive combination of restoration and new build which has been placed to strengthen and enhance the characteristics of the village square.

Figure 11: Before (left) and after (right) example of redevelopment where siting was a key consideration

40. Buildings in groups often share a common frontage or ‘building line’ that’s more or less parallel with the line of the highway, and, as few highways are ever dead straight, this relationship creates many pleasing and often unique visual effects. Building lines that diverge away from the highway are especially interesting as they may evidence a significant time or event in the past. Near the centre they might define an ancient market place, while at the crossing point of a river or stream they could evidence the existence of an earlier bridge or ford that has since been superseded.

41. Another important aspect of layout patterns is the relationship buildings have with one another along the highway, both in terms of their formations (singly, in pairs or in groups of any number) and the gaps between them. The variations are indeed enormous, and in most areas several patterns will exist. In cities, towns and large villages continuous terracing will often be dominant in and near the centre, while beyond this a number of other patterns will prevail, from short terraces or semi-detached houses in fairly regular series, right through to widely-spaced detached houses set in landscaped grounds. In small villages established patterns tend to be more mixed, and the key to their preservation rests very much in ensuring new development complements the mix in its particular locality.

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Figure 12 Dense layouts, characteristic of historic urban areas

The characteristics of materials

42. Over the centuries ideas about floor plan arrangements and architectural styles have spread with relative ease to produce similar forms and appearances throughout the country. Building materials, however, tell a different story. Transporting these was difficult and expensive so first choice usually went to the materials closest to hand. It is not surprising, therefore, that in a country with such a diverse geology, the materials used to construct its historic buildings are a prime source of local identity. This can be very local indeed where the geology is especially varied and able to supply a bounty of serviceable building stones, roofing slates and clays and shillets for cob. Farming practices helped too by supplying straw for thatch, and sometimes local reed from a number of wetland areas chiefly on the coast. In addition innumerable kilns alongside quarries, beaches and navigable rivers were busy producing lime; the essential ingredient for mortars and renders which were gauged with local beach or river sands. These, then, are the materials that truly belong in the area, having enjoyed a long tradition of use, while brick, tiles and exposed timber frame construction only rarely found favour.

43. Deciding what the most suitable materials are for a building project isn't simply a matter of making choices from the range that already exist. It is important to recognise which materials are present in a conservation area and which are not, but equally it is important to recognise how the materials that do exist are used, how extensive their use is, and how they are distributed. Each of these aspects is a potential source of interest as well as identity, bearing in mind that many conservation areas are made up of a series of identifiable zones each with

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characteristics of their own. Slate hung walls, for example, might be conspicuous by their absence from certain parts of a conservation area, but be dominant in another or make only an occasional appearance. And when slate hanging does occur, it might only be applied to certain types of building, and even then, only to particular elevations.

44. Such patterns in the use and distribution of materials will usually have sense and purpose, so new work that doesn't respect them could erode their historic interest and may look out of place. Expensive slate hanging, for example, was often only applied to elevations that took the brunt of the weather, while houses built of rubble stone were often rendered to reflect their 'superior' status in comparison to 'humble' outbuildings whose stone was left exposed. It wouldn't make sense, therefore, if the house render was removed to expose the stonework and a new garage built alongside with a perfectly flat rendered finish.

45. Materials make an immense contribution towards the interest and character of conservation areas, not only in creating their distinctive identities, which is important enough, but also in creating a sense of authenticity that is genuine and meaningful. This is why the introduction of other materials, such as panel fencing in place of stone walls, plastic windows in place of timber, or indeed tarmac in place of cobbled pavements, can have such a disruptive and erosive impact. It is also why special care is always needed when specifying materials for new work. It is not enough to choose stone, for example, without considering its type and form (eg thin-bedded slate stone or rounded limestone), its colour, the texture and colour of its bedding mortar and the method of its laying and pointing. Nor is it enough to choose natural slates without considering their colour, their sizes, the way they're to be laid, and the method of their fixing.

46. The below examples show the importance of materials when making planning decisions in the conservation area:

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Figure 13: This prominent slate cladding is attractive, but its use can be rare and needs to remain so to preserve its particular identity

Figure 14: Narrow cobbled roads and stone buildings are characteristic of Plymouth's historic Barbican area

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Figure 15: Renewing the render of this cottage was appropriate, but not the added patterning

47. For further guidance on materials across the Plan Area please see APPENDIX 2: Specific materials for the Plan Area.

The characteristics of scale and form

48. Scale and form are two aspects of building design which are closely related and derive mainly from the attributes of size, shape and proportion. All buildings have them, as do their parts, and in combination they make a very significant contribution towards a conservation area's interest and character. In particular, the scale and form of buildings has quite a fundamental influence over the way a conservation area is perceived in terms of the kind of settlement it's in. In general the more similar buildings are in these respects the more likely they will relate to each other in harmonious ways.

49. In historic settlements such relationships tend to be the rule rather than the exception, mainly due to the prevalence of traditional materials and methods of construction. These have tended to keep buildings within certain bounds by restricting wall heights and limiting the widths between them to the distance a pitched roof could span (around 6 metres). So even the largest buildings in market towns have simple forms and modest, human scales. But, whilst visual harmony normally prevails in historic areas, the different ages and types of building in each will introduce distinctive patterns, so that roofs, for example, may be characterised by either steep or shallow pitches, or hipped or gabled ends.

50. For example, the new developments shown in both photographs are only a short distance apart, but the differences in their scale and proportions suit them to their different, well-established settings

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Figure 16: Examples of good siting and form

51. Scale and form, however, do much more than illustrate the development and visual impact of traditional building techniques. Of very special interest is the way they shed light on a settlement's history, including its status and functions, its patterns of growth and the fluctuations of its fortunes. In comparison, therefore, to a handful of tiny cottages at the heart of a coastal hamlet, a row of 3-storey town houses in any market town will have a completely different story to tell about the whys and wherefores of their construction. Patterns of this kind characterise every historic settlement and provide a great deal of tangible evidence and information about former times. But it isn't simply for want of ensuring the story they tell can be read by future generations that they need to be respected. The great variety of visual effects they create are of value too, including every level of visual enclosure, and these could easily be harmed by the introduction of new buildings of inappropriate 'stature'.

The characteristics of style and detailing

52. The architectural style of historic buildings, and the detailing of their parts, create visual delight and together supply a tremendous amount of information about their age, status and occupation. They illustrate too how a conservation area has developed over the centuries, giving insight into how its fortunes have fared and what significant events have helped shape the way it looks today.

53. The style of most historic buildings is characterised, to a large extent, by the particular treatment of windows and doors. They, therefore, are especially sensitive to change, making any alterations to them undesirable.

54. As a general rule, the earlier historic buildings, the less likely their exteriors will have been consciously designed. An attractive appearance was doubtlessly sought, but practical considerations prevailed. So whilst room layouts were often the same in similar sorts of buildings, room sizes, and the size and arrangement of their windows, varied enormously to reflect the particular needs and aspirations of their occupants. The results, outside, were compositions most often described as picturesque and usually defined as 'vernacular' in style, their key characteristics being informality, irregularity and simplistic.

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55. As the rule also implies, the later historic buildings are the more likely their exteriors will have been consciously designed. Formality is the key characteristic of their compositions, and for this they're usually defined as 'polite' in style. Buildings designed in this way usually embody classical traditions, so that the proportions of windows and doors, and their arrangement, combine to create regular patterns with vertical emphasis. Such 'politeness' outside was often at the expense of convenience inside, as achieving a balanced design was considered most important, especially on principle elevations. Such politeness also meant that architectural features of classical origin became common, particularly cornices at the eaves and pilasters in support. Indeed, these, along with essential sash windows, were often used to 're-front' vernacular buildings in order to bring them 'up to date' and into fashion. As the detailing of these features (especially sash windows) changed over time they now help to date buildings and the changes made to them. They also show how local craftsmen interpreted national ideas and used them to create buildings and places with distinctive characteristics of their own.

56. The architectural styles of buildings, the way they're distributed and the detailing of the features that characterise them are all significant contributors towards the interest and character of a conservation area. Above all, they provide that essential ingredient, 'authenticity', without which a conservation area would be without its true identity.

57. The below examples show how style and detailing plays a key role in defining conservation areas.

Figure 17: The 'vernacular' style of these 17th century cottages derives mainly from the informality of their appearance

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Figure 18: The 'polite' style of this 19th century house derives from the formality of its architectural treatment which creates a dignified and refined appearance

Figure 19: The formal style of this building reflects its status as an important corner of the Abercrombie plan for Plymouth

58. Guarding against the erosion of vernacular characteristics means avoiding changes that will 'regularise' a building's appearance, like altering windows to a single, standard pattern or size. Taking care not to 'gentrify' simple cottage entrances is important too, while extensions should 'simply' continue the irregularities and informalities of their parent. Polite characteristics, on the other hand, are more likely to be eroded by repairs that don't include the renewal of decorative architectural features, or by extensions that are crudely detailed and disregard the key design features of their parent.

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59. Recognising the different styles, and translating their characteristics into designs for new buildings, requires skill in the understanding and handling of traditional details if they are not to appear superficial and denigrate the 'genuine articles'. New buildings ought not be copies of the old. Rather they should display a purposeful relationship with their setting, and contribute positively towards its character, in a manner that's both imaginative and contemporary. Those qualified and experienced in architectural design will be best able to provide the professional advice and guidance needed and those with a proven record should be sought and commissioned.

60. Below are examples of new development which has introduced modern design into historic settings:

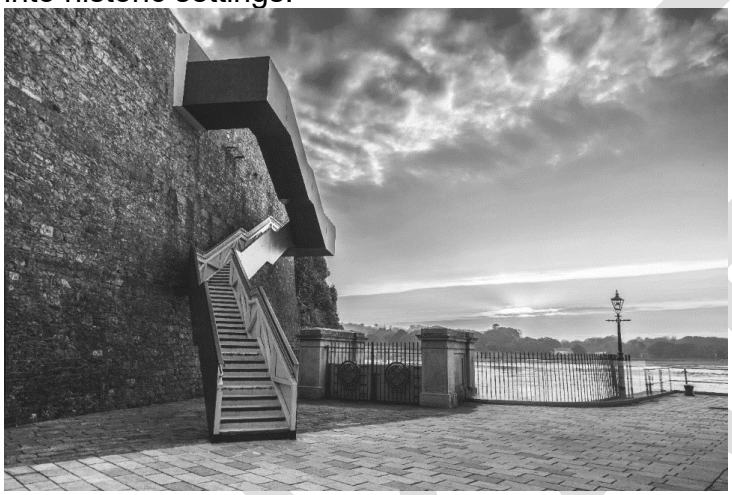

Figure 20: The new staircase linking the Royal William Yard to Devils Point successfully introduced a distinctly modern architectural style and materials to the historic victualling yard. Image © Jay Stone

Figure 21: This small development is modern, but it is suited to its village setting, both in terms of its overall vernacular styling as well as the quality and subtle detailing of its parts. Note, for example, the softened corners to the rendered walls and the appearance of the roof with its traditional 'mitred' hips (right) in comparison to the existing tiled ones (left).

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Contents

APPENDIX 6: Additional guidance for DEV26 2
1. Introduction 2
2. European Sites and Habitat Regulations Assessments (HRA) 2
Habitats Regulations Assessment (HRA) 2
Plymouth Sound and Estuaries European Marine Sites (EMS) 3
South Hams SAC 5
3. European Protected Species 7
4. How to consider compensation and Biodiversity Net Gain in planning applications 11
Major applications 11
Minor applications 12

Table of figures

Figure 1: 12.3km ZOI around Plymouth Sound and Estuaries EMS 3
Figure 2: South Hams SAC consultation area 6
Figure 3: Cirl Bunting breeding range in Devon Primary source: 2016 national survey 10

DRAFT

APPENDIX 6: Additional guidance for DEV26

1. Introduction

1.1 The below gives further guidance on Policy DEV26, it includes information on:

- Habitat Regulations Assessments (HRA), including details on:
  - The Plymouth Sound and Estuaries European Marine Site Zone of Influence; and,
  - The South Hams SAC Consultation Zone.
- Requirements for protected species; and,
- How to consider compensation and Biodiversity Net Gain in planning applications.

2. European Sites and Habitat Regulations Assessments (HRA)

2.1 This guidance expands on guidance at DEV26.1 of the SPD.

Habitats Regulations Assessment (HRA)

2.2 The LPAs are required to ensure that proposed development (alone or in-combination with other development) will not have an adverse effect on the integrity of European Sites – this is undertaken through the 'Habitats Regulations Assessment' (HRA) process.

2.3 Applications are first subject to 'Screening' of the likelihood for significant effects. If there are none then the process ends here.

2.4 If there is a likelihood of significant effects, applications are subject to a more detailed 'Appropriate Assessment' after which Natural England will be consulted. Natural England have issued Standing Advice with respect to consultations on recreational impact only within the Plymouth Sound and Estuaries EMS Zone of Influence.

2.5 Development will only be permitted if it will not adversely affect the integrity of a European Site either alone or in combination with other development.

'Evidence to inform a HRA'

2.6 Where there is potential for a proposed development to significantly effect a European Site (other than where these relate to recreational impacts only within the Plymouth Sound and Estuaries EMS Zone of Influence), the applicant will be expected to provide a document titled 'Evidence to inform a HRA'.

2.7 This document will identify effects and their significance and the proposed avoidance and/or mitigation measures incorporated in the proposal to ensure it will not adversely affect the integrity of a European Site.

2.8 These measures should carry through to other supporting documents for the planning application and the document will inform the HRA carried out by the LPA.

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Plymouth Sound and Estuaries European Marine Sites (EMS)

Recreational pressure

2.9 The Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA are collectively referred to as the Plymouth Sound and Estuaries European Marine Site (EMS).

2.10 A 12.3km Zone of Influence (ZOI) exists around the EMS which was clarified and confirmed as part of the evidence base informing the Joint Local Plan: EMS Recreation Study Document 04. Survey of recreational use within the Plymouth Sound and Estuaries European Marine Site: Scoping report and survey results[1].

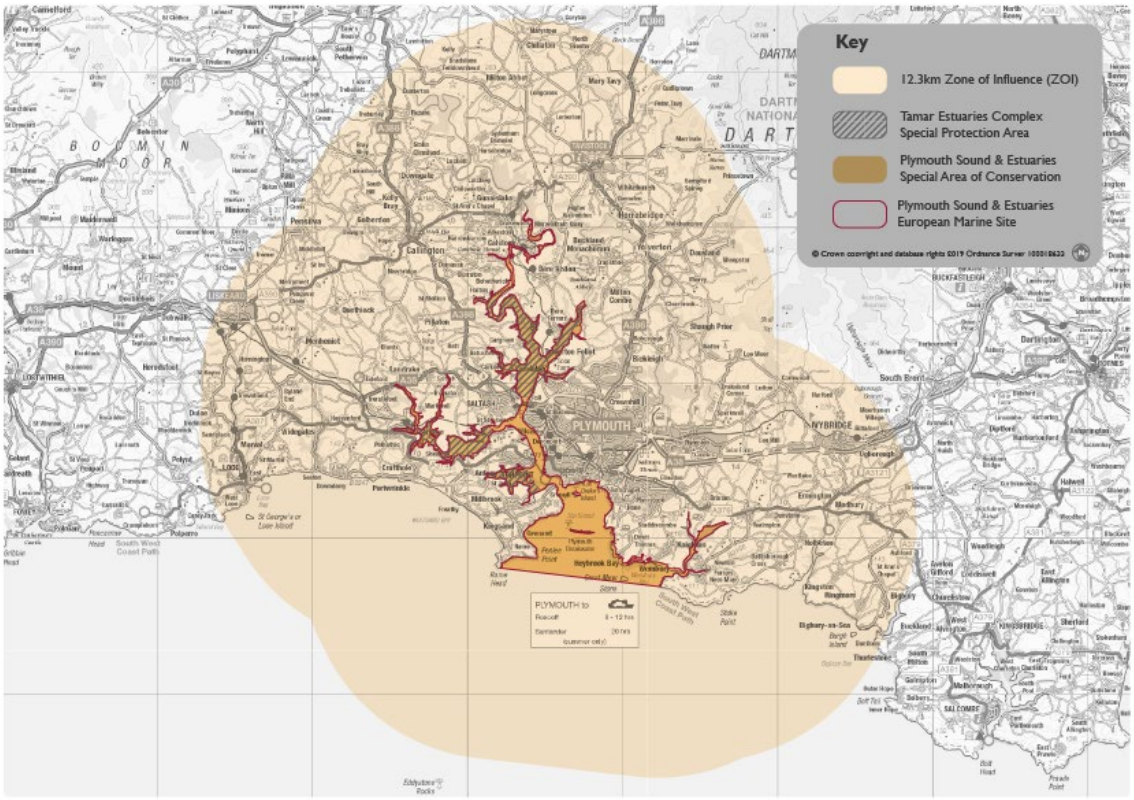

Figure 1: 12.3km ZOI around Plymouth Sound and Estuaries EMS

2.11 Recreational pressure from residents associated with new development within the 12.3km ZOI will require mitigation to ensure that they do not have a significant effect on the Plymouth Sound and Estuaries EMS. Without mitigation new residents, in combination with other development, could have a significant effect.

2.12 A Strategic Access Management and Monitoring Strategy (SAMMS) identifies the management actions that are required to mitigate the potential in-combination of

[1] http://www.plymouth-mpa.uk/wp-content/uploads/2018/06/171207-Rec-Study-04-FINAL-JLP-evidence.pdf

new housing development including which mitigation sums from development are required to contribute towards mitigation.

2.13 Within the PCC administrative area this mitigation sum will be taken from the CIL contribution, whilst within the WDBC and SHDC administrative areas, the sum will be taken by a scheme secured by condition.

2.14 Where a chargeable development falls within the ZOI but does not have any other potential to effect the Plymouth Sound and Estuaries EMS (other than recreational pressure), applicants are not required to submit an 'Evidence to inform a HRA' document. In these cases the LPA will complete a HRA and Appropriate Assessment making reference to the Standing Advice issued by Natural England with respect to consultations on recreational impact only within the Plymouth Sound and Estuaries EMS Zone of Influence.

2.15 Please see Section 12 for further guidance on planning obligations.

Development below the high water mark

2.16 Developments below the high water mark can have a profound effect on the marine environment which can have a knock-on effect on other aspects of the environment and for other users. Impacts can include:

- Physical loss of habitat area from new structures such as slipways and dredging;
- Fragmentation of habitats;
- Physical damage to the habitat so that it degrades over the long-term e.g. through increased anchoring;
- Biological disturbance e.g. through increased bait collection;
- Pollution of the shore and estuary such as construction sites and oil spills;
- Obstruction of natural currents (hydrodynamics) by built structures such as quays and slipways which can cause erosion of key habitats;
- Contribution to adverse in-combination effects; and/or,
- Disturbance to wintering birds, migratory fish and other species protected under European law.

2.17 The most common concerns and issues raised through the planning process are listed below and details provided under a method statement on how this will be minimised should be provided:

- The disturbance of the sediment during construction and the subsequent mobilisation of any contaminants;
- The placement of pilings and structures on the seabed which can alter the hydrodynamics within the estuary;
- The loss of intertidal and subtidal habitat, where a culmination of small loses can have a major impact on the overall functioning of the estuary;
- Increased runoff which can lead to higher levels of pollutants entering the water; and/or,

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- When heavy plant machinery are used on the foreshore.
- The disturbance to migratory birds during construction and as a direct or indirect result of the development.

2.18 Developments which would result in an element of detrimental impact must have regard to the principles of the mitigation hierarchy.

2.19 If a development is deemed necessary then, regardless of which licences are required, the developer will need to demonstrate that they have taken all steps necessary to minimise detrimental impact on biodiversity.

2.20 In addition to the above environmental considerations, proposed development will also need to take into account:

- Economic considerations and the potential impact of any development on those with an interest in using the waters;
- Navigation considerations and the activity of the navy, commercial shipping and recreational vessels, including at night where light pollution can impact the effectiveness of navigational lights;
- Climate change and coastal defences, including rising sea levels and increased adverse weather;
- Ecological considerations through poor working practises during construction (noise and pollution), through loss of habitat or by indirectly changing the way the water functions;
- Recreation considerations, where access both to and into the water is of importance;
- Waterfront development proposals which shut off access to and from the sea, fail to address opportunities to improve access or otherwise impede PCC's vision of being a vibrant waterfront city embracing a Plymouth Sound National Marine Park, will not be supported.

2.21 Any development below the high water mark will also require a 'Marine Consent' from the Marine Management Organisation (MMO)[2]. If the development lies within the intertidal area between high water and low water mark, then both planning permission and marine consents are required. Additional consents may also be required from the harbour authority and the Environment Agency (EA).

South Hams SAC

2.22 The South Hams SAC comprises five distinct and separate significant Greater Horseshoe bat roosts (themselves nationally designated SSSIs).

2.23 Areas surrounding the roosts (Sustenance Zones) have been identified as being of particular importance in supporting the critical feeding and commuting activity of the Greater Horseshoe bats, and the wider landscape (Landscape

[2] https://www.gov.uk/topic/planning-development/marine-licences

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Connectivity Zone) has been identified as of importance for the more dispersed activity of the bats further from the roost locations.

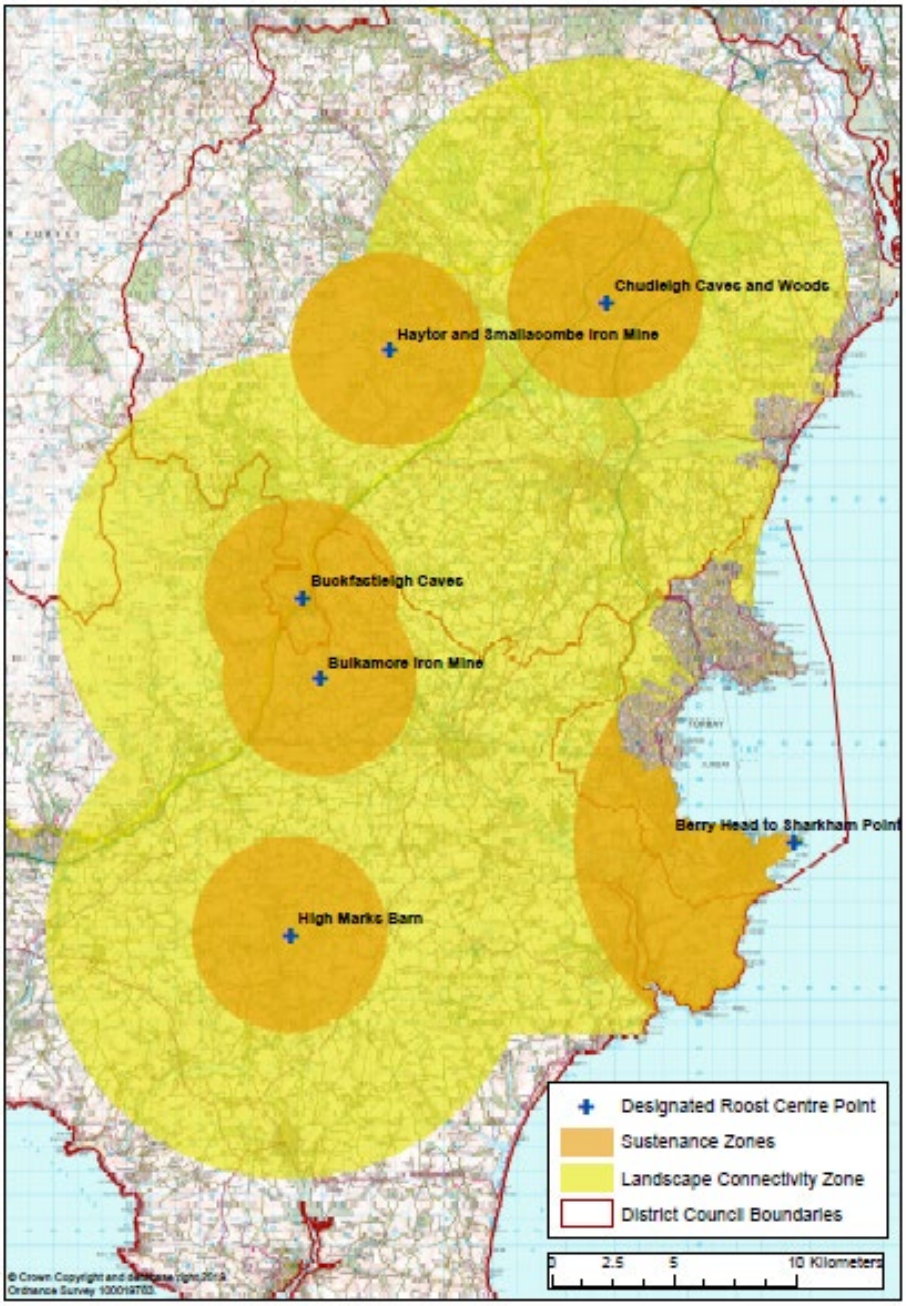

Figure 2: South Hams SAC consultation area

2.24 The roosts and supporting features fall within five LPA administrative boundaries (SHDC, Teignbridge District Council, Devon County Council, Torbay Council and Dartmoor National Park Authority).

2.25 Given the complexities of the South Hams SAC and potential for development a joint South Hams SAC Guidance Document[3] has been adopted across the five LPA areas and should be consulted when undertaking development within the Sustenance Zones or Landscape Connectivity Zone, to understand the likelihood of proposals having significant effects on the South Hams SAC, and whether a HRA is likely to be required.

2.26 The Guidance Note will also be supplemented by a number of Advice Notes giving specific advice on survey effort, mitigation measures and useful information which will assist when considering the impacts of a proposal.

3. European Protected Species

3.1 This guidance expands on guidance at DEV26.4 of the SPD.

3.2 Applicants must avoid impacts on European Protected Species (EPS) wherever possible. EPS may be encountered regularly when undertaking ecological surveys in support of a development proposal, including small scale residential applications, for example, bats roosting within a roofspace, or major development sites for example, dormice nesting in hedgerows or bat foraging/commuting along boundary features.

3.3 EPS that are most likely to be encountered within the JLP area are bats (17 species), dormice, otters and Great Crested Newts.

3.4 To identify when Great Crested Newts (GCN) should be considered within the planning process, see the GCN Consultation Zones[4] at which act as a guide as to when it might be reasonable to undertake a GCN assessment following national guidance.

3.5 Where there is presence of EPS, the likely impacts of the proposed development on EPS should be identified. The LPA will consider whether the proposed development is likely to trigger one or more of the offences against EPS as defined by the Habitats Regulations:

- Deliberately capture, injure or kill an EPS;
- Intentionally or recklessly disturb an EPS in its place of rest/ breeding site;
- Intentionally or recklessly damage, destroy or obstruct access to a EPS place of rest/ breeding site (even if the EPS is not occupying the resting / breeding place at the time); and/or
- Possess or sell or exchange an EPS (dead or alive) or part of an EPS.

3.6 Where an offence is considered likely the LPA is required to consider whether the proposal meets the ‘three derogation tests’ and accordingly whether Natural

[3] https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance/south-hams-sac-guidance
[4] http://www.dbrc.org.uk/great-crested-newt-consultation-zone-5km-maps/

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England is likely to subsequently grant a EPS Licence for otherwise illegal activities to proceed lawfully.

3.7 For a proposal to meet the three derogation tests it must:

- Have an Imperative Reason of Overriding Public Interest (IROPI);
- No Satisfactory Alternative (that would meet the IROPI); and,
- Maintain the Favourable Conservation Status of the EPS concerned.

3.8 If the LPA is satisfied the three derogation tests are met it may grant planning permission and the applicant can then apply to Natural England for an EPS Licence[5].

3.9 The applicant will be required to provide evidence to inform the LPA's consideration of the three tests. The first two tests are planning tests, whilst the third is an ecological test. It is noted that the LPA may not require the level of detail subsequently necessary for Natural England to conclude their consideration of the third test, but nonetheless sufficient information is required to give the LPA confidence that the third test is met, for example, if a compensatory bat roost is required, it should be reflected on submitted plans.

3.10 If EPS are present, but it is considered that a Habitats Regulations offence is unlikely or can be avoided (and an EPS Licence is not required), the applicant must ensure that a non-licence method statement or mitigation strategy is included within the submission, detailing any necessary avoidance or mitigation measures that will ensure the development is undertaken in a lawful manner.

UK Protected Species

3.11 Applicants must avoid impacts on UK protected species wherever possible. The most common UK protected species encountered within development in the JLP area are reptiles, Barn Owls and badgers. It will be necessary to establish the presence of and implications upon these protected species before applying for planning permission and to avoid impact wherever possible. Any avoidance and mitigation measures should also be included within the submission.

3.12 Natural England has issued standing advice regarding protected species[6] to assist LPAs with considering how developments might impact protected species and with assisting LPAs in their decision making for planning applications. The same information may be useful to applicants and developers.

3.13 For works affecting some UK protected species, further licences[7] may be required from Natural England.

[5] https://www.gov.uk/guidance/wildlife-licences
[6] https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications
[7] https://www.gov.uk/guidance/wildlife-licences

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Biodiversity Action Plan (BAP) habitats and species and UK Habitats and *Species of Principal Importance*

3.14 Applicants must avoid harmful impacts on BAP habitats and species wherever possible. BAP habitats and species are those identified as being the most threatened and requiring conservation action under the UK BAP. The UK BAP lists have been used to help draw up statutory lists of Habitats and Species of Principal Importance listed in section 41 of the NERC Act (2006) for which LPAs have a duty to conserve (commonly referred to as Priority Habitats and Species).

3.15 Within Devon the Devon BAP Priority Species[8] list was updated in 2018 with a list of 1,600 species known to be rare in Devon and a list of 96 species for which Devon has a particular responsibility to look after the species and their supporting habitats. The location of Priority Habitats can be found on Defra's interactive map[9].

3.16 If adverse impacts cannot be avoided they must be mitigated as far as possible and compensated for on or off-site (if it can be satisfactorily secured). For Priority Habitats, compensation must be by restoration of existing, or creation of new Priority Habitat to ensure no net loss of that particular habitat type. If compensation is not possible an application may be refused.

Cirl Buntings

3.17 Cirl Buntings are a rare species in the UK (reflected by inclusion as a s41 Priority Species, listing on Schedule 1 of the Wildlife and Countryside Act, 1981, on the Red list as a species of high conservation concern, and a Devon BAP Priority Species) with a very restricted range, most of the population occurring within South Devon.

[8] https://www.naturaldevon.org.uk/devons-natural-environment/devons-wildlife/devonspecialspecies/
[9] https://magic.defra.gov.uk/magicmap.aspx

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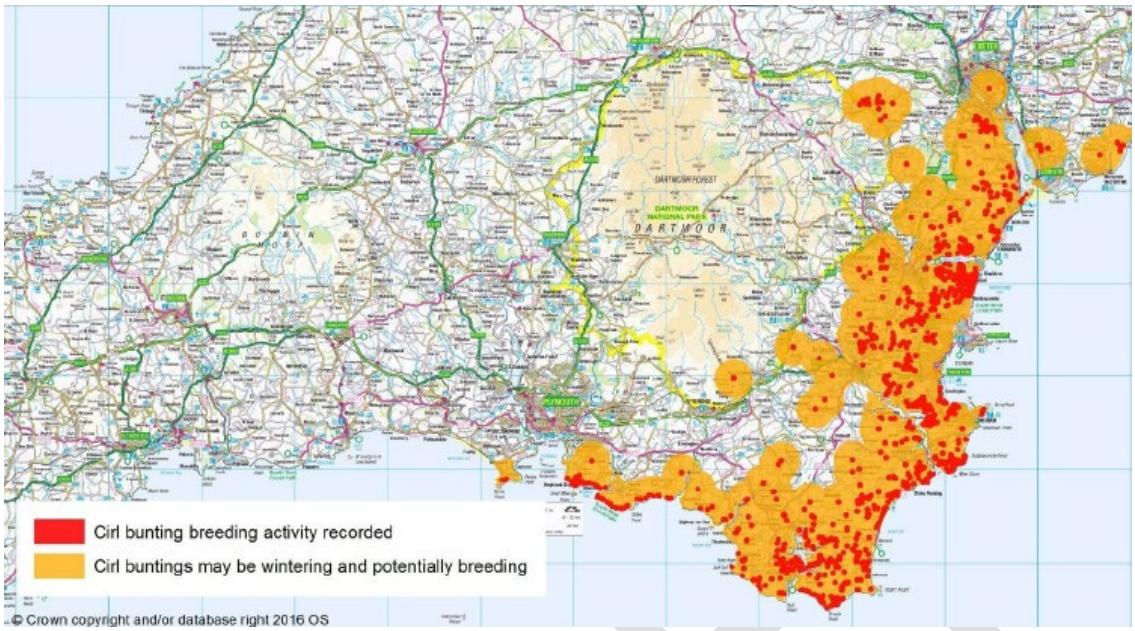

Figure 3: Cirl Bunting breeding range in Devon Primary source: 2016 national survey

3.18 In areas where there are historic records of Cirl Buntings breeding territories, or where suitable habitat is present on a development site, the developer and the LPA will either need to accept presence of Cirl Buntings and agree on the level of presence or undertake specific Cirl Buntings surveys, in accordance with the Wildlife and development guidance note: Cirl Bunting (2017)[10], or the latest iteration thereafter.

3.19 Where loss of summer breeding or winter Cirl Bunting habitat is unavoidable, compensatory habitat must be provided. This is unlikely to be achieved on the development site but may be able to be achieved on other land within South Devon.

3.20 To adequately compensate for the loss of habitat associated with one pair of Cirl Buntings, it is necessary to provide at least 2.5ha of appropriately managed habitat, to include:

- <1.13ha of semi-improved/rough grassland (summer feeding habitat);
- <0.2ha hedge/scrub (nesting habitat); and,
- <1ha weedy overwinter stubble (winter feeding habitat).

3.21 Where suitable mitigation or compensation cannot be provided on site, contributions towards off-site compensation will be sought.

[10] https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/wildlife-and-development-guidance-note---cirl-bunting-october-2017.pdf

3.22 Where offsite compensation is made as a contribution towards land purchase for a nature reserve and RSPB (or other body), management and monitoring costs for the first five years with subsequent costs being met by RSPB (or other body) reserve management budget, full details of cost calculations can be found within the Wildlife and development guidance note: Cirl Bunting (2017).

4. How to consider compensation and Biodiversity Net Gain in planning applications

4.1 This guidance expands on guidance at DEV26.5 of the SPD.

Major applications

1. Consultant ecologist to undertake desk study and initial Preliminary Ecological Appraisal:
    - Assess habitats, their quantity and value;
    - Record findings within Preliminary Ecological Appraisal; and,
    - Undertake further protected species surveys if required.

2. Complete the Defra Biodiversity Metric Calculator:
    - Calculate area and quality of existing biodiversity units;
    - Calculate proposed onsite habitat restoration and creation (and if relevant offsite) in terms of biodiversity units; and,
    - Calculate change in biodiversity units, the value must show a 10 per cent increase in biodiversity units to be policy compliant.

3. Submit PEA/protected species surveys results as an Ecological Impact Assessment (EcIA) with the Defra Biodiversity Metric Calculator spreadsheet.

4. Include details of ongoing management and maintenance of onsite provisions (within a Landscape and Ecological Management Plan – LEMP).

5. If compensation/net gain provisions are to be offsite, provide details of how this will be achieved, and how it fits will local priorities for habitat restoration and creation:
    - If on land owned by applicant, a Management Plan will be required for 30+ years, delivery of which will be secured by s106 clause.
    - If on land owned by a third party, as above with the third party signatory to the s106.
    - If unable to provide on land in applicant's control, provide a calculation showing habitat creation costs applicable to required number of biodiversity units. This is likely to include: land purchase; habitat creation and ongoing management. When agreed, the sum to provide this habitat creation/restoration will be secured by s106 clause and paid upon meeting the trigger to the LPA.

6. LPA to secure provisions by Section 106

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NB – Any necessary impact avoidance and mitigation measures will need to be detailed within the EcIA and adherence to these will be conditioned, and for larger and/or more complex schemes a proportionate Construction and Environmental Management Plan will be required.

Minor applications
Is an ecological survey required? (find out by reviewing LPA local validation checklist)

Yes - Consultant ecologist to:

1. Undertake desk and site survey and record findings within Preliminary Ecological Appraisal.

2. Where there will be an impact on protected habitats or species undertake further surveys as appropriate. Compile results within an Ecological Impact Assessment.

3. Complete an ECOP and Biodiversity Budget and attach these as appendices to the PEA/EcIA, showing a 10% or (where not practicable) a clear biodiversity net gain. Reflect any provisions on elevation drawings as applicable.

4. Where necessary (depending on scale), include details of ongoing management and maintenance of onsite provisions (within a Landscape and Ecological Management Plan)

5. If considered appropriate and proportionate Biodiversity Net Gain, the LPA will condition adherence to the ECOP (and elevation/other drawings as applicable).

No - Applicant to:

1. Applicants will be encourage to complete an ECOP and Biodiversity Budget sheet, showing a clear biodiversity net gain, to include (as a minimum):
    - One inbuilt bat box/brick/tube per dwelling;
    - One inbuilt bird box/brick per dwelling;
    - One inbuilt bee brick per dwelling;
    - A hole for small mammals (such as hedgehogs) in each garden fence of 13 x 13cm.

2. If considered appropriate and proportionate Biodiversity Net Gain, the LPA will condition adherence to the ECOP (and elevation/other drawings as applicable).

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OPEN SPACE ASSESSMENT FORM

Site Info

Greyed out fields will be completed by LPA officer

Site ID:		**Site Name:**			
Easting:		**Northing:**		**Area (Ha):**	
Landscape Character Area:					
Type:					
Size group:					
Date of Submission:					

Map

Photo

Quality and value scores

Overall quality score:	
Overall value score:	
Overall quality/value rating:	

- Site accessible (overall access category for analysis)

OPEN SPACE VALUE ASSESSMENT

A. Designations

A1. International

Total Score: 0

+4		**SPA**
+4		**SAC**
+4		**Ramsar**

A2. National

Total Score: 0

+3		**Listed Building**	+3		**NNR**
+3		**SAM**	+3		**Green Belt**
+3		**SSSI**	+3		**AONB**
+3		**English Heritage Register of Historic Parks and Gardens**			

A3. Access

Total Score: 0

+3		**National/Regional Trail**
+3		**Sustrans Routes**

A4. County - Statutory

Total Score: 0

+2 ☐ **County Wildlife Site**

A5. Local - Statutory

Total Score: 0

+1 ☐ **Conservation Area**

+1 ☐ **Local Nature Reserve**

+1 ☐ **Potential Local Wildlife Site**

+1 ☐ **RIGS**

A6. Other

Total Score: 0

+1 ☐ **Within a Flood Risk Zone**

+1 ☐ **Biodiversity Network**

+1 ☐ **Common Land**

+1 ☐ **Contains Ancient Woodland**

+1 ☐ **Is there a school immediately adjacent to the green space?**

+1 ☐ **Village Greens**

+1 ☐ **T.P.O.**

Potential green space designation - *Section to be completed by LPA*

Not scored, but green space may be eligible for local green space designation if all boxes are ticked

☐ **A7. Is the green space demonstrably special to a local community or does it have local significance because of its beauty, historic importance, recreational value, tranquility or wildlife?**

☐ **A8. Is the green space local in character and not an extensive tract of land?**

☐ **A9. Is the green space in reasonably close proximity to a centre of of population?**

Community Involvement

Total Score: 0

+1 ☐ **A10. Is there a Friends group?**

+1 ☐ **A11. Is there a programme of activities or has funding been provided to an organisation to enable a programme of activities to be developped and delivered?**

+1 ☐ **A12. Has the site achieved a Green Flag, Green Heritage or Green Pennant Award?**

Community Involvement

+1 ☐ **A13. has a management Plan with funding mechanism been secured to**

ensure management for at least 30 years?

Water

Total Score: 0

0 **A14. Is there a water body within or adjacent to the green space**

+1 **A15i. If so, is the waterbody a main river?**

+1 **A15ii. If so, is the waterbody an ordinary watercourse?**

B. Informal Recreation

B1. Site Access

+5 5 **We expect every newly provided or improved green space to be fully accessible**

Types of Access provided:

freely accesible to public

Public Right of way or regional route

B2. Forms of Access Present

Total Score: 0

+1 **Vehicular**

+1 **Pedestrian**

+1 **Disabled**

+1 **Other (please State):**

+1 **Cycle**

+1 **Horse**

B3. Play Provision

Total Score: 0

Please tick if Play Provision is not applicable of the site?

+1 **B3i. Has play equipment been included?**

B3ii. Has other play provision been provided on site?

+1 **MUGA**

+1 **Waterplay**

+1 **Skate Park**

+1 **BMX**

+1 **Other:**

B4. Informal Recreation

Total Score: 0

Please tick if informal recreation is not applicable of the site?

+1 **walking/dog walking**

+1 **Childern's play**

+1 **sitting/relaxing**

+1 **Young people hangingout**

+1 **Skateboarding**

+1 **Horse riding**

+1 **Cycling**

+1 **other (Please state):**

C. Sport/Other Organised Activities

☐ **Please tick if sport and organised activities are not applicable**

C1. Site Access

Total Score: 0

+1 ☐ **Outdoor Athletics Track**

+1 ☐ **Grass Pitches**

+1 ☐ **Artificial Pitches (e.g. astro turf)**

+1 ☐ **Golf**

+1 ☐ **Tennis Court**

+1 ☐ **Bowling Green**

+1 ☐ **Ski slopes**

+1 ☐ **Other (Please state):**

D. Surrounding Areas

D1. Adjacent Land Uses

☐ Residential

☐ Commercial

☐ Industrial

☐ Institution (e.g. Shools, Hospitals, etc.)

☐ Transport Infrastructure

☐ Other Green Space

☐ Coastal

☐ Other (Please state):

E. Natural Habitats/Biodiversity

+1 ☐ **E1. Does the scheme include a management plan promoting nature conservation?**

E2. Vegetation types

Total Score: 0

Grassland

+1 ☐ **ornamental Lawn**

+1 ☐ **short amenity lawn**

+1 ☐ **Wildflower grassland**

+1 ☐ **Low growing herbs**

+1 ☐ **Tall herbs**

+1 ☐ **Bracken**

Scrub, shrubs & hedgerows

+1 ☐ **Scrub**

+1 ☐ **Hedge**

Water & Wetlands

+1 ☐ **running water (rivers and streams)**

Trees & woodland

+1 ☐ **broadleaved woodland**

+1 ☐ **coniferous woodland**

+1 ☐ **woodland edges/ trees and shrubs forming shelterbelt**

+1 ☐ **Tree groups/ scattered trees**

+1 ☐ **Veteran trees or significant individual trees**

+1 ☐ **Orchard**

+1 ☐ **Deadwood**

+1 ☐ Canal

+1 ☐ Pond/lake

+1 ☐ Ditches (water filled)

+1 ☐ Bog

+1 ☐ Wet marginal vegetation

Scrub, shrubs & hedgerowsMarine

+1 ☐ Coastal

+1 ☐ Estuary

Flower beds

+1 ☐ Annual bedding displays

+1 ☐ Ornamental Planting

Brownfield land

+1 ☐ Bare soil and rock

+1 ☐ Derelict wasteland

Allotments

+1 ☐ Active

Artificial habitats

+1 ☐ Disused quarries and quarry faces

0 **TOTAL SCORE: grassland, scrub, shrubs, hedgerows, water, wetlands and marine**

0 **TOTAL SCORE: trees, woodland, flower beds, brownfield land, allotments and artifical habitats**

-1 ☐ Invasive species

+1 ☐ Other Vegetation type (Please State):

☐

F. Character Setting

Total Score: 0

+2 ☐ **F1. has the green space been designed to define the edge or form a separating element between urban/rural edge?**

F2. Does the green space contribute to the character setting of Plymouth?

+2 ☐ **F2a. Is the green space in a Landscape Character Area and does its design positively contribute it**

+2 ☐ **F2b. Is the site coastal and does the design take account of this coastal setting?**

+1 ☐ **F3. Does the green space and its design contribute to the character setting of the immediate local area? Does it positively contribute to a conservation area or its setting?**

+1 ☐ **F4. Is the green space visible from adjacent main road/ railway/ public transport route?**

+1 ☐ **F5. Has the green space been designed to incorporate a recognisable landmark features of local importance?**

+2 ☐ **F6. Does the Green space and its design positively respond to or create any views out/of Plymouth City or the wider landscape/seascape?**

+1 ☐ **F7. Does the Green space and its design positively respond to or create any views out to/of the local area?**

F8. Has the green space been designed to form a buffer for/absorb noise or air pollution from:

+1 ☐ **Nearby traffic**

+1 ☐ **Nearby industry**

+1 ☐ **Other (Please state):** ☐

G. Amenity Detractors

Total Score: 0

-1 ☐ **Road Noise**

-1 ☐ **Rail Noise**

-1 ☐ **Pollution**

-1 ☐ **Lack of management**

-1 ☐ **Erosion**

-1 ☐ **Intrusive buildings**

-1 ☐ **Motorcycle scrambling**

-1 ☐ **Rubbish tipping**

-1 ☐ **Flooding**

-1 ☐ **Other (Please state):**

☐

H. Educational Interest

Total Score: 0

+1 ☐ **H1. Is there or does the design include a built facility which is being used by the local community for education?**

+1 ☐ **H2. Is there or does the design include a natural feature which can used by the local community for education?**

+1 ☐ **H3 Does the site or its design offer educational interests (e.g. nature conservation interest or local historic significance)?**

I. Productive Landscape

Total Score: 0

+1 ☐ **Agricultural**

+1 ☐ **Communal food growing/ allotments**

+1 ☐ **Coppicing**

+1 ☐ **Forestry**

+1 ☐ **Other (Please state):**

☐

OPEN SPACE QUALITY ASSESSMENT FORM

1. Welcoming Place

Total Score: 0

+1 to +4 ☐ **1a. To what extent are the entrances well presented?**

+1 to +3 ☐ 1b. To what extent are the boundaries well defined and maintained?

+1 to +5 ☐ 1c. What is the overall quality of access and accesses within and through the space?

+1 to +5 ☐ 1d. What is the overall quality of access and accesses for people travelling to open space?

+1 to +2 ☐ 1e. What is the overall provision of signage?

2. Health, Safety and Secure

Total Score: 0

+1 to +3 ☐ 2a. Overall provision for informal recreation?

2b. What is the condition of basic amenities?

+1 to +3 ☐ Toilets

+1 to +3 ☐ Car parking

+1 to +3 ☐ Café

+1 to +3 ☐ Litter and/or dog bins

+1 to +3 ☐ Seating

+1 to +3 ☐ Nature trail

+1 to +3 ☐ Lifebelts

+1 to +3 ☐ Cycle parking

+1 to +3 ☐ Other (Please state):

+1 ☐ 2c. Is there natural surveillance into the site from surrounding properties?

+1 ☐ 2d. Do the approaches feel open and secure?

+1 ☐ 2e. Is there a flow of people through the park (to acheive self surveillance)?

+1 ☐ 2f. Is lighting provided?

+1 ☐ 2g. Is dog fouling evident onsite?

3. Clean & Well Maintained

Total Score:

+1 ☐ 3a. Is graffiti evident?

+1 ☐ 3b. Vandalism evident?

+1 to +5 ☐ 3c. Overall cleanliness

+1 to +5 ☐ 3d. Overall condition/quality of planted areas

+1 to +5 ☐ 3e. Overall condition/quality of grass areas

+1 to +3 ☐ 3f. Overall condition/quality of footpaths

+1 to +3 ☐ 3g. Quality of water and associated edge treatment

3h. Are there any buildings or other built feature onsite?

+1 to +3 ☐ If so, please note condition

4. Sustainability

Total Score: ☐

+1 ☐ 4a. Does the proposal include green waste composting area?

+1 ☐ 4b. Does the proposal include sustainable management practices?

+1 ☐ 4c. Does the proposal include waste minimisation/ recycling?

5. Conservation and heritage

Total Score: ☐

+1 to +3 ☐ 5a. Rate the overall design of the open space

+1 ☐ 5b. Does the current proposal assist in conserving historic buildings and/or structures?

6. Community involvement

Total Score: ☐

+1 ☐ 6a. Does the design include a permanent public noticeboard on site?

+1 ☐ 6b. If so, are up to date notices displayed?

+1 ☐ 6c. Are there any temporary notices on site informing users about current developments?

+1 ☐ 6d. If so, are they up to date?

Contents

JLP SPD: Developer Contributions Evidence Base 2
1. Purpose of this document 2
2. Transport 5
2A – Plymouth City Council 5
2B – South Hams and West Devon 8
3. Education infrastructure 9
3A – Plymouth City Council 9
3B – South Hams and West Devon 14
4. Health infrastructure 15
4A – Plymouth City Council 15
4B – South Hams and West Devon 24
5. Green and open space, sport and recreation 25
5A Plymouth, South Hams and West Devon Councils 25
6. European Marine Site (EMS) 38
Article 1: Calculating the Contributions for Marine Recreational Impacts 38

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JLP SPD: Developer Contributions Evidence Base
October 2019

1. Purpose of this document

1.1 This Developer Contributions Evidence Base document informs Section 12. 'Planning Obligations, Community Infrastructure Levy and Development Viability' of the Joint Local Plan Supplementary Planning Document (the JLP SPD). It presents methodologies to help identify the costs of mitigating the impacts of new development proposals on infrastructure, which itself helps guide the negotiation of planning obligations and the apportionment of Community Infrastructure Levy funds.

1.2 This Evidence Base covers the adopted JLP Plan Area which includes Plymouth, South Hams and West Devon councils. As far as possible and where appropriate, a consistent approach across the 3 authorities, and with it the Policy Areas of the JLP, has been sought. This has not always been possible. Plymouth City Council (PCC) is an urban unitary authority whilst South Hams District Council (SHDC) and West Devon Borough Council (WDBC) are largely rural districts. As such, evidence and methodologies may differ. Additionally, in South Hams and West Devon, developer contributions towards key infrastructure types such as Transport, Education, Health, Recycling Centres are the responsibility of Devon County Council (DCC) and will be subject to separate processes, not covered in this document.

1.3 There has been collaborative working with Devon County Council in the preparation of this document. This has been crucial in relation to the Plymouth Policy Area of the JLP in particular, where developer contributions will be sought by Devon County Councils and collected by South Hams Council for infrastructure provision inside Plymouth, e.g. education or transport infrastructure to support development in the urban fringe.

1.4 The evidence presented in this document is based on available data at the time of writing. This includes details of infrastructure needs as identified at Annex 1 of the JLP and in the Infrastructure Needs Assessment which formed part of the evidence base for the JLP and is updated as and when required. Updated Evidence Base reports will be prepared from time to time, and will be published on the Council's websites.

1.5 In respect of the use of this document in negotiating planning obligations, it should be noted that simply because a specific developer contribution has been identified in relation to mitigating an infrastructure impact, it does not necessarily follow that the councils will seek to negotiate the contribution. The document is intended as an aid to the negotiation process. Planning obligations will be negotiated on a case-by-case basis and will need to meet the requirements of Regulations 122 and 123 of the Community Infrastructure Regulations April 2010 (as amended), including the effects of the Community

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Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019[1] which came into force on 1 September 2019.

1.6 In particular, the councils must be satisfied that a planning obligation is necessary to make the development acceptable in planning terms; that the mitigation measures are directly related to the impacts of the development; and, are fairly and reasonably related in scale and kind to the development.

1.7 The evidence base focuses on developer contributions towards the following infrastructure types:

- Transport improvements, including strategic transport projects to address the cumulative impacts of growth, public transport provision, local highway and sustainable transport and behaviour change measures;
- Education – early years, primary, secondary, post 16, SEN provision;
- Health and wellbeing;
- Green and open space – including strategic spaces needed to address the cumulative impacts of the growth of the city, as well as local spaces to meet community needs for recreation and play;
- Sports and recreation infrastructure, including playing pitch provision; and,
- European Marine Site - impact mitigation measures.

Infrastructure type	**Approach**	
	PCC	**SH/WD**
Transport	PCC – case by case basis	DCC – case by case basis
Education	JLP wide approach to costs of provision based on DfE guidance (N.B. PCC applies by bedroom numbers; DCC applies flat rate for 2+ bedrooms)	
Health	JLP wide approach to costs of provision (N.B. PCC applies contributions towards Wellbeing Hubs; DCC applies towards primary care provision)	
Green and open space; sport and recreation	JLP wide approach on PPA and TTVA basis	
European Marine Site	JLP wide approach on PPA and TTVA basis	

1.8 Affordable housing contributions / provision are covered at Section 4. ‘Housing’ of the Joint Local Plan Supplementary Planning Document (the JLP SPD).

1.9 Other potential developer contributions, such as for the loss of employment land; replacement tree planting; public realm; community facilities; transport plans; air quality improvements; bio-diversity net gain and others, may also be sought on a bespoke, case by case basis.

[1] https://www.legislation.gov.uk/uksi/2019/1103/contents/made

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1.10 The contributions received will be pooled towards measures needed to mitigate the impacts of the development, and will be inclusive of all fees and costs.

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2. Transport

2A – Plymouth City Council

2.1 Development that generates a transport need will have an impact on the city's local and strategic transport infrastructure that is likely to require mitigation. As the population of the JLP Plan Area grows as a result of new housing development and as new commercial development attracts new customers, so there will be an increase in trip generation and 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 alternative means of sustainable transport.

2.2 In order to deliver sustainable development, the adopted JLP makes provision for a range of infrastructure and facilities to be delivered alongside the growth in housing and other development. Delivering this infrastructure in a planned and timely manner, enables development to happen when needed, and helps to protect communities.

2.3 Policy SPT9 of the JLP sets out the strategic principles for transport planning and strategy and this is reinforced at Policy DEV29 which states that development will be required to contribute positively to the achievement of a high quality, effective and safe transport system in the Plan Area, and promote sustainable transport choices and facilitate sustainable growth.

2.4 Measures to mitigate the impacts of new development can be met by reducing the demand for travel or reducing/removing the additional impact on the transport network. This might take the form of undertaking on-site measures or, contributing to demand management, e.g. sustainable travel solutions or travel planning, where it can be shown that this has a positive impact. Measures can also involve increasing network capacity through improvements or new provision.

2.5 Measures to mitigate the impacts of new development can be met by reducing the demand for travel or reducing/removing the additional impact on the transport network. This might take the form of undertaking on-site measures or, contributing to demand management, e.g. sustainable travel solutions or travel planning, where it can be shown that this has a positive impact. Measures can also involve increasing network capacity through improvements or new provision, and providing walking and cycling facilities and subsidies for new public transport services to help establish sustainable travel behaviours from the outset. Where public transport contributions are sought, this will be inclusive of the costs of concessionary fares associated with those routes.

2.6 The transport infrastructure required to meet the growth aspirations of the JLP were identified in the accompanying Infrastructure Needs Assessment (INA)

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evidence base, as submitted at July 2017 (and periodically updated as new information emerges).

2.7 As at September 2019, there are over 140 transport infrastructure projects in the INA for the Plymouth Policy Area of the JLP with a total value of over £740m. Of these, 90 are 'key' infrastructure projects (defined as being strategic critical, local critical or strategic necessary), mostly new highway infrastructure, valued at £540 million over the period 2014 – 2034. It should be noted that not all projects have been costed, especially those that are medium or long term and therefore this figure is likely to be an underestimate of what is required.

2.8 The Plymouth Policy Area includes development sites in the urban fringe of Plymouth, e.g. at Sherford or Woolwell, but most of the required off site transport infrastructure falls within the Plymouth built up area. Behavioural change has been factored-in in determining the level of new transport infrastructure required to support Plymouth Policy Area's growth as part of the JLP. It may be considered appropriate that a proportion of the total developer contribution sought is used towards behavioural change measures to ensure that transport impacts are mitigated in the most sustainable way.

2.9 Apportioning this infrastructure investment across the levels of development proposed in the Plan is the starting point for negotiations about transport developer contributions. Although transport infrastructure has a number of established funding sources, including grants, historically approximately 25 per cent of transport scheme funding has come from developer contributions, principally from S106. Whilst this will never be enough, it does acknowledge that the scale of developer contributions should not affect the viability of development overall. It reflects the impact that new development has on increased travel demand but also acknowledges that the transport measures help to deal with the impact of natural growth. It is right that developers should continue to contribute, as one of the ways that they can mitigate the impacts of their developments.

2.10 Using this same proportion of the key infrastructure provision would equate to approximately **£135 million** spread across the quantum and types of development proposed in the JLP.

2.11 Additionally, it is estimated that around 80 per cent of developer contributions should be sought from new residential development with 20 per cent from commercial development, which equates to **£108 million** from new residential development; **£27 million** from new commercial development.

New housing development

2.12 The JLP identifies the provision of 19,000 new homes in the Plymouth Policy Area from 2014 - 2034. £108 million divided by 19,000 homes is equivalent to an indicative figure of £5,684 per house, taken to be a 3 bedroom dwelling.

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This can then be factored up and down by average household size from 1 bed to 5+ bedroom dwellings; and to include a figure for HMO / student bed space. Applying £5,684 for a 3 bedroom house, then this results in the following:

Dwelling size	Average house size	%	Contribution per dwelling
1 bedroom	1.33	51	£2,899
2 bedroom flat	1.86	71	£4,036
2 bedroom house	2.45	93	£5,286
3 bedroom	2.63	100	£5,684
4 bedroom	2.85	108	£6,139
5+ bedroom	3.13	119	£6,764
HMO/student bedspace	1	38	£2,160

New commercial development

2.13 The JLP refers to 375,206 square meters (equating to approximately 82 ha. of land required) of employment floorspace within the Plan Area, of which 291,400 square meters falls in the Plymouth Policy Area, within the plan period.

2.14 £27 million divided by 291,400 is equivalent to £93 per square meters or £9,300 per 100 square meters. This indicative figure will be used in developer contribution negotiations to mitigate against the impact of new commercial development. However, it is recognized that some commercial uses, such as retail, will result in higher levels of trip generation than others. As such, developer contributions will be negotiated on a case by case basis and it is possible that some uses will generate higher asks whilst others will be lower than the indicative figure.

Commercial use	Contribution per 100 sq.m
All commercial uses	£9,300

2.15 The impact of each development will clearly vary, and each negotiated contribution will need to comply with the three statutory tests. Some sites may have higher impacts than others, and this will be a function of the nature and quantity of development proposed, and the extent and state of the transport network over which the development is likely to impact. Hence some sites may need contributions higher than this and some lower.

2.16 For example, a site which is reliant on a transport intervention being in place before it can commence would be expected to make a significant contribution to the funding of that scheme. However, another site may only have impacts on parts of the network that are further away, and consequently the contribution to the improvement of those parts of the network would be less.

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2B – South Hams and West Devon

2.17 Refer to separate guidance provided by Devon County Council

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3. Education infrastructure

3A – Plymouth City Council

3.1 As the population of the JLP area grows, so too will the demand for education. The scale of growth through to 2034 will necessitate expanded and potentially new school, early years and Special Educational Needs provision.

3.2 Plymouth City Council has worked together with Devon County Council to establish an approach that strives for consistency across the JLP area, whilst reflecting the needs of an urban city and rural district areas. Devon County Council is the Education Authority for South Hams and West Devon. Both Plymouth City Council and Devon County Council have statutory responsibility for the provision of education infrastructure.

3.3 Recent Ministry for Homes, Communities and Local Government Planning Practice Guidance (March 2019) relating to Planning Obligations encourages councils to fund schools and other education buildings through developer contributions. This guidance is available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/793661/Securing_developer_contributions_for_education.pdf

3.4 Paragraphs 007 and 008 say local authorities should, 'agree the most appropriate developer funding mechanisms for education, assessing the extent to which developments should be required to mitigate their direct impacts'. The Planning Practice Guidance also states that central government funding for schools is 'reduced' to 'take account of developer contributions, to avoid double-funding of new school places'.

3.5 Subsequent guidance from the Department for Education (Securing developer contributions for education, April 2019) is available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/793661/Securing_developer_contributions_for_education.pdf

3.6 This reinforces the message that new school places necessitated by development should be funded through developer contributions.

3.7 Where a need is identified, education infrastructure contributions may be sought for the following areas:

- Early Years 0-5;
- Primary Schools;
- Secondary Schools;
- Post 16;
- Special Educational Needs (SEN); and,
- Sustainable Travel.

3.8 This approach for calculating education developer contributions seeks to:

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- Make development acceptable in terms of education – by ensuring that the need for additional pupil places generated by new development is mitigated;
- Ensure education and childcare requirements are justified and directly related to development proposed;
- Take account of committed and planned development;
- Recognise available capacity in existing provision; and,
- Avoid unacceptable travel distances to provision.

Calculating education infrastructure mitigation costs

3.9 The contribution sought for addressing impacts on education capacity will be assessed on the net increase in the number of new school places generated by a development and the resulting capital cost to accommodate the increased demand.

Establishing pupil numbers arising from new development

3.10 To establish the impact of existing and new development proposals on education facilities it is necessary to identify the likely number of pupils that will be generated.

3.11 Plymouth City Council has worked alongside Devon County Council to identify appropriate pupil generation figures. Using empirical research undertaken by Devon County Council (see Appendix for more details), it has been established that, on average, a 'family dwelling' generates approximately the following:

Age range	Pupil ratio
0 to 1	0.07
2 to 4	0.11
5 to 11 (Primary School age)	0.25
12 to 16 (Secondary School age)	0.15
17 to 18 (post 16)	0.06

3.12 Early Years provision (0-4) would have a pupil ratio of 0.09 (an average of 0.07 and 0.11).

3.13 Applying the above to different bedroom numbers results in the following recommended pupil ratios:

Bedrooms	Early years	Primary	Secondary	Post 16
2	0.07	0.22	0.12	0.04
3	0.09	0.25	0.15	0.06
4+	0.11	0.28	0.18	0.08

3.14 The DfE is currently producing a detailed methodology for calculating pupil yields which will be published in due course. Once published, the pupil ratio multipliers outlined above will be reviewed to ensure consistency with any national approach which may emerge.

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3.15 In total, approximately 3.7 per cent of the school population require specific Special Education provision, in the main delivered through a local Special School. Special Educational Need pupils are currently showing a year on year increase.

3.16 It should be noted that affordable housing is included in education capacity and contribution calculations, as it generates a need for additional education facilities within a specific locality. In addition, the empirical evidence on which future requirements are based, takes account of education requirements associated with affordable housing.

3.17 Student accommodation, holiday homes and housing designated for older people will be excluded, assuming a condition to restrict occupation is attached to any planning permission.

Establishing baseline school capacity

3.18 When assessing the contribution appropriate from each planning application or development proposal, Plymouth City Council will factor in any current spare capacity in existing education and early years provision within the locality. When calculating the existing spare school places, two key factors will be incorporated:

1. The number of existing spare school places there are within the locality (or across the city in the case of Secondary provision), adjusted with an assessment of the likely places that are expected to be taken up by children in future years based on the number of known 0 – 5 year olds (who are in many instances already attending early years providers) for primary provision and known primary numbers for secondary provision.
2. The number of school places taken up by existing but yet to be implemented planning permissions (factoring in capacity provided by developer contributions).

3.19 This approach will also be followed when considering baseline capacity for SEN.

3.20 When calculating the existing spare early years places, the capacity within schools, childminders, day nurseries and preschools will be considered and adjusted with an assessment of the likely places that are expected to be taken up in future years based on projections using data on live births secured from the NHS.

3.21 If insufficient capacity is identified in this process, then it is assumed that need will be met at the next nearest appropriate provision to the development site which does have uncommitted capacity, taking into account any additional costs associated with the need to provide school transport for pupils.

3.22 Plymouth City Council will seek contributions from developers where pupils arising from the development cannot be accommodated within existing capacity.

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3.23 Additional facilities will either be provided through the expansion of an existing provision or through the development of a new provision – this will be determined by the circumstances of the nearest provision and the scale of the development on a case by case basis, taking account of wider development allocations.
In respect of Special School places, it is recognised that it is possible provision will not necessarily be within close proximity. This may also require the provision of school transport.

Calculating the developer contribution

3.24 The Department for Education report (Securing developer contributions for education, April 2019) provides guidance on the costs of provision, with para 15. Advising that the assumed costs of mainstream school places are based on national average costs published annually in the DfE School Place Scorecards[2], adjusted to reflect costs in the region, using BCIS location factors (0.99 regional factor for the South West). It also advises that the per pupil cost of early years provision is assumed to be the same as for a primary school; that further education places provided within secondary sixth form will cost broadly the same as a secondary school place; and, that special school (SEN) are set at four times the cost of mainstream places to reflect the need for more space per pupil.

3.25 The cost of pupil places in Plymouth using this approach is set out below:

Education infrastructure	Plymouth cost per place informed by DfE guidance
Early Years New Build	£19,417
Early Years extension	£16,432
Primary New Build	£19,417
Primary extension	£16,432
Secondary New Build	£23,725
Secondary extension	£22,513
Post 16	£23,725
Post 16	£22,513
SEN New Build	£86,284
SEN extension	£78,668

3.26 The table below applies the number of pupils generated from 2, 3 and 4+ dwellings and relates them to the cost of providing early years, primary, secondary and post 16 provision to show an indicative cost per dwelling. No figure is shown for SEN provision as this will be calculated on a case by case basis. The potential, indicative mitigation cost per dwelling:

Education	Bedrooms	Cost per dwelling		Pupil ratio
		New build	Extension	
Early Years	2	£1,359	£1,150	0.07
	3	£1,748	£1,479	0.09

[2] https://www.gov.uk/government/collections/school-places-scorecards

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Education	Bedrooms	Cost per dwelling		Pupil ratio
		New build	Extension	
	4+	£2,136	£1,807	0.11
Primary	2	£4,272	£3,615	0.22
	3	£4,854	£4,108	0.25
	4+	£5,437	£4,601	0.28
Secondary	2	£2,847	£2,701	0.12
	3	£3,559	£3,377	0.15
	4+	£4,270	£4,052	0.18
Post 16	2	£949	£900	0.04
	3	£1,424	£1,351	0.06
	4+	£1,898	£1,801	0.08

3.27 The new build or school expansion rate per pupil will be applied to each pupil for whom new capacity will need to be secured. Plymouth City Council, working with Devon County Council, will use the BCIS All in Tender price index to calculate uplift for inflation to the point that the mitigation payment is made, the base date being March 2019 (Q1 2019 index value = 322).

3.28 In accordance with DfE guidance, contributions towards Early Years provision will be sought at the same build cost rate as primary places. All new primary schools should incorporate early years provision.

3.29 Informed by DfE guidance, the rate required for Special Education places is estimated at 4 times the cost of mainstream places. The cost per place rates for SEN provision do not distinguish between primary or secondary but rather uses an average of the two.

3.30 Where it is necessary to build a new school or early years provision in order to provide places, a proportional contribution, directly related to the scale of development, will be sought towards the cost of land acquisition. Alternatively, suitable land may be set aside by the developer or the developer may provide the facility.

3.31 The cost of home to school transport, where applicable, will be based on actual costs on a development by development basis. In the main these costs will be based on existing routes already serving the area in accordance with the council's approach to entitlement to school transport.

Payment triggers

3.32 As a general rule, Plymouth City Council will seek financial contributions towards education provision to be paid in the following instalments:

- 50 per cent payment on commencement of the development
- 50 per cent payment on occupation of 50 per cent of dwellings.

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3.33 Payment of financial contributions in advance of the triggers outlined above will be welcomed. Later triggers may be accepted if developers demonstrate a valid reason for a delayed payment. Equally the Council may seek contributions to be paid at an earlier date if the circumstances require it.

APPENDIX A – Background to methodology assumptions

Pupil generation

3.34 The pupil yields used to identify the number of pupils generated by each development are based on empirical research undertaken by Devon County Council based upon a door to door survey of new housing completed and occupied in all District Council areas in 1999. This survey included both market and affordable housing. This identified an occupancy level of 0.072 0-1 year olds; 0.108 2, 3 and 4 year olds; 0.25 primary age children; and, 0.18 secondary age children. Based on this, the same indices are used for early years and primary (0.25) with 0.15 at secondary level and 0.06 at post 16. Approximately 1.5 per cent of children will require a specialist place.

3.35 An analysis in 2009 of the completed housing in the Kings / Clyst Heath area in Exeter, and the number of pupils known to be living there, confirmed that the above indices are appropriate for applying to new housing developments. In 2015, a further analysis at Cranbrook suggested these indices are prudent.

3.36 The areas surveyed, including more recent analysis, are considered to be consistent with those found and therefore appropriate for use in Plymouth.

3.37 Plymouth City Council, working with Devon County Council, will keep the rates under review as nationally, other Local Authorities have reported higher indices.

3.38 The DfE is currently producing a detailed methodology for calculating pupil yields which will be published in due course. Once published, the multipliers outlined above will be reviewed to ensure consistency with any national approach which may emerge.

3B – South Hams and West Devon

3.39 Refer to separate guidance provided by Devon County Council

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4. Health infrastructure

4A – Plymouth City Council

4.1 New development, in particular housing development, leads to population growth which places additional pressures on existing health services. Student housing will also add to these pressures. Whilst health services are in receipt of Government block funding, a combination of an ageing population and medical advances in particular is placing significant financial pressures on health and social care services. Consequently, in order to mitigate the impacts, it is considered appropriate that new housing development should make a contribution towards necessary improvements in the city's health infrastructure.

4.2 The preferred approach for the use of developer contributions is to invest in the city's network of Wellbeing Hubs (see APPENDIX B for more details). Wellbeing Hubs enable more people to be healthy and stay healthy by enhancing self-care and community resilience, empowering communities to take active roles in their health and wellbeing. This is consistent with the Devon STP strategic priority to enhance self-care and community resilience. Wellbeing Hubs will contribute to the improved resilience of existing primary care services.

4.3 The methodology for calculating appropriate levels of developer contributions is based on costs that would otherwise be sought from development towards improvements to primary care infrastructure, in particular GP facilities. As such, the calculation of the cost of GP facilities is used as a proxy to determine the value of the contribution towards the network of Wellbeing Hubs across the city. The approach to the calculation of the cost of GP facilities is consistent with that currently used across the Districts within Devon County Council.

Calculation of developer contributions

New housing development

4.4 For new housing development, the calculation is based on a combination of average household size and new dwelling size (number of bedrooms) data, to provide an indicator of population increase, together with estimated cost of primary care space data, as below:

1. Calculate the expected population increase resulting from the development (including affordable units).
   Average household size ranges from 1.33 for a 1 bedroom dwelling to 3.13 for 5+ bedrooms. Where the mix is not known, an assumed average of 2.2 people per household is used until further detail is available.

2. Calculate the amount of additional Primary Care Space that would otherwise be required as a result of the population increase.
   NHS England has published 'size and space standards' which set out the appropriate size of GP premises (m^2 Gross Internal Area) in relation to the number of patients to be accommodated at the premises. These standards are given in Table 1 below. The table also shows the corresponding Gross Internal Area per patient (in m^2):

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No. of patients	GIA	GIA per patient
0-2,000	199m^2	0.1m^2
2,001-4,000	333m^2	0.08m^2
4,001-6,000	500m^2	0.08m^2
6,001-8,000	667m^2	0.08m^2
8,001-10,000	833m^2	0.08m^2
10,001-12,000	916m^2	0.08m^2
12,001-14,000	1000m^2	0.07m^2
14,001-16,000	1083m^2	0.07m^2
16,001-18,000	1167m^2	0.06m^2
18,001-20,000	1250m^2	0.06m^2

Table 1: NHS size and space standards

The size standards have been produced by the NHS as part of a document entitled 'Premises Principles of Best Practice Part 1 – Procurement and Development' which is yet to be published. The space standards are used with Health Building Note 1-01 which is used within this methodology to determine costs.

In most instances, GP premises would fall within the range 2001 – 12,000 patients giving an average requirement of 0.08m^2 per patient.

3. Calculate the cost of new healthcare premises.
Cost guidance is based on a Healthcare Premises Cost Guide (HPCG) published by the Department of Health. This provides a cost per square metre for building and engineering services for different healthcare departments based on overall gross internal area for real, built schemes. The methodology for costings can be found in the HPCG4 (2010). Table 2 below identifies the 2010 HPCG costs per m^2 for 'Facilities for primary and community care services' (as covered by Health Building Note 11-015). Costs are based on new-build, two-storey premises operating independently on a greenfield site. The figures given are based on a Median Index of Public Sector (MIPS) of 480.

Type	2010 HPCG (based on a MIPS index of 480) per m^2			
	Public space	Staff space	Clinical space	Overall space
Primary Care (including GP surgeries)	£2,060	£1,820	£2,160	£2,040
Extended Primary Care	£1,870	£1,650	£2,210	£1,990
Community Hospital	£1,840	£1,620	£2,440	£2,200

Table 2: 2010 Healthcare Premises Cost Guidance for 'facilities for primary and community care'

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The MIPS index upon which these figures are reported is no longer published. Accordingly, it is recommended by the Department for Business Innovation and Skills (now the Department for Business, Energy and Industrial Strategy) that the PUBSEC index should be used as an alternative. Using a conversion factor of 2.778, MIPS 480 is equivalent to PUBSEC 173.

As at September 2016, it was reported by the Building Cost Information Service (BCIS) that the PUBSEC 'reporting level' is 195 (a 12.7 per cent increase from the 2010 index). Taking this increase into account, figures adjusted from the HPCG 2010 figures are presented in Table 3:

Type	**Adjusted HPCG (based on a PUBSEC index of 195) per m^2**			
	Public space	**Staff space**	**Clinical space**	**Overall space**
Primary Care (including GP surgeries)	£2,322	£2,051	£2,434	£2,299
Extended Primary Care	£2,107	£1,860	£2,491	£2,243
Community Hospital	£2,074	£1,826	£2,524	£2,479

Table 3: Adjusted Healthcare Premises Cost Guidance for 'facilities for primary and community care'

4. Calculate the value of developer contributions:
   Table 4 below shows the value of developer contributions for various dwelling sizes, using the information identified at steps 1-3 above. An average GIA of 0.08 per m^2 has been used together with the overall primary care space cost of £2299 per m^2, i.e. for 1 person, 2299/0.08 = 184

Dwelling size	**Average household Size**	**Contribution (£)**
1 bedroom	1.33	245
2 bedroom flat	1.86	342
2 bedroom house	2.45	451
3 bedroom	2.62	482
4 bedroom	2.85	524
5+ bedroom	3.13	576
Per bed space (other residential)	1	184

Table 4: Developer contribution per dwelling

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Based on the above, an example housing development would be as follows:

100 houses comprised of 30 x 2 bed houses; 40 x 3 bed houses; 30 x 4 bed houses.

2 bed 30 x £451 = £13,530 (based on 30 x 2.45 x 451)
3 bed 40 x £482 = £19,280 (based on 40 x 2.62 x 482)
4 bed 30 x £524 = £15,720 (based on 30 x 2.85 x 524)
Total = £48,530

In this example, a health developer contribution of £48,530 would be sought towards the network of Wellbeing Hubs across the city.

Purpose Built Student Accommodation

4.5 Developer contributions towards purpose built student accommodation is calculated at an average household size of 1 per bed space. To allow for 40 week occupation, the calculation is reduced to 0.8.

4.6 Based on the above, an example purpose built student accommodation development would be calculated as follows:

100 bedspace purpose build student accommodation development.
1000.8 x 184 = £14,720

4.7 In this example, a health developer contribution of £14,720 would be sought towards the network of Wellbeing Hubs across the city.

APPENDIX B - Background information on Wellbeing Hubs:
Devon STP Integrated Care Model (ICM):

4.8 Plymouth City Council and the Devon CCG have a long and established record of cooperation and collaboration. Since December 2016, partners in the health and care system across Devon have been working with a shared purpose to create a clinically and financially sustainable health and care system that will improve the health, wellbeing and care of the population. There are four strategic priorities:

- Enable more people to be healthy and stay healthy
- Enhance self-care and community resilience
- Integrate and improve community services and care in people's homes
- Deliver modern, safe and sustainable services

Wellbeing Hubs:

4.9 Wellbeing Hubs are an integral part of the ICM, with a focus on prevention, early intervention, empowering communities and providing support for those in need. The vision for Wellbeing Hubs is to develop 'a network of integrated resources working together to enable and support people in the local community to live

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independently and make life choices that will improve their health and wellbeing'.

4.10 Wellbeing Hubs will:

- Offer services provided by community members, volunteers, paid staff across public, private, and community / voluntary sectors
- Communicate and work together to provide joined up, quality, consistent information and support for individuals to promote wellbeing, independence, recovery and reablement.
- Make sense locally; the Hub will reflect the local population's needs, and work with the different networks in different neighborhoods
- Make the best use of available estate
- Be accessible and inclusive e.g. Dementia Friendly

4.7 The integrated resources would include (but not be limited to);

- Housing, benefits, debt, health and social care advice and advocacy
- Healthy Lifestyles and health and wellbeing promotion (e.g. smoking cessation)
- Counselling, befriending and other mental health support
- Long-term conditions (physical and mental) self-management education, and 1 to 1 support
- Employment, education, training, volunteering, learning and digital inclusion
- Social, arts, crafts and peer support activities

4.8 The Wellbeing Hubs will be underpinned by a comprehensive social prescribing service, supporting people identified as in need to access the right support for them, as well as staff trained in brief interventions and MECC (Making Every Contact Count), and an IT system containing all the relevant information required, providing a 'virtual hub' with an online advice and information offer that can be accessed from anywhere. Some Wellbeing Hubs will take a lead on specific groups or topics city-wide; for example, veterans' health, accelerating mental health needs, carers' health, learning disabilities and sensory impairment. Support provided includes:

Social Prescribing

4.9 Social prescribing schemes offer a range of benefits to the healthcare system (as well as benefits to the individual), through reductions in demand. The total value of all benefits accruing to all stakeholders gives a very supportive picture of social prescribing. To estimate the potential benefits in Plymouth, we have referred heavily on evaluation of the Rotherham Social Prescribing Service, which found significant reductions in the use of acute hospital services:

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Signposting and support

4.10 The Health and Wellbeing Hubs will offer a wider offer of signposting and community engagement than simply social prescribing. The evidence base is less strong for this, since the definition of the intervention tends to be broad.

4.11 As an estimate, the impact of this support in terms of NHS use might be 10-20 per cent of that from social prescribing; but this is still considerable as numbers of people accessing these services will be larger once each hub is up and running. Footfall will vary in each hub but we know that the Jan Cutting HLC has a footfall of around 750 per week; given that there are differing patterns of attendance, an estimate of annual footfall is at least 3000 people.

Behaviour change

4.12 Behaviour change will be an important part of the work of Wellbeing Hubs. The four behaviours that we focus on are those which cause the most disease and disability in our populations; alcohol, diet, physical activity and smoking.

Advice and Information

4.13 Though there is no robust cost saving data available for information and advice, there is a simple logic model which suggests that this service is worthwhile. Each quarter, 2500 people are supported with some information and advice. 50-150 are complex issues and there is evidence of multiple issues being resolved. For example, around £1 million of benefit payments that have not been reaching the right individual have been achieved, often for people and families who are disabled. This is likely to make a significant difference to their lives, and is highly likely to result in improvements to the management of their condition, which in turn reduces healthcare need.

4.14 The network of integrated resources will cover 4 tiers;

- **Specialist Health Hubs** - Places where people already go for medical interventions; people will be supported and signposted into services that can help them to address some of their wider needs which would not be met through a medical intervention, with the aim of improving their health and wellbeing, helping them to manage the health condition and preventing the onset of others.
- **Targeted Health and Wellbeing Hubs** - Places where Primary Care (particularly GP practices) can be brought together with wellbeing and social care, providing a comprehensive offer of health and wellbeing under one roof. (This requires new build or refurbishment of premises to provide better integration of services)
- **Targeted Wellbeing Hubs** – Places where people and services naturally congregate, where wellbeing and social care services will be brought to local communities. Links to Primary Care will be strengthened particularly through social prescribing.
- **Universal Tier** – Places where people go for other services. The ambition here is to ensure that all community assets (libraries, primary care,

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churches and other community groups) are able to carry out brief interventions with people, and signpost them onto the best service and/or the local Hub to meet their needs. (Making Every Contact Count model). The robust use of ICT is key here; we have a 'Plymouth Online Directory' which is currently being improved to include better, more accessible engagement tools, simple, clear access to advice and information and better reporting to assist with maintenance and to gain insight on usage. We also have a volunteering website 'Our Plymouth' which will link in closely and provides a social network style platform to foster social engagement and increase awareness of wellbeing services.

4.15 The current list of Hubs is as follows:

Name	Description	Estimate opening
Specialist Health Hubs		
Cumberland Centre	The Cumberland Centre is an Urgent Treatment Centre including locality mental health teams, which will incorporate the full range of Wellbeing Hub Services; it also has a large GP Practice and a pharmacy within the same complex.	March 2019
Mount Gould Local Care Centre	Mount Gould is subject to a master planning exercise which will result in more acute services being delivered here and will include GPs and wellbeing services.	October 2019
Derriford Hospital	Derriford Hospital is a large teaching hospital serving Plymouth and nearby areas of Devon and Cornwall. It is a regional trauma centre and also provides tertiary cardiothoracic surgery, neurosurgery and renal transplant surgery for the South West Peninsula. Many people attending hospital have the capacity to benefit from the services being offered as part of Wellbeing Hubs, and being able to start to support people during an attendance or an admission is likely to help their health and wellbeing as well as having the potential to reduce demand on the hospital.	TBC
Targeted Health and Wellbeing Hubs		
Ocean Health (Stirling Road)	Ocean Health is GP Practice, in a deprived area. The Wellbeing element of the hub will be delivered across 3 locations in a hub-and-spoke manner; the GP practice, the local library (St Budeaux) and in Barne Barton Pharmacy (Barne Barton is an isolated deprived area).	March 2019

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Name	Description	Estimate opening
City Centre	In early stages of planning, it is hoped to develop a GP practice, Dental surgery and Wellbeing Hub in a city centre building which is about to undergo comprehensive refurbishment. This may also include relocation of an existing Young People's support services providing much better facilities. The area in the city centre is easily accessible and regularly used by our most in-need communities; it is also close to other facilities such as pharmacy, Council 'First Stop Shop', a Memory Café (dementia support) and the local market. We are also working to develop a dental practice led by the social enterprise connected with the Peninsula Dental School.	March 2020
Estover	Building yet to be identified, will work with GPs and Livewell Southwest to identify a building	March 2020
Efford TBC	Council owned Youth and Community Centre, OPE plan to redevelop site as a health and wellbeing hub including a GP practice and pharmacy, youth and wellbeing facilities	March 2020
Stonehouse	A 'Complex Lives' hub, based in one of our most deprived areas, which will provide services for people and families with significant health, social and wellbeing challenges (such as the homeless and those with substance misuse issues). This will include a GP practice with specialist skills working with this group. Being led by CVS.	TBC
Rees Youth Centre, Plympton	Discussions are underway around the development of a 'Primary Care Home' Wellbeing Hub to explore further the potential of this model of healthcare for potential spread across the city. This is based in one of our less deprived areas, so offers less opportunity for reducing inequalities but does offer potential for shifting demand to lower cost services. Timeline to be confirmed	TBC
Plymstock TBC	To be confirmed	TBC
Targeted Wellbeing Hubs		

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Name	Description	Estimate opening
Jan Cutting Healthy Living Centre	Wellbeing Hub in a deprived area, providing full range of support to the local community. Includes Head Space, an out-of-hours service for people who consider that they are approaching a mental health crisis. This runs in a non-clinical setting with a safe, calm and structured environment, with the goal of de-escalating crises.	OPENED March 2018
Four Greens	A Community Economic Development Trust in a deprived part of the city, already includes a Children's Centre and community activity; is now developing an offer for people with long-term conditions including time banking, education, peer support; is a target area for the National Diabetes Prevention Programme.	12 October 2018
Improving Lives, Mannamead	A Wellbeing hub with a specific remit to work across the city to promote and improve the health of some specific groups in the population who are in need, including veterans, carers, people with learning disabilities and those with Sensory disabilities.	27 October 2018
Southway TBC	Building yet to be identified, possibly the Council Community Centre and Children's Centre.	March 2020

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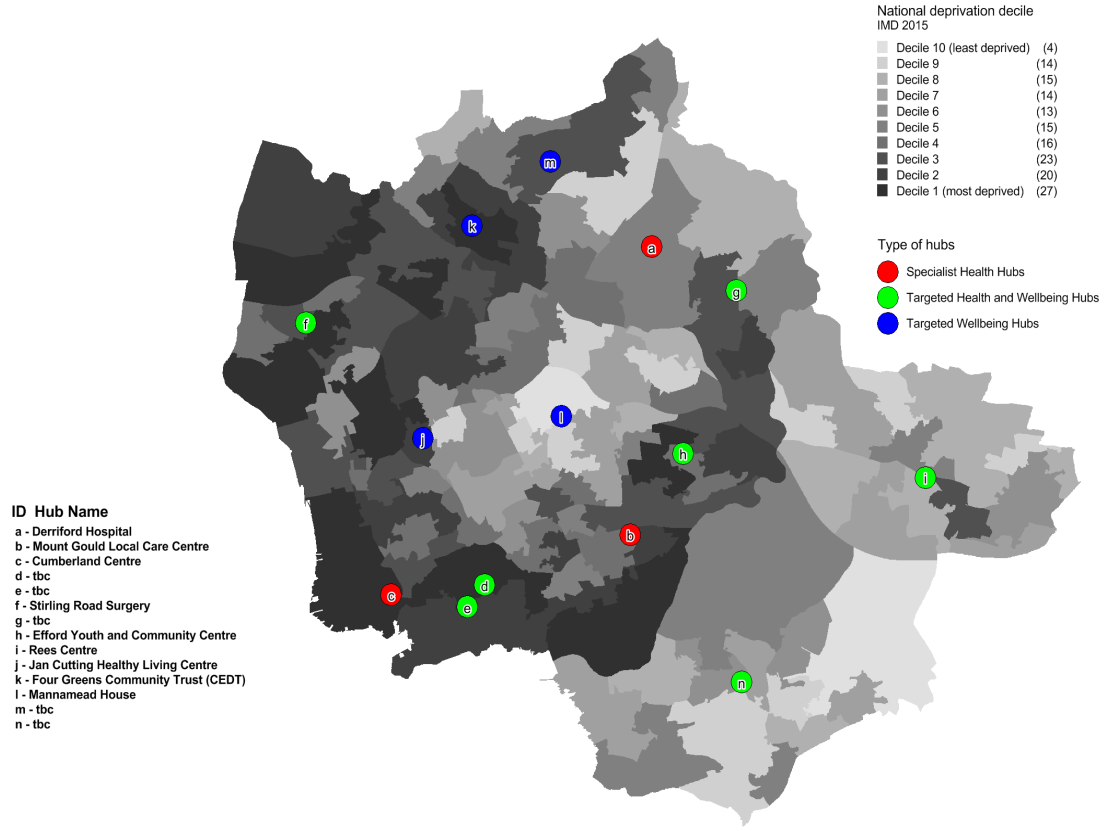

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4B – South Hams and West Devon

Refer to separate guidance provided by Devon County Council

5. Green and open space, sport and recreation

5A Plymouth, South Hams and West Devon Councils

5.1 Developer contributions have an important role to play in ensuring that the green infrastructure impacts and needs of new development are met. The Plymouth and South West Devon Joint Local Plan (the JLP), supported by the various Open Space Assessments building on the 2010 Plymouth Green Infrastructure Delivery Plan, provides a strong local policy and delivery justification for the use of planning obligations in relation to both local and strategic green infrastructure impacts.

5.2 Each new home potentially has an impact on the city's existing green infrastructure, or creates a need for new green spaces. Developer provision of, or contributions to, green infrastructure delivery and/or management may therefore be necessary to make the development acceptable in planning terms.

5.3 Figure 3.2 of the JLP sets out measures against which the sustainability of development can be assessed including in relation to the quantity, quality and accessibility of green space across the JLP area.

5.4 The Plymouth Policy Area Open Space Assessment (POSA) defines Accessible Natural Greenspace as Amenity Green Space, Parks and Gardens, and Natural and Semi-natural green space within the PPA and sets the following quantity standards for its provision:

Type of open space	**Quantity standard (ha per 1,000 population)**
Amenity Green Space	1.44
Parks and Gardens	1.15
Natural and Semi-natural green space	2.5
Total Accessible Natural Greenspace	**5.09**
Allotments	0.15

Table 1: Quantity standards for PPA Green space provisions

5.5 The Plymouth Play assessment 2017 sets out the following Play Space provision standard for the Plymouth Policy Area.

	Quantity standard (ha per 1,000 population)
Play space	0.08

Table 2: Quantity standards for PPA Play Space provision

5.6 In relation to sport provision within the Plymouth Policy Area the JLP and the Plymouth and South West Devon Sports and Leisure Facilities Plan 2016 to 2034: Assessment report require the following for sport provision within the Plymouth Policy Area:

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Type of open space	Quantity standard (ha per 1,000 population)
Playing Pitches	0.79
Wet Sports Facilities	0.0107
Dry Sports Facilities	0.0490
Outdoor Sports Facilities	0.0951

Table 3: Quantity standards for PPA Sports provision

5.7 The Thriving Towns and Villages Open Space, Sport and Recreation (OSSR) Study has determined quantity standards of green and open space, sports, play and recreation provision based on an audit of need and provision. These standards are shown in Table 4 below:

Type of open space	Quantity standard (ha per 1,000 population)
Accessible Natural Greenspace (may be parks and gardens or amenity greenspace depending on local circumstances)	1.91
Playing Pitches	1.27
Playing Pitches – changing rooms	0.006
Play Facilities (equipped and to be buffered in accordance with FIT guidance)	0.09
Wet Sports Facilities	0.0101
Dry Sports Facilities	0.0449
Outdoor Sports Facilities (tennis courts and bowling greens)	0.046
Allotments	0.15
Greenways	As required to provide effective links between destinations
Cemeteries and Churchyards	As defined by Town/Parish level need
Civic Space	Developments of 50+ dwellings may seek to incorporate new civic spaces in line with quality and accessibility standards.

Table 4: Quantity standards for open space, sport and recreation provisions

5.8 Besides the above standards the JLP designates a number of Strategic Green Spaces (SGSs), which will assist in mitigating any potential recreational impacts on the South Dartmoor Woods SAC and protected landscapes. The LPAs will take a pro-active approach towards delivering and improving these SGSs:

- Sherford Community Park will be delivered as part of Sherford New Community.
- Woolwell Community Park will be delivered as part of Woolwell new community as set out in JLP policy PLY44
- Central Park, Saltram Countryside Park, Derriford Community Park and The Plym Valley SGSs will be delivered through a number of funding streams which will include developer contributions from development within the PPA towards specific improvement projects within these green spaces in line

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with the below charging schedule. These SGSs are essential to deliver sustainable Development within the PPA.

5.9 Mitigation of greenspace impacts of development can be either on-site or off-site, depending on the circumstances of the case. (see Table 5). Reflecting the rural nature of the TTVA (i.e. where a minor development can apply significant pressure on existing facilities or the need new facilities), contributions towards improving existing/new facilities may be sought for developments of 5-10 dwellings.

OSSR Type	**Number of dwellings**				**Comments and minimum size for on-site provision**
	5-10 (applies in TTVA only)	**10-49**	**50-199**	**200+**	
PPA only - Amenity Green Space	N/A	Off Site	Off Site	On Site	**PPA:** Projects will be identified for each S106 request
		On Site	On Site		
PPA only - Natural and Semi-natural green space		Off Site	Off Site	On Site	**PPA:** Projects will be identified for each S106 request
		On Site	On Site		
TTVA only - Accessible Natural Greenspace	Off Site	Off Site	Off Site	On Site	**TTVA:** Refer to South Hams/West Devon Green Infrastructure Framework and Town/Parish OSSR Plans for information on projects in locality, and to Greenspace Audit. No fixed minimum size but facility must function well and be an integral part of design and layout
	On Site	On Site	On Site		
Playing Pitches	Off Site	Off site	Off Site	Off Site	Will need to meet minimum Governing Body standards. See Sport England "Comparative sizes of Sports Pitches and Courts"
			On Site	On Site	
Play Spaces / Provisions for children and Young People	Off Site	Off Site	On Site	On Site	While in general LAPs are not supported, in the 10-49 range the Councils may consider a split of LAP on site and off site contribution to a LEAP (if there is evidence of local need), or a sole off-site contribution to LEAP. Minimum size for onsite LAP is 100m^2 (excluding buffer zone) and has to demonstrably work in design and functional terms.
		On Site			

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OSSR Type	Number of dwellings				Comments and minimum size for on-site provision
	5-10 (applies in TTVA only)	10-49	50-199	200+	
					Small, isolated LAPs will not be supported and off site provision may be sought in lieu. Minimum size for onsite LEAP is 400m^2 (excluding buffer zone).
Allotments	Off Site	Off Site	Off Site On Site	On Site	**TTVA:** normal minimum is 6 plots giving 0.18ha. Smaller sites may be considered where local circumstances provide opportunities **PPA:** new allotments areas shall be no smaller than 0.5ha
Greenways (TTVA) and Green Corridors (PPA)	Off Site	Off site	Off site	Off site	**Each development will need to deliver a well-connected development incorporating where appropriate green connection to the wider town and landscape** **TTVA:** Off-site contributions towards greenway/recreational links may be sought reflecting both objectives and specific projects identified in the South Hams/West Devon Green Infrastructure Framework and Town/Parish OSSR Plans **PPA:** S106 request will depend on the site location
Sport and Leisure Facilities	Off Site	Off site	Off site	Off site	**TTVA:** As defined by Town/Parish level need (including Neighbourhood Plans/Town or Parish OSSR Plans) **PPA:** As identified in the relevant strategy
Cemeteries and Churchyards	Off Site	Off site	Off site	Off site	**TTVA:** As defined by Town/Parish level need **PPA:** As identified in the relevant strategy
Parks and Gardens	Off Site	Off site	Off site	Off site	**TTVA:** Developments in Area Centres may be required to

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OSSR Type	Number of dwellings				Comments and minimum size for on-site provision
	5-10 (applies in TTVA only)	10-49	50-199	200+	
			On Site	On Site	contribute to improving quality and accessibility to existing parks and gardens in those towns **PPA:** Developments may be required to contribute to improving quality and accessibility to existing parks and gardens. Where development is of a sufficient scale and a local need is present on-site provision may be sought.
TTVA only - Civic Spaces	Off Site	Off Site	Off Site	Off Site	**TTVA:** Developments may be required to contribute towards enhancing and improving accessibility to existing civic space. Developments of 50+ dwellings may seek to incorporate new civic spaces in line with quality and accessibility standards.
			On Site	On Site	

Table 5: On site Provision or Off Site Financial Contribution

5.10 Table 6 sets out the quantity of Green and Open Space, Sport and Recreation Measures provisions per 1,000 population and per person, and offsite financial contribution per m² and per person for the Plymouth Policy Area.

Green and Open Space, Sport and Recreation measure	On site provision		Off-site financial contribution		Comment
	ha/1,000	m²/person	£/ha	£/person	
Amenity Green Space	1.44	14.4	202,741.32	291.95	These costs are based on exemplar PCC street services costings
Parks and Gardens	1.15	11.5	473,840.28	544.92	These costs are based on exemplar PCC street services costings
Natural and Semi-natural green space	2.5	25	83,395.88	208.49	These costs are based on exemplar PCC street services costings

Green and Open Space, Sport and Recreation measure	On site provision		Off-site financial contribution		Comment
	ha/1,000	m²/person	£/ha	£/person	
Playing Pitch	0.79	7.9	709,746.84	560.70	These costs are based on previous SPD costs adjusted for inflation
Allotments	0.15	1.5	104,719.00	15.71	These costs are based on exemplar PCC street services costings
Play Spaces (equipped area only, not including buffer)	0.08	0.8	2,865,127.50	229.21	These costs are based on previous SPD costs adjusted for inflation
			£/m²	£/person	
Outdoor Sports Facilities (tennis courts, outdoor bowls)	0.0951	0.951	£163	155.01	Standard calculated based on assessment of existing facilities (Appendices 5 and 6), and costs from Sport England Quarterly Costs (2nd qtr, 2016). Requirements to be based on evidence of local need/deficiencies as identified Neighbourhood Plans.
Green Corridors					Each development will need to deliver a well-connected development incorporating where appropriate green connection to the wider town and landscape. S106 request will depend on the site location
Cemeteries and Churchyards					As identified in the relevant strategy
TOTAL			**2005.99**		This is the per person cost of capital provision of these standards of open space. This cost applies to provision of new open space/facilities or

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Green and Open Space, Sport and Recreation measure	On site provision		Off-site financial contribution		Comment
	ha/1,000	m²/person	£/ha	£/person	
					enhancing existing facilities (notably outdoor pitches or play which may often include provision of new facilities). Contribution per person is taken to be a reasonable measure of the impacts of a proposed development, irrespective of whether new provision or improvement of existing facilities is required.

Table 6: Standards for on-site provision or off site financial contribution in the PPA

5.11 Table 7 sets out the quantity of onsite OSSR provisions per 1,000 population and per person, and offsite financial contribution per m² and per person for the Thriving Towns and Villages area.

OSSR Type	On site provision		Off-site financial contribution		Comment
	ha/1,000	m^2/person	£/m^2	£/person	
Accessible Natural Greenspace	1.91	19.1	£14.31	£273	These costs are based on exemplar PCC street services costings (reflecting a midpoint between the cost of amenity space and natural green space)
Playing Pitch	1.27	12.7	£ 71	£ 901	These costs are based on previous PCC SPD costs adjusted for inflation
Play Spaces (equipped area only, not including buffer)	0.09	0.9	£ 287	£ 258	These costs are based on previous PCC SPD costs adjusted for inflation
Outdoor Sports Facilities (tennis	0.046	0.46	£163	£75	Standard calculated based on assessment of existing facilities (Appendices 5 and 6), and costs from Sport

OSSR Type	On site provision		Off-site financial contribution		Comment
	ha/1,000	m^2/person	£/m^2	£/person	
courts, outdoor bowls)					England Quarterly Costs (2nd qtr, 2016). Requirements to be based on evidence of local need/deficiencies as identified in Town/Parish OSSR Plans or Neighbourhood Plans.
Parks and Gardens					Developments in Main Towns may be required to contribute to improving quality and accessibility to existing parks and gardens. Off-site contributions would fall under the £/person rate applicable to Accessible Natural Space
Allotments	0.15	1.5	£10.47	£15.71	These costs are based on exemplar PCC street services costings
Greenways					Assumption is that on site access routes will connect to offsite routes and wider greenways network. Off-site contributions towards greenway/recreational links may be sought on a case by case basis reflecting both objectives and specific projects identified in the South Hams Green Infrastructure Framework and Town/Parish OSSR Plans.
Cemeteries and Churchyards					As defined by Town/Parish level need. Negotiations with respect to level of contributions would be undertaken where need is identified and on a case by case basis.
Civic Spaces					Developments may be required to contribute towards enhancing and improving

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OSSR Type	On site provision		Off-site financial contribution		Comment
	ha/1,000	m^2/person	£/m^2	£/person	
					accessibility to existing civic space. Developments of 50+ dwellings may seek to incorporate new civic spaces in line with quality and accessibility standards.
TOTAL			£1,522.71		This is the per person cost of capital provision of these standards of open space. This cost applies to provision of new open space/facilities or enhancing existing facilities (notably outdoor pitches or play which may often include provision of new facilities). Contribution per person is taken to be a reasonable measure of the impacts of a proposed development, irrespective of whether new provision or improvement of existing facilities is required.

Table 7: Standards for on-site provision or off site financial contribution in the TTVA

5.12 Following the above and the evidence set out in the various Open Space Assessments, Tables 8 and 9 sets out the level of provision considered generally appropriate to mitigate greenspace impacts (note those facilities which would not be expected to be provided onsite have been omitted, as indicated in Table5):

Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Average household size	1.33	1.86	2.45	2.63	2.85	3.13
Amenity Green Space (m²)	19.15	26.78	35.28	37.73	41.04	45.07
Parks and Gardens (m²)	15.30	21.39	28.18	30.13	32.78	36.00
Natural and Semi-natural green space (m²)	33.25	46.50	61.25	65.50	71.25	78.25

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Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Playing Pitches (m^2)	10.51	14.69	19.36	20.78	22.52	24.73
Play spaces (m^2)	1.06	1.49	1.96	2.10	2.28	2.50
Allotments (m^2)	2.00	2.79	3.68	3.93	4.28	4.70

Table 8: Onsite provisions (in m^2) for each open space typology according to dwelling size in the PPA

Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Average household size	1.33	1.86	2.45	2.63	2.85	3.13
Accessible Natural Greenspace (m^2)	25.4	35.53	46.8	50.23	54.44	59.78
Playing Pitches (m^2)	16.9	23.62	31.12	33.4	36.2	39.75
Pitch changing rooms (m^2)	0.08	0.11	0.15	0.16	0.17	0.19
Play spaces (m^2)	1.2	1.67	2.21	2.37	2.57	2.82
Allotments (m^2)	2	2.79	3.68	3.95	4.28	4.7

Table 9: Onsite provisions (in m^2) for each OSSR type according to dwelling size in the TTVA

5.13 Table 10 sets out benchmark levels of contribution for offsite works in the Plymouth Policy Area where the necessary Green and Play Space and outdoor Sport measures cannot be delivered on-site according to dwelling size. Reference should be made to Table5, and local circumstances when considering which provisions will apply, however a contribution will be sought for open space consisting of Accessible Natural Greenspace, Playing Pitches (and changing rooms), play spaces, outdoor pitches and allotments from all development of more than 9 residential units (where not provided onsite).

Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Average household size	1.33	1.86	2.45	2.63	2.85	3.13
Amenity Green Space (£)	388.29	543.03	715.28	767.83	832.06	913.80
Parks and Gardens (£)	724.74	1,013.60	1,335.05	1,433.14	1,553.02	1,705.60

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Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Natural and Semi-natural green space (£)	277.29	387.79	510.80	548.33	594.20	652.57
Playing Pitches (£)	745.73	1,042.91	1,373.72	1,474.66	1,598.00	1,755.00
Play spaces (£)	304.85	426.33	561.56	602.82	653.25	717.43
Allotments (£)	20.89	29.22	38.49	41.32	44.77	49.17
Outdoor sports (£)	206.16	288.32	379.77	407.68	441.78	485.18
TOTAL open space contribution	2,338.58	3,170.56	4,307.93	4,624.44	5,011.27	5,503.59

Table 10: Offsite provision (in £s) for each Green and Open Space, Sport and Recreation measures according to dwelling size in PPA

5.14 Within the Plymouth Policy Area for the Delivery of Central Park, Saltram Countryside Park, Derriford Community Park and Plym Valley Strategic Green Spaces the above Open Space Contributions can be partially or wholly dedicated to any of the aforementioned Strategic Green Space as these green spaces are expected to deliver green space benefits for the city-wide population. Further the aforementioned Strategic Green Spaces consists of some or all of the above outlined Green Space typologies, where developer contributions will be sought for any of the aforementioned SGSs a specific improvement project will be specified.

5.15 For wet sports and dry sports facilities we will be taking a strategic approach and will only be seeking contributions on a case by case situation. Developer contributions will not be the sole funder of Wet and Dry Sports facilities. To reflect this, contributions from developers will be sought at 25 per cent of the total cost of provision per dwelling size (in £'s) as set out in the table below for the PPA, which will be used as a starting point for the negotiations.

Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Average household size	1.33	1.86	2.45	2.63	2.85	3.13
Wet Sports (£)	604.82	845.84	1,114.14	1,196	1,296.04	1,423.37
Dry Sports (£)	505.07	706.34	930.39	998.74	1,082.29	1,188.62

5.16 Standard calculated using Sport England Facility Calculator which takes into account local population profiles and sports participation rates. Costs from Sport England Quarterly Costs (2nd quarter, 2016).

5.17 Table 11 sets out the level of contributions within the Thriving Towns and Villages Area where OSSR provision is to be made offsite according to dwelling size. Reference should be made to Table 2, and local circumstances when considering which provisions will apply, however the likelihood is that Accessible

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Natural Greenspace, Playing Pitches (and changing rooms), play spaces and allotment contributions will apply in all cases (where not provided onsite).

Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Average household size	1.33	1.86	2.45	2.63	2.85	3.13
Accessible Natural Greenspace (£)	363	508	669	718	778	854
Playing Pitches (£)	1,198	1,676	2,207	2,370	2,568	2.820
Play spaces (£)	343	480	632	679	735	808
Allotments (£)	20.9	29.22	38.49	41.32	44.77	49.17
Outdoor sports (£)	99	140	184	197	214	235

Table 11: Offsite provision (in £s) for each OSSR type according to dwelling size in the TTVA

5.18 For wet sports and dry sports facilities we will be taking a strategic approach and will only be seeking contributions on a case by case situation. Developer contributions will not be the sole funder of Wet and Dry Sports facilities. To reflect this, contributions from developers will be sought at 25 per cent of the total cost of provision per dwelling size (in £'s) as set out in the table below for the TTVA, which will be used as a starting point for the negotiations.

Dwelling size	1 bed	2 bed flat	2 bed	3 bed	4 bed	5 bed
Average household size	1.33	1.86	2.45	2.63	2.85	3.13
Wet Sports (£)	570.90	798.41	1051.66	1128.93	1223.36	1343.55
Dry Sports (£)	462.84	647.28	852.60	915.24	991.80	1089.24

5.19 Standard calculated using Sport England Facility Calculator which takes into account local population profiles and sports participation rates. Costs from Sport England Quarterly Costs (2nd quarter, 2016)

5.20 Table 12 details annual and 20 year commuted maintenance sums for Green and Open Space, Sport and Recreation measures (per m²) for both the PPA and TTVA. The Costs are based on real life costing of PCC street services department.

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Green and Open Space, Sport and Recreation measures	Annual Cost/m^2	20 year cost/m^2
Amenity Green Space (£)	1.64	32.84
Parks and Gardens (£)	2.72	54.45
Natural and Semi-natural green space (£)	1.51	30.21
Accessible Natural Greenspace (£, TTVA only)	1.58	31.52
Playing Pitches (£)	1.74	34.84
Play spaces (£) (These costs are based on previous PCC SPD costs adjusted for inflation)	26.69	533.8
Allotments (£)	0.43	8.6
Outdoor Sports Facilities (based on outdoor tennis court) (£)	2.50	50

Table 12: Commuted maintenance sums for PPA and TTVA

5.21 Further references:

- Plymouth Policy Area Open Space Assessment
- The Plymouth Play assessment 2017
- The Plymouth and South West Devon Sports and Leisure Facilities Plan 2016 to 2034: Assessment report
- West Devon OSSR Study (2017)
- South Hams OSSR Study (2017)
- Thriving Towns and Village OSSR Study (2017) – this combining the 2 quantity standards within the West Devon and South Hams OSSR Studies into combined standards for the TTV Policy Area, as reflected within this chapter and tables above.

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6. European Marine Site (EMS)

Article 1: Calculating the Contributions for Marine Recreational Impacts

6.1 The Plymouth Sound and Estuaries European Marine Sites (EMS) Recreation Mitigation and Management Scheme represents the mitigation plan to manage the increased recreational impacts that would arise from the new dwellings from the JLP. This strategy is the most accurate and comprehensive expression of how the risks will be managed and is fully compatible with the requirements arising from the conclusion of the Habitat Regulations Assessment of the adopted Joint Local Plan as confirmed by the Inspector. This strategy spans the period up to the end of the Joint Local Plan Period and sets out how the pressures will be managed in-perpetuity, which is taken as being 80 years.

6.2 The Recreation Mitigation and Management Scheme identifies a range of activities and operations related to recreational pressure that threaten the favourable status of the European Marine Site (EMS). These plans are the most accurate and comprehensive expression of recreational management issues that these areas face, and form the basis for calculating the level of contribution required.

6.3 Contributions are based on costs over the plan period as well as for a further 80 years as under the Conservation of Habitats and Species Regulations 2017, mitigation needs to be provided for 'in perpetuity' which is accepted as 80 years.

6.4 The estimate for delivering the Mitigation and Management Scheme[3] during the required period is £6,271,423. As stated in the Habitat Regulations Assessment, and reflected in the JLP, the EMS Recreation Study #04[4] identified that the people living within 12.3km of the EMA boundary will, through their recreational activities, impact on the EMS. The projected housing numbers for all local planning authorities within 12.3km zone of influence has then been used to produce a cost per dwelling.

6.5 This cost per head is used to define the following contributions per dwelling:

Total number of houses to be delivered within the 12.3km Zone of Influence	No Houses
Cornwall	1,200
Plymouth	8,241
South Hams	6,462
West Devon	985

[3] Plymouth Sound and Estuaries European Marine Site Recreation Mitigation and Management Scheme. 2019. Plymouth City Council.

[4] Langmead, Tillin, Griffiths, Bastos, Milburn, Butler & Arnold. 2017. "EMS Recreation Study Document 04. Survey of recreational use within the Plymouth Sound and Estuaries European Marine Site: Scoping report and survey results." Marine Biological Association. 2017.

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Total number of houses to be delivered within the 12.3km Zone of Influence	No Houses
Total houses	**16,888**

Table 13: Numbers of houses to be built and cost of delivery of the EMS Recreation Mitigation and Management Scheme

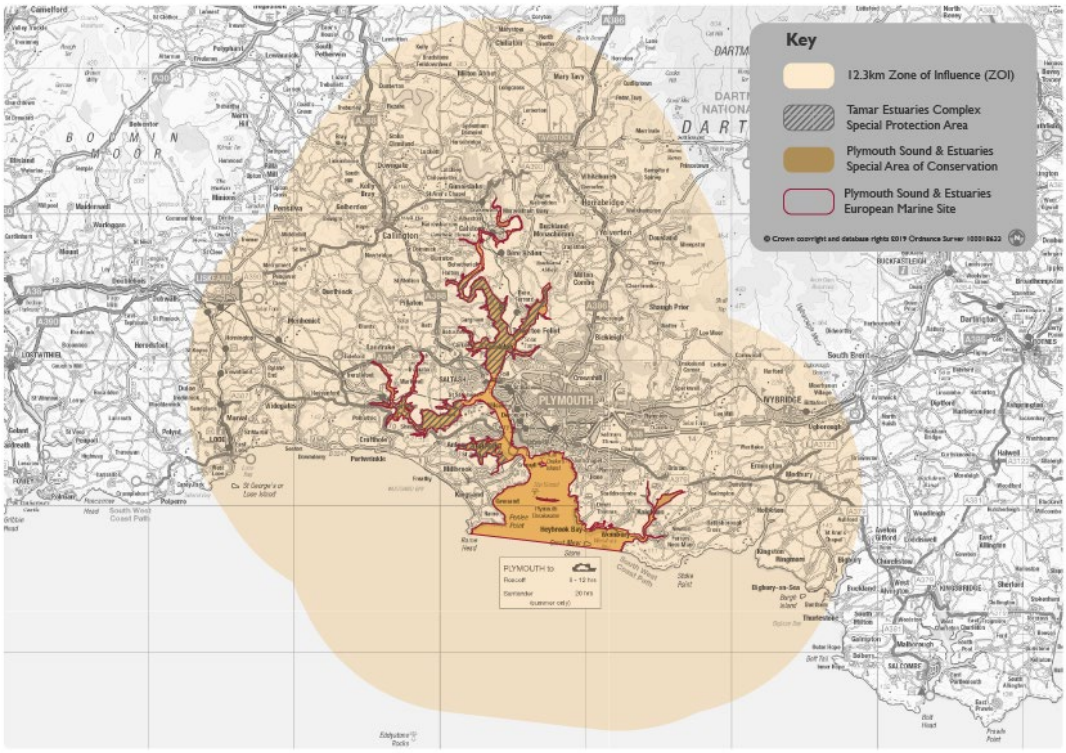

Figure 1: Zone of Charging of 12.3km

Cost for managing the EMS Recreational Impacts for the plan period and in perpetuity	**£6,271,423**
Average cost per dwelling	£371.35

6.6 This cost per dwelling is used to define the following contributions per dwelling based on housing data from Plymouth City Council for the period of 2006 - 2015 and on average occupancy figures from the 2001 Census data.

Size	Av household occupancy	Cost per unit £
1 bedroom	1.33	236.62
2 bedroom flat	1.86	330.92
2 bedroom house	2.45	435.89
3 bedroom dwelling	2.63	467.91
4+ bedroom dwelling	2.85	507.05
Cost per head		177.91

Table 14: Rates per size dwelling

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Barn Guide

Traditional Farm Buildings

Their Adaptation and Re-use

South Hams District Council

West Devon Borough Council

PLYMOUTH CITY COUNCIL

Barn Guide

Traditional Farm Buildings

Their Adaptation and Re-use

Contents

- Introduction ____ 3
- What the Buildings are and why they're Special ____ 4
- A Disciplined Approach to Design ____ 8
- Design in General ____ 10
- Design in Detail: ____ 12
  - Roofs ____ 12
  - Walls ____ 17
  - Openings for Windows and Doors ____ 20
  - Door and Window Types ____ 23
  - Extensions and Additions ____ 27
- The Setting ____ 30
- Wildlife ____ 35
- Checklist of Application Requirements ____ 37

Introduction

This guide is about the treatment of traditional farm buildings which are no longer needed for agriculture but are about to be, or already have been, adapted to serve a different use.

It is a 'best practice' guide describing how important these buildings are and how their character and interest can be successfully conserved. By the same token, it lets owners and developers know what the design and planning issues are, and how best to tackle them to achieve an acceptable scheme.

It covers works to their settings as well as the buildings themselves, not just those proposed as part of an initial conversion scheme, but also later ones when further works are being considered.

The guidance will have most relevance to proposals for the initial conversion of a building that has retained most of its interest and character. When proposals relate to an already converted building, however, its relevance will need to be judged against two things in particular. How well the initial conversion retained the character of the building and its setting, and how well the new proposals maintain the standards and qualities originally achieved.

If the building's character was mostly lost, the only relevant guidance might be that relating to the building's relationship with the setting. On the other hand, it will always be relevant to proposals that offer opportunities to regain lost character, such as when 'inappropriate' worn-out elements, like roof claddings or windows and doors, need replacement.

...how important these buildings are and how their character and interest can be successfully conserved.

Inset: The main subject of this guide: well-kept (not ruinous) farm buildings with their character and interest well-preserved..... if and when proposals are made for their conversion.

Main: Also the subject of this guide: farm buildings that have already been converted but still retain much of their interest and character.

Barn Guide

What they are and why they're Special

Farm buildings are the working buildings of a farm. Not the 'domestic' farmhouse, but the 'industrial' buildings constructed to accommodate the many processes and practices involved in the production and storage of food.

The essential features of most traditional farm buildings include:

- **The original fabric** of the walls, floors and roof structure, and any original window frames, doors and shutters. There may be fittings of interest too, both inside and out.
- **An uncluttered exterior** characterised by extensive blank walls and roofs with unbroken lines and few openings
- **An unpartitioned interior** (upper floors in particular) characterised by impressive proportions, long sight lines and the structural elements exposed.
- **An agricultural setting** characterised by hard-surfaced yards and open field surroundings. A characteristic of many two-storey farm buildings, is they are set into rising ground so that the upper storey also has 'ground level' access (the so-called 'bank barns').

As an integral part of an ancient landscape, farms and all the buildings on them help chart the district's settlement pattern and its agricultural development and structure through the ages. Their standing buildings evidence the days of scythe and sickle harvesting and flail threshing, as well as the more recent stages of mechanisation and the rationalisation of farming practices. They evidence too the way the district was settled, with some farmstead sites known to have been continuously occupied since before Saxon times.

Main: Recorded first in the 1300's, the site of this farmstead is typical in evidencing long and continuous settlement.

Inset: Less common are the 'model farmsteads' built anew. This one is dated 1853.

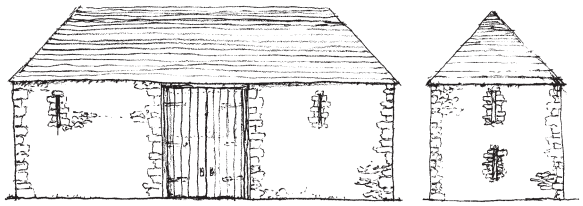
... help chart the district's settlement pattern and its agricultural development...

The types of buildings on a farm, and their size, relate mainly to its acreage and the kind of farming carried on. In the area, as in most of the rest of Devon, this was always a mixture of arable and pastoral, right up to the end of the 19th century. As a result, most farmers were involved in a whole range of activities, including growing corn (and other crops), raising beef cattle, dairying, cider making and rearing pigs and sheep, and for all but the last they needed a range of different buildings to accommodate them.

While the threshing (or corn) barn is perhaps the most common, not all farm buildings are actually 'barns', either by name or nature. There are several other types, and as each has a different function, they have different forms and appearances too. Individual examples will probably be unique, but their features will be typical of their type, making them distinguishable as well as distinctive.

The following diagrams and descriptions explain what the characterising features are of the main types of traditional farm building:

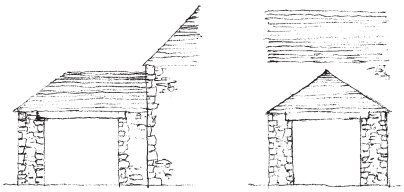
Threshing Barn



For the processing and storage of cereals. Characterised by a set of large double doors on one side opposite a smaller door on the other, most often in a near central position. With a threshing floor between them, the spaces on either side supplied separate storage for harvested and processed cereals.

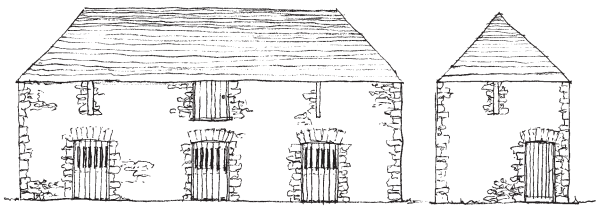
Porches sometimes flank the large doors, with the thickness of their projecting sides tapered to improve the draught.

Round House



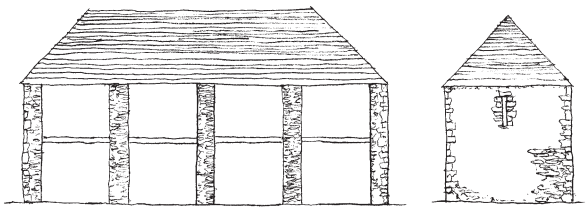
These extensions are sometimes an additional characteristic of Threshing Barns, built to shelter a 'horse engine' that drove a Threshing Machine. Some are open-sided and others enclosed, while their plans may be semi-circular, polygonal or a simple rectangle.

Shippon



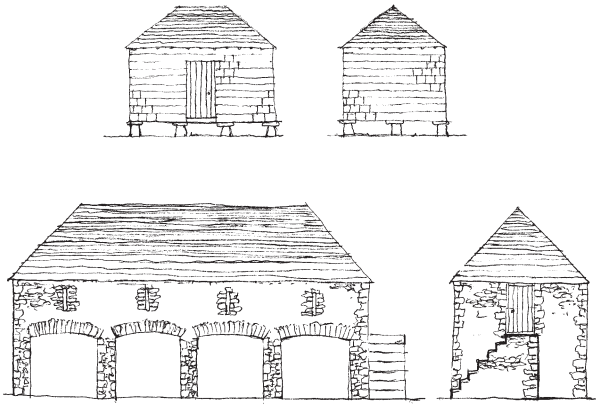
To house oxen and cattle with fodder storage above. Characterised by regularly spaced doors on the yard side, with a pitching door (or window) at first floor.

Linhay



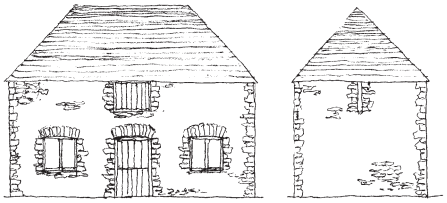
To store hay (at first floor) and provide shelter for either cattle (cattle linhay) or farm machinery (cart linhay). Characterised by an open front with the first floor and roof supported by regularly spaced posts or pillars. Sometimes the pillars are full-height from ground to eaves.

Granary



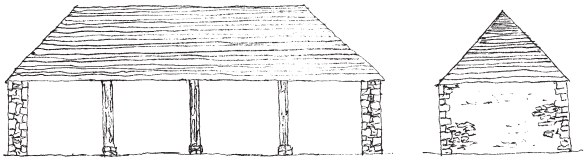
To store grain before it has been milled. Smaller ones were usually built on staddle stones (mushroom-shaped stumps) to help keep the grain dry and free from vermin. Exceptional for rural areas, they are usually of timber-frame construction, and just as exceptional for farm buildings, they are often slate-hung too. Larger ones are similar to linhays but with the upper floor front enclosed. Ground floors were normally used as cart sheds, while access to the first floor was usually via stone steps on an outside wall.

Stables



To house horses, usually with a 'hayloft' on the first floor and a pitching door at front. Characterised externally by regular, often near-symmetrical, arrangements of windows and doors. Interiors were divided into stalls, often with a 'loose box' (larger stall) for a foaling mare or sick horse. Outside steps to the first floor are quite common, particularly on larger holdings where farm hands were likely to occupy at least part of the 'accommodation'.

Cart Shed



Cart Shed - to shelter carts and other farm machinery. An open fronted, single-storey structure with the roof supported on regularly spaced posts or pillars.

Most farms in the area had a threshing barn and typically a shippon and linhay nearby, although often the threshing barn was actually incorporated on the first floor of a 'bank barn' with accommodation for cattle beneath. In addition, any of the following were likely to complete the farmstead range: a stable block, a cider pound, cart-sheds, a granary, pig sties, fowl pens and sometimes even a dovecote - if the farmstead was that of the Lord of the Manor (whose doves or pigeons had the freedom to fatten themselves on his 'subjects' corn as well as his own!) In addition, beyond the farmstead and serving distant fields, there might also be a field barn or animal shelter.

The variety of building types in any farmstead range is an essential aspect of their interest and character. Although often used differently today than originally intended, and have been modified as a result, most farm buildings still retain the distinguishing features of their type and much of their authentic character. The least altered are special indeed, while the modifications made to many can be of interest in themselves.

The linhay (right above) and the shippon with barn over (right) have different characteristics that are typical of their types and clearly tell them apart.

As historic structures, traditional farm buildings illustrate well the use and development of local building materials and methods. Indeed, they comprise some of the most locally distinctive and characterful buildings in the landscape, more often than not built of stone and cob extracted from the sites they occupy. In addition, as products of their particular age, they record the resources and resourcefulness of their builders and users.

Sized to suit its purpose, the tithe barn (right above) speaks volumes of the 'taxes-in-kind' it was built to store. Examples are few, as are small animal shelters like this one (right) surrounded by fields in complete isolation.

A Disciplined Approach to Design

Both in themselves and in their setting, and whether listed or not, traditional farm buildings make a tremendous contribution towards the interest and character of settlements and countryside.

In principle this makes their conservation most desirable, but whatever their type and wherever they are located, their authenticity as traditional farm buildings will only be properly conserved if:

- Their original fabric requires little in the way of rebuilding, and
- The changes needed to secure their future are few and can be done in a way that maintains their essential characteristics – inside, outside or in their settings.

... the design approach most suited ... is one that seeks to suit the new use to the building...

Below: An unconventional new use provided the key to the successful conversion of this, still characterful, listed farm building. It has served mainly as a venue for music recitals since being converted about 8 years ago in what was a very conservation-friendly manner.

Acceptable schemes are only likely to be achieved through the adoption of a flexible and imaginative approach to their design; not one that relies on conventional solutions to creating an acceptable place in which to live or work, but one that's inspired as well as disciplined by a building's existing characteristics. Every change being proposed, whatever its size or purpose, needs to be examined in terms of the necessity for it, the impact it will have, and whether alternatives exist (including alternatives to the way the building is being occupied or serviced, as these can sometimes obviate the need for a change altogether). Assessing the impact of changes, and knowing what alternatives there are, requires skill and knowledge, and those qualified and experienced in conserving the character of historic buildings, as well as architectural design, will be best able to provide the professional guidance needed. This is because the design approach most suited to the conversion of traditional farm buildings is

not one that simply aims to suit a building to its new use. Rather its one that seeks to suit the new use to the building, maybe in an out-of-the-ordinary way, and not always in a way the user might prefer.

If a large part of a building's fabric has to be replaced to make it suitable for re-use (through works of demolition and rebuilding) it is likely that the scheme being proposed will not be considered a conversion of an existing building but the construction of a new one on its site. In this case, different or additional planning policies will be relevant to determining the application being made. Proposals for conversion should therefore be supported and substantiated by a structural report which makes clear what the building's repair and rebuilding requirements are. This is important because when a conversion scheme is approved only the demolitions identified in the application are covered. Other demolitions thought to be required as work progresses will need to be formally agreed beforehand, and this could involve the making of a new application. In this case a scheme will need to be reassessed as a new-build one if all the demolitions put together amount to a large part of the building's fabric being replaced.

An essential first step to gaining a full understanding of a building's interest and character is the production of accurate, annotated drawings (including floor plans, elevations and cross sections) which show exactly what its existing features and details are (both inside and outside, and in its setting, including relationships with other buildings and features like walls, hedge banks, leats and ponds). Accompanied by photographs, these will supply a vital reference for influencing the design and enabling its assessment. The councils' will expect such survey information to form part of an application, while a descriptive and illustrated record of the building will normally be required as a condition of a planning approval, to be submitted prior to the commencement of any works.

Design in General

All traditional farm buildings have characteristics that are typical of, and identify, their type, but as each was built to suit the personal needs of it's user and the nature of it's site, no two are exactly the same.

The characteristics of individual examples are therefore unique, and it is these that need to be respected whenever proposals are being made – not the characteristics of different farm building types or even the same type of farm building in a different location.

- Traditional farm buildings tend to have a robust, uncluttered appearance that plainly and simply reflects their workaday use. This is true of their surroundings too, where the movement of large animals or vehicles was frequent. Architectural embellishments and decorative touches are therefore largely absent, so features of this kind (especially if domestic in scale or association, like porches and canopies or lanterns and hanging baskets) tend to look out of place and should be avoided. The same is true of external TV aerials and satellite dishes, which may need to be located inconspicuously in a detached location.

Main and inset: While their form and shape are actually quite similar, the design and detail of these two buildings (and their settings) have characteristics that clearly set them apart. When converting farm buildings the aim and challenge is to make sure their 'non-domestic' character isn't eroded by introducing characteristics of the 'domestic' kind.

- The insertion of additional door or window openings will begin to change the character and appearance of most traditional farm buildings, so their introduction should as far as possible be avoided (especially on significant elevations or prominent roof slopes). It

... make sure their 'non-domestic' character isn't eroded by introducing characteristics of the 'domestic' kind.

makes absolute sense, therefore, to arrange interiors so that every advantage is taken of the openings that do exist (in providing daylight, ventilation and access).

Right: Open-plan interiors offer the flexibility needed to take full advantage of opportunities like this, to insert large areas of glazing.

Below: In larger rooms and open-plan interiors, glazed ventilation slits can play a vital role in supplementing the main sources of daylight.

- The ageing processes that affect natural materials create exceptionally characterful patinas and idiosyncrasies which enhance the appearance of most traditional farm buildings. Over-zealous renewals will destroy them, so works to the fabric should, as far as possible, be limited to essential repairs.
- Although made up of several buildings with characteristics of their own, farmstead groups are nearly always visually cohesive, with each building relating to the others in a variety of ways (to do with their siting and arrangement, their materials and methods of construction, the features they have, and how they are designed). These 'neighbourly' characteristics are as important as their individual ones, so the aim should be not to compromise either. This means, of course, there will be less scope for making changes to individual buildings in farmstead groups. To be acceptable, any proposed change will need to avoid harming not only a building's own characteristics, but also the cohesive qualities of the whole and the individual qualities of its neighbours.
- A vital aspect of the character of individual farm buildings sited in fields away from the farmstead is their isolation. Often viewed only from a distance, their relationship with the rural setting is both immediate and intimate, and unless accompanied by a fold yard with enclosing walls or banks, there will be little opportunity to visually assimilate an alternative use without compromising this essential characteristic – especially if a long metalled drive has to be constructed to provide access. For this reason there is normally a presumption against the conversion of isolated or remote farm buildings, especially where they are prominent in the rural scene

Below: Isolated farm buildings (like the animal shelter shown left), along with individual farmstead groups, characterise the countryside and are an essential aspect of its visual appeal. This is seriously harmed, however, when conversions to non-agricultural uses are conspicuous, as they tend to intrude upon the traditional, ***agricultural*** *scene.*

Design in Detail - Roofs

Roofs are nearly always a dominant feature of farm buildings, while their timber structures often provide the only real clues about a building's age and development.

As a feature of roof slopes... dormers are not characteristic...

The pitches of roof slopes, the forms they take and the materials used to clad them are important too, each contributing greatly towards the distinctive characteristics of the part of the district they're in.

- Aim to retain at least the principle timbers of historic roof structures by making good and giving them the support they need to survive. Interiors can be enhanced by their exposure, while the undulating lines they create outside, which are true to the building's age, will continue to give visual delight if not straightened during the process of repair.
- If an historic roof structure is wholly beyond repair (or has already been replaced in an inappropriate manner), aim to reinstate its existing (or its original) form and configuration, taking care to establish the correct ridge height, angles of pitch and the forms of the ends (most commonly gabled or with full or partial hips).
- Although numerous in the past, thatched roofs on farm buildings are now few and far between, but where the material does survive it should certainly be preserved (Indeed, the majority are listed to help ensure this happens). Whenever practical it should also be

Main: Held together by wooden pegs, these roof trusses are undoubtedly pre-Victorian and probably date from the 1700's.

Inset: Here photographed more than 20 years ago, these thatched roofs have since been renewed and survive today to give a rare glimpse of what was formerly a much more familiar rural scene.

reinstated on roofs that were previously thatched. Where thatch has been replaced by corrogated sheet this may be an acceptable alternative.

- Aim to retain natural slate roof claddings that are in a reasonably sound condition. Modern techniques are available to deal inconspicuously with slates that are slipping (but are otherwise sound), while missing slates can often be matched by suppliers of salvaged building materials.
- If the natural slate cladding of a roof has to be stripped for renewal, aim to salvage any sound slates. If the supply is sufficient, re-use them on the more prominent slopes and use matching new or second-hand natural slates on the others. These should be grey-blue in colour, not dark. Aim also to salvage any clay ridge tiles, particularly those which are locally distinctive such as 'thumb-pinched' crests (see photograph below) . Whatever their number, always re-use them, and make up any losses with matching second-hand tiles or new ones with a similar colour and profile.

Above: Careful re-use of its ridge tiles has meant this roof has retained most of its historic interest and character even though the slates themselves required renewal. The appearance and hand-made qualities of the tiles are a positive asset.

- Aim to continue or repeat the pattern of existing slatework when carrying out patch repairs or complete renewals. Traditional, 'graduated' patterns are especially characterful and attractive, comprising random width slates laid in diminishing courses (largest at the eaves and smallest at the ridge). Another traditional pattern to repeat involves the use of much larger slates at the eaves and along the verges as a precaution against wind damage.

Right: Before the arrival of the railways, when mass-produced slates became available in abundance, all roofs were skilfully laid in this 'graduated' way.

Right: As well as making the roof wind and weather tight, the larger slates at the eaves and verges create a very distinctive pattern.

- Aim to repeat the existing treatment of the eaves and the verges of gable ends. Do not introduce overhangs beyond the wall's face or add fascia- or barge-boards where these are absent (other than perhaps the narrowest of fascias at the eaves, applied directly to the wall, if this is essential for fixing new guttering - see next item). The use of slates to protect any exposed parts of the roof structure at the verges is a common practice that should be retained or repeated in new work. The fixing of standard (unnecessarily deep) fascias to the wall face or the addition of projecting 'box eaves' should always be avoided as these are not characteristic of farm buildings, are visually intrusive, and tend to introduce an inappropriate 'domestic' appearance.

Left: The eaves (and verges) of older roofs hardly project beyond the wall face.

Right: The skilfully executed slatework to this gable verge replicates the original detail in every way.

Middle Left: 'Boxed' eaves and verges like these are typical of modern houses but totally alien to traditional farm buildings and should therefore be avoided.

- Guttering is largely absent from traditional farm building roofs, so usually it has to be added whenever new uses are introduced. Aim to use cast iron with a half-round section, as this will be in tune with the historic nature of the buildings as well as their robust and straightforward character. Extruded aluminium is a more expensive alternative which when painted has a similar appearance to cast-iron. Plastic, on the other hand, is a poor, less sustainable, substitute whose appearance is generally out of keeping with natural walling and roofing materials. Avoid its use if at all possible, especially on principle elevations, but if used elsewhere it should always be grey or black (not 'domestic looking' white). Whenever practical, aim to attach guttering directly to either the wall face using 'rise-and-fall' brackets or to the wall plate or rafter ends if these are exposed.

Bottom Left: The perfect way to add rainwater goods: made of cast iron, with the guttering fixed to the wall with brackets, they reinforce the building's historic character.

- Aim to construct hips in the traditional (and the most attractive) way using mitred slates laid on lead soakers (best practice). Hips finished with a narrow fillet of mortar running the length of the mitred joints are common but less attractive and prone to cracking. Tiles came into use in Victorian times but they tend to produce a clumsy, heavy appearance. While it would be correct to reinstate them where they exist on a Victorian roof, their absence from earlier roofs is a characteristic that should be respected. Lead rolls with exposed aprons running the length of hips (and ridges) aren't characteristic of 'humble' farm building roofs, however, and should normally be avoided.

- Corrugated iron sheeting has been used on roofs since the middle of the 19th century, so it can be an original cladding as well as a replacement for original slate or thatch. The fact is, many old buildings would have perished long ago had the 'affordable' sheeting not been available to cover their 27 failing roofs. Its use is therefore not uncommon, and for historical, practical and even aesthetic reasons there may be cases where its use today is both acceptable and desirable. Aim always to repeat the same, small-scale, wavy profile of traditional corrugated

sheeting, and choose a colour that is suited to the setting. Avoid the rectangular profiled sheeting that is commonly used for (and therefore associated with) the construction of new factories on industrial estates.

Above Right: In use for more than a century, corrugated sheeting is now very much part of the traditional farming scene. It tends to reinforce the 'non-domestic' character of the buildings it protects and, as these former stables show, it is neither unattractive nor out-of-keeping.

Right: The conversion of this farm building to a workshop involved the reinstatement of its corrugated sheet roof. Most importantly, in order to maintain its traditional appearance, the wavy profile of the replacement sheeting was scaled to match the old.

Below: The authentic character of this old roof has been preserved to perfection. The 'mitred hip' casts rainwater off down the graduated slatework for it to be collected in cast iron guttering fixed with brackets.

- Chimneystacks are often the most obvious features that signal the whereabouts of the farmhouse in a farmstead group. Their presence clearly labels the building 'domestic', which is entirely as it should be. Without them, the working buildings gather an equally appropriate 'non-domestic' label. The absence of chimney stacks from the roofs of farm buildings is therefore an essential aspect of their character (and that of the farmstead group) so their introduction is almost always inappropriate. A matt-finished flue with a simple, utilitarian appearance may be an acceptable alternative, but only if its size is small and its location inconspicuous. If not, the only solution might be to use fuels or forms of heating that do not require flues through the roof.

Below: The chimney stacks in this larger-than-average farmstead group do more than just define the domestic and non-domestic ranges. They also explain that the oldest part of the farmhouse occupies a wing at the rear, while off this wing, in a small scullery extension, a copper for heating water was tucked into one corner.

- The interior roof space of farm buildings was invariably left open to form part of the storage area on the upper floor. Separate day lighting at this high level was rarely needed or sought, but if ever it was, the traditional and most economic solution was to replace a few slates with glass. By the 19th century small rooflights were used as an alternative, but the introduction of 'expensive' dormers, to gain extra headroom as well, was never favoured.

As a feature of roof slopes, therefore, dormers are not characteristic, while their tendency to create a domestic appearance is wholly inappropriate. The addition of rooflights can also be visually intrusive, but where absolutely essential they may prove suitable as part of an otherwise acceptable scheme. The aim should be to restrict them to the least prominent roof slope(s); to keep their size and number to a minimum; to use only those with vertical proportions; and to avoid doing damage to important roof structures. In addition, the new windows should have a top- or side-hung method of opening and be fitted so that they are nearly flush with the roof surface. Where these limitations on the siting and number of rooflights cannot be met, it may be that the alternative use of patent glazing will provide an acceptable, if less traditional, solution to conserving a building's essential characteristics.

Above: Far less damaging than 'windows in the wall face', these rooflights met the criteria mentioned in the text and were placed in a regular pattern to reflect established practice.

- The ventilation of voids in felted roofs has long involved the introduction of conspicuous, modern looking fittings and roof forms that are alien in an historic setting and disrupt the homogenous appearance that characterises slate roofs. With the introduction of 'ventilators' that are incorporated into the felt lining, however, this adverse impact can now be avoided, as they operate 'invisibly' beneath the slatework.

Below: Vents like these along the length of a roof will have a very damaging impact on its appearance and character. They should always be avoided in favour of the most discreet types.

Below: Although even less discernible now than they originally were (after a hundred years of weathering) the two glass 'slates' on this roof still manage to let in an appreciable amount of daylight.

Walls

The walls of nearly all traditional farm buildings are built of local stone, and / or cob.

Rendered surfaces, even over cob, are uncommon, and so too 'expensive' slate cladding which was generally reserved for cottages and houses……and the timber-framed granaries just mentioned. As the need arose, horizontal timber boarding or vertical corrugated sheeting was usually employed to close off sections of open fronted buildings to accommodate changes to a farm's operations.

The complex geology of the area, and the wide range of building stones it supplies, is nowhere better recorded than in the walls of traditional farm buildings. Whether sedimentary, metamorphic or igneous, all types of stone are in evidence, making an immense contribution towards the local distinctiveness of every part of the district. In the main it is rubble stone, brought straight from its source in roughly hewn pieces.

The plentiful supply of stone meant brick was never favoured as a walling material, and not until the 19th century was its ease of use and regular form utilised to the full in constructing door and window openings.

The mortar was invariably lime-based… slightly recessed in the joint and 'finished off' with a brush.

Main: Walls like these, constructed of cob above stone, are typical of many parts of the area.

Inset: Small granary buildings placed neatly on staddle stones are rare in the area, and so too any type of farm building clad in slate.

Stonework patterns are many and varied. Typically, they tend to be either rounded (above left) or thin-bedded (above right), but whatever the pattern, new work should always respect what is locally distinctive.

- The colours and the shapes of the stones that walls are built of are foremost in creating their distinctive qualities. As well as visual interest they can be a source of historical interest too, by giving clues to the age and development of a building and indeed the farmstead group as a whole. Colours are obviously many and varied, while shapes can range from the thinnest of slithers to the almost round. Aim to replicate the existing patterns of colour and shape whenever stonework is being repaired, renewed or reinstated where lost.
- If the dismantling of any part of an existing wall is essential, aim to record its appearance if its going to be rebuilt, and to do the work carefully by hand so that all the stone pieces are salvaged and made ready for re-use without damage.
- When additional stone is needed to complete the rebuilding of an existing wall, aim to use salvaged stone from the site that is compatible with the patterns of colour and shape that are distinctive to the building. (Salvaged stone from elsewhere may not be). Do not, however, demolish valuable walls or buildings nearby in order to supply it. If new stone has to be used, this should have the same compatibility too.
- When completely new exterior walls are to be constructed (such as for an extension), again aim to use salvaged stone or new stone which, in this case, is compatible with the patterns of colour and shape that are distinctive to the locality. Where a wall is to have only a facing skin of stone, aim to build it thick enough to allow the largest stones of the local pattern to be incorporated. Except when constructing segmental arches over door and window openings, (see page 23), the stones should always be laid on their natural, quarry, bed to minimise erosion and avoid any resemblance to vertical crazy paving. Aim also to avoid exposing machine-sawn faces as these will look out of place in an otherwise historic setting.

Below: This 'crazy paving' approach to wall construction should always be avoided. More similar technically to bathroom tiling, and with an appearance more suited to garden patios, there is no precedence for its adoption in the historic setting of traditional farm buildings.

- The mortar joints of traditional stonework are nearly always thin so as to maximise the durability of the wall and minimise the amount of mortar needed to construct it. The mortar itself was invariably lime-based, with the final pointing slightly recessed in the joint and 'finished off' with a brush. For practical as well as aesthetic reasons, therefore, aim to lay and point stonework so that the thickness and finish of the mortar joints follows this traditional practice, using a lime-based mortar whose mix and colour matches the original.
- Cob is a strong, durable and energy efficient walling material that is an important feature of farm buildings in many parts of the district. As the composition and colour of cob varies from area to area, its exposed surfaces are a particularly attractive and characterful source of local distinctiveness. It is always important, therefore, to retain sections of cob walling, however small these may be. The tops of walls should always be protected from the weather during building operations, while advice on repairs should always be sought from an experienced contractor.
- Small nesting holes for pigeons (to supplement the farmer's diet) are a special feature of many farm buildings, usually located in a regular pattern high on an east-facing wall. These should always be retained for their visual and historic interest, as should other 'minor' features like external stone steps and mounting blocks alongside stone walls.

Above: The nesting holes in this 17th century farm building are somewhat unusual in that the central few on the bottom row have slate slabs running along their bases. That the slabs are above the doorway, and project out from the wall by a small and seemingly measured amount, suggests they weren't provided for the pigeons' benefit, but to spare whoever used the door from being 'spotted'.

Right: Although conversion made these characterful steps redundant they were nevertheless retained as a feature of interest and a reminder of how the building was formerly used.

Right: Not unique, but certainly rare, these stone steps giving access to a granary have a dog kennel built-in…… across the yard from the farmhouse door.

Openings for Windows and Doors

Apart from the open fronts of linhays and cart sheds, most farm buildings have very few openings in their walls, with some walls – including those of linhays and cart sheds - having none at all.

This 'lack of openings' is a fundamental aspect of their character, while the size and proportions of the openings they do have, as well as their number and arrangement, all contribute towards the characteristics of both individual walls and the buildings they serve. In every case, therefore, the most fundamental of aims should be to retain existing openings in their original form (and re-open original ones that have since been blocked), and not create new ones unless an acceptable scheme could not otherwise be achieved.

- The creation of new openings will begin to alter the authentic character of a building. If essential, their number should be kept to an absolute minimum, while their size, proportions and siting should be compatible with existing patterns and the characteristics specific to the building's type. Ingenious designs and locations for new openings that do not conform to established practices are likely to erode a building's genuine authenticity and should therefore be avoided (such as triangular-shaped openings for new windows in gabled ends).

Inset: Courtyard facing buildings tend to be single aspect with their sides and rear walls often characterised by a total absence of openings. New openings in these walls will harm the building's essential character, so while new rooflights may sometimes be acceptable, a basically single aspect solution to conversion will need to be sought.

Main: The key design feature which enabled this single aspect conversion to succeed was the use of the ground floor (with its several existing openings) for bedroom accommodation and the first floor for living.

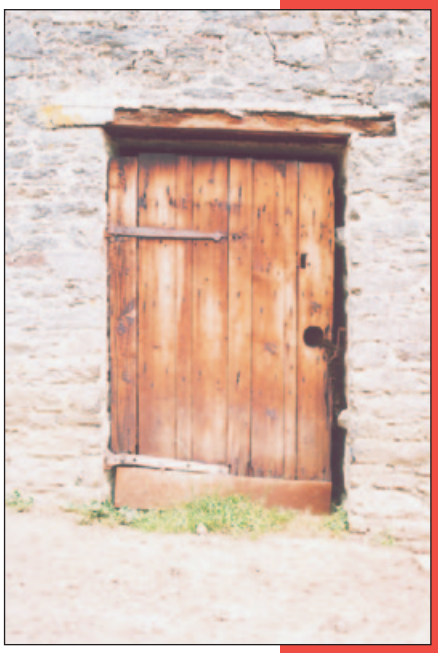
- Ventilation slits are a common (and very important) characteristic of many farm buildings and should neither be blocked nor enlarged. While not windows, they do allow some light into the interior, so aim to maximise this potential by fitting fixed glazing units in minimal frames.

Below: The historic interest of this particular ventilation slit is much enhanced by the fact it appears to preserve part of a medieval stone window at its head. The piece of carved masonry was probably salvaged from the nearby farmhouse when it was rebuilt in the 18th century and its 'old fashioned' windows replaced with up-to-date sliding sashes.

- The way the lintels, sills and reveals (at the top, bottom and sides) of openings are constructed is a source of historic interest as well as visual character. When repairing them, or repeating an existing pattern, be sure to record their construction details beforehand, from outer face to inner, and including the location of the door or window frame in the thickness of the wall.

Top Right: Across the openings of windows and single doors, timber lintels usually have a narrow, plank-like appearance.

Bottom Right: Stone lintels usually take the form of shallow 'segmental' arches, whatever size of opening they span.



- Lintels of timber are still quite common. Those spanning the widest openings have a 'beam-like' profile and appearance, while those across smaller openings tend to have a more 'plank-like' form and are often made up of more than one piece to give support through the thickness of the wall. Their exposed sections, inside and out, therefore appear quite narrow. Although it may be practical to reinstate the 'hidden' parts of a deep lintel using concrete beams, these should never be exposed, while the practice of 'encasing' them in timber boarding is never convincing and should always be avoided.

- Lintels of stone sometimes comprise large single slabs (especially of slate or granite) laid horizontally across the opening, but more often they are made up of small pieces combined vertically to form a shallow curving ('segmental') arch. The pieces used are usually similar in size and rectangular in form, creating a compact, regular pattern with both the underside and front faces relatively smooth.

- Bricks (on-edge) largely replaced stone and timber for the construction and renewal of lintels in the latter part of the 19th century. The more discerning builder would shape (rub) the bricks so that, although in a curving (segmental) arch, the joints would be straight. (Ie. the bricks were

tapered, not the joints). The use of brick sometimes extended to the reveals too, with the bricks laid in pairs or threes to create the pattern and appearance of stone quoins (large corner stones). Whether of brick or stone, however, an arch supported on flat, iron straps is the poorest of substitutes for a properly constructed, authentic, self-supporting segmental arch.

Top Right: The brick of this arched lintel extends to the reveals too, except for the inclusion of two large stones which have brackets set firmly in them (probably to accept the hinges of an original frameless door that has since been replaced).

- Sills are normally dressed stone pieces or slabs with their ends only slightly recessed (if at all) into the stonework on either side, and their drip edges extending forward of the wall face by a similarly small amount. Standard timber sills intended for the house-building market are incongruous and give an opening an inappropriate domestic appearance. Some sills, like the chutes serving root stores, slope to the inside and are particularly interesting features that now have a considerable rarity value.

Above: Sills are invariably of stone, with drip edges that project little beyond the face of the wall.

Door and Window Types

Normally made with a robustness to suit the heavy-duty use of the buildings they are in, the doors and windows of traditional farm buildings, together with their frames if they exist, tend to have a chunky, industrial appearance.

They also tend not to be made to standard dimensions, so it is likely that all new and replacement door and window joinery will have to be purpose made. Units manufactured for the mass housing and d-i-y markets will inevitably possess a 'less-than-robust' domestic appearance that looks incongruous - even if, by chance, one of them fits an opening perfectly.

- New or replacement doors and windows should always be made of timber and recessed in their openings in the traditional manner (this not only improves weather protection but also reinforces the 'sturdy' appearance that most farm buildings have). The timber should be painted or stained using colours that relate positively to the robust character of the building, the rural character of its setting, and the natural colours of its stonework. Bright 'garish' colours should obviously be avoided, but white (because of its domestic associations) and red-browns (because they create the look of alien, tropical hardwoods like mahogany) are equally inappropriate.

Inset: The preservation of this massive pair of doors (one of a series on this elevation) was important to the successful conversion of this listed building. Imaginative use of the spaces inside meant they could each serve as front entrances to domestic accommodation.

Main: Retained to perform an aesthetic rather than practical function, these old doors (which look more like gates) preserve part of the building's authentic character in a manner that doesn't look contrived.

... Aim to repair and re-hang them if at all practical...

- Original doors can display a great deal of ingenuity in the way they are made to suit their purpose, and add interest as well as character to a building. The massive entrance doors to threshing barns often have smaller ones incorporated in them, while shippon doors were often partly slatted for ventilation. Aim to repair and re-hang them if at all practical, either to perform their original purpose; to act as shutters to an inserted window, or simply hung in a permanently open position against the wall.

Right: Perhaps the most common doors of all are those constructed of solid, vertical planks. Straightforward lines and unfussy detailing are their essential characteristics.

Left: This traditional door pattern, and patterns similar to it, are common throughout the district, designed to allow ventilation when closed. With the open slats glazed, the design is well suited to adaptation for use in new or replacement work.

Unless an existing pattern suggests otherwise, new doors designed with solid, full height, vertical planking are likely to prove the most acceptable. The widths of the planks should be greater than those normally used for domestic doors, and if daylighting is essential, this should be obtained through a small glazed section in the top half of the door that is aligned with the planking.

Left: Essential to the character of this 'up-market' stable block, these doors were successfully preserved to function more like shutters. When open they reveal a glazed screen incorporating a 'secondary' door that maintains the integrity of the opening in a most attractive and innovative manner.

Above: When daylighting is absolutely essential, the 'solid' nature of the door should always remain dominant, while any glazing inserted should be located and proportioned to marry with the planks. (Here there are 6, but when planks are odd in number, a single, central glass panel will suit best).

- Windows are generally plain and straightforward in their design and quite different to those found in a farmhouse or cottage. They contribute both interest and character, so aim to retain them or adapt them to a suitable form that can be matched in new work as well. Vertical iron or timber bars are an essential feature of many window openings and should be incorporated in the final design.

Above: Traditional windows in farm buildings tend to have chunky, robust-looking frames. They mostly lack glazing, sometimes have internal shutters, and often have vertical iron bars inserted to improve security.

- Unless an existing pattern suggests otherwise, the most acceptable design for new windows is likely to be the side-hung casement fitted flush in its (chunky) frame. Normally in pairs, with a mullion between, each side should have an identical appearance even if one is fixed and the other opening (in other words, fixed [non-opening] lights should not be glazed directly to the frame, but to an sub-frame which is dimensionally the same as the opening casement). The addition of glazing bars to create multi-paned windows tends to introduce an incongruous domestic appearance, so this practice should be avoided.

Right: These flush-fitting casements set in a chunky, mullioned frame (one with an upright post dividing the window into two) have a simple and unfussy design that suits them to the character of most farm buildings.

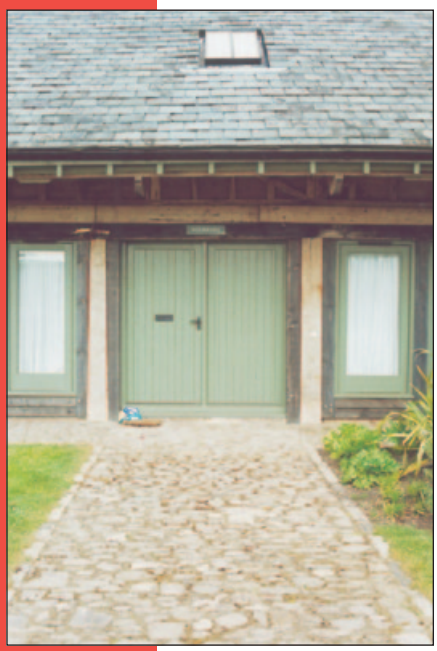
- Only by treating existing door openings as single entities will their integrity (as door openings) be properly maintained. The division of a door opening into distinctly separate elements that do not follow the pattern of the original door is therefore undesirable. Replacing a wider-than-average door with the combination of a standard door and a glazed (or solid) panel beside it should therefore be avoided. As well as harming the authentic appearance of the doorway, this treatment introduces a domestic character and an uncharacteristic, 'lop-sided' appearance. A door of the same width as the one being replaced should always be used. Replacing a single door with the combination of a small window and an infill panel of masonry

Right: Where a farm building continues in non-domestic use (as here) it is often practical to renew windows exactly in their original form and so preserve their character entirely.

beneath it should also be avoided. If a window is to be inserted in place of a door it should be full-height, although a smaller window, with vertical planking beneath, can be acceptable if these are set within a full height frame.

Right: The partial glazing of this former door opening preserves its integrity (as a 'full height' door opening) by being set entirely within a full height frame.

- The double-doors of larger openings divide them visually into two, so their treatment should aim to reflect this pattern by appearing as two separate, and usually identical, halves. Replacement double doors should therefore have the same heights and widths as the originals and close the opening completely (as for single door openings, the combination of narrower doors and separate side panels should normally be avoided). Replacement windows in double-door openings should again be full height, and be 'even' in number so that the opening 'divides' at the centre - where the original doors would have met when closed.



Left: To preserve the integrity of this double-door opening, the appearance of the 'real' solid door on the left was repeated on the fixed panel to its right.

- Some openings, like those to the front of linhays and cart or cattle shelters, were never intended to be closed by windows or doors, so they lack the frames that normally go with their insertion. Indeed, frames were sometimes dispensed with in openings that were actually hung with doors on hinges fixed directly into the stonework. That these openings were never fitted with frames is, of course, part of their character. Their treatment, therefore, should aim to respect this characteristic through designs that avoid the need for framing or else minimise the visual impact of any that must be introduced.

Right: To preserve the character of this unframed opening (between the supporting pillars of an open-sided roundhouse) the glazing was secured directly into the masonry.

Extensions and Additions

While the roundhouse is a characteristic feature of many threshing barns, extensions to other kinds of traditional farm building are far less common.

Strictly speaking, many of those that do exist aren't extensions at all, but additional buildings constructed against the wall of another. Usually lean-to in form, they don't have access through the wall but simply rely on it for support in a 'cost saving' manner. Minor buildings like pigsties or open fronted shelters were sometimes added in this way, but whether 'separate additions' (like these) or 'integral extensions' (like the roundhouse), the buildings are just as important as their parent in evidencing how a farmstead has developed over the years. Their retention is therefore essential to telling the 'complete story'.

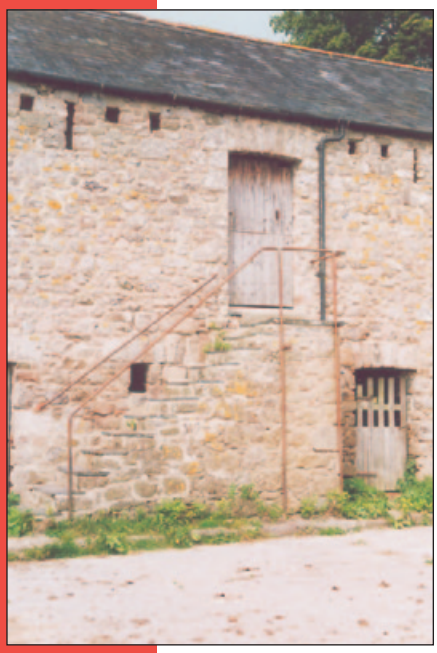
Main: This roundhouse extension is typical of its type, being attached to the rear wall of the threshing barn, well clear of the 'threshing doors'.

Inset: Although uncommon in themselves, where other small additions have been constructed they normally have a 'lean-to' roof and are usually located at one end.

The porch and canopy extensions that shelter so many farmhouse doors are only rarely found on the working buildings close by – with one exception, and that is the threshing barn. Its massive, cart entrance doors were often set within a shallow porch or beneath a substantial canopy. Invariably, however, these purposeful devices were an integral part of the original design and were not added later.

The general absence of extensions and additions to traditional farm buildings is an aspect of their historic interest and authentic character.

Right: Significantly as well as typically, this 17th century bank barn was designed and built with just one canopy - to shelter the threshing door and the threshing floor inside. Canopies above other openings are rare, even above pitching doors like the high level one in this building's gable (at right).



Left: The only other structures likely to be found projecting forward of the four walls of farm buildings are staircases, built mainly to serve granary stores or other specialised uses (like stable-hand accommodation above a stables). Unusually, this one seems to have been added after the building's construction, as the signs are it is blocking an earlier door. This doesn't mean, however, that it should be removed.

- The general absence of extensions and additions to traditional farm buildings is an aspect of their historic interest and authentic character. Conversion schemes that involve the construction of new extensions or additions (or the demolition of existing ones) are more likely to harm the integrity of a farm building and are therefore less likely to be acceptable.
- Whether or not a threshing barn has a roundhouse attached is a significant aspect of its historic interest and authentic character (as well as that of the farmstead it occupies). The absence of one does not mean, therefore, that an extension built to look like one would be acceptable.
- In the exceptional circumstances of a new addition being acceptable, designs which mimic particular farm building types may not be appropriate as these can confuse the understanding of a farmstead's historical development. Contemporary designs which relate in a more general sense to the simple lines and robust nature of the original, as well as its scale, form and materials of construction, can provide a more relevant solution by responding in an innovative way to both the setting and the requirements of the new use. Even if well designed, however, an extension which dominates the parent building; is located on a visually prominent or important elevation, or is positioned in a way that compromises the significance of an important feature (like threshing doors) is less likely to be acceptable.
- Individual garages may be a common feature of residential suburbs, but they look out of place in the setting of traditional farm buildings or farmsteads. Whenever practical, therefore, garaging should be provided in suitable existing buildings, such as linhays or cart sheds which are more likely to have openings of sufficient size. The construction of new garaging may be acceptable if it can be achieved without having an adverse impact upon the character and historic interest of the existing buildings and their setting. This may mean that a site well away or hidden from the existing buildings needs to be considered, but it will certainly mean that their materials and form will need to be compatible with those of the existing buildings and that their scale and design are characteristic of farmstead buildings of a similar type (for example, cart sheds). In many cases, however, the only way to accommodate the car will be in discreetly located parking areas.

Right: Open fronted shelters lend themselves well to car storage. Used in a 'car port' manner, without the addition of doors or partitions, their character and appearance need hardly be changed at all.

Right: Conversion schemes often involve the removal of unsightly makeshift structures or the relocation of modern agricultural buildings. The latter was the case here, and because the site vacated was both levelled and hidden in the landscape, it proved a most suitable location for new garaging (the 2 blocks on the left).

The Setting

Just as farm buildings are the 'working' buildings of a farm, the spaces around them, or at least those they face, are its 'working' spaces whose functions also relate to the kind of farming carried on.

Whether accommodating the movement of large animals or the manoeuvring of heavily laden and awkwardly drawn carts or trailers, the spaces are usually open and uncluttered. But whether to confine stock or safeguard machinery or produce, they tend otherwise to be enclosed, often in a courtyard form, by buildings, gates and walls. These are the essential characteristics of most farmstead settings, while features in them, like dung pits near shippons or rick yards next to threshing barns, contribute positively towards their historic interest.

Another characteristic that's significant is the way the landscape around a farm building or farmstead group often flows unimpeded right up to its 'outside' walls. The relationship is 'immediate', while the blank walls of many courtyard groups help create an irresistible, fortress-like appearance. Above all, the open setting of the vast majority of farm buildings characterises a long history of single ownership.

... aim to retain the spatial characteristics of a setting as well as any features of interest it possesses.

Inset: The cobbled depression preserved as a focal feature of this very large courtyard was once a dung pit serving the shippon ranges along two of its sides.

Main: A scene typical of farmstead groups arranged around a courtyard. The farming landscape flows right to their rear walls, which characteristically have few if any openings.

- The settings of traditional farm buildings are an integral part of their interest and character. It is the buildings in their setting, not simply the buildings themselves, that is significant in conservation terms. In every case, therefore, the aim should be to retain the spatial characteristics of a setting

as well as any features of interest it possesses. Some farmyards (and spaces nearby) may have been permanently sub-divided in the past to create small fold yards or pens. While it will usually be desirable to retain these for their historic interest, the creation of more sub-divisions should as far as possible be avoided, especially where the space concerned is open to public view. (This includes the avoidance of lines of large stones intended to define separate ownerships or vehicular routes, as these create a particularly incongruous appearance).

Above: The wind-shaped tree behind this isolated field barn suggests the high stone wall at right was built to shelter it's yard from the weather. With a view to retaining its value as a visual barrier too, the wall's repair went hand-in-hand with the introduction of a new business use.

Below: Integrated with existing stone walls and built of locally salvaged materials, these new stone walls serve to disguise a refuse collection point near the entrance to a courtyard group of converted farm buildings.

- Boundary structures like hedge banks, walls and traditional fences and gates, which enclose spaces around a farmstead (including the approach lanes and any ancillary yards or paddocks) posses historical interest and are usually characterful features in themselves. They nearly always have aesthetic value too, creating visual links between buildings (and therefore 'holding' them together as an harmonious group) or helping to create spaces that are visually self-contained (and often hidden from general view). Aim to respect and utilise these values from the outset, as the conservation of boundary structures is fundamental to achieving an acceptable scheme. Those that exist should be retained and, where necessary, repaired in a like-for-like manner. New structures may be acceptable (such as to mask a refuse point), but they will need to reinforce existing characteristics and be constructed in a way that is compatible with local materials and methods. Walls of standard concrete blocks will nearly always be inappropriate, as will plastic chain-link fences and fences made of lapped or ornamental timber panels. As far as new hedge-banks are concerned, these should always be planted with indigenous hedgerow species, not ornamental ones and never leylandii.

Below Right: Perhaps no more obviously that in picturesque locations like this one, existing walls, banks, hedgerows and gates make a tremendous contribution towards the interest and character of farm building groups. Their removal would certainly cause harm, while the introduction of alien forms and features of a domestic or ornamental kind would have a very erosive impact.

Left:Although necessarily enlarged, the character of this access through an existing stone wall was preserved through the careful reconstruction of its distinctive gate pier.

Above: Conceding to public safety and convenience, natural stone paths (on the approaches to a number of retail and workshop units) were necessarily laid across this well preserved cobbled courtyard. While easily recognised, the paths nevertheless harmonise perfectly with the cobbles on account of the matching materials used, the irregularities of their pattern, the undulations of their levels and the absence of any fanciful or formal features (like edgings).

- The two materials most commonly used to hard-surface historic farmyards are stone setts and cobbles. Both are small in scale, and areas paved with them have a generally uniform and homogenous appearance that reflects their straightforward and practical purpose. Rarely, if ever, are they laid to ornamental patterns, and while cobbles might have the date of their laying inscribed, usually it is only the lines of shallow drainage channels that introduce variation. Aim to retain these traditional hard surfaces and, if it is practical, salvage and restore those that have been subsequently hidden. Aim also to continue their use whenever hard surfaces are to be reinstated, particularly where this will complete an original section.

Above: The re-use of cobbles, salvaged from inside buildings as well as outside, is always desirable. Here a pathway has been laid across a courtyard to align purposefully with the 'public' route through the building opposite. What is particularly noteworthy about the path, however, is that it has been laid entirely with salvaged cobbles and without different edgings that would have created a too formal or too fussy appearance.

Left: When sufficiently sound, cobbled surfaces should be retained in situ, as these were, to preserve the genuine character of an historic setting. They will preserve local identity too since, as with building stones and clays for cob, cobble stones are distinctive to a locality, being gathered from nearby fields or quarries.

- New hard surfaces should respect the characteristics of the old in terms of their scale, colour and pattern. Natural stone setts and cobbles should always be preferred, but certain concrete setts with 'tumbled' arrises (ie those with their sharp angles softened) will normally be acceptable if they are also laid to a straightforward, 'non-ornamental' pattern. Other than for surfacing access lanes, tarmac should be avoided in farmyard locations (as its use was never favoured), as should the use of coloured or 'surface-moulded' concrete slabs which introduce an incongruous domestic appearance.

Above: While clearly modern, this particular type of concrete sett (with its tumbled arrises and variations in colour and size) has attributres that generally suit it to 'less-than-formal' historic settings. By comparison, brick or block pavers that have bevelled or sharply defined arrises; are regularly sized or shaped, and do not have subtle variations in their colour, tend to appear too formal and 'manicured.'

- For very large yards it may be appropriate to consider using setts or cobbles in combination with 'mass' materials like gravel or stone chippings. The latter usually look best if compacted, while their type, colour and texture should relate to the natural materials around, including the stone of the buildings. Low growing ground cover planting (including grass) might also be suitable, but only if it is managed to produce an un-manicured appearance. Simplicity is the key to a successful scheme, so such combinations of finishes should always be arranged in a 'non-fussy' manner that relates primarily to the original usage of the buildings and yard. They might therefore 'define' the points of access to buildings and the routes to them across or around the yard. Loose gravel or chippings for paths, however, cannot be recommended as it transfers to other surfaces or areas with ease and requires separate edgings that will probably look incongruous and introduce a fussy detail. Original features like dung pits or drainage channelling should always be incorporated into the landscaping scheme.

- Suburban style flower or shrub beds are unsuited to farmyard settings. Only the farmhouse was ever likely to have an ornamental garden; usually at the front, and always separated from the 'working' spaces by walls and gates. The introduction of these beds into the yards and areas next to farm buildings is almost bound to have an adverse impact on their open, 'working' character, particularly so when their planting contrives to enclose and divide areas into smaller units. Low growing herbs, on the other hand, have a certain affinity with such settings, while areas of grass which are maintained under a relaxed regime also tend to be complementary – unlike perfectly manicured lawns which will certainly be at odds. The 'outer' surroundings of farm buildings, beyond the 'working' yards, should be regarded as part of the wider landscape and be treated and managed in a way that is compatible with it's character e.g. as an area of meadow, orchard or copse. This approach to their treatment will be especially relevant, of course, where the surroundings of the buildings are open to public view.

Right: However tempting it may have been to adorn the balcony, steps and alcoves with potted plants, and to line the path with an ornamental flower bed, the absence of such garden features has made an immense contribution towards preserving this building's authentic character.

Right Below: Garden beds in farmyard settings will appear especially incongruous if not treated in a very simple and restrained manner. This has been achieved here by limiting the planting zone to a narrow strip against the building's wall and planting only low growing herbs and the occasional shrub or climber.

- Structures and features that are normally associated with residential sites and areas, like garden sheds, summer houses, gazebos and greenhouses (particularly the mass-produced types) are unlikely to suit the 'non-domestic' character of farm buildings and their settings. Unless shielded from view by existing walls or buildings, or otherwise located in an inconspicuous position, their introduction is unlikely to be acceptable even if well designed.

Wildlife

Traditional farm buildings are home to a host of native animals, many of them rare, and each in their own way taking advantage of the accommodating spaces and structures on offer.

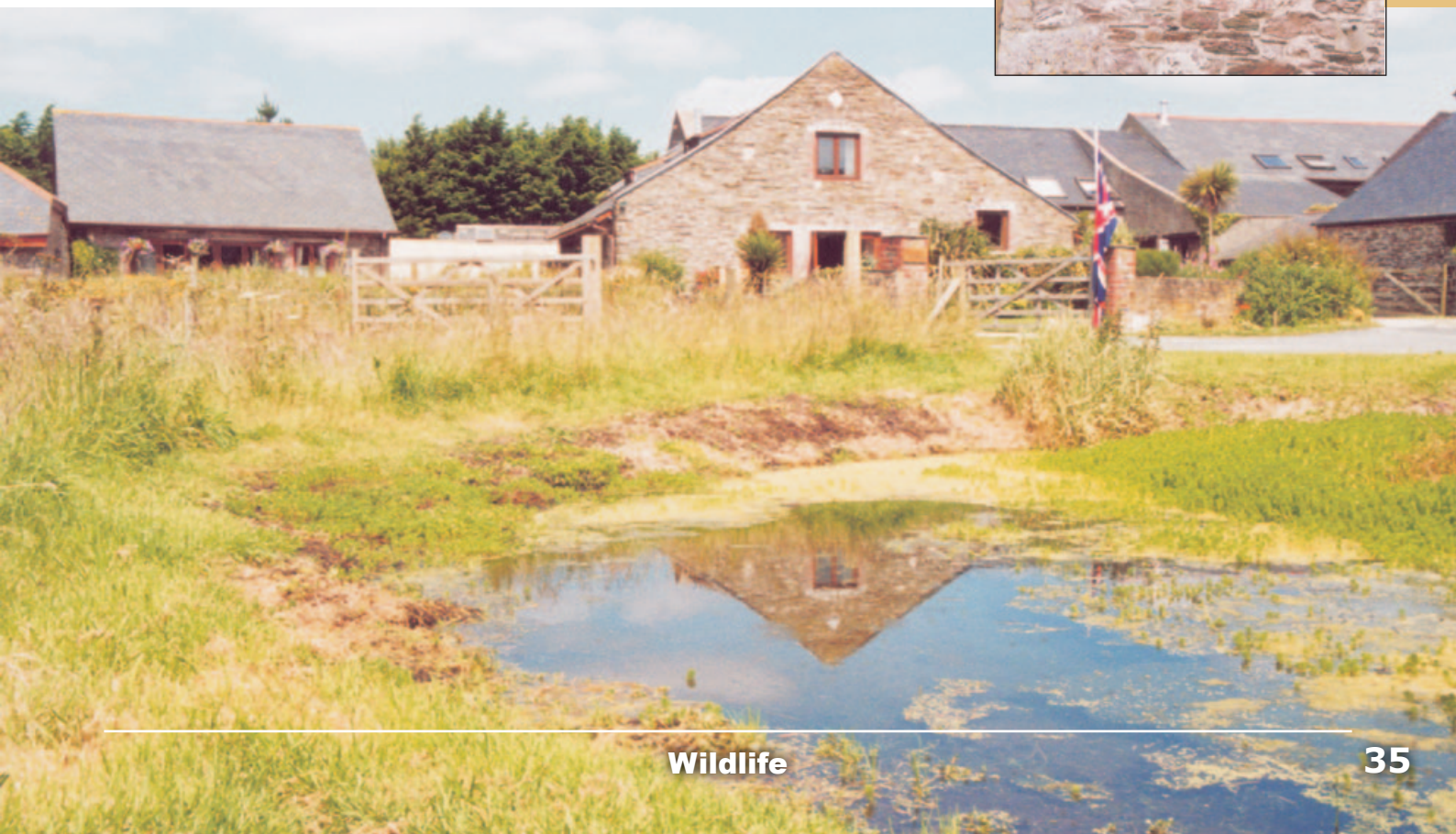
From solitary bees in ‘soft mortar’ burrows, to barn owls in roomy roof voids, the range is wide and mostly on the wing. The survival of them all is important, but it is the well-being of roosting bats (any of the 16 species found in England) and nesting birds (especially barn owls, and particularly swallows, swifts and house martins) that need to be most carefully addressed. Principally this means doing two things: making absolutely sure their lives are not disturbed during their nesting or breeding seasons, and making arrangements to ensure their ‘occupation’ of the building is sustained and not threatened by any works or actions.

It is necessary to resolve how this will be achieved before an application is determined because it might involve works that need to be considered in the context of the overall scheme. In addition, it will be in an applicant’s personal interests to deal with these matters ‘in advance’ as disturbance is no less a criminal act as killing, injuring or capturing a bat or bird, taking a nest or egg, interfering with a nest or roost, or obstructing a flight path to them.

… ensure their ‘occupation’ of the building is sustained and not threatened by any works or actions.

Main: Natural ponds are one of the more obvious wildlife habitats that suit the surroundings of farm buildings, and are particularly valuable if associated with areas of rough grassland, water meadow or native woodland

Inset: Being birds of prey, barn owls were not unwelcome visitors to the farmstead. Indeed, they were sometimes encouraged to take up residence through the provision of ‘owl holes’ in suitable gable ends.



Establishing whether any protected species are present is an essential first step, so have an ecological survey carried out by a specialist consultant at the earliest opportunity. If protected species are found during a structural survey, then this would need to be investigated before continuing with it.

- Many traditional farm buildings are located in settings that are potentially ideal for supporting a wealth of wildlife, so even if the ecological survey confirms an absence of protected species, it is always desirable to consider whether provisions could be made to encourage native species that have become increasingly rare. Not just birds and bats, but butterflies and moths, frogs and newts, dragonflies and bees, and small mammals like hedgehogs, field mice and voles. And whether required by the wildlife legislation or not, include details of the provisions with your application to ensure they're suitable for their purpose and receive consent if it is needed.

Checklist of Application Requirements
(always refer to the local authority validation checklist)

Structural Survey

This is required to substantiate the repair requirements of a building and should specify their extent and nature. It is especially important that the report identify all parts of the building's fabric that require renewal (through removal/demolition and replacement/reconstruction). When a conversion scheme is approved only the repairs and renewals identified in the application are covered. Any additional works of this kind, but particularly demolitions and reconstructions, will need to be formally agreed beforehand, and this could involve the submission of a new application.

To ensure clarity, certain repairs (like those to roof trusses) may need to be illustrated by drawings, while the parts of the fabric proposed for renewal should always be identified in this way.

Ecological Survey

This is required to substantiate the existence (or otherwise) of any protected wildlife species and their habitats. It should describe the measures to be taken to minimise and mitigate the impact of the conversion scheme, both during the construction works and following completion. (Certain mitigation works may involve acts that are prohibited by the Wildlife legislation (e.g. the disturbance of a bat roost). In such circumstances it will be for the applicant to seek a licence to carry them out from the Department of the Environment, Food and Rural Affairs (DEFRA).

Design and Access Statements and a Heritage Statement where applicable

Plans and Drawings

While advice on the plans and drawings to be submitted with applications is included in the guidance note issued with the application forms, the following requirements are specific to applications involving the conversion of traditional farm buildings.

On **Site Survey** plans, show and describe features that form part of the building's setting, including adjacent buildings and structures, ground surface treatments and levels, landform features (like quarries) and other features like walls, hedge-banks, trees, leats and ponds. Where there are significant changes in level across or near the site, these should be shown in cross section.

On **Building Survey** drawings, aim to identify and describe the building's features and characteristics, including the materials used in its construction and the design and appearance of its component parts. Special features, inside and out, should be recorded on measured drawings, while section drawings should be used to illustrate the major construction details of the roof, walls and floors, including typical window/door openings and the treatment of the roof at the eaves and verges.

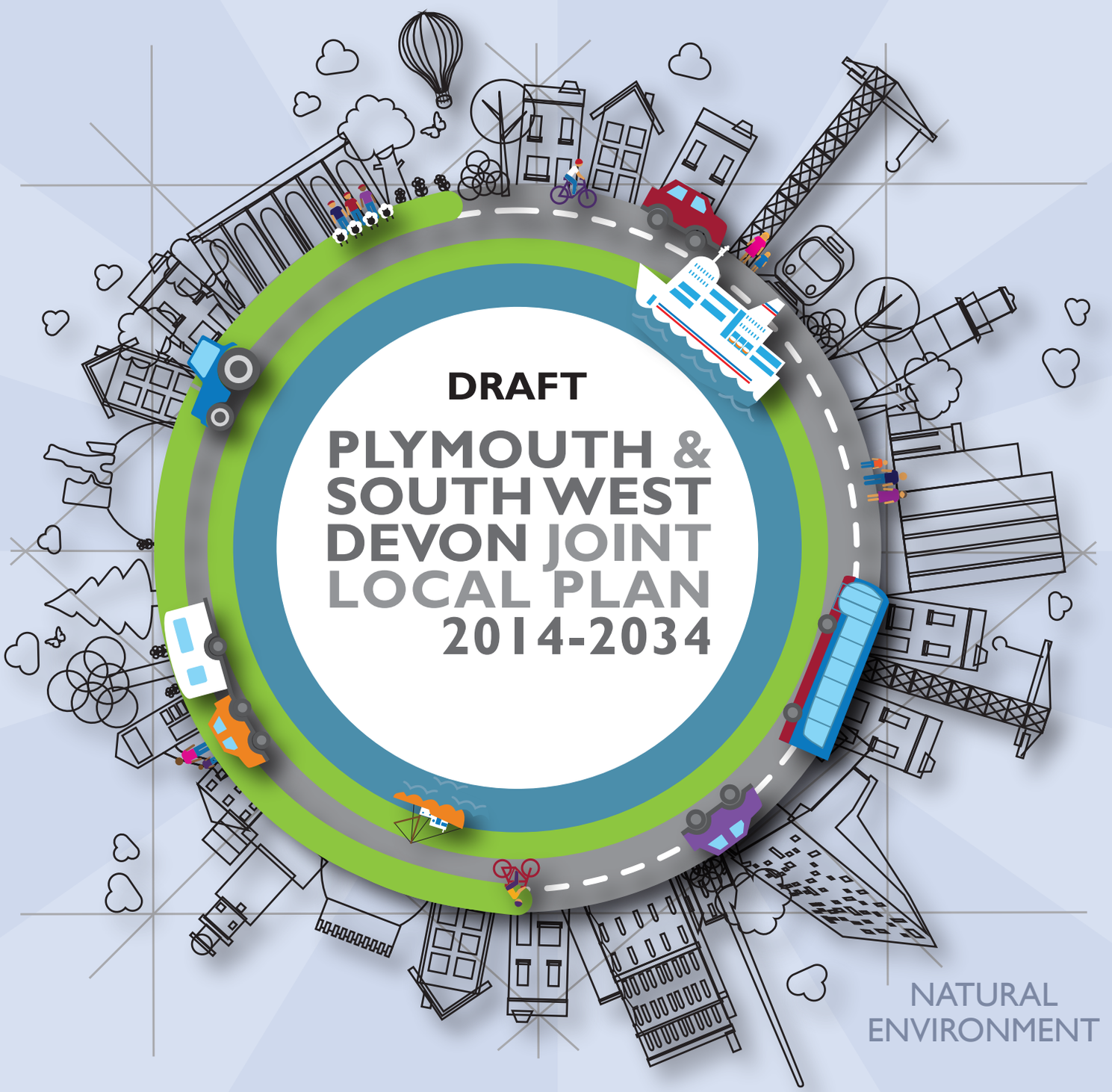
The plans and drawings of the **Proposals** should, of course, show how the setting of the buildings, as well as the buildings themselves, are to be used and treated.

HEALTHY COMMUNITIES

PLACE SHAPING AND HERITAGE

HOUSING

ECONOMY



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PLYMOUTH & SOUTH WEST DEVON JOINT LOCAL PLAN 2014-2034

NATURAL ENVIRONMENT

CLIMATE CHANGE, FLOODING AND COASTAL CHANGE

TRANSPORT AND INFRASTRUCTURE

SUPPLEMENTARY PLANNING DOCUMENT 2019

produced by West Devon Borough Council, South Hams District Council and Plymouth City Council

Contents

1. Introduction 10
1.1 What is this document about? 10
1.2 What is the status of this document? 10
1.3 How to use this document 12
1.4 Monitoring and review 12
1.5 What else should be considered? 13
2. Sustainable Development and the Climate Emergency 15
2.1 What part can the SPD play in responding to the Climate Emergency? 15
2.2 How does the Joint Local Plan contribute to carbon neutrality? 15
2.3 How will this affect planning decisions? 17
3. Healthy communities (DEV1-DEV6) 18
3.1 Introduction 18
3.2 Protecting health and amenity (DEV1) 18
DEV1.1 – Impact of new development 18
DEV1.2 – Accessibility 18
DEV1.3 – Health Impact Assessments 19
Public Access Defibrillators (PADs) 19
3.3 Air, water, soil, noise, land and light (DEV2) 21
DEV2.1 and DEV2.2 – Air 21
DEV2.1 and DEV2.3 – Water 22
DEV2.1 and DEV2.4 – Light 23
DEV2.1 and DEV2.5 – Land 23
DEV2.1 and DEV2.6 – Soil 23
DEV2.1 and DEV2.7 – Noise 24
DEV2.8 – Avoidance of impacts on European Sites 24
Night-time economy 25
Street cafes 27
3.4 Sport and recreation (DEV3) and Playing pitches (DEV4) 29
DEV3 and DEV4 - Sports facilities and playing pitches 29
DEV4 – Playing pitches 30
DEV3.2 – Water and waterside access 32
DEV3.3 – Public rights of way and bridleways 32
3.5 Community food growing and allotments (DEV5) 33

DRAFT

Allotment design 34
3.6 Hot food take aways in Plymouth (DEV6) 36
4. Housing (DEV7-DEV13) 37
4.1 Introduction 37
4.2 Meeting local housing need in the Plymouth Policy Area (DEV7) 37
DEV7.1 – Overall housing mix 37
DEV7.2 – Affordable housing within the PPA 38
4.3 Meeting local housing need in the Thriving Towns and Villages Policy Area (DEV8) 39
DEV8.1 – Overall housing mix 39
DEV8.2 and DEV8.3 – Affordable housing within the TTV 42
4.4 Meeting local housing need in the Plan Area (DEV9) 43
DEV9.1 – Affordable housing in the Plan Area 43
DEV9.2 - Self and custom build housing 43
DEV9.3 - 'Build to Rent' 45
DEV9.4 – Accessible housing 45
4.5 Affordable Housing (DEV7-DEV10) 47
DEV7.2 – Affordable housing thresholds within the PPA 49
DEV8.2 – Affordable housing thresholds in the TTV Policy Area 50
DEV10.3 – Affordable housing design considerations in the Plan Area 53
4.6 Delivering high quality housing (DEV10) 57
DEV10.1 – Design of housing development 57
DEV10.2 – Crime and fear of crime 57
DEV10.3 – Affordable housing design considerations 57
DEV10.4 – Residential annexes 58
DEV10.5 – Space standards 59
DEV10.5 - Outdoor amenity space 59
DEV10.6 – Development of garden space 60
DEV10.7 – Conversions to flats and Houses in Multiple Occupation (HMOs) 60
DEV10.8 – Standard of accommodation (HMOs) 62
4.7 Houses in Multiple Occupation in the Plymouth Article 4 Direction Area (DEV11) 65
DEV11.1 – The '10 per cent threshold' 66
DEV11.2 – Presumption against 'sandwiching' 67

DRAFT

DEV11.3 – HMO licensing 68
4.8 Purpose built student accommodation in the Plymouth Policy Area (DEV12) 69
DEV12.1 – Meeting the identified need 70
DEV12.2 – An appropriate location 70
DEV12.3 – Excessive concentration of PBSA 70
DEV12.4 – Loss of an existing use 70
DEV12.5 – Appropriate features within the development 71
DEV12.6 – Adjacent uses and the surrounding area 71
DEV12.7 – Management plans 71
DEV12.8 – Arrival plans 72
DEV12.9 – Future proofing 72
DEV12.10 – On-site parking 72
DEV12.11 – Recycling/refuse and cycles 72
4.9 Consideration of sites for Travellers and Travelling Showpeople (DEV13) 73
DEV13.1 – Location of new sites 73
DEV13.2-7 – Site specific criteria 73
Additional considerations for the design of Transit Sites 77
Additional considerations for the design of Temporary Stopping Places (TSPs) 77
Additional considerations for Travelling Showpeople 78
5. Economy (DEV14-DEV19) 79
5.1 Introduction 79
5.2 Maintaining a flexible mix of employment sites (DEV14) 79
5.3 Supporting the rural economy (DEV15) 82
DEV15.5 – Garden centres and farm shops 82
5.4 Providing retail and town centre uses in appropriate locations (DEV16) 83
DEV16.1 – Retail spatial strategy 83
DEV16.2 – Sequential test 83
DEV16.3 – Impact assessments 86
Derriford Commercial Centre (PLY38) additional guidance 86
5.5 Promoting competitive town centres (DEV17) 88
5.6 Protecting local shops and services (DEV18) 89
DEV18.1 – Retail hierarchy 89

DRAFT

DEV18.5 – Specific impacts 90
DEV18.6 – Community facilities 90
5.7 Provisions for local employment and skills (DEV19) 91
DEV19 – Employment and Skills Plans (ESP) 91
6. Place shaping and heritage (DEV20-DEV22) 92
6.1 Introduction 92
6.2 Place shaping and the quality of the built environment (DEV20) 92
Existing context and character 92
Placemaking 92
Masterplans 93
Design codes 93
Design Review Panels 93
Design considerations 93
DEV20.5 – Landscape design 102
DEV20.6 – Community safety and crime 102
DEV20.9 – Public Art 103
6.3 Development affecting the historic environment (DEV21) 104
DEV21.2 – Designated heritage assets 104
DEV21.3 – Non-designated heritage assets (NDHAs) 108
6.4 Cornwall and West Devon Mining Landscape World Heritage Site (DEV22) 112
7. Natural environment (DEV23-DEV28) 113
7.1 Introduction 113
7.2 Landscape character (DEV23) 113
DEV23.6 – Landscape and Visual Impact Assessment (LVIA) 118
DEV23.7 – Avoidance, mitigation, compensation and enhancements 121
7.3 Undeveloped Coast and Heritage Coast (DEV24) 122
DEV24.1 and DEV24.2 – Coastal location 123
7.4 Nationally protected landscapes (DEV25) 126
DEV25.3 – Major developments in the AONBs 127
DEV25.2-DEV25.4 – Conserving and enhancing natural beauty 128
DEV25.8 – Bringing forward proposals 128
7.5 Protecting and enhancing biodiversity and geological conservation (DEV26) 130
The protected sites hierarchy 131

DRAFT

DEV26.1 - European Sites and Habitats Regulations Assessment (HRA) 134
DEV26.2 - Nationally significant sites for nature conservation 134
DEV26.3 - Locally designated sites 135
DEV26.4 - Protected species, Priority Habitats and Species and associated planning policy and legislation 135
DEV26.5 – Biodiversity Net Gain 136
DEV26.6 - Securing measures for biodiversity and ensuring long term management 141
7.6 Green and play spaces (DEV27) 142
DEV27.1 - Strategic Green Spaces 143
DEV27.2 – Open spaces, including designated City Green Space and Neighbourhood Green Space 143
DEV27.3 – Accessible green and play spaces 149
Planning obligations for green space 152
7.7 Trees, woodlands and hedgerows (DEV28) 153
New planting requirements 158
8. Transport and infrastructure (DEV29-DEV31) 162
8.1 Introduction 162
8.2 Specific provisions relating to transport (DEV29) 162
DEV29.2 - Parking dimensions 162
DEV29.3 – Parking provision: residential 163
DEV29.4 – Parking provision: non-residential 164
DEV29.5 – Other parking facilities 170
DEV29.7 – Travel plans 173
DEV29.8 – Permeability and connectivity 176
DEV29.9 – Strategic transport infrastructure 177
8.3 Meeting the community infrastructure needs of new homes (DEV30) . 181
Digital connectivity 181
8.4 Waste management (DEV31) 183
DEV31.1 – Design and access arrangements for refuse collection vehicles 183
DEV31.2 – Providing integrated facilities in new developments 185
DEV31.3 – Site Waste Management Plan (SWMP) 190
9. Climate change, flooding, and coastal change (DEV32-DEV36) 191
9.1 Introduction 191

DRAFT

9.2 Delivering low carbon development (DEV32) 191
DEV32.1 – Minimising natural resources in development 194
DEV32.2 – Taking account of the impact of climate change 194
DEV32.3-DEV32.6 – Energy statements and methodology 195
DEV32.3 – Energy hierarchy 199
DEV32.4 – Solar master plans 200
DEV32.5 – On-site renewable energy 201
DEV32.6 – District energy networks 201
9.3 Renewable and low carbon energy (including heat) (DEV33) 207
DEV33.8 – Energy generation facilities 207
9.4 Community energy (DEV34) 209
Community ownership of energy developments 209
9.5 Managing flood risk and water quality impacts (DEV35) 210
DEV35.2 – Exception test 211
DEV35.2 and DEV35.7 – Flood Risk Assessment/Drainage Strategy requirements 212
DEV35.3 – Flood Zones 2 and 3 214
DEV35.4 – Surface water drainage hierarchy 214
DEV35.4 – Sustainable Drainage Systems (SuDS) 215
9.6 Coastal Change Management Areas (DEV36) 217
10. Detailed provisions relating to the PPA 218
10.1 Introduction 218
10.2 Improving Plymouth's city centre (PLY6) 218
PLY6.3 – Tall buildings 218
Plymouth city centre shop fronts 220
10.3 Plymouth Airport (PLY42) 221
PLY42.1 – Protection from prejudicial development 221
PLY42.3 – Temporary uses 222
PLY42.4 – Environmental improvements 222
11. Detailed provisions relating to the TTV Policy Area 223
11.1 Introduction 223
11.2 Prioritising growth through a hierarchy of settlements (TTV1) 223
11.3 Delivering sustainable development in the Thriving Towns and Villages Policy Area (TTV2) 226
TTV2.1 and TTV2.2. – Vitality and vibrancy 226

TTV2.3 – Rural business and enterprise 226
TTV2.4 – Diversification of rural businesses 226
TTV2.5 – Sustainable rural tourism and leisure developments 226
TTV2.6 – Rural services and community facilities 226
TTV2.7 – Sustainable transport accessibility 227
TTV2.8 – Natural infrastructure 227
11.4 Development in Sustainable Villages (TTV25) 228
11.5 Development in the countryside (TTV26) 231
TTV26.1 – Isolated development 232
TTV26.2 – Development in the countryside 233
11.6 Meeting housing needs in rural areas (TTV27) 234
TTV27.1 – Meeting the need for affordable housing 234
TTV27.2 – Housing mix 235
TTV27.3 – Management of the scheme 235
11.7 Horse related developments in the countryside (TTV28) 236
TTV28.2 – Existing and new buildings 236
TTV28.3 – Management 236
11.8 Residential extensions and replacement dwellings in the countryside (TTV29) 237
TTV29.2 – Size of replacement dwelling 237
TTV29.4 – Position of replacement dwelling 237
TTV29.5 – Extension scale and design 237
11.9 Specific design details for Okehampton (TTV14) 238
Okehampton character areas 238
Materials 239
11.10 Specific design details for Tavistock (TTV16 and TTV17) 241
Tavistock character areas 241
Materials 242
12. Planning obligations, conditions, the Community Infrastructure Levy and development viability 244
12.1 Introduction 244
Policy context 244
Infrastructure Needs Assessment (INA) 246
12.2 Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy (DEL1) 247

DRAFT

DEL1.2 – Community Infrastructure Levy (CIL) 247
DEL1.3 – Planning obligations 248
DEL1.5 – Development viability 255

Table of figures

Figure 1: Table showing adopted SPDs to be superseded 11
Figure 2: Street cafe planning considerations 28
Figure 3: JLP Figure 3.2 extract - playing pitch standards 29
Figure 4: JLP Figure 3.2 extract - allotments/community food growing space 33
Figure 5: Allotment plot sizes 34
Figure 6: Plymouth lower quartile income and housing affordability example (based on Sept 2018 dataset) 48
Figure 7: Example of affordable housing products within the PPA (September 2018) 48
Figure 8: South Hams lower quartile income and housing affordability example 48
Figure 9: West Devon lower quartile income and housing affordability example 49
Figure 10: Service charge cap per annum (19/20) 53
Figure 11: Method for calculating the commuted sum from residential development 56
Figure 12: Outdoor amenity space standards by housing type 59
Figure 13: Map showing an example of 100m radius from a HMO planning proposal site 67
Figure 14: Illustration showing HMO 'sandwiching' 68
Figure 15: Design considerations for blocks 95
Figure 16: Design considerations for streets, movement and the public realm 97
Figure 17: Further public realm design considerations 99
Figure 18: Design principles for buildings 102
Figure 19: Non-designated heritage asset (NDHA) assessment methodology 109
Figure 20: How to assess application compliance with DEV23 115
Figure 21: Landscape characteristics and features 117
Figure 22: Matrix for Landscape and Visual Impact Assessment (LVIA) and Landscape Appraisals requirements: PPA 119
Figure 23: Matrix for Landscape and Visual Impact Assessment (LVIA) and Landscape Appraisals requirements: TTV Policy Area 120
Figure 24: Considerations for decision-taking on development proposals in or affecting AONBs 129
Figure 25: The mitigation hierarchy in practice 133
Figure 26: Example Biodiversity Budget 139
Figure 27: Delivering offsite compensation and Biodiversity Net Gain 140
Figure 28: Green space typologies and associated size thresholds 144
Figure 29: Accessibility parameters across the Plan Area 145
Figure 30: JLP Figure 3.2 extract re. green spaces 146
Figure 31: Principles of value of green space to be considered 148
Figure 32: Quality criteria and questions to be considered 148
Figure 33: Play space siting standards 151

DRAFT

Figure 34: Amount of detail/information required per application type with regards to trees 155
Figure 35: Principles of assessing development proposals with regards to ancient woodlands, ancient/veteran trees and the immediate surroundings 157
Figure 36: No. of replacement trees needed based on trunk diameter of lost tree 159
Figure 37: Parking dimensions 163
Figure 38: Indicative car parking provision for new residential development 163
Figure 39: Indicative car parking provision for new non-residential development 167
Figure 40: Public transport accessibility levels in Plymouth 168
Figure 41: Minimum cycle parking provision for new residential development 170
Figure 42: Minimum cycle parking provision for new non-residential development 171
Figure 43: Electric Vehicle (EV) charging point's provision 172
Figure 44: Minimum road width clearance required where on-street parking is provided for on both sides of the road 185
Figure 45: Volume of required refuse storage 186
Figure 46: Good and poor examples of provision for bin storage in residential design 188
Figure 47: Application requirements for DEV32 193
Figure 48: Example table showing CO_2 tonnes per annum 199
Figure 49: Example table showing Regulated Carbon Savings 199
Figure 50: District heating opportunity areas in Plymouth 203
Figure 51: Low temperature building zone (LTBZ) in Plymouth 204
Figure 52: Public Safety Zone 221
Figure 53: Indicative character areas of Okehampton 238
Figure 54: Okehampton colour palette 240
Figure 55: Indicative character areas 241
Figure 56: Tavistock colour palette 243
Figure 57: Relationship between the JLP, SPD and evidence base 245
Figure 58: Thresholds below which infrastructure contributions are unlikely to be sought 249
Figure 59: Planning obligation 'type', infrastructure example and relevant SPD section 253
Figure 60: Index linking formula for late financial contributions 254

DRAFT

1. Introduction

1.1 What is this document about?

1.1.1 This Supplementary Planning Document (SPD) has been prepared by Plymouth City Council (PCC), South Hams District Council (SHDC) and West Devon Borough Council (WDBC) to amplify and give guidance on the implementation of the policies of the Plymouth and South West Devon Joint Local Plan (JLP).

1.1.2 The spatial strategy of the JLP operates at three different spatial levels:

1. **The Plan Area** - This includes the Plymouth Housing Market Area (HMA), which is made up of Plymouth, South Hams and West Devon local authority areas and part of Dartmoor National Park.
2. **The Plymouth Policy Area (PPA)** - 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 (TTV)** - This incorporates rural South Hams and West Devon, including its market towns, settlements and villages.

1.1.3 The SPD provides guidance for each of the spatial levels as set out within the JLP and shown on the following policy maps:

- Policies Map: Plymouth Policy Area[1]
- Policies Map: Thriving Towns and Villages Policy Area (South Hams)[2]
- Policies Map: Thriving Towns and Villages Policy Area (West Devon)[3]

1.1.4 Throughout the JLP, there is reference to both a PPA and a TTV Policy Area SPD, this SPD incorporates both.

1.1.5 The JLP also refers to the Okehampton Masterplan SPD and the Tavistock Masterplan SPD. Both the design and the delivery parts referred to in these documents have been incorporated into this SPD at Section 11 (Detailed provisions relating to the TTV Policy Area), superseding both documents.

1.2 What is the status of this document?

1.2.1 The SPD will be a material consideration in the consideration of planning applications pursuant to Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended.

1.2.2 Once formally adopted the SPD will supersede the following SPDs which were previously adopted by the three local authorities:

[1] https://www.plymouth.gov.uk/sites/default/files/PoliciesMapPPA.pdf
[2] https://www.plymouth.gov.uk/sites/default/files/PoliciesMapTTVSH.pdf
[3] https://www.plymouth.gov.uk/sites/default/files/PoliciesMapTTVWD.pdf

Adopted SPD to be superseded	Adoption date
Plymouth	
Sustainable Design SPD	07/2009
Planning Obligations and Affordable Housing SPD 2nd Review	07/2012
Shopping Centres SPD	07/2012
Development Guidelines SPD (First Review) including Coastal Planning	04/2013
South Hams	
Open Space, Sport and Recreation Supplementary Planning Document	06/2006
Affordable Housing Supplementary Planning Document	09/2008
Planning Obligations Supplementary Planning Document	12/2008
West Devon	
Reuse of Rural Buildings SPD	03/2006
Infrastructure and Facilities to Support New Development SPD	06/2007
Affordable Housing Code of Practice	03/2012
Assessing the Impact of New Retail Development in West Devon SPD	04/2013
South and South West of Tavistock Masterplan SPD	04/2013
East of Okehampton Masterplan SPD	01/2014

Figure 1: Table showing adopted SPDs to be superseded

1.2.3 The Cornwall and West Devon Mining Landscape World Heritage Site Supplementary Planning Document remains in place and should be considered alongside this document.

1.2.4 In addition to this document, there are two companion documents which have also been updated/produced to support the guidance within the SPD, these are:

- Developer Contributions Evidence Base; and,
- Traditional Farm Buildings: Their adaptation and re-use (Barn Guide)

1.2.5 The Developer Contributions Evidence Base document informs Section 12 (Planning obligations, conditions, the Community Infrastructure Levy and development viability) of the SPD. It presents methodologies used to calculate the value of developer contributions, in particular via planning obligations, required to mitigate the impacts of new development proposals on key infrastructure provision, such as transport, education, health, green space.

1.2.6 The Barn Guide is previous guidance from SHDC and WDBC which aids developers looking to adapt or re-use traditional farm buildings which are common in rural areas. This document has only been updated so amended so that it now also covers Plymouth. This is guidance which details how the buildings character and interest can be successfully conserved through the planning process.

1.2.7 In the future, additional guidance documents may come forward to amplify policies in the JLP. These documents should also be considered alongside this SPD.

1.3 How to use this document

1.3.1 The SPD is intended to be used by all members of the community, as well as those directly involved in the development industry.

1.3.2 For ease of use, the SPD has been divided into the following sections, which follows the structure of the JLP itself:

1. Introduction
2. Sustainable Development and the Climate Emergency
3. Healthy communities (DEV1-DEV6)
4. Housing (DEV7-DEV13)
5. Economy (DEV14-DEV19)
6. Place shaping and heritage (DEV20-DEV22)
7. Natural environment (DEV23-DEV28)
8. Transport and infrastructure (DEV29-DEV31)
9. Climate change, flooding, and coastal change (DEV32-DEV36)
10. Detailed provisions relating to the Plymouth Policy Area
11. Detailed provisions relating to the Thriving Towns and Villages Policy Area
12. Planning obligations, the Community Infrastructure Levy and development viability (DEL1)

1.3.3 As part of the SPD, a set of appendices have also been produced which give further detail and guidance:

- APPENDIX 1: Residential extensions and alterations
- APPENDIX 2: Specific materials for the Plan Area
- APPENDIX 3: Shop fronts, including ATMs
- APPENDIX 4: Primary shopping boundaries and frontages
- APPENDIX 5: New work in conservation areas
- APPENDIX 6: Additional guidance for DEV26
- APPENDIX 7: Open space assessment form

1.3.4 If further appendices are produced in the future they will go through a similar process of consultation and adoption as the previous.

1.4 Monitoring and review

1.4.1 The SPD has been designed to be and is intended to be capable of being revised and updated as and when required to take into account significant legislative or planning policy changes.

1.4.2 The three councils/local planning authorities (LPAs) will monitor the effectiveness of this guidance and review as appropriate in the light of its performance and future changes in planning law and policy guidance.

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1.4.3 Please note: Where guidance refers to the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) this is referring to the Revised NPPF[4] and the subsequently updated NPPG[5].

1.5 What else should be considered?

1.5.1 Alongside the Plymouth and South West Devon Joint Local Plan and this SPD, developers will also need to consider each LPA's 'Local Validation List' which identifies the information needed to register, assess and determine any planning application:

- Plymouth's Local Validation List[6]
- South Hams' Local Validation List[7]
- West Devon's Local Validation List[8]

1.5.2 'Made' Neighbourhood Plans also need to be considered. The progress and status of Neighbourhood Plans across the Plan Area can be found on the South West Devon Neighbourhood Plans page[9] and the Plymouth Neighbourhood Plans page[10].

1.5.3 Each LPA offers a pre-application service to provide advice and guidance on prospective planning applications. Developers are encouraged to seek advice if there is uncertainty before a planning application is submitted:

- Plymouth City Council's development enquiry service (pre-application advice[11]
- South Hams District Council pre-application service[12]
- West Devon Borough Council pre-application service[13]

1.5.4 Irrespective of the need for planning permission, most building works require building regulation approval. For advice on building control and regulations please visit:

- Plymouth City Council building control and regulations[14]
- Devon Building Control Partnership[15]

[4] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[5] https://www.gov.uk/government/collections/planning-practice-guidance
[6] https://www.plymouth.gov.uk/planninganddevelopment/planningapplications/applyplanningpermission0
[7] https://www.southhams.gov.uk/article/4045/Planning-Validation-Checklists-Local-List-
[8] https://www.westdevon.gov.uk/article/4045/Planning-Validation-Checklists-Local-List-
[9] https://www.neighbourhoodplanning.swdevon.gov.uk/
[10] https://www.plymouth.gov.uk/neighbourhoodplanning
[11] https://www.plymouth.gov.uk/planninganddevelopment/planningapplications/makeplanningapplication/developmentenquiryservice
[12] https://www.southhams.gov.uk/article/3225/Pre-Application-Service
[13] https://www.westdevon.gov.uk/article/3225/Pre-Application-Service
[14] https://www.plymouth.gov.uk/planningandbuildingcontrol/buildingcontrolandregulations
[15] http://www.devonbuildingcontrol.gov.uk/

1.5.5 Whilst PCC is a unitary authority which is responsible for the provision of all local government services, SHDC and WDBC are part of a 'two-tier' local government structure alongside Devon County Council (DCC) which has a significant role within the planning system in these two areas. Where PCC's and DCC's processes are different, this has been clearly identified throughout the SPD.

1.5.6 For South Hams and West Devon, DCC plays the role of:

- The Minerals and Waste Planning Authority - in this role DCC has prepared and adopted Minerals and Waste Plans and also determines planning applications for minerals and waste development;
- The Highways Authority (HA) - in this role, DCC has a duty to maintain the safety and functionality of roads and ensure that development has an acceptable impact on the highway network. In its work as HA, DCC also plans and delivers walking and cycling routes, maintains Public Rights of Way and works with other transport providers such as bus and train companies to improve multi-modal travel options;
- The Education Authority - in this role, DCC has a duty to secure sufficient educational provision (including early years and childcare) to meet the needs of children, retaining responsibility for overall strategic planning of school places. Part of this role is to ensure that the educational impacts of development are managed through securing appropriate developer contributions and delivering additional infrastructure;
- Lead Local Flood Authority (LLFA) – in this role DCC is responsible for managing flood risk from surface water, groundwater and ordinary water courses and also has a consenting role for ordinary watercourses. In order to manage the impact which development has on flood risk, DCC engages with the planning system through the preparation of local plans and responding to planning applications. The Lead Local Flood Authority (LLFA) is a statutory consultee in the planning process, to assess the surface water drainage for major planning applications whilst the authority also reviews some minor applications on a case-by-case basis;
- DCC also has a wide variety of responsibilities in relation to social care and infrastructure provision which it engages with the planning system in South Hams and West Devon. DCC is responsible for public health, adult and children's social care, youth services and waste management;
- DCC also maintains the Historic Environment Record (HER) for South Hams and West Devon.

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2. Sustainable Development and the Climate Emergency

2.1 What part can the SPD play in responding to the Climate Emergency?

2.1.1 In 2019, the three JLP Councils each declared a Climate Emergency, with South Hams and West Devon also declaring a Biodiversity Emergency. These declarations showed the concern that the Councils have for the dangers presented by accelerating climate change, and a commitment to taking clear and decisive action to move to carbon neutrality across the JLP area. These declarations were made after the process of creating the JLP and so are not explicitly referenced within it.

2.1.2 The role of the SPD is to amplify and explain how the policies of the JLP will be implemented. Although the SPD cannot add new policy in its own right in response to the Climate Emergency it can play a significant role in the delivery of a more sustainable future by establishing clearly how the low carbon policies and sustainable development strategy of the JLP will be implemented.

2.2 How does the Joint Local Plan contribute to carbon neutrality?

2.2.1 The JLP contains development management (DEV) policies which address directly the need for low carbon solutions within the development and planning process. Guidance on these policies is set out later in this SPD.

2.2.2 Additionally, the strategic approach of the JLP is strongly based on underlying principles of sustainable development which are highly relevant to the Climate Emergency:

a) The spatial strategy of the JLP (section 3) is driven by focusing growth at Plymouth. As part of the development of the plan, the three LPAs undertook a sustainability assessment of all the different options for the distribution of growth across the Plan Area, ranging from complete dispersal across the area to complete concentration at Plymouth. The distribution strategy chosen had the greatest sustainability benefits. By focusing growth at Plymouth new residents have the opportunity to take advantage of local jobs and services and to choose to travel without using the car.
b) The spatial strategy also locates development in the Main Towns of the TTV Policy Area, again focusing most development in locations where new residents have the choice to make low carbon choices for work, leisure activities and travel.
c) The plan actively discourages new development in locations which are remote from services, facilities and jobs.

2.2.3 These principles are set out in greater detail in Strategic Objective 1 (SO1) of the JLP.

2.2.4 The JLP sets out clear sustainability principles which lie at the heart of the spatial strategy. Policies SPT1 and SPT2 are deliberately placed as the first policies of the JLP in order to establish from the outset that it is fundamentally about the delivery of sustainable development.

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2.2.5 Policy SPT1 (Delivering sustainable development) of the plan sets out a 'golden thread' of sustainability principles in policy, and sets out that "The LPAs will support growth and change that delivers a more sustainable future for Plymouth and South West Devon." The principles set out in this policy support the creation of a sustainable economy, a sustainable society and a sustainable environment. They set a context for all new development taking place in Plymouth and South West Devon.

2.2.6 Policy SPT2 (Sustainable linked neighbourhoods and sustainable rural communities) takes one particular dimension of sustainable development, namely the sustainability of the places where people live in the Plan Area. It establishes some key principles about the achievement of sustainable neighbourhoods and communities. As for SPT1, the provisions of this strategic policy can be tracked through the JLP. The explanatory text sets out a series of measures in Figure 3.2 of the JLP which represent sustainability outcomes that are aspired to for the Plan Area, and which will be promoted as appropriate through the development management process.

2.2.7 Finally, the remaining SPT policies set out over-arching principles that not only establish how the LPAs will drive forwards change in the Plan Area over the plan period, but which also set out the context and expectations for how development should be delivered. As well as setting the plan requirement and delivery strategy for housing, employment and retail development, the SPT policies include policies on strategic green space, the marine environment, the protection of sensitive environments, and a strong transport strategy framed around reducing the need to travel and maximising the ability for people to travel using low carbon modes. This transport strategy is particularly important as, if we are to move to a carbon neutral society, the carbon cost of travel must be significantly reduced.

2.2.8 The commitment of the Councils to advancing sustainable futures for the region can be seen in new initiatives coming forward from the Councils and their partners. This includes, for example, the work on climate emergency action plans and the declaration of intent to designate Plymouth Sound as the UK's first National Marine Park in recognition of the vital importance of the ocean to our overall well-being.

2.2.9 These strategic approaches and policies inform the rest of the JLP. Policies set out in the Strategy for the PPA, Strategy for the TTV Policy Area, Development policies and Delivery and monitoring sections of the JLP provides the detail of how the overarching strategic policies should be applied. By applying all of the relevant policies in the JLP to all development proposals coming forward, the LPAs will ensure that sustainable forms of development are achieved.

2.2.10 Sustainable development, and an explicitly recognised link between the sustainable characteristics of development and carbon reduction, therefore

underpins the strategy and all policies of the JLP. In relation to the recent declarations of Climate Emergency, it is therefore fair to say that the JLP gives the LPAs the tools to use to ensure that all new development which takes place in the plan period takes place sustainably, and is considered in the light of climate change.

2.3 How will this affect planning decisions?

2.3.1 The JLP, along with 'made' Neighbourhood Plans and the Devon County Council Minerals and Waste Local Plans, comprises the development plan for Plymouth and South West Devon. It sets out the policies that will be used to determine planning applications by PCC, SHDC and WDBC as the LPAs. Therefore, the considerations set out above show how the plan aims to achieve sustainable forms of development and to reduce carbon impacts will be applied to the consideration of planning applications. The matters outlined above set the context for the discussions the LPAs will have with applicants, and for the decisions they will need to arrive at.

2.3.2 Clearly, the declarations of Climate Emergency sit alongside these matters. It will be for the LPAs to decide how best to use the policies in the JLP to achieve their Climate Action Plan commitments.

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3. Healthy communities (DEV1-DEV6)

3.1 Introduction

3.1.1 Planning decisions can have a major beneficial impact in terms of meeting vital health and well-being objectives, and improving the living conditions of the community.

3.1.2 The guidance in this chapter primarily supports polices DEV1 to DEV6 in the JLP. It also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP.

3.1.3 Further details of the key criteria that determine the acceptability of new developments in the context below can also be found in Section 4 (Housing) and Section 6 (Place shaping and heritage).

3.2 Protecting health and amenity (DEV1)

What is this policy about?

3.2.1 DEV1 is a policy to ensure that development helps to deliver healthy communities by supporting good residential amenity, accessibility and, in respect of larger developments, their wider health impacts.

What needs to be considered in the implementation of this policy?

DEV1.1 – Impact of new development

3.2.2 DEV1.1 aims to ensure new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise, vibration and odour disturbance for both new and existing residents, workers and visitors.

3.2.3 Details relating to these points are available throughout the SPD but specifically in:

- Guidance at DEV10 (Delivering high quality housing);
- Guidance at DEV20 (Place shaping and the quality of the built environment); and,
- APPENDIX 1: Residential extensions and alterations.

3.2.4 Developers will need to demonstrate through the application process that these points have been considered.

DEV1.2 – Accessibility

3.2.5 The LPAs are under a duty to ensure that new developments and public spaces are designed to be accessible to all people. DEV1.2 looks to ensure this is possible.

3.2.6 All appropriate practical measures should be incorporated into new proposals to enable access to developments by all members of the community, including people with disabilities or for whose mobility is impaired by other circumstances. Good quality housing and well-planned, enabling, local environments can have a substantial impact on the quality of life.

3.2.7 To ensure accessibility, good practice guidance should be considered when designing a new development proposal. Including, but not exclusive too:

- RTPI guidance on Dementia and Town Planning[16];
- BS 8300-1:2018 Design of an accessible and inclusive built environment. External environment - code of practice[17].

DEV1.3 – Health Impact Assessments

3.2.8 DEV1.3 requires a Health Impact Assessment (HIA) to be submitted as part of any Environmental Statement in relation to planning applications with a likely significant health impact. This is to ensure health and wellbeing are properly considered in planning proposals and health inequalities are addressed. A development is considered to carry a particular risk of a significant impact on health where a development is for 100 houses or more or consists of more than 10,000 square metres of industrial/commercial land.

3.2.9 Guidance on Health Impact Assessment Tools[18] has been produced by the Department of Health and Social Care. The London Healthy Urban Development Unit (HUDU) has also developed a rapid HIA tool[19], which is less resource intensive using existing evidence to quickly assess the impacts of a development plan or proposal and recommend measures to address negative impacts and maximise benefits.

3.2.10 HIAs should aim to enhance the potential positive aspects of a proposal through assessment, avoiding or minimising any negative impacts, with particular emphasis on disadvantaged sections of communities that might be affected.

3.2.11 Early discussions with Public Health are actively encouraged so that the design of the development maximises the potential health benefits of the proposal.

Public Access Defibrillators (PADs)

3.2.12 DEV1 ensures development proposals safeguard the health and amenity of local communities and consider health infrastructure in all proposals. Sudden cardiac arrest (SCA) is a leading cause of premature death and every minute counts, but with immediate treatment many lives can be saved.

3.2.13 Unless it can be demonstrated that a registered PAD exists within close proximity of the site (normally to allow collection and return to the site within three minutes), provision of a PAD will normally be expected as part of any planning application for:

- All new gyms/recreational developments;

[16] https://www.rtpi.org.uk/knowledge/practice/dementia-and-town-planning
[17] https://www.thenbs.com/PublicationIndex/documents/details?Pub=BSI&DocID=320519
[18] https://www.gov.uk/government/publications/health-impact-assessment-tools
[19] https://www.healthyurbandevelopment.nhs.uk/our-services/delivering-healthy-urban-development/health-impact-assessment/

- All new schools or when a new development is proposed on a school site;
- All new public buildings;
- All new retail/leisure development over 500 square metres;
- All new libraries;
- All new clinical developments, including GP surgeries, pharmacies and dental practices;
- All new hotels;
- All new transportation hubs such as coach stations, train stations, airports and seaports;
- Developments in public spaces such as green spaces or blue spaces where foot fall is expected to be above 2,000 per day;
- All new industrial estates; and/or,
- All new employment uses over 1,000 square meters.

3.2.14 The PAD should be installed on an external surface of a building or other appropriate location. It should also be registered with the South Western Ambulance Service Federation Trust (SWASFT) and monitored and maintained in accordance with their registration requirements thereafter.

3.2.15 Where the provision of a PAD and associated signage has been proposed, it will be secured through a planning condition attached to the planning permission.

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3.3 Air, water, soil, noise, land and light (DEV2)

What is this policy about?

3.3.1 Planning plays an important role in protecting the environment from pollution and managing natural resources. DEV2 is a policy to ensure development proposals will not cause unacceptable on- or off-site risk or harm to human health, the natural environment or living conditions, either individually or cumulatively.

3.3.2 Each LPA's Local Validation List states when an assessment is needed to be submitted as part of a planning application to address concerns highlighted in this policy.

What needs to be considered in the implementation of this policy?

DEV2.1 and DEV2.2 – Air

3.3.3 Both DEV2.1 and DEV2.2 aim to minimise negative air quality impacts by development proposals.

3.3.4 Developments will normally be refused where a development is going to have a significant impact on an Air Quality Management Areas (AQMAs), create a new AQMA, or result in an adverse effect on a European Site. Instead, recognising the impact that emissions have on human and environmental health, the LPA's will seek to support developments that minimise their impact on air quality.

3.3.5 Maps showing the AQMAs across the Plan Area are available below:

1. Plymouth City Council[20];
2. South Hams District Council[21];
3. There are currently no AQMAs in West Devon.

3.3.6 When ensuring development proposals avoid or mitigate against having a negative impact on air, the type of mitigation required on a particular development should be informed by:

- Outcomes from transport statements, assessments and plans;
- Air Quality Assessments or emission profiling;
- LPAs' Air Quality Action Plans;
- Specific needs identified in site specific spatial policy allocations;
- Travel awareness/planning and highway development requirements;
- The latest Defra Local Air Quality Management Guidance[22];
- The latest information to be found on the UK Air Pollution Information System[23]; and/or,
- Relevant technical guidance and acknowledged best practice.

[20] https://www.plymouth.gov.uk/environmentandpollution/airquality
[21] https://www.southhams.gov.uk/article/3902/Air-Quality
[22] https://laqm.defra.gov.uk/supporting-guidance.html
[23] http://www.apis.ac.uk

3.3.7 Whilst the LPAs recognise the importance of the Government's 'Road to Zero Strategy'[24] and supports the aim of decarbonising transport networks, there are also other opportunities within the transport networks to make small improvements that will have significant positive impacts on air quality.

3.3.8 The LPAs expect all new development proposals to take into consideration the below list of potential measures:

- Provision of electric vehicle charging points (Guidance on the requirements of electric vehicle charging points can be found at DEV29 (Specific provision relating to transport));
- Designation of parking spaces for low emission vehicles;
- Provision of facilities to encourage sustainable travel, such as cycling facilities;
- Travel planning with new residents/businesses to encourage travel by sustainable transport modes as well as the uptake of ultra-low emission vehicles;
- Green travel vouchers;
- Facilities within developments which support active modes of transport such as: drying rooms; showers and lockers etc.
- Ensuring good connectivity to existing and future public transport, cycle and pedestrian routes; and,
- The provision of trees and landscaping features where appropriate.

3.3.9 For major developments which are likely to have a negative impact on air quality, the level of contribution towards off-setting measures will be calculated based upon the damage caused by the additional emissions. This approach allows for mitigation measures to be delivered in line with any existing air quality action plans.

3.3.10 Any mitigation measures will be secured through planning conditions or through planning obligations and will be negotiated on a case-by-case basis.

3.3.11 Please see Section 12 for further guidance on planning obligations.

DEV2.1 and DEV2.3 – Water

3.3.12 Development may not be supported if there is likely to be interruption to the quantity or quality of water available to off-site supplies. Evidence may be required if a development is identified as having an unacceptable impact on private water supplies in the vicinity of the proposed development.

[24] https://www.gov.uk/government/news/government-launches-road-to-zero-strategy-to-lead-the-world-in-zero-emission-vehicle-technology

DEV2.1 and DEV2.4 – Light

3.3.13 DEV2.1 and DEV2.4 ensures development avoids harmful environmental impacts and increased health risks arising from a number of factors, including light and light pollution.

3.3.14 When considering light pollution as part of a development, the latest edition of Guidance for the Reduction of Obtrusive Light[25] written by the Institution of Lighting Professionals (ILP) should be considered.

3.3.15 As a general principle, lighting impacts upon habitats used by wildlife, particularly hedgerows, should not be subject to new illumination. When considering sensitive design of lighting to avoid or minimise impacts on wildlife the latest edition of the Bats and artificial lighting in the UK Guidance Note 08/18[26] written by the ILP and the Bat Conservation Trust (BCT) should be considered.

3.3.16 Further details of the key criteria that determine the acceptability of new developments in this context can be found in Section 4 (Housing), Section 6 (Place shaping and heritage) and Section 7 (Natural Environment).

DEV2.1 and DEV2.5 – Land

3.3.17 DEV2.1 and DEV2.5 ensures remediation and mitigation of land from a number of factors, including instability and contamination. The LPAs support development which seeks to remediate brownfield land, as long as the end development is safe for use.

3.3.18 Where an application does not automatically require a contamination assessment, but where it has been determined that there is some potential risk of contamination, a Phase 1 assessment will need to be carried out before the application can be determined.

DEV2.1 and DEV2.6 – Soil

3.3.19 DEV2.1 and DEV2.6 aims to protect soil, including safeguarding the long term potential of the 'best and most versatile agricultural land' which is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification.

3.3.20 However, the decision on the loss of agricultural land will be considered on a case-by-case basis. For example, in an area of mostly grade 4 agricultural land, the LPAs may consider the loss of grade 3b to be unacceptable, similarly in a landscape where there is very little land of grade 1 or 2, the LPAs may resist the loss of grade 3a.

[25] https://www.theilp.org.uk/documents/obtrusive-light/
[26] https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229

3.3.21 Maps showing the agricultural land classifications in the South West are available through Natural England[27].

DEV2.1 and DEV2.7 – Noise

3.3.22 DEV2.7 looks to promote good health and a good quality of life through the management of noise.

3.3.23 Relevant planning applications should be accompanied with the appropriate information to assess its impact on noise. Applications should consider the following points to control noise generation:

- Sound power level and the resultant level of noise of equipment;
- Different methods of installing equipment so as to reduce noise;
- Design and position of equipment on-site, including the position of entrances and screening if necessary;
- Sound-proofing or insulation measures, particularly for adjoining properties; and,
- Hours of operation.

3.3.24 Impacts will generally be considered against BS 8233 Guidance on sound insulation and noise reduction for buildings[28]. Where external amenities form part of the development, the LPAs will normally seek a level of 55dB LAeq (16 hour) in these areas.

3.3.25 Noise is of particular concern for uses associated with the night-time economy, whether it is from the use itself, the activities within or related to the use of the premises, or from a use that generates an abundance of short term visits. Any planning application associated with the night-time economy will be considered carefully during the planning application process along with the following guidance.

DEV2.8 – Avoidance of impacts on European Sites

3.3.26 DEV2.8 looks to define when a development will not be acceptable in terms of air, water, soil, noise and land impacts on a European Site by stating that development will only be permitted where it can be concluded that it will not cause an adverse effect on the integrity of a European Site. All forms of pollution will need to be considered both during construction and during operation, including: dust; emissions; runoff; surface water; groundwater and noise and percussive impacts. This information will need to inform any formal assessment under the Habitats and Species Regulations 2017.

3.3.27 Please see guidance at DEV26 (Protecting and enhancing biodiversity and geological conservation) for further guidance on the impact on European Sites.

[27] http://publications.naturalengland.org.uk/category/5954148537204736
[28] https://shop.bsigroup.com/ProductDetail?pid=000000000030241579

Night-time economy

3.3.28 There are many elements to the night-time economy including theatres, night-clubs, restaurants, hot food take aways, public houses and bars. This guidance follows on from the considerations under DEV2 to encourage the promotion of a safe and vibrant night-time economy across the Plan Area.

3.3.29 Development must ensure that it does not incur an unacceptable impact from resulting noise, litter and anti-social behaviour. Planning conditions may be included with the grant of any planning permission in order to protect local amenity and local communities.

3.3.30 The following guidance should be read in conjunction with any specific guidance issued by the relevant local authority regarding licenses and permits.

'Agent of change'

3.3.31 Paragraph 182 of the NPPF 2019, introduced the principles of 'agent of change', this is interpreted as meaning that existing industrial and commercial units amenity should be protected from future residential developments. The 'agent of change' principle is particularly significant for the Plan Area as the live music[29] scene plays an important role in the cultural offer of Plymouth and the South West with a number of venues across the Plan Area.

3.3.32 Where a sensitive development is proposed adjacent to an existing commercial/industrial use it will only be acceptable if the uses can be demonstrated to be compatible, or can be made compatible through on-site/off-site improvements at the developer's expense. This may include the provision of soundproofing measures to the proposed development as advised by a certified acoustic engineer.

3.3.33 The LPAs may also seek a contribution towards improving noise insulation to an existing live music venue. In the event that measures to ensure that the noise sensitive development can coexist with the live music venue are not satisfactorily provided, the LPAs may refuse planning consent for the new development.

3.3.34 Please see Section 12 for further guidance on planning obligations.

Highways, transport and noise/amenity

3.3.35 Where applications are likely to attract customers from a wide area, suitable and sufficient car parking and space for public transport should be considered, including space for bus stops and taxi ranks.

3.3.36 Adequate provision should also be made for the loading/unloading of goods and servicing items. If appropriate, the LPAs may attach a restrictive planning condition to an application to ensure noise and other disturbances is kept to a

[29]In the context of this guidance, 'live music' is defined as the amplified performance of music – either by a live band or a DJ.

minimal, for example, to ensure reverse beepers are turned off after a certain time at night.

3.3.37 Please see Section 8 for further guidance on highways and transport.

Opening hours

3.3.38 In residential areas, opening hours may be restricted to ensure minimal impact on the noise amenity of surrounding residents. In general, residential areas are more sensitive to noise between certain hours and restrictive conditions limiting hours of operation may be attached to planning applications to ensure a minimal negative impact on residents. Any restrictive conditions will be based on specific circumstances, such as the location of the application site and appropriate evidence.

3.3.39 In areas where there is an intensity or concentration of night-time economy uses more flexibility may be considered and in mixed-use areas a balance will be struck between commercial activity and the protection of local amenity.

Odours

3.3.40 Odours, normally cooking odours, and extraction systems can cause nuisance to local residents in terms of smell, noise and vibration. Applications for uses which cause odours should be accompanied with the appropriate information about the extraction system to assess its impact and planning conditions may be put in place for control.

3.3.41 Generally flues should terminate at a maximum 1 metre above ridge height. Internal flues will normally require Building Regulation approval (in line with Building Regulation Approved Document J[30]) and fire risk assessment.

Waste management

3.3.42 For guidance on waste management please see DEV31.

Use of outside areas

3.3.43 The use of the premises and any external activities should be assessed. Applications will need to consider:

- Safety, including the free flow of pedestrians and the management of queues;
- Litter and the attraction of vermin or other animals such as seagulls;
- Fixtures and fittings which must be of suitable construction; and,
- Increased capacity for the premises and any impact this may have on the provision of toilet facilities, waste and means of escape from fire.

[30] https://www.planningportal.co.uk/info/200135/approved_documents/72/part_j_-_combustion_appliances_and_fuel_storage_systems

Smoking shelters

3.3.44 The provision of outdoor smoking areas should be considered at the design stage of a proposal and take into account the potential for noise or odour nuisance, litter, obstruction of the highway/pavements, and compliance with the Health Act 2006.

Street cafes

3.3.45 Tables and chairs placed outside buildings can provide enjoyable facilities and contribute to the vibrancy and character of an area, as long as they do not obstruct pedestrian access or endanger pedestrian safety.

3.3.46 Where tables and chairs are located on private land, planning permission is likely to be required whilst those on public pavements and pedestrianised areas are dealt with by licence applications to the relevant Highway Authority.

3.3.47 If planning permission is required for outdoor chairs and tables in association with a food and drink uses, the following considerations will apply:

- Street cafés need to relate positively to the existing street-scene and movement of pedestrians needs to be considered;
- There should be at least 2 metres of clear, unobstructed footway width between the edge of the street café and the edge of the carriageway. A greater width may be required in some locations;
- Where the use directly fronts the premises from which the refreshments are served, an unobstructed corridor to the shop entrance of at least 2 metres should be retained;
- Tables/chairs should be sufficiently spaced to enable wheelchair and pram access;
- When tables and chairs are proposed directly outside a shop front on a public highway, a physical barrier of approximately 1 metre in height will be required to guide visually impaired persons safely around the use; and,
- The style of furniture should reflect its purpose and location. Domestic ‘patio style’ furniture is unlikely to work in the city or a district centre setting for example. Particular attention will need to be given to outdoor furniture designs in conservation areas.

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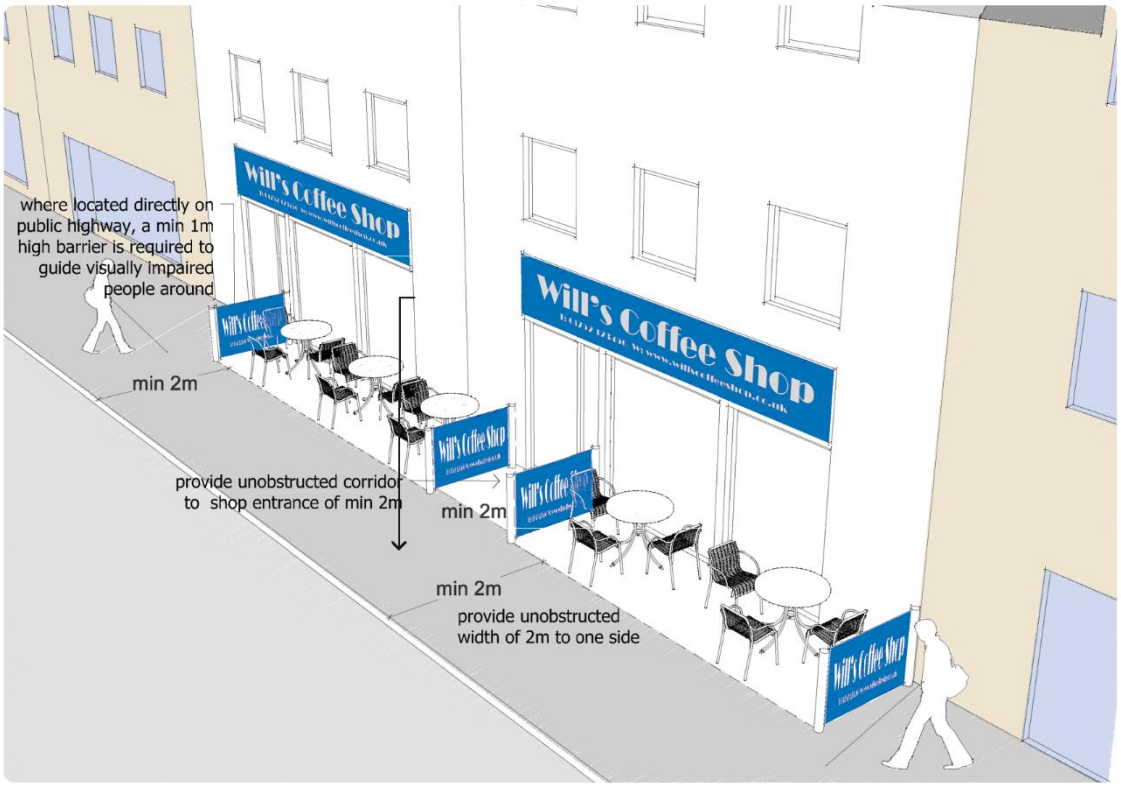

Figure 2: Street cafe planning considerations

3.3.48 The display of signs, such as A-Boards, on the pavement or pedestrianised areas, where related to these outdoor refreshment areas, will be strictly limited to ensure unnecessary obstructions or visual clutter does not occur. A lack of the appropriate permission or license may result in enforcement action taken.

3.3.49 For further guidance on shop fronts and advertisements please see APPENDIX 3: Shop fronts, including ATMs.

3.4 Sport and recreation (DEV3) and Playing pitches (DEV4)

What is this policy about?

3.4.1 Policies DEV3 and DEV4 supports opportunities for sport, physical activity and active leisure. DEV3 also includes guidance on protecting, enhancing and creating new public rights of way (PROW) and bridleways.

What needs to be considered in the implementation of this policy?

DEV3 and DEV4 - Sports facilities and playing pitches

3.4.2 DEV3.1, DEV3.2 and DEV4 support opportunities for sport, physical activity and active leisure and are policies to ensure that development and growth is matched by an appropriate level of provision for playing pitch and other sports facilities.

3.4.3 The LPAs most up-to-date Playing Pitch strategies address both internal and cross-boundary issues and displaced demand between the different authorities.

3.4.4 The LPAs are obliged to consult with Sport England with regard to the provision of new playing pitches/sports facilities or development affecting playing field land. It is recommended that this guidance is read alongside guidance provided by Sport England[31] and the relevant sport Non-Governing Body (NGB):

- Football Association[32];
- Rugby Football Union[33];
- England and Wales Cricket Board[34]; and,
- England Hockey[35].

3.4.5 The playing pitch standard is outlined in Figure 3.2 of the JLP as set out below:

Measure	PPA	TTV Policy Area – Main Towns, Towns & Key Villages	Reason for difference in standard across Plan Area
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.

Figure 3: JLP Figure 3.2 extract - playing pitch standards

Playing pitches vs. playing fields[36]

3.4.6 The Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO 2015) defines a playing pitch as: *"a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which*

[31] https://www.sportengland.org/
[32] http://www.thefa.com/get-involved/player/facility-development-and-technical-guidance
[33] http://laws.worldrugby.org/
[34] https://www.ecb.co.uk/be-involved/club-support/club-facility-management/project-development-guidance
[35] http://www.englandhockey.co.uk/landing.asp?section=1877&sectionTitle=Facilities+Support
[36] A playing pitch is also a playing field in the context of the guidance in this SPD.

is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo" and can have either a grass surface or an artificial one.

3.4.7 A playing field is defined as: ***"****the whole of a site which encompasses at least one playing pitch".*

3.4.8 It is important to recognise that the definition of a playing field includes more than the surface of the pitch and the LPAs will protect all parts of a playing field, not just those which are currently laid out as pitches. This is because other parts of a playing field are a resource which may be needed, now or in the future, and it is important that they be afforded the same protection.

What needs to be considered in the implementation of this policy?

DEV4 – Playing pitches

3.4.9 Policy DEV4 looks to protect and improve the stock and capacity of playing pitch facilities and improve the quality of existing playing pitches and ancillary facilities.

Re-development of existing playing pitches

3.4.10 The re-development of existing playing pitches will only be acceptable where the proposed development meets the five exceptions outlined in Sport England's Playing Fields Policy and Guidance[37] or provided for in specific allocation policies.

3.4.11 Planning applications will be considered against the current version of these exceptions should they be amended in the future.

Provision of new playing pitches

3.4.12 Proposals for new playing pitches should conform to current Non-Governing Body's (NGB) and Sport England's technical standards which are available via Sport England's Planning for Sport[38] website and documents.

3.4.13 For a new pitch there usually needs to be an establishment period of at least 12 months (although this can vary depending on the amount of maintenance that is carried out during this period). The size and general establishment of all pitches should meet with Sport England's technical Guidance note Natural Turf for Sport[39].

3.4.14 New residential development on larger sites will, where practicable, be expected to deliver new playing pitch facilities on-site. Where relevant, this is set out in the specific allocation policies within the JLP. In these cases it is recommended that

[37] https://www.sportengland.org/facilities-and-planning/planning-for-sport/playing-fields-policy/
[38] https://www.sportengland.org/facilities-planning/planning-for-sport/
[39] https://www.sportengland.org/facilities-and-planning/design-and-cost-guidance/natural-turf-for-sport/

applicants engage with the relevant LPA at an early stage to consider the form, location, layout, specification etc. of pitches and ancillary facilities to ensure they are incorporated into a masterplan and applications in an acceptable manner.

Design and layout requirements

3.4.15 Playing pitches should be integrated with other land uses in any new development scheme and should complement other provision such as sport and leisure facilities, green infrastructure and other community provision. Sport England's Active Design Guide[40] provides useful information to help inform development design and layout and should be taken into account.

3.4.16 Developers should be able to demonstrate how the playing pitches proposed meet the requirements identified for the development.

3.4.17 The size of a changing area for grass roots football should be 16 square metres (including bench space) plus showers, toilets, entrance hall, two officials' changing rooms (each with an internal area of 5 square metres) and incorporate a shower, toilet and wash basin, spectator toilets, storage and a social area including a small kitchen.

3.4.18 Ancillary facilities should be based on Sport England's Clubhouse Design Guide[41] and the relevant sport's NGB guidance.

3.4.19 Full specifications and construction details should be provided to ensure that the playing fields will be of an acceptable quality. The specification and details should be produced by a suitably qualified agronomist in accordance with current Sport England and NGB technical guidance and should include details of: surface materials; levels; fencing; gates; soil cultivation/amelioration; seeding; drainage and lighting (including lux levels).

Mitigation

3.4.20 Whilst new residential development on larger sites will be expected to deliver new playing pitch facilities on-site, on smaller sites, or where it is not practicable, new residential developments will be required to contribute towards new or improved playing pitch/sports provision through a planning obligation for off-site provision.

3.4.21 Mitigation will apply to all residential developments with the exception of self-build dwellings. Financial contributions will be reasonable and proportionate and calculated based on the number of new residents resulting from the proposed development. Contributions towards maintenance will also be required.

3.4.22 Contributions towards new provision or improvements to existing sites will be required where there are identified local deficiencies in the quantity, accessibility

[40] https://www.sportengland.org/facilities-and-planning/active-design/
[41] https://www.sportengland.org/facilities-and-planning/design-and-cost-guidance/clubhouses/

or quality and/or value of sports and recreational facilities. Each LPA's separate Playing Pitch Strategy states where new/improved provision is needed based on demand. Other local evidence includes 'made' Neighbourhood Plans and Town/Parish Open Space, Sport and Recreation (OSSR) Plans.

3.4.23 Mitigation for loss of facilities and the impact on new residents are two distinct and separate issues and should be considered separately in determining planning obligations.

3.4.24 In some cases it may be acceptable to re-develop existing playing pitches and provide new facilities elsewhere. This will also typically be secured through a planning obligation and will need to meet Sport England criteria.

3.4.25 Please see Section 12 for further guidance on planning obligations.

DEV3.2 – Water and waterside access

3.4.26 Access to the water such as to the sea, estuaries and rivers/etc. for recreation, whether alongside, on, or in the water, is of key importance to the Plan Area.

3.4.27 Waterfront development proposals which shut off access to and from the water, fail to address opportunities to improve access to the water or otherwise impedes the vision of the Plan Area being a vibrant waterside location, embracing will not be supported.

DEV3.3 – Public rights of way and bridleways

3.4.28 There are opportunities to improve connectivity, particularly linking new development sites to existing recreational areas, green spaces and Public Rights of Way. Opportunities to increase, or improve, Public Rights of Way (PROW) alongside new development, will be actively pursued.

3.4.29 Provision of a good network of PROW can help to reduce the need to travel by car and also encourage healthy, active lifestyles. The LPAs may therefore seek off-site contributions towards creation of new, or improvements to existing, PROW or recreational links reflecting needs set out in:

- Specific allocation policies;
- Green Infrastructure Frameworks; and/or
- Any local requirements identified in 'made' Neighbourhood Plans, or Town/Parish OSSR Plans.

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3.5 Community food growing and allotments (DEV5)

What is this policy about?

3.5.1 DEV5 is a policy to support and encourage local food growing by ensuring the provision of allotments and/or community food growing sites. The allotments/community food growing space standard is outlined in Figure 3.2 of the JLP:

Measure	PPA	TTV Policy Area – Main Towns, Towns & Key Villages	Reason for difference in standard across Plan Area
Allotments / community food growing space	0.15ha per 1,000 people	0.15ha per 1,000 people	n/a

Figure 4: JLP Figure 3.2 extract - allotments/community food growing space

3.5.2 Alongside formal allotments/community food growing space, the LPAs will also encourage the implementation of edible landscaping such as orchards and food forests, etc.

What needs to be considered in the implementation of this policy?

3.5.3 Besides the standards outlined above, new and improvements to existing allotments will need to adhere to the guidance outlined below to ensure the provision is appropriate for its use. Allotment proposals, which do not accord with the provided guidance, will be considered not appropriate to the demand and therefore could result in planning permission being refused.

3.5.4 On large residential development sites, for example 500 dwellings or more, in an area where there is a local deficiency in allotment provision, such as when the aforementioned standard has not been met, or there are no allotment sites within a 1 kilometre radius, the LPAs will seek on-site delivery of new allotments. In all other situations where the allotment standard is not met, the LPAs may seek a planning obligation to improve or expand existing allotment site.

3.5.5 Any proposals for allotments should include details of:

- The ongoing management through a suitable body such as city, town or parish councils, allotment associations, community groups or management companies. Within Plymouth area plots will be managed by PCC; and,
- The arrangement, specification and management of land for allotments, including details of the charging schedules for future plot holders and the specifications for enclosures.

3.5.6 The specified management practices will also need to adhere to best horticultural practices and comply with the relevant British Standards.

3.5.7 To ensure delivered allotments are fit for purpose and the details secured (including the implementation and maintenance of allotments), the LPAs will be

seeking to utilise a planning condition, a bond or planning obligation clause. Measures will require:

- The applicant to pay an inspection fee to the LPA to check and sign off the completed work; and,
- Set out measures for remediation if the applicant fails to deliver the work in accordance with the approved drawings.

3.5.8 Please see Section 12 for further guidance on planning obligations.

Allotment design

3.5.9 The design of new allotments or improvements to existing allotments as part of a planning application should adhere to the following guidelines:

- Allotment plot sizes:

Allotment plot size	PPA	TTV – Main Towns, Towns and Key Villages
10m x 12.5m	Standard plot	Standard half-sized plot
10m x 25m		Standard plot

Figure 5: Allotment plot sizes

- Allotments should be evenly distributed across settlement areas based on a catchment radius of approximately 1 kilometre. Allotments should not be located in parcels of less than 0.5 hectares to enable efficient management;
- Every allotment site should include sufficient provision for paths and communal facilities. Each site should include a hard surfaced circular main access path which is 3 metres wide, or include provision for turning head to allow for maintenance vehicle access. The surfacing of any minor footpaths will depend on the size of the site, access, and the levels;
- Allotments should be well located in relation to complementary green spaces;
- Areas that involve ball sports should be suitably buffered;
- Water supply pipes and any other service runs should align with the path network;
- Allotments should be proportionate to the scale of the site and design should include:
    - Cultivatable soil, free of rubble or contamination and supported by soil test results;
    - Enclosures formed by dog, stock and rabbit proof fencing that is attractive, integrates well with the adjacent areas and, where appropriate, incorporates native hedge planting;
    - A secure and accessible community hut;
    - Toilets (male/female, including wheelchair accessible) and washing facilities;
    - Grey water recycling, unless demonstrated to be impractical;
    - Rainwater collection facilities on each communal building;
    - A storage area for each plot of at least 2 square meters;
    - 1 water stand pipe per every 5 standard TTV Policy Area plots or every 10 standard PPA plots;
    - Cycle parking;

    - 10 per cent of plots should be designed for disabled access which includes smaller raised beds;
    - Access provision for cars with a minimum 3 meter wide lockable access gate, vehicle turning and adequate car parking.
- Traditional orchard fruit trees may form a small part of an allotment site but would more commonly form part of planting schemes in other green spaces such as parks or natural green space; and,
- Allotments should not be located:
    - In a floodplain;
    - In attenuation ponds; and/or,
    - On land overshadowed by buildings or vegetation that would inhibit productivity.

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3.6 Hot food take aways in Plymouth (DEV6)

What is this policy about?

3.6.1 A key health issue identified by the LPAs concerns the impact on the diet and health of young people as a result of the proximity of fast-food premises to educational premises. Policy DEV6 resists proposals that seek to provide new hot food take aways (Use Class A5[42]) within a 400 metre radius of providers of secondary education within the PPA only.

What needs to be considered in the implementation of this policy?

3.6.2 The food environment is the interaction between the physical, biological and social factors affecting individuals, or a group of individual's, eating habits and the resulting patterns of food consumption. A toxic food environment is one in which options for obtaining a healthy diet are constrained by some or all of the following: lack of choice; saturation of food outlets offering mostly unhealthy choices; advertising of and availability of unhealthy food choices in preference to those regarded as healthy and lack of availability of retailers selling healthy foods.

3.6.3 Substantial consideration will be given to the food environment when determining applications within 400m of an existing (or proposed) secondary school.

3.6.4 400m is accepted nationally as the average distance a school child would be willing to walk during a 1 hour lunch break in order to access food from an outlet outside the school grounds. It is roughly equivalent to a 10 minute walk. 400 metres will be measured using a circle radius rather than actual walking route in order to remain as transparent and enforceable as possible. However, where there are major obstructions such as a major road or impassable green space dissecting the route within the 400m this figure may need to be reduced accordingly and will be considered on a case-by-case basis.

3.6.5 For further guidance on A5 uses please see guidance at DEV18.5.

[42] A5 Hot food takeaways - For the sale of hot food for consumption off the premises, Town and Country Planning (Use Classes) Order 1987 (as amended)

4. Housing (DEV7-DEV13)

4.1 Introduction

4.1.1 The delivery of sufficient homes to meet the needs of the Plan Area is one of the greatest challenges for the JLP. Section 3 of the JLP (the spatial strategy) sets out the overall housing need whilst sections 4 and 5 outline site allocation policies. Policies DEV7 to DEV13 sets out policies for the type, mix and quality of housing to be provided, including for specialist groups.

4.1.2 Policy SPT3 (Provision for new homes) in Section 3 of the JLP sets out the overall housing requirements in each policy area:

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

4.1.3 The guidance in this chapter primarily supports polices DEV7 to DEV13 in the JLP. It also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP.

4.2 Meeting local housing need in the Plymouth Policy Area (DEV7)

What is this policy about?

4.2.1 DEV7 is a policy to ensure 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 in the Plymouth Policy Area (PPA).

4.2.2 Early discussions with the LPAs are encouraged to ensure the proposed development meets the housing needs of the PPA.

What needs to be considered in the implementation of this policy?

DEV7.1 – Overall housing mix

4.2.3 DEV7.1 requires a mix of dwelling sizes, types and tenures appropriate to the area to be delivered to ensure a wide choice of high quality homes.

4.2.4 Within the PPA, local evidence will be used for negotiation when discussing housing mix. In particular the LPAs will use the Strategic Housing Market Assessment Part 2[43] (Chapter 4) as a starting point for negotiation.

4.2.5 DEV7.1ii specifically refers to ensuring housing is available for households with specific needs, these could include, but is not limited to:

- Older people;
- Service families and veterans;
- Families with children; and/or,

[43] https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf

- Persons with long-term health problems or disabilities.

DEV7.2 – Affordable housing within the PPA

4.2.6 DEV7.2 sets out the expected affordable housing contribution for developments of above ten homes. For guidance on affordable housing please see sub-section 4.5 of this SPD.

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4.3 Meeting local housing need in the Thriving Towns and Villages Policy Area (DEV8)

What is this policy about?

4.3.1 DEV8 is a policy to ensure a wide choice of high quality homes is available in the Thriving Towns and Villages (TTV) Policy Area by increasing opportunities for home ownership, meet the needs for social and rented housing, and create sustainable, inclusive and mixed communities

4.3.2 The policy seeks to ensure that the mix of new homes delivered in the TTV policy area corrects demographic imbalances and enhances community resilience. Ensuring a broad mix of new homes will contribute to enabling young people to find homes of their own, young working families to secure appropriate housing for each lifestage, and older people to access housing that meets their changing needs.

4.3.3 Early discussions with the LPAs are encouraged to ensure the proposed development meets the housing needs of the TTV.

What needs to be considered in the implementation of this policy?

DEV8.1 – Overall housing mix

4.3.4 DEV8.1 requires a mix of dwelling sizes (referring to the number of bedrooms per dwelling), types and tenures appropriate to the area and as supported by local housing evidence.

4.3.5 In South Hams and West Devon there is an imbalance in provision. There is a higher proportion of 4 or more bed homes than the rest of Devon and Cornwall (8.2 per cent for West Devon, 7.1 per cent for South Hams). Both are also in the top three in Devon and Cornwall for under-occupancy with around 35 per cent of homes having less than 0.5 persons per bedroom.

4.3.6 Housing stock that comprises a relative over-provision of large houses makes it increasingly difficult to rebalance the demographic profile and increase home ownership because the current housing stock is inherently unaffordable. These houses are not suited to smaller households or households that are earning close or similar to the national wage.

4.3.7 When seeking to ensure a diversity of size, the number of bedrooms will be used as the key metric (as the size of a dwelling has a significant impact on how affordable it is), with the Strategic Housing Market Assessment Part 2: Objectively Assessed Need for Affordable Housing (SHMNA Part 2)[44] providing thresholds for the number of dwellings required by bedroom. In order to ensure that homes are not built with a surplus of rooms that can be used as bedrooms, the LPAs will carefully examine floor plans.

[44] https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf

4.3.8 Home working is supported and as such the provision of one room identified as an office or study will be accepted, but other rooms that have the potential to be used as bedrooms (other than living rooms, kitchens, dining rooms, rooms with mains plumbing/toilets or rooms with no windows and/or main entrances) will be considered as such, and considered against the requirements of DEV8 on that basis.

4.3.9 On major development proposals, the smallest home in the Nationally Described Space Standard (NDSS)[45] category should meet the minimum NDSS requirement but also be no more than 75 per cent of the size of the largest home in the same category. For example if the largest three bed, six person dwelling on a site is 160 square meters, the smallest three bed six person home should not exceed 120 square meters. The number of the largest dwellings within each category should not exceed the number of the smallest dwellings within each category; in the example given above, a scheme with more 160 square meters three bed, six person dwellings than 120 square meters three bed, six person dwellings will not be supported.

4.3.10 The terms 'appropriate to the area' and 'local housing evidence' relate to the use of information regarding housing stock in the settlements and parishes of the TTV Policy Area. The baseline when considering the 'existing stock' will be taken from the latest census. When submitting an application, applicants should demonstrate an understanding of the existing housing stock, and explain how an application responds to both the identified needs within the SHMNA Part 2, and the existing housing mix within the nearest settlement, or as part of the wider parish.

DEV8.1(i) – Redressing imbalance

4.3.11 In parts of the TTV policy area, the current mix of housing has been imbalanced and the demographic profile shows a continuing trend of young people and working age families displaced.

4.3.12 The SHMNA Part 2 provides a breakdown of housing mix required to meet the needs of projected household formation throughout the plan period. There is a degree of variability to household projections, and as such the housing mix prescribed in the SHMNA Part 2 for each LPA will form the basis of a discussion regarding proposed housing mix, taking into account local circumstances and particular characteristics on a site by site basis.

For housing schemes of 5 units and over

4.3.13 The housing mix prescribed for each housing tenure type within the SHMNA Part 2 should be considered as the requirement for all schemes of 5 units and over. For smaller schemes this may require a degree of rounding up or down depending on the overall number of units. A pragmatic approach will be applied

[45] https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

to ensure broad consistency with the requirements identified in the SHMNA Part 2.

4.3.14 DEV8 is clear that housing mix requirements may be adjusted by the LPA to correct existing imbalances in the housing stock of a given settlement or parish. An imbalance is defined as being different by a variance of more than 10 per cent from the LPA average for any housing type or size, as established by the Office for National Statistics (ONS) data. In such cases, it may be appropriate to stray from the prescribed percentages identified in the SHMNA Part 2 in such a way that helps redress an existing imbalance. A flexible approach will be taken to negotiating the most effective way of responding to existing imbalances, with viability and market signals as additional factors that could influence what is considered to be an acceptable mix.

4.3.15 If housing proposals are considered as outline, housing mix will be prescribed as a condition of the permission.

For housing schemes of less than 5 units

4.3.16 The prescribed ratios in the SHMNA Part 2 can be considered informative, but it is unlikely that small schemes can fully reflect all of the identified needs expressed in the SHMNA Part 2. Instead, a full understanding of the current housing mix within a settlement, taken from ONS data, will need to justify the dwelling(s) proposed. Proposals that seek to deliver a type of dwelling for which there is already an over-provision when compared to the 2011 baseline are unlikely to be supported unless there are other material considerations that justify the size and type of housing proposed.

4.3.17 Where there is an identified policy conflict with DEV8, in that a proposal seeks to exacerbate an identified existing imbalance, a local connection requirement may be sought through a planning obligation to offset the negative impact of further skewing the housing mix.

4.3.18 Similarly, where proposals seek to deliver homes of a type and/or size of which there is an existing overprovision, and in settlements and parishes which have an affordability ratio of above a factor of 10, an open market reduction may be sought in perpetuity on specified dwellings, secured through a planning obligation. This will make certain dwellings more affordable when considering the open market value against the level of average earnings.

4.3.19 For further guidance on planning obligations in Section 12.

DEV8.1(iii) – Younger people, working families and older people

4.3.20 Emphasis has been placed on delivering dwellings to meet the needs of younger people, working families and older people. The SHMNA Part 2 identifies a required uplift in 1 and 2 bed properties compared to the 2011 baseline for West Devon (8 per cent of housing stock in 2011 comprised of 1 and 2 bed) and South

Hams (15 per cent combined 1 and 2 bed) in order to meet the needs of newly formed households throughout the plan period. Increased delivery of 1 and 2 beds will benefit different needs groups, but only if the 1 and 2 bed properties are delivered with attributes that are suited to specific needs. Household sizes are projected to continue to get smaller throughout the plan period in the TTV Policy Area.

DEV8.2 and DEV8.3 – Affordable housing within the TTV

4.3.21 DEV8.2 and DEV8.3 sets out the expected affordable housing contribution for developments in the TTV. For guidance on affordable housing please see sub-section 4.5 of this SPD.

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4.4 Meeting local housing need in the Plan Area (DEV9)

What is this policy about?

4.4.1 DEV9 is a policy which gives additional provisions for the delivery of a range and mix of housing to meet local housing needs across the whole Plan Area.

What needs to be considered in the implementation of this policy?

DEV9.1 – Affordable housing in the Plan Area

4.4.2 DEV9.1 states what could be included as affordable housing:

- Affordable housing for rent, for example:
  - Social and Affordable Rent; and,
  - Affordable Private Rent ('Build to Rent').
- Affordable routes to home ownership, for example:
  - Starter homes;
  - Shared ownership;
  - Shared equity; and,
  - Rent-to-buy.

4.4.3 Please see sub-section 4.5 of this document for guidance on the delivery of affordable housing across the Plan Area.

DEV9.2 - Self and custom build housing

4.4.4 DEV9.2 states that the LPAs will support self and custom build housing developments provided that they meet the requirements of other policies.

4.4.5 Self and custom build housing is defined in the Housing and Planning Act 2016[46]: *"The building or completion by – (a) individuals, (b) associations of individuals, or (c) persons working with or for individuals or associations of individuals of houses to be occupied as homes by those individuals. But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person."*

4.4.6 In practice the majority of self builds are built to the customer's design by local builders or house manufacturers and not physically built by the eventual occupier.

4.4.7 The LPAs support self, custom and community housing as they provide accommodation suitable for individual needs and promote sustainable and innovative construction and design.

4.4.8 In order to qualify for a Community Infrastructure Levy (CIL) relief in those parts of the Plan Area where CIL applies (currently the Plymouth LPA area only), a self-build home must be the occupant's sole or principal residence for at least three years following completion of the build.

[46] http://www.legislation.gov.uk/ukpga/2016/22/enacted

4.4.9 Other policies such as housing mix, size, design and tenure (DEV7, DEV8, DEV9 and DEV10) will need to be considered on a case-by-case basis depending on the need at that time. In some locations smaller units will be required rather than large bespoke properties.

4.4.10 Each LPA has separate initiatives with regard to self/custom build. Please contact the appropriate LPA to discuss what support is available.

4.4.11 As identified in criterion DEV9.2i, the provision of serviced plots within major developments can make a significant contribution to help meet the LPA's duty under the Housing and Planning Act 2016. Where this is proposed:

- Phasing is required to ensure self/custom builders can claim their CIL exemption, if applicable;
- Serviced plots/shells should be marketed to the LPA's satisfaction for a period of at least 12 months at an agreed price, following which the developer may apply to the LPA to vary the planning consent; and,
- The part of the site containing the serviced plots will usually be capable of being accessed without entering the main site to enable the serviced plots/shells to be brought forward at the start of the development.

4.4.12 Whilst they should not be overly prescriptive, developers may also wish to agree a Design Code at the time of obtaining outline consent for the plots. This would give comfort to the buyers of neighbouring properties that the serviced plot houses will fit in with the overall development.

Community-led self/custom build

4.4.13 The LPAs wish to encourage community-led self/custom build housing development as a way to meet specific housing needs identified by the community. Groups considering providing community-led housing should contact PCC's Housing Delivery Team or SHDC's and WDBC's Housing Enabling Team at the earliest opportunity for guidance.

4.4.14 For guidance on affordable self/custom build please see guidance at sub-section 4.5.

Additional considerations for self/custom build in the TTV Policy Area

4.4.15 All properties secured for self/custom build, particularly those on exception sites in the TTV Policy Area, will need to refer to DEV8 and will be secured in perpetuity through a planning obligation (s106 agreement).

4.4.16 Local Lettings Plans and/or a planning obligation may be attached to properties/sites brought forward for self/custom build. This may depend on the location and ownership of the sites. In the TTV, attention should also be paid to the rural exception sites policy (TTV27 – Meeting local housing needs in rural areas) and to 'made' and emerging neighbourhood plans in that community.

DEV9.3 - 'Build to Rent'

4.4.17 DEV9.3 seeks to support development, which increases housing choice in the private rented sector, including 'Build to Rent.' Applications that propose 'Build to Rent' will be considered on a scheme by scheme basis.

4.4.18 'Build to Rent' is defined in the NPPF as: *"Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control."*

4.4.19 It is the LPAs' expectations that 'Build to Rent' will be delivered in accordance with the NPPG[47] guidance on 'build to rent'.

4.4.20 In addition to the NPPG requirements, the LPAs will require 'Build to Rent' schemes to:

- Include a covenant or clawback to ensure the homes are held as 'Build to Rent' for a minimum of 15 years; and,
- Ensure that all units are self-contained and let separately, that there is unified ownership and management of the development and that longer tenancies (three years or more) are available to all tenants.

4.4.21 For guidance on Affordable Private Rent please see guidance at sub-section 4.5.

DEV9.4 – Accessible housing

4.4.22 DEV9.4 specifies the mix of accessible housing units which will be sought on both new build and conversions (where possible), with reference to Category M4(2) and Category M4(3) of the Building Regulations Approved Document M[48]. On schemes of 5 or more dwellings, 20 per cent of the total number of dwellings should where possible meet Category M4(2); and on sites of 50 dwellings or more, at least 2 per cent should meet Category M4(3). For the avoidance of doubt all part figures relating to the number of M4(2) and M4(3) figure will be rounded up to whole dwelling numbers.

4.4.23 It will be the LPA's assumption that the M4(3) units will be constructed to an 'adaptable' rather than the 'accessible' standard. Where the latter is required, the LPA will negotiate with the developer how this will be achieved. For clarity, M4(3) 'adaptable dwellings' are to be constructed to be adjustable for occupation by a wheelchair user, whereas accessible dwellings should be constructed for immediate occupation.

[47] https://www.gov.uk/guidance/build-to-rent

[48] https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m

4.4.24 Category M4(3) will be counted as contributing towards the Category M4(2) dwelling requirement.

4.4.25 In exception circumstances, where it can be robustly justified and that it is impossible for developers to fully comply with M4(2) or M4(3), due to site characteristics such as topography, the LPAs will still encourage developments to meet achievable elements within the standard.

4.4.26 Categories M4(2) and M4(3) will be secured by way of a planning condition imposed on new development as part of the process of granting planning permission.

4.4.27 Technical guidance relating to the access to and use of dwellings is set out in Building Regulations Approved Document M Volume 1[49].

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[49] https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

4.5 Affordable Housing (DEV7-DEV10)

4.5.1 DEV7 (Meeting local housing need in the Plymouth Policy Area), DEV8 (Meeting local housing need in the Thriving Towns and Villages Policy Area), DEV9 (Meeting local housing need in the Plan Area) and DEV10 (Delivering high quality housing) sets out how the need for affordable housing will be met. The below sets out guidance in relation to the affordable housing provision across these policies.

4.5.2 When referring to 'affordable housing' the most up-to-date definition as defined in the NPPF should be used.

4.5.3 It is recommended that this guidance is considered alongside the Strategic Housing Market Assessment Part 2: Objectively Assessed Need for Affordable Housing (SHMNA Part 2)[50].

4.5.4 In this chapter there is guidance that relates to the whole Plan Area and additional guidance that is bespoke to the PPA and TTV Policy Area. Section headings will inform you as to what policy area the guidance is applicable to.

Affordability of housing in the PPA

4.5.5 The PPA has an affordable housing need. Plymouth's housing need evidence demonstrates an element of this. In May 2019 there were 11,010 households on the Plymouth housing register, 2,840 of these were considered to be in priority need (Bands A-C).

4.5.6 The NPPG, Housing need assessment, September 2018[51] states that assessing affordability involves comparing housing cost against the ability to pay.

Plymouth worked example

4.5.7 In Plymouth, the lower quartile house price (entry level market housing) was £136,800[52] (September 2018). The lower quartile gross annual workplace earnings for September 2018 was £20,860[53]. This provides a ratio of lower quartile house price to lower quartile gross annual workplace earnings of 6.56[54].

4.5.8 Although the lower quartile house price is more affordable than most parts of the South West, it is significantly above the usual lending formulae for mortgages which is still based on 3.5 times gross income, plus a standard capital deposit.

[50] https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf
[51] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
[52] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian
[53] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian
[54] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian

Therefore housing affordability is still a big issue as house prices continue to increase more than wages causing the gap to widen.

Affordable purchase price = lower quartile gross annual workplace earnings x 3.5 times lending + 10% deposit. Affordable purchase price = £20,860 x 3.5 + £7,301 = £80,311

Figure 6: Plymouth lower quartile income and housing affordability example (based on Sept 2018 dataset[55])

The cost of affordable housing products in the PPA

4.5.9 The table below gives a flavour of the cost of some affordable housing products within the PPA. Plymouth figures are used as an example:

Affordable housing product	Average cost
Social Rent	£70.36 per week
Affordable Rent	£113.76 per week

Figure 7: Example of affordable housing products within the PPA (September 2018[56])

Affordability of housing in the TTV Policy Area

4.5.10 The TTV Policy Area has an affordable housing need and housing need evidence demonstrates this. In April 2019 there were 1,451 households on the South Hams housing register, of these 693 were considered to be in housing need in Bands A-D. In West Devon there were 873 households on the Devon Home Choice register and 417 were considered to be in housing need Bands A-D.

4.5.11 The NPPG, Housing need assessment, September 2018[57] states that assessing affordability involves comparing housing cost against the ability to pay.

South Hams worked example

4.5.12 In the South Hams, the lower quartile house price (entry level market housing) was £212,500[58] (September 2017). The lower quartile gross annual workplace earnings for September 2017 was £18,577[58]. This provides a ratio of lower quartile house price to lower quartile gross annual workplace earnings of 11.44.

Affordable purchase price = lower quartile gross annual workplace earnings x 3.5 times lending + 10% deposit. Affordable purchase price = £18,577 x 3.5 + £6,501.05 = £71,521.45

Figure 8: South Hams lower quartile income and housing affordability example

[55] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian
[56] Homes England Statistical Data Return 2018 (Local Authority View) – https://www.gov.uk/government/collections/statistical-data-return-statistical-releases
[57] https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
[58] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian

West Devon worked example

4.5.13 In West Devon, the lower quartile house price (entry level market housing) was £161,000[58] (September 2017). The lower quartile gross annual workplace earnings for September 2017 was £16,823[58]. This provides a ratio of lower quartile house price to lower quartile gross annual workplace earnings of 9.57.

Affordable purchase price = lower quartile gross annual workplace earnings x 3.5 times lending + 10% deposit. Affordable purchase price = £16,823 x 3.5 + £5,888.05 = £64,768.55

Figure 9: West Devon lower quartile income and housing affordability example

Affordable housing thresholds in the Plan Area

4.5.14 The LPAs will seek to ensure that the spirit of the threshold policies is not avoided by the artificial sub-division of sites resulting in applications below the threshold, or developments at densities below that which is reasonably appropriate to the site. Applications close to the affordable housing threshold will be subject to thorough testing and policy assessment.

4.5.15 Where occupation is restricted by planning conditions or legal agreements e.g. residential care/nursing homes, student accommodation etc. a contribution to affordable housing may not be required. Provision for affordable housing however will be required from older persons housing (e.g. sheltered housing and extra care) and other supported housing schemes etc. because these are considered to fall within the Use Class C3 (dwelling houses). For clarity, this includes market-led retirement schemes.

4.5.16 'Made' Neighbourhood Plans may have their own individual policies and applicants will need to be aware of these. The progress and status of Neighbourhood Plans across the PPA and TTV can be found here on the South West Devon Neighbourhood Plans page[59] and the Plymouth Neighbourhood Plans page[60].

DEV7.2 – Affordable housing thresholds within the PPA

4.5.17 DEV7.2 sets out the expected affordable housing requirement for private sector developments above ten homes, which is that at least 30 per cent of the total number of dwellings should be affordable without public subsidy, subject to viability, or 20 per cent for a 'Build to Rent' scheme. These homes should be provided on-site, except in the case of sites of between 11 and 14 dwellings where the requirement can be met by providing an off-site contribution to deliver affordable housing elsewhere in the policy area. The affordable housing threshold will apply to the total number of dwellings that are being proposed on-site.

[59] https://www.neighbourhoodplanning.swdevon.gov.uk/
[60] https://www.plymouth.gov.uk/neighbourhoodplanning

DEV8.2 – Affordable housing thresholds in the TTV Policy Area

4.5.18 Much of South Hams and West Devon includes Designated Rural Areas, (The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009)[61] and areas with special designations, as defined in section 157 of the Housing Act 1985[62].

4.5.1 DEV8.2 sets out the expected affordable housing requirement for private sector developments above ten homes, which is that at least 30 per cent of the total number of dwellings should be affordable without public subsidy, subject to viability. These homes should be provided on-site.

4.5.2 Should a site fall within a Designated Rural Area or an area with special designations (as defined in section 157 of the Housing Act 1985), financial contributions will be expected for developments of 6 to 10 units. Development of 6 to 10 units with a total gross internal area (GIA) of over 1,000 square metres, should provide an affordable housing contribution in accordance with Policy DEV8.2.

Affordable housing tenure mix in the Plan Area

4.5.3 Paragraph 64 of the NPPF states that where major residential development is proposed, it expects at least 10 per cent of the total number of homes on the development to be available as Affordable Home Ownership (as part of the overall affordable housing for the site), unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of a specific group. It allows for exemptions for developments that propose:

- Solely 'Build to Rent' homes;
- Specialist accommodation for a group with specific needs (such as purpose-built accommodation for the elderly or students);
- Self/custom build; or
- 100 per cent affordable housing schemes.

4.5.4 The Plan Area has a demonstrable need for a range of affordable housing products. For this reason and to help create the mixed and balanced communities that are required by the NPPF, the LPAs will expect the affordable housing tenure mix to be split between social rented homes (65 per cent) and Affordable Home Ownership tenures (35 per cent).

4.5.5 In exceptional circumstances, where viability considerations reduce the proportion of affordable housing, it may be possible to consider some of the rented units to be affordable rent in order to increase overall affordable housing delivery or to meet an identified need.

[61] http://www.legislation.gov.uk/uksi/2009/2098/made
[62] https://www.legislation.gov.uk/ukpga/1985/68

4.5.6 The form of Affordable Home Ownership tenure comprising the 35 per cent will be considered on a site by site basis, acknowledging the findings of the SHMNA Part 2 that products vary in affordability in terms of dwelling size and local market conditions.

4.5.7 The matter of affordable housing tenure mix should be discussed with PCC's Housing Delivery Team or SHDC's and WDBC's Housing Enabling Team at the earliest opportunity to ensure a balanced approach to the requirements of the NPPF and local housing need.

Affordable housing tenure requirements in the Plan Area

4.5.8 The LPAs and their partners are committed to ensuring that all affordable homes are genuinely affordable in the local context and meet the identified housing need. To ensure this is the case:

- Where the affordable housing product makes reference to market rent or sales values, valuation evidence will be required by the LPAs to demonstrate the total housing costs of the tenure proposed against the market rent. This requirement will be captured through a planning obligation. Please see Section 12 for guidance on planning obligations;
- Rent levels within affordable housing products[63], should not exceed the Local Housing Allowance (LHA) in order to maintain affordability. LHA rates are available on the websites of the LPAs and applicable across the Plan Area;
- For clarity Intermediate Rent as part of a 'rent to buy' model should not exceed 80 per cent of the current market rent (inclusive of service charge);
- For Affordable Home Ownership Products[64] it will be the responsibility of the developer to provide evidence of the products' affordability. It is expected that these products will be affordable to people unable to access entry level market housing. This affordability assessment should be submitted to and approved by the LPA prior to the submission of a planning application and should be detailed in the Affordable Housing Statement accompanying the planning application. Reference should be made to the income data from the ONS Annual Survey of Hours and Earnings (ASHE); and,
- All houses provided as part of an affordable housing offer should be provided on a freehold basis.

Affordable housing tenure requirement in the PPA

4.5.9 In the PPA, essential local worker accommodation is not considered as an affordable housing product. This is because essential local workers generally earns around or above the average wages and are able to compete in the housing market.

[63] This could include Social Rent, Affordable Rent and Affordable Private Rent as examples.
[64]Affordable Home Ownership Products – this could include: starter homes; discounted market sales housing and other routes to home ownership.

Affordable self/custom build in the Plan Area

4.5.10 Affordable housing provision on self/custom build sites will be required in accordance with policies DEV7 and DEV8. In exceptional circumstances and at the LPA's discretion, the requirement to provide at least 30 per cent affordable housing on qualifying sites may be balanced against the LPA's duty to provide self/custom build plots, for example where the community benefits of self/custom build are realised.

4.5.11 Where affordable self/custom build housing is proposed, the affordable housing model should be submitted to and approved by the LPA prior to the submission of a planning application and it should be detailed in the Affordable Housing Statement accompanying the planning application. In considering the eligibility of the purchaser/occupant, the LPA will require an eligibility assessment, for example from Help to Buy South West[65], the cost of which will need to be met by the developer or seller.

4.5.12 On self/custom build sites, affordable housing requirements may be met by the provision of serviced plots or shells for self or custom builders that are eligible for affordable housing and at an affordable price. Details of which should be submitted to and approved by the LPA prior to the submission of a planning application and should be detailed in the Affordable Housing Statement accompanying the planning application.

Affordable Private Rent in the Plan Area

4.5.13 Where schemes exceed the affordable housing threshold outlined in DEV7 and DEV8, 20 per cent of dwellings should be provided as Affordable Private Rent. To ensure the affordability in the local context, the LPA's require Affordable Private Rent schemes to:

- Set Affordable Private Rent at a level that is at least 20 per cent less than the private market rent (inclusive of service charges) for the same or equivalent property;
- Ensure Affordable Private Rent levels do not exceed the Local Housing Allowance (LHA) LHA rates are available on the websites of the LPAs; and
- Submit affordability and eligibility assessment information to the LPA as part of any pre-application service and include the approved proposal as part of the Affordable Housing Statement accompanying any planning application.

Affordable housing, service charges and other estate management charges in the Plan Area

4.5.14 Service charges are subject to separate legal requirements, however to ensure that total housing costs are considered when assessing the affordability of new affordable properties, the LPAs expect developers to limit service charges and

[65] https://www.helptobuysw.org.uk/

estate management fees to reasonable levels on all new housing developments where affordable housing is provided. For this reason, the implications of the design and specification of the development on the service charge and estate management charge should be considered at an early stage and discussed through the LPA's pre-application services. This is particularly the case when developing supported housing for vulnerable or older people.

4.5.15 Where there are concerns about high service charge costs and management company fees, the LPAs will require the applicant to demonstrate how the total housing costs of the development meets the requirement of the NPPF to deliver affordable housing on-site to eligible applicants.

4.5.16 For general needs affordable housing, the LPAs would normally expect the service and estate management charge to not exceed the following per annum sums:

House	Flat without a lift	Flat with a lift
£208.00	£681.72	£1,040

Figure 10: Service charge cap per annum (19/20)

4.5.17 These figures will be updated on an annual basis by RPI (Retail Price Index) +0.5 per cent.

DEV10.3 – Affordable housing design considerations in the Plan Area

4.5.18 DEV10.3 requires that affordable housing, including affordable private rent, should be indistinguishable from other homes on the site and reflect the type of housing on the development as a whole.

4.5.19 Affordable housing should not be different to the market housing in terms of build quality, materials, design detail, levels of amenity space, car parking and privacy. Tenure blind integration should be considered at an early stage of the design process. The affordable housing offer should also be a representative mix of the type and size (in terms of number of bedrooms) of the overall dwelling mix. The LPA may however wish to discuss the provision of specific types of affordable housing to meet an identified local need in certain circumstances.

4.5.20 For example, energy efficiency is also important, as reducing energy costs for occupants is particularly significant for those living in affordable housing and those more vulnerable to fuel poverty in addition to combating climate change.

4.5.21 Affordable dwellings should be spread throughout the development, although on large sites this can take the form of small clusters, not normally exceeding 12 dwellings. Consideration will be given for larger clusters for example in the case of older persons sheltered housing, extra care, and supported housing schemes.

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4.5.22 The LPAs expects developers to liaise with Registered Providers (RPs) at an early stage to ensure that the specification of the proposed affordable units meet the RPs' technical requirements.

Registered Providers (RP)

4.5.23 The LPAs strongly prefer all forms of on-site affordable housing provision to be provided in conjunction with a RP that can secure effective long-term management of the property and ensure that any recycled subsidy contributes to alternative affordable housing provision locally. For clarity, where subsidy is being recycled there is a strong preference for this to be reinvested in the same local authority that it originated in.

4.5.24 As per the NPPF definition for 'affordable housing for rent,' the landlord should be a RP, except where it is included as part of a 'Build to Rent' scheme.

RPs in the PPA - Plymouth Housing Development Partnership (PHDP)

4.5.25 Within the Plymouth authority boundary, developers are encouraged to work in collaboration with PCC and the partners who form the Plymouth Housing Development Partnership (PHDP):

- Aster Group;
- Bournemouth Churches Housing Association;
- Clarion Housing Group;
- Guinness Partnership;
- LiveWest;
- Plymouth Community Homes;
- Rentplus;
- Sanctuary Housing Association;
- Tamar Housing; and,
- Westward Housing Group.

4.5.26 Homes England is also a member of the PHDP and works closely with PCC and its RP partners to help deliver affordable housing in the City.

RPs in the TTV Policy Area

4.5.27 The PHDP does not currently operate outside of the Plymouth LPA area. SHDC and WDBC do however work with a number of the RPs listed above in addition to:

- Hastoe Housing Association;
- South Devon Rural Housing Association;
- South Western Housing Society; and,
- Teign Housing.

Financial considerations in the Plan Area

4.5.28 It is important for developers to have a clear understanding of the likely financial impact of the affordable housing planning obligation in advance of acquiring land and making a planning application. The planning policy presumption is that the

affordable housing should be provided without public subsidy. Any deviation from this policy must be agreed by the LPA on a case-by-case basis and will be assessed through a viability appraisal process as per policy DEL1.5. The viability appraisal and any accompanying report will be published on the appropriate LPA's website as set out in paragraph 57 of the NPPF.

4.5.29 For further guidance on viability please see Section 12.

Delivery and future control in the Plan Area

4.5.30 It is expected that affordable housing units will be secured through a planning obligation.

4.5.31 A copy of the standard planning obligation (Section 106) affordable housing clauses are available on request. If it is envisioned that the standard clauses need to be varied, the LPAs would encourage an early discussion as part of the pre-application service.

4.5.32 The delivery of affordable housing on-site requires timely completion, in line with market housing. This means that:

- Not more than 50 per cent of open market dwellings should be occupied unless and until 50 per cent of affordable housing has been completed and made available for occupation; and,
- Not more than 80 per cent of open market dwellings should be occupied unless and until 100 per cent of affordable housing has been completed and made available for occupation.

Off-site provision and commuted sums in the Plan Area

4.5.33 DEV7.2 and DEV8.3 assumes that affordable housing will be provided on-site for all qualifying developments and paragraph 62 of the NPPF also expects affordable housing to be provided on-site.

Off-site provision and commuted sums in the PPA

4.5.34 Within the PPA, circumstances where the affordable housing requirement may be provided by off-site provision, or via an appropriate financial contribution[66] (subject to appropriate evidence where required), include:

- Developments of between 11 and 14 units;
- Developments where it is impractical or unreasonable for an RP to manage a small number of units within a larger development, for example where viability has reduced the proportion of affordable housing numbers to a very low level;
- Developments where the total housing costs of the affordable rental product or affordable home ownership units would be unaffordable to eligible applicants. For example where very high service and other

[66]Where the policy requirement for affordable housing doesn't result in a whole number of affordable units, the fraction will be required as a commuted sum rather than the number being either rounded up or down to the nearest whole number.

management charges would be required because of the nature of the development.

Off-site provision and commuted sums in the TTV Policy Area

4.5.35 Within the TTV Policy Area, the following applies:

- Housing schemes of 1 to 5 units will not require a financial contribution, unless a 'made' Neighbourhood Plan requests this;
- For housing schemes of 6 to 10 units within a Designated Rural Areas[67] (or other special land designation) of the TTV Policy Area, an off-site contribution will be required and calculated using the method below;
- For schemes over 10 units, or in the TTV Policy Area towns, a minimum of 30 per cent on-site provision will be required;
- Developments where the total GIA exceeds 1,000 meters squared will be expected to provide affordable housing contributions. Please speak to the affordable housing team in this instance.
- Guidance on TTV27 (Meeting local housing needs in rural areas) will also be considered.

Calculating affordable housing commuted sums in the Plan Area

4.5.36 Across the Plan Area, financial contributions may be pooled with contributions from other developments to further the delivery of affordable housing at other locations within the relevant administrative boundary as appropriate and at the discretion of the LPAs.

4.5.37 The LPAs will require an early trigger in the planning obligation agreement for payment of the commuted sum, with at least 50 per cent made on commencement of development.

Affordable housing contribution = no. of affordable units x (open market value of the units minus the average Registered Provider (RP) purchase price for comparable properties).

Figure 11: Method for calculating the commuted sum from residential development

4.5.38 The housing mix used in calculating the off-site affordable housing contribution will be based on the affordable housing type and tenure mix. The average RP purchase price will be based on evidence supplied by developers and the RPs within viability assessments undertaken within the previous 12 months.

4.5.39 To help to collate this information, RPs and developers will be individually required to submit documentation confirming the purchase price paid for the affordable housing units (also known as the 'transfer price'). The LPAs reserve the right to seek clarification or further documentation as required.

[67]Designated Rural Areas are parish-level areas designated under S.157 of the Housing Act 1985 through SI 2009 No. 2098.

4.6 Delivering high quality housing (DEV10)

What is this policy about?

4.6.1 DEV10 is a policy to ensure that new housing development is of high quality in terms of its design and resilience. This does not only include the range, type and size of housing required, but also ensures that housing and extensions to housing is built to a high standard in locations that relate well to existing communities and make a positive contribution to the character of all settlements across the Plan Area.

4.6.2 For detailed guidance on house extensions and alterations please see APPENDIX 1: Residential extensions and alterations.

What needs to be considered in the implementation of this policy?

4.6.3 The LPAs will expect high standards of design, layout and landscaping for all developments which respect the character of the area.

4.6.4 When designing housing, regard should be had to the design principles in the Building for Life 12 Guide[68].

4.6.5 Specific design guidance should also be considered for specialist housing developments, such as the Housing our Ageing Population Panel for Innovation (HAPPI) principles[69] in older person proposals.

DEV10.1 – Design of housing development

4.6.6 Great care needs to be taken in the design and layout of new housing development, including at the edge of built up areas, to ensure that it functions as a seamless part of the existing community rather than an unrelated addition. Masterplans and Design and Access Statements associated with the development need to take account of this wider context, not just in terms of the relation of the new buildings to the existing built environment, but in terms of connectivity to key facilities such as schools, shops and green spaces.

4.6.7 For guidance on design and specific materials across the Plan Area please see DEV20 and APPENDIX 2: Specific materials for the Plan Area.

DEV10.2 – Crime and fear of crime

4.6.8 DEV10.2 looks to ensure development proposals provide safe and secure living environments and are therefore expected to comply with the secure by design principles. Please see guidance at DEV20.6 for further details.

DEV10.3 – Affordable housing design considerations

4.6.9 For affordable housing design guidance please see sub-section 4.5.

[68] https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition
[69] https://www.gov.uk/government/publications/housing-our-ageing-population-panel-for-innovation

4.6.10 For guidance on space standards please see DEV10.5 below.

DEV10.4 – Residential annexes

4.6.11 DEV10.4 specifies that residential annexes will be supported where they are within the same curtilage and ownership as the principle dwelling. Problems can arise where this type of development creates a self-contained unit, either severed from the main dwelling or which could, with little or no adaptation, potentially be severed from the main dwelling to form a separate unit. This can result in the creation of sub-standard accommodation with inadequate privacy, access, parking and amenity space.

4.6.12 In respect of residential annexes, ancillary relates to the use and degree of dependence on the main dwelling, not the physical attachment or design/appearance of the annexe. Each case is likely to be different in terms of its built form (attached or severed) but the level of dependence will be consistently considered by the LPAs based on the criteria set out below. Annexes that demonstrate little dependence, i.e. are self-contained of the main dwelling, will likely be refused planning permission.

4.6.13 When considering whether an extension or outbuilding is capable of being occupied independently of the main dwelling, the LPAs will have regard to its relationship to the main dwelling, and the extent to which facilities such as bathrooms, kitchens and toilets are shared. The LPAs will normally expect an annex to:

- Be an extension to the existing dwelling, or an outbuilding sited within its garden;
- Be functionally related to the main dwelling, for example where the occupant is a dependent relative of the main dwelling's resident(s);
- Be used only in conjunction with the main dwelling;
- Be in the same ownership as the main dwelling;
- Be accessed via the main dwelling or its garden and not by means of an independent access.
- Be reliant on facilities and floor space provided by the main dwelling such that it cannot be occupied completely independently;
- Share a garden or other outdoor amenity space with the main dwelling, with no boundary demarcation or sub division of the land between the main dwelling and the annexe; and,
- Be designed in such a way as to easily allow the annexe to be used as an integral part of the main dwelling at a later date.

4.6.14 A residential annex should be designed as an integral part of the overall dwelling. The general design guidelines relating to house extensions, alterations and outbuildings in APPENDIX 1: Residential extensions and alterations apply.

4.6.15 Planning conditions restricting occupancy to a member of the main dwelling's household will be attached where these are considered necessary.

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Statement of use of annexe

4.6.16 When submitting a planning application for an annexe a written statement explaining who it will be used by, their relationship with the occupants of the main dwelling and how the use of the annexe complies with the criteria listed above should be included.

DEV10.5 – Space standards

4.6.17 DEV10.5 states that all dwellings, including Houses in Multiple Occupation (HMOs) and conversions, irrespective of tenure, should meet the Nationally Described Space Standard (NDSS)[70] as defined by DCLG.

4.6.18 Whilst the NDSS will be required in the majority of cases, a relaxed standard may be allowed in exceptional circumstances, for example, for the conversion of a listed building or another building where bringing it back into use is considered a greater benefit.

4.6.19 Where a relaxed standard is permitted, significant justification may be required through a viability statement.

DEV10.5 - Outdoor amenity space

4.6.20 DEV10.5 states that sufficient external amenity space or private gardens should be provided for with new dwellings (including conversions of existing properties into flats), this should be useable space and clearly identifiable as part of the planning application.

4.6.21 The following table sets out the standards of provision for outdoor amenity space and includes all front, rear and side useable areas (but excludes car parking):

Housing type	Minimum standard
Detached dwelling	100m^2
Semi-detached dwelling	75m^2
Terraced dwelling (including end terrace)	50m^2
Flats	50m^2 per development plus 5m^2 per additional unit over 5. This will normally be in the form of a communal space. Private balconies can be included in the calculation of amenity space, provided that they are a useable size of at least 3m^2.
HMOs (up to and including 6 occupants)	10m^2 per person
HMOs (7 or more occupants)	15m^2 per person

Figure 12: Outdoor amenity space standards by housing type

[70] https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

4.6.23 It is not appropriate to define leftover spaces as communal areas. Communal outdoor amenity areas should be:

- Located to give a degree of privacy from streets or other public areas;
- Be accessible to all residents;
- Laid out in a way which will provide good amenity to residents; and,
- Be located so as to be able to be supervised by residents in order to make them feel safe.

4.6.24 Whilst the table above sets out a minimum standard of amenity space expected for new dwellings, the proposed site's location and proximity to local parks and public open spaces will be taken into account during the application process, as well as whether the proposed site is within an older and more densely developed neighbourhood. Exceptions to the above standards will be negotiated on a case-by-case basis.

DEV10.6 – Development of garden space

4.6.25 Whilst new housing development in gardens can make a contribution to the local housing stock, garden development can have a negative impact on the character and amenity of an area.

4.6.26 Gardens are not defined as being previously developed land and a higher test of suitability will be taken when considering applications of new housing in gardens. The LPAs will carefully consider new development proposals of this type to ensure it only takes place on appropriate sites in residential areas and where it does not harm the character of the area.

4.6.27 For detailed guidance on house extensions and alterations please see APPENDIX 1: Residential extensions and alterations.

DEV10.7 – Conversions to flats and Houses in Multiple Occupation (HMOs)

4.6.28 DEV10.7 looks to ensure that the conversions of existing properties into self-contained flats[71] and HMOs will only be permitted where the development will not harm the character of the area.

4.6.29 In order to ensure good quality smaller family dwellings are retained, houses of less than 115 meters squared gross floor area are not considered suited for conversion to HMOs or flats. When assessing proposals, the LPAs will calculate the gross floor area of the dwelling as the area of the building ten years prior to the application, checking whether the property has been extended during this time. This is to prevent the extending of 'family' accommodation to take it above the 115 meters squared floor area criteria.

[71]A self-contained flat is where all the dwelling's rooms and basic amenities are accessible from behind a single entrance door.

4.6.30 When faced with an application to subdivide a dwelling, the following will be taken into consideration:

- Flat conversions need to respect the scale and character of the original building and other buildings in the neighbourhood; and,
- The property should be large enough to accommodate the number of flats proposed and provide the necessary amenities without the need for significant alterations or extensions.

Conversions of vacant or under-used buildings

4.6.31 In recent years the government has encouraged the conversion of vacant or under-used spaces in order to bring more life back into city, district and local centres and to make more efficient use of available space. In some cases planning permission is not needed due to permitted development rights. The Town and Country Planning (General Permitted Development) (England) Order 2015[72] is the principal order which sets out when planning permission is not needed, provided that no restrictive condition is attached or that the development is exempt from the permitted development rights through an 'Article 4' direction.

4.6.32 The LPAs will take the following considerations into account when assessing suitability for conversion:

- The proposed development should not cause the loss of a viable use that is considered important to retain, particularly given the LPAs' objective of creating sustainable, linked communities;
- There will be no adverse effect on the vitality and viability of shopping centres; and,
- The location and situation of the premises will provide an acceptable living environment having regard to the nature of the area and adjacent uses.

Standard of accommodation (flats)

4.6.33 It is important for the quality of life of occupants that flat conversions provide a decent standard of accommodation. As such the following considerations for the internal layout will apply:

- All flats should be self-contained and conform with Nationally Described Space Standards (NDSS);
- The proposal should not generally involve the provision of self-contained flats within basements and rear tenements, unless enough natural light is available;
- Where possible, 'stacking principles' should be adhered to with living rooms above living rooms, bedrooms above bedrooms, etc.;
- Principal habitable rooms should receive adequate levels of natural daylight; and,
- Single aspect flats should generally be avoided.

[72] http://www.legislation.gov.uk/uksi/2015/596/contents/made

4.6.34 Providing separate access to the front and rear of each self-contained flat within a building can present a logistical challenge but is often required to enable occupiers to access amenity space, parking, and refuse storage areas etc. One possibility that is often considered is the installation of external rear stairs. However, external staircases can cause significant amenity problems for neighbours in relation to noise and privacy and can look unsightly as well as compromise the safety of occupiers if they are poorly lit and become slippery in wet and cold weather conditions. For these reasons they will rarely be acceptable. The presumption is that access staircases should be accommodated internally.

DEV10.8 – Standard of accommodation (HMOs)

4.6.35 Under planning legislation, a HMO is defined as a residential dwelling occupied by 3 or more unrelated individuals that share basic amenities, such as kitchens, bathrooms and living space. Small/medium HMOs are occupied by between 3 and 6 unrelated individuals and are classified as Use Class C4 dwellings in planning terms. Large HMOs with more than 6 residents are unclassified by the Planning Use Class Order and considered sui generis.

4.6.36 DEV10.8 looks to ensure Homes in Multiple Occupation (HMOs) are only permitted when the proposal meets certain requirements.

4.6.37 Applications for HMOs will be expected to demonstrate the layout and design is suitable for the proposed use and number of occupants. HMOs will need to be of a decent standard for occupiers and this standard will be maintained with planning conditions that will form part of the planning permission. Licensable HMOs can be inspected throughout the duration of the licence to ensure licensing criteria is being met.

4.6.38 Please note, within certain areas of Plymouth, an Article 4 area has removed the permitted development rights of house owners to convert a single dwellinghouse (Use Class C3) into a HMO (Use Class C4). For further guidance on this please see guidance at DEV11.

Communal space for HMOs

4.6.39 It is expected that all HMOs will have shared kitchen facilities and will normally have at least one communal room. All room types within a HMO and their size should be indicated on the plans submitted when applying for planning permission. On occasion, an applicant may be able to demonstrate the provision of a communal room would not be appropriate and in such circumstances, the applicant will be required to provide an explanation justifying this position with the planning application. In such instances, the floor space of the bedrooms would be expected to be significantly larger and accord with the standards of bedroom sizes set out in HMO licencing guidance.

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4.6.40 All units of occupation are expected to have access to shared facilities for cooking and bathroom/toilet facilities that are conveniently accessible, suitable and sufficient for the number of occupants. Detailed guidance on licensable HMO standards is available on the Council's websites:

- Plymouth City Council[73]
- South Hams District Council[74]
- West Devon Borough Council[75]

4.6.41 In addition to communal space, all HMOs should seek to provide an appropriate area for drying laundry. Where this is proposed within the property, it should be well ventilated and should not restrict the movement of occupants. Providing drying areas can reduce the likelihood of condensation and damp, which, when combined with poor ventilation, can have a detrimental impact on health.

4.6.42 All HMO proposals and extensions to existing HMOs will be expected to provide sufficient useable outdoor amenity space for the number of occupants as set out in guidance at DEV10.5. The outdoor amenity space should be readily accessible by all occupants, secure and should not be overly dominated by refuse facilities. Outdoor amenity space should be provided in addition to the space that is allocated for car parking, cycle parking, refuse storage and laundry drying areas. Where outdoor amenity space is restricted, HMO applicants will need to demonstrate that occupants have good access to public green space to mitigate for limited amenity space at the application site.

4.6.43 All planning applications for HMOs should provide a clear indication of the location and type of rooms available within the property and where communal space, including drying space, will be provided.

Management of HMOs

4.6.44 A manager of a HMO has a legal responsibility to properly manage that property and ensure the building and curtilage is maintained to a good standard with all facilities kept in proper working order. Guidance on HMO standards and the levels of management required is available on the LPA's websites.

Noise

4.6.45 Converting, or sub-dividing, a house to a HMO results in more people living in the property, and the potential for greater noise levels. Noise is by far the greatest direct cause of disturbance to neighbours. Reducing noise is also important for the existing surrounding community and the amenity of occupiers living in the HMO.

[73] https://www.plymouth.gov.uk/homesandproperty/privaterentedaccommodation/housesmultipleoccupationhmo/hmostandards
[74] https://www.southhams.gov.uk/HMO
[75] https://www.westdevon.gov.uk/HMO

4.6.46 To minimise the impacts of noise disturbance, the internal layout of HMOs should be considered to ensure that, where possible, rooms of a similar type are located together and communal rooms, such as, lounges, bathrooms and kitchens do not immediately adjoin sleeping accommodation on the same floor. Soundproofing can also be put in internal vertical walls surrounding sleeping accommodation on the same floor, and between floors. Stairwell walls can be sound-proofed. Adjoining communal rooms and sleeping accommodation between neighbouring properties should also be avoided where possible and good sound insulation should be considered.

4.6.47 HMOs within residential areas generally have less impact on neighbours if they are located in large, detached properties. If the proposal involves a semi-detached or terraced house, then good sound insulation will be needed to prevent any noise disturbance to neighbours.

Refuse

4.6.48 Planning permission will only be granted for HMOs and extensions to existing HMOs if it can be demonstrated that adequate and effective provision has been made for the storage of recycling and non-recyclable waste. Waste containers should be suitably stored with bins located inside a dedicated refuse store wherever possible. The maximum number of bins required will be determined on a case-by-case basis and will be informed by an assessment of refuse emerging from the maximum number of occupants. Details of the proposed refuse storage arrangements should be provided with the planning application.

4.6.49 Further details on refuse storage can be found at DEV31. Advice and guidance on waste receptacles and collection services is available on each LPA's website.

Transport and parking

4.6.50 Additional pressure for on-street or off-street parking arising from a HMO conversion can be reduced if the HMO is located within easy walking distance of shops, amenities and public transport services.

4.6.51 The guidance set out at Policy DEV29 in this SPD indicates what level of car and cycle parking might be required to support HMO planning proposals.

Compliance and enforcement

4.6.52 The LPAs work closely with the Council's Housing Licencing Teams to ensure that HMOs have the appropriate planning permission and that HMO licences are in place where applicable. Enforcement action will be taken when planning or licencing breeches are identified.

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4.7 Houses in Multiple Occupation in the Plymouth Article 4 Direction Area (DEV11)

What is this policy about?

4.7.1 Policy DEV11 seeks to prevent new concentrations of HMOs in the Article 4 area and seeks to positively control the balance of property types to ensure a range of housing needs can be met without compromising existing residential amenity. The definition of a HMO is set out at guidance at DEV10.8 above.

4.7.2 An Article 4 Direction to remove the permitted development rights of house owners to convert a single dwellinghouse (Use Class C3) into a HMO (Use Class C4) came into effect in Plymouth on 14 September 2012. The Article 4 Direction applies to a number of neighbourhoods in and around central Plymouth where there are particularly high concentrations of HMOs. A map showing the area covered by the Article 4 Direction is available online[76].

4.7.3 Within the Article 4 area, planning permission is required to convert a single dwellinghouse to a HMO with between 3 and 6 occupants. Planning permission to convert a property into a large HMO with more than 6 occupants requires planning permission throughout the entire city. These planning controls ensure that HMOs are more evenly distributed throughout Plymouth, they prevent excessive concentrations of HMOs and ensure mixed and balanced communities are delivered to meet a range of housing needs.

4.7.4 Please note that the guidance available in this SPD at DEV10.8 is also applicable to the Article 4 area.

What needs to be considered in the implementation of this policy?

Criteria for the acceptability of proposed HMOs

4.7.5 The degree of impact that a proposed HMO or HMO extension could have will depend on the location and nature of the existing and resulting housing stock and the number of existing HMOs and other non-family dwellings in the area.

4.7.6 Proposed HMOs and HMO extensions should not cause the loss of a viable use that is considered important to retain in the context of creating sustainable, linked communities. It is also important to consider opportunities to provide family dwellings to help re-balance communities, where appropriate, when considering conversions from other uses or HMO extensions.

4.7.7 Many HMOs within the Article 4 area are occupied by students and the transient nature of the student population can change the character of local services, shops and food and drink outlets. The student population brings significant financial benefits to Plymouth, but the uneven distribution of the student population and non-student occupied HMOs has put pressure on the housing stock in certain parts of the city and has led to the displacement of families.

[76] www.plymouth.gov.uk/sites/default/files/Article4DirectionMap_0.pdf

4.7.8 While HMOs can assist in meeting the city's housing needs, there is still a need to manage the supply to avoid high concentrations in an area. Applications for HMO conversions in areas where there is already a high concentration of non-family dwellings will normally be resisted unless they can demonstrate the conversion will not lead to, or worsen, imbalanced communities, amenity concerns or loss of residential character. Applications for extensions to existing HMOs will be assessed on a case-by-case basis.

4.7.9 Using council tax data, HMO licensing information and planning application records, an evidence base has been prepared to assess HMO proposals. This database will be routinely kept up to date. It may not be possible to publish the detailed evidence on an individual property basis due to data protection laws, however, the LPAs will be able to provide statistical information about the proportion of HMOs within a 100 metre radius of the application site and this will be included in the application report and will be used to inform the decision making process. The 100 metre buffer zone and 10 per cent concentration level will enable the LPA to manage future changes in the city's housing stock to ensure the surrounding area is not adversely affected by new HMO development.

4.7.10 Due to the types of information and resources available to the LPA, it is not possible to identify all existing HMOs in the city. In some circumstances, information provided by the applicant or in letters of representation can be used as evidence to support the LPA's decision, where the information can be reasonably verified. Unsupported statements about the use of a property or properties will normally carry very little weight. The local community, or applicant, may choose to carry out research to produce an evidence base showing a detailed understanding of their area. It will be expected that such research is carried out professionally (normally by a professional accredited with the RTPI, RICS or another relevant institute) and in accordance with good practice and ethical considerations.

4.7.11 It may be necessary for the LPA to revise the HMO threshold in the interests of good planning if there is a significant change in the number of HMOs available or recognised changes to the city's housing needs.

DEV11.1 – The '10 per cent threshold'

4.7.12 Policy DEV11 defines a tipping point where the concentration of HMOs begins to adversely impact on the character and balance of the local community. In Plymouth, it is considered that within the Article 4 area, a threshold of 10 per cent of HMOs within the housing stock is an appropriate ceiling to maintain balanced communities. This figure is the number of buildings that are in HMO use as a percentage of all residential dwellings within 100 metres of the application site. Changes of use that would result in a concentration of HMOs higher than 10 per cent (including the application property) will normally be resisted. A balanced judgement will be sought depending on the circumstances of the planning application.

4.7.13 When considering HMO planning proposals, a 100m radius will be mapped around the application site; the number and type of residential properties within the area will then be calculated on the existing and planned number of HMOs within the 100 metre mapped zone. The map below shows an example of a 100m radius around a HMO application site.

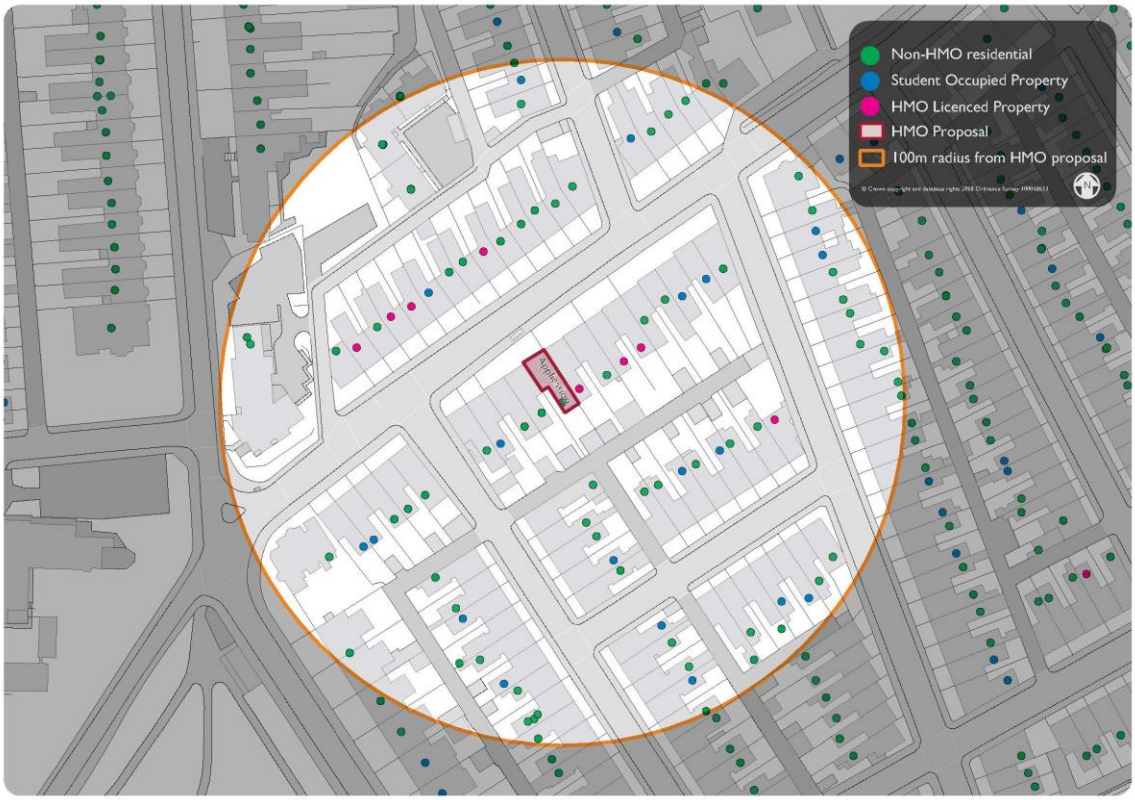

Figure 13: Map showing an example of 100m radius from a HMO planning proposal site

4.7.14 The threshold limit aims to prevent new concentrations of HMOs and seeks to encourage a more even housing distribution across central areas of the city.

DEV11.2 – Presumption against 'sandwiching'

4.7.15 Any proposal to create a HMO which results in a single dwelling (Use Class C3) being sandwiched between two HMO's is likely to be considered unacceptable. The ability to resist 'sandwiching' reflects the very significant negative impact that can be felt by occupiers of single dwellings when they are directly conjoined on two sides by properties that are in multiple occupation. Subdivided units and HMO extensions will be considered on a case-by-case basis.

Figure 14: Illustration showing HMO 'sandwiching'

DEV11.3 – HMO licensing

4.7.16 Mandatory HMO licensing has been in force since the introduction of the Housing Act 2004, however, the prescribed description of what criteria makes a licensable HMO was subject to changes on 1 October 2018. HMO licensing is independent of the planning process and has its own specific requirements different to planning. Further information can be accessed on the Council's website[77].

4.7.17 It is an offence to breach planning legislation and housing laws. Appropriate enforcement action will be taken whenever necessary to address such matters.

[77] https://www.plymouth.gov.uk/housing/privaterentedaccommodation/housesmultipleoccupationhmo

4.8 Purpose built student accommodation in the Plymouth Policy Area (DEV12)

What is this policy about?

4.8.1 The education economy is of significant importance to Plymouth with the city hosting three major Higher Education Institutes (HEI): the University of Plymouth; University of St Mark and St John and Plymouth College of Art.

4.8.2 In 2013/14, the PPA's student population contributed £300 million in to the area's economy (based on 31,654 students).

4.8.3 It is essential that accommodation is provided for those attending these establishments of the appropriate form and in suitable locations. While many students occupy older properties within established residential areas, many students also choose to live in purpose built student accommodation (PBSA).

4.8.4 DEV12 is a policy to ensure that PBSA in the PPA is only permitted where certain criteria can be adequately addressed.

What needs to be considered in the implementation of this policy?

Student accommodation demand

4.8.5 It is difficult to accurately determine the current level of 'need' for PBSA in the PPA. Only an estimate can be provided as need is influenced by a number of complex and variable factors, including student population trends, existing student housing supply, the tendency to live in halls of residence, the number of 'international students' which often choose PBSA and the quality and price of accommodation available.

4.8.6 Consideration needs to be given to the existing level of PBSA, schemes under construction and those in the development pipeline with extant planning permission. This information needs to be considered alongside up-to-date HEI student enrolment statistics and future projections within the city to ensure there is a genuine, identified need for new PBSA developments.

4.8.7 Applicants seeking permission for new PBSA are encouraged to engage with HEIs from the outset and throughout the planning process as appropriate to ensure proposals respond to any identified student needs.

4.8.8 First year students are considered to have the greatest need for PBSA and when studying away from home, the University of Plymouth actively encourage these more vulnerable students to live in managed PBSA. It is important that the LPA meets the accommodation needs of these students for their welfare and to ensure HEIs can flourish and continue to positively contribute to the PPA's economy. At the time of publication of the SPD there are a sufficient number of rooms available in PBSA to accommodate the needs of all first year students enrolled in Plymouth's HEIs.

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DEV12.1 – Meeting the identified need

4.8.9 Policy DEV12.1 seeks to ensure proposed PBSA meets an identified need. Applications for PBSA will be required to identify the target market for the proposal and provide evidence to show how specific targeted occupant needs will be met. It will also be necessary to clarify why the identified need is currently unmet by the existing stock of accommodation.

4.8.10 Applicants should also provide information that details where students are likely to be drawn from to occupy the proposed development. If available, applicants will be requested to provide support from a HEI as appropriate.

4.8.11 Identifying the target market and level of need will help to determine whether students are more likely to choose PBSA rather than C3 dwelling houses and C4 HMOs.

DEV12.2 – An appropriate location

4.8.12 DEV12.2 ensures PBSA is delivered in the most sustainable locations where existing infrastructure is optimised and urban regeneration potential is supported. Applicants will need to demonstrate the proposal is within a short walking distance of a HEI using a direct, quick and easy route. This will facilitate ease of access to campus for students and will promote sustainable travel and minimise car use. In accordance with the JLP:

- Plymouth City Centre will be the primary location for PBSA in Plymouth, particularly on sites where the development will kick-start other regeneration projects; and,
- Developments proposed to support the University of St Mark and St John will be encouraged in the new district centre in Derriford, and will be assessed on their merits taking policy DEV12 criteria into consideration.

DEV12.3 – Excessive concentration of PBSA

4.8.13 DEV12.3 ensures the delivery of a balanced and sustainable community. Consideration will be given to the existing and planned PBSA in the area to avoid the creation of dominant single use areas.

4.8.14 An overconcentration of students living in a neighbourhood is not considered desirable due to the noise and social impacts this concentration brings and the pressure on supporting infrastructure (including the coordination of arrivals at certain times of the year).

DEV12.4 – Loss of an existing use

4.8.15 DEV12.4 ensures the proposal does not result in a harmful loss of an existing use. The LPA will consider the former and existing use of the development site, and will resist applications which would result in a harmful loss of employment opportunities or would have a detrimental impact on the amenity or character of an area.

DEV12.5 – Appropriate features within the development

4.8.16 DEV12.5 ensures the nature, layout and design of proposed PBSA is appropriate to the location, context and the identified user group. High quality PBSA can deliver regeneration benefits, whilst minimising any potential harm to local character, environmental quality or existing residential amenity. It is the LPA's desire that PBSA is designed to facilitate the needs of students currently drawn to HMOs to help redress community imbalances in some residential areas.

4.8.17 Within proposed PBSA there should be:

- An appropriate mix of room types to meet the identified needs of the target occupants, for example, it may be appropriate to deliver more cluster flats and shared rooms in new developments to give students a greater diversity of choice rather than single occupancy studios. The proposed accommodation type should be supported with appropriate evidence;
- Adequate communal space for students to facilitate social interaction and support modern ways of learning;
- Adequate social learning spaces to create opportunities for peer interaction and that support group work, which may include: informal break-out areas; common rooms; libraries or cafes with study zones located within the PBSA building; and,
- On-site laundry facilities to meet the needs of the student occupants and create further opportunities for social interaction between resident occupants.

DEV12.6 – Adjacent uses and the surrounding area

4.8.18 DEV12.6 ensures developments are integrated and support community cohesion. PBSA will therefore be resisted where it will have an unacceptable or adverse impact on adjacent properties or the general amenity of the surrounding area and any potential conflicts with neighbouring land uses will need to be minimised.

DEV12.7 – Management plans

4.8.19 DEV12.7 will ensure proposed PBSA is managed to provide a positive and safe living environment. It also helps minimise local concerns and the potential negative impacts on the local community. Therefore applications for PBSA will need to be accompanied by management plans that:

- Provide information on how the property will be staffed and managed to benefit all student occupants and the local neighbouring community;
- Include strong lines of communication for the reporting and monitoring of maintenance and welfare issues and must include 24 hour contact details;
- Provide information on the ongoing maintenance and upkeep of the building, both internally and externally;
- Are drawn up in consultation with the city's HEIs to ensure the management plans are effective, meaningful, and enforceable; and,
- Will be kept up to date and any revisions should be made available on request.

DEV12.8 – Arrival plans

4.8.20 DEV12.8 ensures applications for PBSA are supported by a clear and concise arrivals plan. An arrivals plan must include adequate and effective vehicular movement arrangements for the arrival of students moving in to and out of the PBSA at the start and end of terms. Therefore:

- Existing or planning parking facilities and drop-off bays should be sufficiently managed where appropriate to meet the needs of these students and minimise possible disruptions to the road network;
- Local car parking facilities suitable for use during drop-off and collection should be detailed within the arrivals plan and should include relevant information about the car parking hours of operation and the distance from the accommodation; and,
- Arrival plans should be agreed in consultation with the appropriate HEI, Local Highways Authority and the LPA.

DEV12.9 – Future proofing

4.8.21 DEV12.9 will ensure developments are sustainable and will help to address concerns about the perceived risk of redundant high rise PBSA buildings. Applicants will need to demonstrate that consideration has been given to the future use of the PBSA building should it become surplus to requirements in the future. Adaptations may include the internal conversion of the premises to accommodate non-student residents or office space for example.

4.8.22 Applicants should provide details of the expected lifespan of PBSA buildings to help the LPA plan, monitor and manage the future supply.

DEV12.10 – On-site parking

4.8.23 DEV12.10 will ensure developments are adequately and appropriately serviced in terms of parking facilities. Developments should be designed to achieve on-site parking levels as set out in guidance at DEV29 of this document, ensuring that adequate measures are in place to maintain this level of provision and the effective practical use of it.

DEV12.11 – Recycling/refuse and cycles

4.8.24 DEV12.11 will ensure developments are adequately, and appropriately serviced in terms of storage for recycling/refuse and cycles. This will be negotiated on a case-by-case basis through the application process.

4.8.25 Further details on cycle storage can be found at guidance at DEV29 whilst details on storage for recycling/refuse can be found at guidance at DEV31.

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4.9 Consideration of sites for Travellers and Travelling Showpeople (DEV13)

What is this policy about?

4.9.1 DEV13 is a policy to ensure the traditional and nomadic life of Gypsy, Roma and Traveller communities, including Travelling Showpeople, is facilitated whilst respecting the interests of the settled community. This guidance aims to provide a framework that will assist in the design and construction of appropriate sites for occupation by members of the communities.

4.9.2 For the purposes of the planning system, "Gypsies and Travellers" means: *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such."*

4.9.3 For the purposes of the planning system, "Travelling Showpeople" means: *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above."* (Planning policy for traveller sites, CLG, August 2015[78]).

4.9.4 The Department for Communities and Local Government Advice Note 'Designing Gypsy and Traveller Sites' Good Practice Guide, May 2008[79] provides a good benchmark for considering the design of sites and should be considered alongside this guidance.

4.9.5 Please note that sites are also likely to need a licence from the relevant Council.

What needs to be considered in the implementation of this policy?

DEV13.1 – Location of new sites

4.9.6 New sites should be located near to existing settlements and to local services and facilities but should be of a scale that does not place an undue pressure on local infrastructure.

DEV13.2-7 – Site specific criteria

4.9.7 New sites should be developed in accordance with existing planning policies and designations, with particular regard made to:

- Convenience for residents;
- Safety for residents;

[78] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

[79] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsysites.pdf

- Visual and acoustic privacy, both for people living on the site and those living nearby;
- Aesthetic compatibility with the local environment;
- Safe and convenient access; and,
- Scope for social integration with the local community.

4.9.8 In addressing each of these criteria, consultation with the local community of and with members of the settled community living in close proximity to a site is valuable to ensure best and most convenient use of available space.

4.9.9 When designing new sites, and to ensure criteria DEV13.2 to DEV13.7 of the policy is met, the following guidance should be adhered to.

Size

4.9.10 Sites need to be designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking. Sites work best when they take account of the size of the site and the needs and demographics of the families' resident on them.

4.9.11 Sites should ideally consist of up to 15 pitches in capacity unless there is clear evidence to suggest that a larger site is preferred by the community.

4.9.12 Smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family. These can be advantageous in making good use of small plots of land, whilst still retaining the qualities expected by families. When considering sites for one extended family, the relevant LPA may request evidence to demonstrate this.

Layout

4.9.13 The layout of the site will very much depend on the shape and size of the site, however consultation with the community is highly recommended when deciding how best to proceed with the overall layout of a site. While there is the traditional linear layout of pitches, a circular or horseshoe design may be preferable by the community.

Orientation of pitches

4.9.14 Site layout and design should ensure a degree of privacy for individual households (for instance by ensuring that neighbours cannot directly overlook each other's living quarters), but without inhibiting the sense of community.

4.9.15 In designing the layout of a site enough space should be provided to permit the easy manoeuvrability of residents own living accommodation both to the site and on to a pitch. Account needs to be taken of members of the communities who favour the use of a mobile home in place of the traditional caravan which could be up to around 25 metres in length.

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Density and spacing of caravans and trailers

4.9.16 To ensure fire safety it is essential that every trailer, caravan or park home is not less than 6 metres from another. Other structures are allowed in the separation zone if they are made of non-combustible materials and do not impede means of escape.

Site perimeter boundaries

4.9.17 The site boundary must provide clear demarcation of the perimeter of the site so as to prevent nuisance for existing residents. Boundaries should take into account adjoining land uses and be designed with safety and protection in mind. Measures to protect the safety of site residents from fire are of particular importance and it is essential that a clear gap of 3 metres[80] is provided within the inside of all site perimeter boundaries as a fire prevention measure.

4.9.18 Where owners of existing sites are experiencing difficulties in achieving this requirement due to current space constraints, it is strongly advised that they consult their local fire authority to identify ways in which the residents' safety can be safeguarded.

Health and safety

4.9.19 When designing the layout of a site, careful consideration must be given to the health and safety of residents, in particular children, given the likelihood of a high density of children on the site and high levels of vehicle ownership of towing caravans and land for employment purposes. The need for separate vehicular/pedestrian access should be considered.

Access for emergency vehicles

4.9.20 It is essential that consultation with local fire and rescue services take place at a very early stage of designing a site. In designing a site all routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning vehicles. To increase potential access points for emergency vehicles, more than one access route into the site is recommended.

4.9.21 Where possible, site roads should be designed to allow two vehicles to pass each other (minimum 5.5m). Specific guidance should be sought from the local fire authority for each site.

Security

4.9.22 Site layout plays an important role in avoiding a sense of enclosure and isolation. The aim should be to 'design out' crime and social exclusion and 'design in' community safety and social inclusion through openness of design, allowing ease of access to, from and through the site, whether walking or driving.

[80] Model Standards 2008 for Caravan Sites in England - https://webarchive.nationalarchives.gov.uk/20120920035001/http://www.communities.gov.uk/documents/housing/pdf/modelstandards2008.pdf

4.9.23 Site layout should maximise natural surveillance enabling residents to easily oversee all areas of the site. Scheme specific advice on security provision for the site should be obtained from the LPAs and reference should be made to the secure by design principles highlighted at DEV20.6 to inform detailed planning of the site.

Play areas

4.9.24 It is recommended that the inclusion of a communal recreation area for children of all ages is considered for larger sites and where suitable provision is not easily/safely accessible via walking or public transport.

4.9.25 Specially designated play areas should ideally be designed in consultation with children and parents from the community to ensure they provide equipment which will be best used. The site manager should also be consulted with regards to maintenance. Locating play areas in secluded areas of the site and near boundary perimeters is not favoured.

Parking

4.9.26 Adequate parking for residents use should be provided. Parking spaces should be a minimum of 2.4 x 4.8 metres as specified in guidance at DEV29. Resident parking should largely be provided for on individual pitches but a site could also contain additional parking facilities for visitors and/or specialist vehicles such as for commercial purposes and horseboxes. The location of parking and type of vehicles permitted on site will be considered on case-by-case basis and secured via condition if necessary.

Inclusion of space for work/animals

4.9.27 Working from residential pitches should be discouraged and residents should not normally be allowed to work elsewhere on-site. Where significant commercial or other work activity is envisaged for a site it is important to ensure that the site is delineated so that residential areas are separated from areas for commercial or work use. This also applies to the inclusion of space for keeping animals. Where there is demand for space for animals, and where the site provider is satisfied that it may be reasonable and practicable to include this, a grazing area for horses and ponies could be provided to reflect the cultural use of the horse as a traditional means of transport.

Landscape design

4.9.28 Landscaping to mitigate impacts should preferably be soft (grassed areas, shrubs and trees) rather than hard (such as paved or concreted areas).

Site management

4.9.29 Any planning application for sites, should set out the need for the accommodation and eligibility of the prospective households in the context of the

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definitions set out in this section. Applications should also include a site management strategy.

Additional considerations for the design of Transit Sites

4.9.30 Transit sites are not intended to be used as permanent accommodation by individual households, but may be in use all year round. Timescales are usually determined on a case-by-case basis.

4.9.31 The site requirements are similar to those relating to permanent sites outlined above except the proximity to community facilities is primarily in respect of the need to access schools and the provision of private amenity blocks. i.e. it is expected that private amenity blocks will be provided on each pitch to provide WC facilities, wash basins, showers and a hot and cold water supply. The preference is that this is provided as permanent fixed structures, however, where the site is not proposed to be in constant use, temporary structures may be considered.

4.9.32 In considering any planning applications the LPAs will have regard to the proposed nature of transit site use and the extent of facilities required.

Additional considerations for the design of Temporary Stopping Places (TSPs)

4.9.33 Temporary Stopping Places (TSPs) have different requirements to permanent and transit sites in that access to essential services is not a priority and the required on-site facilities are less.

4.9.34 The LPAs consider a TSP to:

- Be for the purpose of short term stays at times of increased demand. It is expected that a TSP will not normally be used for more than 3 months in any one calendar year and timescales for stopping will be determined on a case-by-case basis; and,
- Support an adopted Council accommodation policy and be located in accordance with a spatial network approach.

4.9.35 When determining the selection or location of sites for TSPs the LPAs will consider:

- Whether the site provides safe and convenient access to road networks;
- Whether the site is located so as to cause minimum disruption to surrounding communities;
- Any risks that may arise due to adjoining land uses, including the potential presence of young children;
- The site should provide no more than 10 pitches.

4.9.36 When considering the site layout, access and orientation of TSPs:

- It is expected that each pitch should be approximately 250 square metres in size, to allow for two touring caravans and two parking spaces;

- Markings or barriers should be provided to encourage residents to park safely, allow access for emergency vehicles and enable maximum use of the site in accordance with its intended capacity and fire safety standards. Particular regard must be given to the need to ensure a safe distance between trailers/caravans and other structures made of combustible materials. The advice of the Local Fire Officer should be sought in considering the layout of TSPs;
- The highway to and from the site must be of sufficient quality and size to enable access onto and off the site by heavy vehicles such as trailers;
- There must be a clear demarcation around the TSP to prevent unauthorised expansion of the site.

4.9.37 When considering site services and facilities for TSPs:

- It is essential for a cold water supply to be provided for the use of site residents, which may be by use of water standpipe or bowser.
- WC facilities must be provided for the use of residents, at a ratio of 1:4 (toilet facilities:households) with separate provision for men and women.
- A sewerage disposal point and refuse disposal facilities should be provided.

Additional considerations for Travelling Showpeople

4.9.38 Whilst most of the guidance above may apply, the needs of Travelling Showpeople are usually different to others of the community. Their sites often combine residential, storage and maintenance uses. Typically, a site contains areas for accommodation, usually caravans and mobile homes, and areas for storing, repairing and maintaining vehicles and fairground equipment. These combined residential and storage sites are known as plots and yards.

4.9.39 Although Travelling Showpeople travel for extended periods, they require a permanent base for storage of equipment and for residential use during the winter. These plots (or yards) are also occupied throughout the year, often by older people and families with children, for example. The Showmen's Guild 'Model Standard Package'[81] provides model standards and site considerations when developing and planning for Travelling Showpeople sites.

[81] https://www.herefordshire.gov.uk/download/downloads/id/14107/ps07_-_travelling_showpeoples_sites_-_a_planning_focus_model_standard_package_revised_september_2007.pdf

5. Economy (DEV14-DEV19)

5.1 Introduction

5.1.1 Ensuring the Plan Area has a vibrant and diverse economy is key to the delivery of the JLP. Section 3 of the JLP (the spatial strategy) sets out the overall employment and retail need that the plan is seeking to achieve whilst Section 4 (Strategy for Plymouth Policy Area) and Section 5 (Strategy for Thriving Towns and Villages Policy Area) sets site allocation policies. DEV14 to DEV19 considers 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.

5.1.2 The guidance in this chapter primarily supports polices DEV14 to DEV19 in the JLP. It also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP.

5.2 Maintaining a flexible mix of employment sites (DEV14)

What is this policy about?

5.2.1 DEV14 sets out the criteria to help make decisions for proposed changes of use of employment land. The JLP allocates a range of sites for B Class Uses across the Plan Area, these can be viewed in Section 4 and Section 5 of the JLP. Alongside the provision of new employment land, the LPAs need to ensure that land which is currently in employment use is protected unless a number of provisions can be met.

5.2.2 For the purpose of this policy the term ‘employment land, premises and sites’ includes all land currently in use for:

- Business (Class B1);
- General Industrial (Class B2); and/or,
- Storage and Distribution (Class B8).

5.2.3 The LPAs also recognise that other uses of land provide employment opportunities and also combine with B Class Uses to provide areas of economic development. For example:

- Retail and leisure;
- High technology premises including research, business and science parks;
- Agriculture;
- Mineral extraction;
- Telecommunications;
- Transport uses such as ports and airports;
- Specialised waste facilities;
- Residential institutions;
- Energy production; and/or,
- Tourism development.

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5.2.4 Proposals for change of use will be carefully assessed for the impact that they could have on the provision and maintenance of employment land. Some proposed changes of use however do not require planning permission. The Town and Country Planning (General Permitted Development) (England) Order 2015[82] is the principal order which sets out when planning permission is not needed, provided that no restrictive condition is attached or that the development is exempt from the permitted development rights through an 'Article 4' direction.

5.2.5 Where planning permission is required for changes of use, these will be determined in line with the JLP policies having regard to the benefits which the proposed change of use will bring to the location.

What needs to be considered in the implementation of this policy?

DEV14.1 – Change of use of existing employment sites

5.2.6 DEV14.1 sets out the exceptional circumstances where there may be justification for the loss of employment land. However, in such cases the LPAs will seek measures, including developer contributions to employment related initiatives, to mitigate this loss in accordance with Policy DEV19.

5.2.7 Please see Section 12 for further guidance on planning obligations.

5.2.8 Where the provisions of Policy DEV14.1iii come into effect, a change of use of an existing employment site will need to demonstrate that there is no reasonable prospect of the site being used as employment land in the future.

5.2.9 In these circumstances, clear and robust evidence will be required to demonstrate that there is no demand for employment floorspace in the form of a marketing report. This report should be proportionately relative to the nature of the proposal and advice should be sought with the LPA on the extent of the justification required.

5.2.10 The report should contain proof of the following:

- The site has been continuously marketed as an employment site for at least 24 months;
- The site has been marketed for an appropriate mix of employment uses, tailored to its location in the Plan Area and local evidence such as the size of nearby units and the mixture of uses appropriate to the site;
- A viability assessment was undertaken on the site, addressing the feasibility and economic viability of refurbishing, renewing or modernising larger scale office buildings for use as smaller units, produced by a qualified surveyor familiar with the local market for business uses;
- The site has been marketed by a workspace provider/commercial agent;
- The site has been marketed through appropriate methods. Evidence could include:

[82] http://www.legislation.gov.uk/uksi/2015/596/contents/made

  - A copy of the dated letter of instruction to the workspace provider/commercial agent and dated copies of the property details;
  - Web based marketing through the appointed commercial agents website and other relevant search engines;
  - Advertising within target publications such as the local press; and/or,
  - On-site/premises marketing boards constant throughout the period in which the property is being marketed;
- Evidence that the premises/site was marketed at a price with associated terms that are commensurate with market values and based on evidence from recent and similar transactions and deals.
  - Where possible at least three examples should be provided of completed transactions involving similar sites or premises with similar terms within the local area, preferably in the last 12 months. Alternatively, written evidence from an independent qualified valuer on the market values in the local area could be provided;
  - All information about prices and terms should be provided in a format that enables easy comparisons, using equivalent and comparable expressions of price per unit of floorspace. Where the price changed during the marketing campaign, the reasons for this should be included within the report;
  - Where premises are marketed with a lease, the length of the lease offered should not be unduly restrictive and should include the potential for short term lease in appropriate places.
- A record of enquiries through the period of the marketing campaign. This should include the date, contact details and nature of the enquiry including the type of business or individual enquiring, how the enquirer found the premises and the follow up actions taken.
  - Where the flow of enquiries has been limited or decreasing, the marketing report should explain the measures undertaken to refresh the campaign.

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5.3 Supporting the rural economy (DEV15)

What is this policy about?

5.3.1 DEV15 is a policy to support the diversification of the rural economy and to improve the balance of jobs within rural areas. Businesses of all types, sizes and sectors are, in principle, supported to prosper, grow and provide decently paid employment opportunities.

5.3.2 This is particularly relevant in the TTV Policy Area as the majority of rural employees work in small and medium-sized enterprises (SMEs) and, whilst the unemployment rate in rural areas is relatively low, many job opportunities are poorly paid, seasonal and/or insecure. Retention and growth of local employers and supporting business start-ups and home working are therefore key considerations when determining applications.

What needs to be considered in the implementation of this policy?

5.3.3 Proposals and measures to address the above would be considered as favourable in the determination of a planning application. The economy is dynamic and applicants are invited to prepare, in consultation and collaboration with the LPAs and other interested parties, evidence that assesses the current economic conditions and sets out a clear rationale for the proposed development.

5.3.4 SHDC and WDBC will also be issuing an Enterprise Strategy and Action Plan to provide further guidance. When published, these should be taken into consideration alongside this guidance.

DEV15.5 – Garden centres and farm shops

5.3.5 Garden centres and farm shops should reflect and support the local area and the economy. Proposals that are of an inappropriately large-scale and/or seeking to introduce business that harms the local economy and/or heritage are unlikely to be supported.

5.3.6 75 per cent of goods (measured by retail value) sold within new farm shops and garden centres will be restricted to a specified geographical area. This may be defined simply as the Plan Area, combined local authority areas or a measurable radius from the proposal site, in order to ensure sufficient benefits of the proposal are retained within the local economy.

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5.4 Providing retail and town centre uses in appropriate locations (DEV16)

What is this policy about?

5.4.1 The network of centres in the Joint Local Plan Area, as identified in Figure 3.7, Figure 3.8 and Figure 3.9 of the JLP, plays an important role in providing shops and services to the local population. They are a vital part of ensuring sustainable communities and provide an important part of the appeal of individual areas. The location of where retail and town centre use is directed and supported is therefore an important consideration in considering development proposals.

5.4.2 DEV16 is a policy which seeks to ensure that retail and town centre uses are located in appropriate locations by adopting a 'centres first approach' and supporting the spatial strategy of the plan. The guidance set out below amplifies the policies set out in the JLP and should be considered alongside that set out in the NPPF and NPPG.

What needs to be considered in the implementation of this policy?

DEV16.1 – Retail spatial strategy

5.4.3 Section 3 of the JLP sets out the spatial strategy for the Plan Area and includes SPT5 (Provision for retail development) and SPT6 (Spatial provision of retail and main town centre uses) which identifies a centres-first approach to retail and other town centre uses. In support of this, Figures 3.7 (Retail hierarchy in Plymouth Policy Area Centres) and 3.8 (Retail hierarchy in Thriving Towns and Villages Policy Area Centres) sets out the retail hierarchy.

5.4.4 Maps showing the location and extent of the primary shopping areas, in addition to the primary and secondary frontages for each retail and town centre, can be found in APPENDIX 4: Primary shopping boundaries and frontages.

5.4.5 When considering how proposals accord with the spatial strategy, consideration will be given to the strategy and the retail hierarchy.

DEV16.2 – Sequential test

5.4.6 All proposals which include 'main town centre uses' (as defined by the NPPF)[83] in edge of centre locations, out of centre locations and the Derriford Commercial Centre will require a sequential test unless they are subject to one or more of the following exceptions:

- Small scale rural offices or other small scale rural development (in accordance with the NPPF and policy DEV16);

[83]**Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

- Proposals that are located in an existing or proposed centre within the retail hierarchy identified by policy SPT6 or are provided for as positive allocations in the JLP, (except the Derriford District Centre); and/or,
- Where the use(s) are specified in policy allocations and the scale of the proposal is in line with the policy.

5.4.7 It is the applicant's responsibility to demonstrate that this test has been met and failure to do so can itself justify refusal of an application.

5.4.8 This requirement applies irrespective of the amount of floorspace proposed, although it will be applied proportionately relative to the nature of the proposal and its possible impacts. Whilst proposals for A1 retail space typically requires the most robust and detailed sequential tests, the policy requirement applies equally to other main town centre uses.

5.4.9 Detailed guidance on undertaking a sequential test is set out in the NPPG (Town centres and retail[84]). The guidance here amplifies that provided nationally. Applicants are strongly recommended to carry out their sequential assessment with the involvement of the relevant LPA through a pre-application service.

5.4.10 The following elements should be considered in producing a sequential assessment.

Before starting a sequential test

5.4.11 Before starting the sequential test it is important to be clear that the test must not be operator specific in its considerations. It should rather focus on the use class or use classes being applied for as part of the scheme. As part of this it can consider the broad range of goods or the offer the proposal seeks to provide. Where such matters are to be taken into account they must be robustly demonstrated and evidenced. It is strongly recommended that potential restrictive conditions are identified from the outset where relevant matters are considered to influence the sequential test.

Defining the catchment area

5.4.12 A sequential test must consider whether there are sequentially preferable sites which are suitable and available within the catchment area of the proposal. The starting point for a sequential test is therefore to define the catchment area. The catchment area should not be specific to an individual operator and should be agreed in discussion with the LPA. The catchment area should be the same as the geographical area that the development seeks to serve.

Sequential hierarchy

5.4.13 Once a catchment area has been defined and agreed the applicant should identify sites to consider within the catchment area. The starting point for this is

[84] https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres

to list those town centres (as defined by the NPPF[85], including local and district centres and the City Centre) that form part of the retail hierarchy (set out in policy SPT6 and shown in Figures 3.8 and 3.9 of the JLP) and which are within the catchment area.

5.4.14 Where the proposal has a city-wide or town-wide catchment, it should normally prioritise sites within the city or town centre; similarly, district level catchments should normally prioritise district centres over local centres.

5.4.15 The sequential test should first consider sites within the boundaries of the relevant town centres; then edge of centre sites should be considered, with preference given to accessible sites which are well connected to the town centre. Only after such sites have been considered should out of centre sites be considered, and again preference should be given to accessible sites which are well connected to town centres.

5.4.16 The definition of 'edge of centre' sites differs depending on the nature of the proposal as follows:

- For A1 retail schemes: a location that is well connected to and within 300m from the Primary Shopping Area (as shown on the adopted proposals Map);
- For other main town centre uses: a location within 300m of the town centre boundary;
- For Office development (Use Class B1a): outside town centres but within 500m of a public transport interchange (for example that located at Derriford Hospital).

5.4.17 All sites that are potentially available and/or suitable within the sequentially preferable locations described above should be considered. Matters such as land ownership and the cost of rent and preferences over ownership or leasehold occupation are not matters that are normally considered to be legitimate considerations for the sequential test.

5.4.18 The NPPF expects applicants and LPAs to demonstrate flexibility on issues such as format and scale to enable the occupation of sequentially preferable sites to be fully explored. This includes issues such as the proposed inclusion of a drive-through facility. In identifying sites consideration must be given to the flexibility of the proposal to show how the scheme could be located on more sequentially preferable sites. This process should be informed by discussions with the LPA.

[85]**Town centre:** Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

5.4.19 Guidance on whether a site is potentially available and/or suitable and guidance on sequentially preferable sites is set out in the NPPG.

Locational requirements

5.4.20 It is acknowledged that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Where this is the case these should be discussed with the relevant LPA and robust justification must be provided for consideration. For example stating that adjacent surface level car parking is required is not sufficient without specific reasons why this is the case, as many town centres are served by dedicated parking facilities which would also meet such a need. Similarly, the applicant's desire to incorporate a drive-through facility should not justify the exclusion from the sequential test of sites that do not have vehicle access. For the avoidance of doubt land ownership or a desire for a specific unit or site does not provide such a justification.

DEV16.3 – Impact assessments

5.4.21 DEV16.3 states when an impact assessment is needed for edge of centre and out of centre locations. The floorspace thresholds are lower than those of the NPPF to ensure that there is no detrimental impact on the vitality and viability of existing centres and on existing, committed and planned public and private investment in centres, including proposed centres. It is also the case that an impact assessment is required for proposals in the Derriford District Centre and other policies which do not specifically allocate a retail or leisure use or where the amount of floorspace proposed in the policy is exceeded.

5.4.22 Detailed guidance on undertaking an impact assessment is set out in the NPPG. This should form the basis of an impact assessment and it is strongly recommended this is undertaken with the involvement of the relevant LPA through a pre-application service. The most recent shopping/retail study produced by the relevant LPA should also be considered as part of any assessment and the LPA retains the right to request more up-to-date information if relevant/required.

5.4.23 Any impact test should also be considered alongside the cumulative impacts with other developments.

Derriford Commercial Centre (PLY38) additional guidance

5.4.24 In relation to proposals within the Derriford Commercial Centre (PLY38) the requirement for a sequential test and impact assessment relates specifically to ensuring that proposals with a city-wide catchment are directed to the Plymouth City Centre in the first instance such that the Commercial Centre fulfils a complementary role to the City Centre rather than competing with it.

5.4.25 The requirement for a sequential test and impact assessment should be discussed directly with the LPAs before an application is submitted to

inform applicants where a sequential test and/or an impact assessment may not be required. In considering this, the LPAs will consider the follow matters:

- Is the proposal complementary with the role of the City Centre or likely to compete with it (including cumulatively with the other approved development in the commercial centre)?
- Does the proposal involve leisure or office floorspace of less than 2,500 square meters gross?
- Does the proposal include less than 1,000 square meters of gross floor space of A1 comparison goods?
- Is the proposal to vary an existing planning permission in a way that will change the catchment of the centre and potentially impact on the City Centre?
- Does the proposal accord with the requirements of policy PLY38 in other respects?

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5.5 Promoting competitive town centres (DEV17)

What is this policy about?

5.5.1 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.

5.5.2 DEV17 is a policy to support the protection of these vital functions provided by the main towns as well as facilitating the specific opportunities for redevelopment as well as the more general, but innovative, aspirations in the PBA Retail and Leisure Study[86] and appendicies[87].

What needs to be considered in the implementation of this policy?

5.5.3 The strategic policies of the JLP seek to direct town centre uses to the main centres in the Plan Area. In the TTV Policy Area, existing uses are protected in the six main towns and new development is directed to the main and smaller centres. Policy DEV17 seeks to consolidate the self-sufficiency of communities by promoting a vibrant mix of uses and to ensure resilience in service provision for communities and their respective hinterland.

5.5.4 New development proposals should demonstrate a positive contribution to active and low carbon transport options and should make provision to improve and ensure access for all.

5.5.5 In encouraging a mix of uses care needs to be taken to avoid incompatibility in terms of noise and other disturbance that could harm amenity.

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[86] https://www.plymouth.gov.uk/sites/default/files/RetailAndLeisureStudy_0.pdf
[87] https://www.plymouth.gov.uk/sites/default/files/RetailAndLeisureStudyAppendicies.pdf

5.6 Protecting local shops and services (DEV18)

What is this policy about?

5.6.1 DEV18 is a policy to ensure that centres retain their primary function and to ensure that local services and facilities are retained to serve communities.

5.6.2 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, relevant and at the heart of local communities.

5.6.3 Policy DEV18 also goes further, seeking to ensure that uses that can have unacceptable impacts on centres are properly managed. It also acknowledges and provides protection for facilities which play important roles in the local community which are not located in centres.

5.6.4 The primary and secondary frontages for each centre are set out in APPENDIX 4: Primary shopping boundaries and frontages. The location of the proposals in these areas and/or the remainder of the centre will alter the requirement which it is considered against.

What needs to be considered in the implementation of this policy?

DEV18.1 – Retail hierarchy

5.6.5 Each centre has its own unique characteristics, whether that is in relation to its size, the issues it faces or the wider role it plays for the area and local community. These characteristics will be considered in the determination of proposals. The primary consideration is to preserve the vitality and viability of each centre to ensure it continues its role and function in the retail hierarchy and for the community it serves. The retail hierarchy is set out in Section 3 of the JLP.

5.6.6 The location of the proposal within the centre will also be taken into consideration when determining proposals. Different considerations will be relevant depending on whether the proposal is in the primary frontage, secondary frontage or somewhere else in the centre.

5.6.7 When considering proposals the following will be taken into account:

- The overall proportion of A1 uses within the individual frontage, the part of a centre and/ or street the proposal relates to and the centre as a whole;
- The number, distribution and proximity of different uses with in the individual frontage, the part of a centre and the centre as a whole;
- The particular nature, character, vibrancy and footfall associated with the existing and proposed use;
- The location and prominence of the unit within the frontage; and,
- The size of the unit and its frontage length.

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DEV18.5 – Specific impacts

5.6.8 A concentration of food and drink outlets may create situations where their combined impact creates problems for local amenity or disturbance to local communities. The development of clusters can have a negative impact on the environment and character of an area and have a negative impact on the health of nearby residents.

5.6.9 It is for the applicant to satisfy the LPA that their development will not add to the cumulative impact problems in the locality where new uses are being proposed.

5.6.10 Within the defined centres, for applications for A5 uses, the LPAs will look to ensure:

- The total percentage of A5 (in the context of the total number of units) does not exceed 20 per cent; and,
- Where the above is met, there should be no less than two-non A5 units between groups of hot-food takeaways.

DEV18.6 – Community facilities

5.6.11 For development which looks to change the use of a community facility, in order to demonstrate that there is no reasonable prospect of a community facility continuing, the premises needs to have been marketed through a registered agent as a business (not as a development opportunity for an alternative use) for a minimum of 12 months.

5.6.12 Within the TTV Policy Area, within the same 12 month period, the owners of the business must show that they have highlighted the potential sale to the relevant parish councils (including adjoining parishes) to allow for the potential nomination of the property as an Asset of Community Value.

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5.7 Provisions for local employment and skills (DEV19)

What is this policy about?

5.7.1 DEV19 is a policy to ensure major development proposals support local employment and skills in the construction industry.

What needs to be considered in the implementation of this policy?

DEV19 – Employment and Skills Plans (ESP)

5.7.2 Policy DEV19 states that the LPAs will require Employment and Skills Plans (ESP) for all major development proposals. ESPs should relate to the demolition, site preparation and construction phases of development and may be secured through a suitably worded pre-commencement planning condition.

5.7.3 The LPAs will work constructively with applicants to agree on the content of an ESP and there may be instances where the LPA will require a developer to submit effective monitoring on a continual basis to the LPA.

5.7.4 The LPAs will use the employment and skills benchmarks set out in the National Skills Academy's Client Based Approach as a starting point for negotiations with developers. This benchmarking has been formulated for a range of construction types and value bands, and have been agreed by the industry. The national Construction Industry Training Board (CITB) has an evidence base which justifies and demonstrates that the benchmarks requested are proportionate and achievable.

5.7.5 An ESP will not be requested for new residential development of under 10 units or for any new non-residential development under 1,000 meters squared. In Plymouth, the LPA has produced a guidance note which clarifies the key components that are expected in ESPs.

5.7.6 To provide for the required growth of the Plan Area it is necessary to ensure inclusive growth in the employment base. This will require: the protection, where appropriate, of existing employment land; the bringing forward of new land, and the support of other processes including: land acquisition; provision of infrastructure; support for inward investment; start up and business growth, and for social enterprise and skills development.

Mitigation

5.7.7 Development that results in the loss of employment space, or involves the non-delivery of previously approved employment generating development proposals, will be expected to mitigate through a planning obligation.

5.7.8 Please see Section 12 for further guidance on planning obligations.

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6. Place shaping and heritage (DEV20-DEV22)

6.1 Introduction

6.1.1 The JLP seeks to ensure development is carried out in a high quality way, creating positive places which contribute to people's quality of life, engender local pride and take account of the context.

6.1.2 This chapter supports polices DEV20-DEV22 in the JLP. It also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP.

6.1.3 As part of this SPD a number of specific design guidance appendices have been produced to support the consideration of design issues. These include:

- APPENDIX 1: Residential extensions and alterations
- APPENDIX 2: Specific materials for the Plan Area
- APPENDIX 3: Shop fronts, including ATMs

6.2 Place shaping and the quality of the built environment (DEV20)

What is this policy about?

6.2.1 DEV20 seeks good quality design as an integral part of sustainable development. It is about creating places, buildings and spaces that work well for everyone, look good, last well, and adapt to the needs of future generations.

What needs to be considered in the implementation of this policy?

Existing context and character

6.2.2 Good design starts from an understanding of the place, the local context and the site. Development proposals should be informed by a thorough analysis and appraisal of the physical and policy context and character of the area as well as the specific conditions of the site. This analysis should be summarised and the opportunities and constraints identified for pre-application discussion and to support planning application submissions.

Placemaking

6.2.3 New development should function well and create a positive sense of place. While in some places development should enhance the existing character of the site and local area, it should seek to raise the standard of design in other areas that have a relatively poor image and character, rather than replicating existing low quality design. This may include:

- Incorporating existing positive site features into new development to provide continuity and create a sense of maturity;
- Responding to the character of the local area in terms of design, architecture, landscape and public realm;
- Creating attractive new places with a positive and distinctive character appropriate to their role and function within the wider area, for example, new neighbourhoods, centres, streets or open spaces;
- Incorporating views and areas of historic interest; and,

- Creating accessible and inclusive environments that feel safe and enable active, healthy, lifestyles and wellbeing.

Masterplans

6.2.4 Large and strategically important schemes should have a clear vision and strategies for the manner in which the developments will come forward and must demonstrate how a sound analysis and response to the context has informed the evolution of the proposal.

6.2.5 Masterplans provide the opportunity to demonstrate how schemes will meet objectives for the area, including to show how development will integrate with existing masterplans and development. Mini-masterplanning exercises may be sought, where appropriate, to demonstrate that a proposal will fit within the potential future evolution of an urban block without prejudicing the redevelopment potential of adjacent sites. Masterplans are also important for residential layouts, including in the Main Towns in the TTV Policy Area, where they can aid the integration of new development into existing settlements.

Design codes

6.2.6 Design codes may be sought for large development sites and areas. These will be expected to provide specific and detailed development parameters. The graphic and written components of design codes should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

Design Review Panels

6.2.7 It may be useful for prominent and strategically important schemes to be considered at an independent, bespoke Design Review Panel[88]. These can provide useful objective assessments of proposals and can add value at all stages of the development management process. They can be used for all scales of development where design is a key component to the decision making process. Recommendations from the independent design review panels can be taken into account in the determination of planning applications.

Design considerations

6.2.8 When considering new applications in relation to design, the LPAs will consider each development at each of the following scales:

- Neighbourhoods – an area of development that is local in scale and based around a nominal 5 minute walk or 400m distance where access to a range of local facilities, jobs, and public transport is possible;
- Blocks – the areas of towns and cities that are contained by a pattern of streets or spaces;
- Streets – the spaces between buildings, including the public realm; and,

[88] https://www.plymouth.gov.uk/planningpolicy/designandhistoricenvironment/urbandesign

- Building design – including proposed mix of uses, building footprint, height and massing, elevation composition, architectural expression, sustainable design, adaptability and the use of materials.

Neighbourhoods

6.2.9 Depending on scale, new development should be designed to support existing, or create new, neighbourhoods within convenient walking-range of local facilities, jobs and public transport.

Blocks

6.2.10 Blocks are the areas of land contained by a pattern of streets or spaces. Blocks may contain shops, houses, parks, car parks and other aspects of community life. The way buildings are arranged and their relationship to the street affects the character, function and safety of an area. In particular the LPAs will expect the following to have been considered in the design of proposals:

Design principle	What needs to be considered?
Layout	The layout of blocks should be carefully considered. Perimeter block layouts will be encouraged as they provide an efficient use of land with building fronts and entrances facing public spaces and the backs providing a private space. Such layouts minimise unsupervised public spaces and routes that can feel unsafe.
Legibility and way-finding	Blocks should be designed to be easy to understand and navigate by arranging development to respond positively to the distinctive character and qualities and patterns of the natural and built environments. They should reinforce the local identity of an area and make it easier to get to and through.
Energy-use and orientation	Energy use should be considered in the design of blocks and new residential layouts, including the optimisation of passive solar gain and the need for solar-shading. When assessing applications the following guidance will be taken into account: • The main orientation of new dwellings should be within 30 degrees of south to maximise sunlight. The most frequently used rooms should be located on the south side of the building; • Spaces on the north side of the building, such as hallways, utility rooms and bathrooms should have smaller windows to minimise heat loss; • Windows should cover an area equal to at least 15 per cent of the room's floor area to ensure adequate daylight to habitable rooms; • Single-aspect flats or houses should generally be avoided, unless they are south-facing;

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Design principle	What needs to be considered?
	• It is important to consider the shading effect that landscaping schemes will have on sunlight and daylight once the site's landscaping matures. While developments should be designed to maximise passive solar gain, it is also important that buildings are oriented to avoid overheating, without the need for air conditioning, especially if single aspect uses are proposed. Please see DEV32.4, Solar master plans for further details.
Building footprints	Building footprints of blocks should align and respond positively to adjacent streets, buildings and spaces. The depth of building footprints should be such that the need for artificial lighting and ventilation is minimised.
Active frontages	On public streets and spaces, developments should have active frontages, particularly at ground floor level where it is important that buildings overlook the street. Blank walls should be avoided on public frontages.
Entrances	Building entrances should be easy to find, well-defined and clearly visible from the street. Any changes in level must be carefully considered. Where ramps are necessary, these should be designed to relate well to the building and adjacent public realm. Utility boxes should be discreetly placed.
Corners	Street corners are particularly important in terms of way-finding. Buildings and blocks should be designed to turn corners well, so that both elevations seen from the street have windows in them, rather than offering blank walls or gable ends to the street. Windows and entrances that wrap around corners should be considered to maximise natural surveillance over the street and bring generous amounts of natural light into buildings.
Building heights and massing	Building heights should respond positively to the scale of adjacent buildings, streets and spaces. The size of individual buildings and their elements should be carefully considered, including in relation to: overshadowing; overlooking; local character; skylines and vistas and views.

Figure 15: Design considerations for blocks

Streets, movement and the public realm

6.2.11 When designing new places or integrating new development within existing places, there should be a clear hierarchy of routes, providing a safe and attractive environment that is interconnected. The needs of the most vulnerable users should be considered first: pedestrians; then cyclists; then public transport users; and finally, other motor vehicles. In particular the LPAs will expect the following to have been considered in the design of proposals:

Design principle	What needs to be considered?
Urban layout	Development should respond positively to the layout of existing landscapes, buildings, streets and spaces to ensure that buildings relate well to each other. Streets should be well connected and spaces complementary and could involve: following retaining existing landscape features or existing building lines; creating new links between existing streets and providing new public spaces.
Rural layout	The landscape within which the site is located must be respected. The imposition of wide roads for example, in an area which is typified by rural lanes, should be avoided. Existing landscape features such as Devon banks should be included in developments where possible. Existing planting should also be retained where possible. Much of the South Hams and parts of West Devon are located in very sensitive landscapes where policy requires the conservation and enhancement of the natural qualities of the landscape. The retention and reinforcement of landscape features can help to deliver the conservation and enhancement required by Policy DEV25.
Movement	Development should allow for people to move safely and directly to and through places. Prioritising pedestrians, cyclists and public transport respectively and providing a positive experience for all users, whatever their mobility needs. Street layouts and materials should be simple, neat and easy to understand. Developments should provide an appropriate number of routes to and within them to allow direct and convenient movement and respect pedestrian desire lines, connecting with key routes and destinations within and outside the development.
Adaptability	Proposals should allow for potential future connectivity to adjacent areas of undeveloped land to enable fully permeable networks to develop in the future.
Public vs. private space	There should be a clear definition between public and private space. Design should ensure there is no ambiguity about which spaces are public and private. With houses for example, a buffer zone, such as a front garden, can successfully be used between public outdoor space and private internal space to support privacy and security.
Pedestrian and cycle links	It is important to improve connections between streets and spaces in new developments and existing areas by creating new pedestrian and cycle links and implementing wayfinding measures such as signage. Pedestrian and cycle networks should be continuous, direct, accessible, legible and without clutter and barriers. Where

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Design principle	What needs to be considered?
	appropriate, large-scale pedestrian spaces should allow for cycle use. Safe and convenient crossing points should also be considered to provide continuity of pedestrian and cycle links.

Figure 16: Design considerations for streets, movement and the public realm

6.2.12 Further guidance on modes of transport and traffic objects is available at Section 8 (transport and infrastructure).

Public realm

6.2.13 The public realm, including the highways and pavements surrounding a development site, provides the setting to schemes and has the ability to enhance a project and provide benefits for all. Improvements to surrounding streets and pavements help a new development integrate successfully with its context. Proposals where the public realm is in poor condition and is not included in the development can be negatively affected and are a missed opportunity.

6.2.14 The LPAs recognise that the public realm is a vital ingredient in helping to create a sense of place, character, interest, amenity, quality of life and space to meet and socialise. When designing new public realm, an understanding of context is a key consideration and particular emphasis must be placed on creating high quality spaces with robust materials and design detailing. Early engagement to ensure accessibility of the public realm with the LPA and relevant groups is encouraged.

6.2.15 There will be situations where the development provides a new piece of public realm integral to the project and in some situations a public realm space may be delivered on its own without any associated building. This guidance is valid for both these scenarios and the LPAs will expect the following to have been considered at the design stage of an application:

Design principle	What needs to be considered?
Context and character	The primary objective of all public realm schemes should be to reinforce local character and deliver attractive, functional, sustainable and robust streets and spaces to compliment a locality. Public realm design should also contribute to new place-making, creating destinations which are designed primarily for people, supporting the economic and social activities they are engaged in. Where the character of an area is very strong, developments should identify the key design elements, materials and patterns that exist in the area which would be appropriate for use in the design and delivery of the new public realm. Schemes that support consistent use of materials and elements will be supported.

Design principle	What needs to be considered?
	Existing public open space of strategic/townscape importance should be safeguarded and enhanced where possible. Where the character is not so positive, designs should nonetheless strive to achieve high quality outcomes. Developers are encouraged, where appropriate, to achieve new, innovative and unique design solutions which generate character. Alternatively, an understanding of the history of the area can be useful to assist in generating positive design solutions.
Legibility	Public realm design should support and, where possible, improve the ability of visitors, tourists and residents to orientate and understand the urban and rural environments that they find themselves within. The use of vistas, views, clear and concise signage, information points, and landmark features are useful tools to help inform and orientate people. New public realm design should consider the placement of new objects very carefully including the planting of new trees, such as not to block key views and frustrate legibility, immediately or at some time in the future.
Accessibility	Streets and spaces should offer access, or offer alternative achievable access for everyone irrespective of their disabilities. Where raised carriageways are used, for instance in shared surface streets, early consideration needs to be given to disabled and vulnerable road users. The installation of street furniture, bollards and tactile paving should be considered as measures to provide clarity of routes for people with disabilities and Equality Impact Assessments (EqIAs) should be undertaken when considering any such scheme.
Adaptability	Space is arguably one of the most important assets and in places, such as in urban Plymouth and in town centres in the TTV Policy Area, where pressure to use every available space is high, the ability to use that space for a variety of uses becomes valuable. Developments should consider what potential exists for new streets and spaces to be used to support uses other than simply for access and movement. For instance, it may be that the space could host commercial, community or civic functions for a temporary period. Considering this early on in the development of the design will be important to inform an appropriate treatment and detailing of vehicle and pedestrian domains and avoid costly retro-fitting.
Sustainability	Sustainability of the public realm should be an overarching and long term goal. This should include material longevity

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Design principle	What needs to be considered?
	for the hard landscape materials used, ensuring such materials retain their colour over time and perform well according to their designed function. Particular consideration needs to be given to hard materials which are used by vehicles, not just where access is provided, but where access can inadvertently occur, such as with vehicles mounting pavements. Designers should also consider the role of public realm schemes in providing sustainable drainage and mitigating extremes of temperature such as the use of porous road/path surfaces. Green infrastructure in the public realm such as parks, playing fields and ponds or lakes can all provide vital space for water to pond or flow, storing it safely and away from critical buildings and infrastructure.
Materials	Streets and spaces necessitate good quality durable materials which complement their context and weather attractively. The selection of materials and their performance and detailing will be important considerations for the success of the scheme over time. Designs need to be developed with maintenance costs in mind to ensure that materials are long-lasting and easily sourced. For details on appropriate materials throughout the Plan Area please see APPENDIX 2: Specific materials for the Plan Area.
Street furniture	Obsolete, duplicated or unnecessary items of street furniture should be removed and new items installed only where necessary.

Figure 17: Further public realm design considerations

Management and maintenance of the public realm

6.2.16 Items of street furniture and street surfaces should form part of a coordinated palette of materials and street furniture suites designed for an area. The suites of furniture and materials palettes should be consistently applied, except where developments call for something entirely bespoke and even these should share some commonality with developed palettes. In Plymouth, this co-ordination is guided by Plymouth's Paving Manual[89] which encourages the appropriate use of materials depending upon the location of the development and informed by the particular characteristics of the surroundings.

6.2.17 Public realm schemes achieved through the planning application process for adoption by the LPA are likely to require contributed sums for maintenance by way of a planning obligation. In addition, where the scheme involves development on the public highway, details of the scheme will need to be

[89] https://www.plymouth.gov.uk/sites/default/files/DraftPlymouthPavingManual.pdf

submitted to the Local Highway Authority (LHA) and agreed through a s278 Agreement. New areas of highway to be adopted by the LHA will normally be achieved through a s38 Agreement. Where both highway and planning authority are involved, consistency of information in respect of both the details and finishes between the two processes should be coordinated.

6.2.18 For private public realm schemes a planning condition may be placed on the approval of any application to ensure that an appropriate related external space management and maintenance plan is created and implemented.

6.2.19 Please see Section 8 for further guidance on transport considerations.

6.2.20 Please see Section 12 for further guidance on planning obligations.

Shop fronts, including ATMs

6.2.21 Shop fronts, advertisements and ATMs play a key role in parts of the public realm as they contribute to the character and appearance of the street-scene as well as attracting customers. Please see APPENDIX 3: Shop fronts, including ATMs for detailed guidance.

Building design

6.2.22 The LPAs will expect the following design issues to have been considered in the design of proposals:

Design principle	What needs to be considered?
Building lines	It is important that new development responds positively to the line of existing building frontages to create continuity of street frontage, unless there is a strong case to do otherwise which is supported by sound urban design analysis.
Boundaries	Developments should include clear and robust boundary treatments that are appropriate to their context and contribute to local character and identity. For example, new developments adjacent to areas of green space or countryside should include natural boundaries such as hedges which also encourage wildlife. For further guidance on hedgerows please see DEV28 (trees, woodlands and hedgerows). In urban areas building frontages rather than boundary treatments will generally be expected to address and overlook public open spaces. In the exceptional circumstances where boundary treatments can be justified in this situation, more formal boundaries may be appropriate, provided they are of good quality and respond positively to the context. All boundary treatments must not negatively affect the amenity of adjacent land or properties and must

Design principle	What needs to be considered?
	contribute to the security and safety of the development scheme.
Architectural quality	New development must be attractive and of good architectural quality. It should strive for architectural excellence and it is recommended that applicants use professional architects. Where appropriate the LPAs will encourage applicants to use a Design Review Panel to assist in raising design standards. A lack of local character should not be used as a justification for further nondescript or placeless development. Distinctiveness can be delivered through new designs that respond to local characteristics in a contemporary way. Local traditions and character should not be ignored without a robust justification. Architectural competitions are strongly encouraged for key strategic sites.
Adaptability	Buildings should be designed to be adaptable to support changes in use over time. They should be adaptable and resilient to climate change. Further guidance on low carbon development can be found at DEV32.
Efficiency and sustainability	Buildings should be designed to minimise their use of resources, both during construction and operation. Efficiency and sustainable design should be a generating principle for the architecture of buildings, rather than something added as an afterthought. Buildings must take every opportunity to use passive solar heating, natural ventilation and cooling, whilst minimising wastage of energy and resources. Energy-efficiency enhancements to existing buildings are strongly encouraged, including through measures such as external insulation. Such measures must be implemented sensitively to respond positively to local character.
Materials	Building materials should be robust, attractive and respond positively to local character. For details on appropriate materials throughout the Plan Area please see APPENDIX 2: Specific materials for the Plan Area.
Design details	Design details can enhance or undermine the overall quality of proposals and at the earliest possible stage they should be carefully considered to ensure they are considered collectively and not given attention only as an afterthought. These include items such as: doors; windows; porches; balconies; lighting; flues/ventilation; eaves and verges; gutters; pipes/other rain water details; roof plant; lift over-runs; utility boxes; signage; metalwork and decorative features and bin, cycle and other storage

Design principle	What needs to be considered?
	areas. Junctions and joins between elements should also be carefully considered.

Figure 18: Design principles for buildings

DEV20.5 – Landscape design

6.2.24 The LPA's expect landscape design to follow the same principles as set out above for the design of the public realm. Further detail on how to address landscape character and features has been provided in the guidance for Policy DEV23. Special care will need to be given to the location of trees to ensure every planted tree has the best potential to reach maturity, for further guidance see the guidance for Policy DEV28. Landscape specifications will need to comply with current best horticultural practices and the relevant up-to-date British Standards.

6.2.25 When a landscape scheme is required, the LPAs will seek details of its ownership, implementation, management and how the management will be secured, including details of how the scheme will be inspected to ensure that completed work and maintenance operations are verified. The provision of these details will often be secured through a planning condition, as part of a planning obligation or through a bond. It is recommended that applicants consider the long-term maintenance of their proposed landscape scheme as early as possible.

6.2.26 Details of the maintenance can be provided as a stand-alone document or incorporated into a Landscape Ecological Management Plan (LEMP). The latter combined approach is preferred as it ensures landscape and biodiversity objectives are coordinated and reduces the number of documents to be submitted.

6.2.27 The specified management practices will need to adhere to best horticultural practices and comply with the relevant British Standards.

6.2.28 Where a developer wishes the Council to take on management of the landscaping scheme, appropriate commuted payments will be required. A scheme will only be taken on where it has been implemented in accordance with the agreed scheme, with mediation measures completed before the hand-over.

DEV20.6 – Community safety and crime

6.2.29 DEV20.6 looks to ensure development contributes to community safety and reduces opportunities for crime and the fear of crime. Developers need to show that crime prevention has been considered in the design and layout of all major developments including housing, commercial, public spaces, footpaths, cycle routes, and communal areas.

6.2.30 Where a proposed development undermines community safety, planning permission could be refused and where possible the LPAs will seek amendments or impose planning conditions which will address crime prevention issues.

6.2.31 The following criteria will be applied to meet the safety and security objectives:

- Providing places with well-defined routes, spaces and entrances that provide for convenient and safe movement without compromising security;
- Providing adequate natural surveillance (overlooking) of adjacent streets and spaces;
- Ensuring that all new developments are designed to make crime difficult to commit by increasing the risk of detection;
- Creating a sense of ownership by providing a clear definition between public and private spaces;
- In a residential context, developments should be designed with a defensible space, a threshold between the public realm and building entrances, unless this is out of character with a positive street scene such as within a conservation area;
- Promoting activity that is appropriate to the area, providing convenient access and movement routes;
- Providing where necessary for well-designed security features;
- Providing places that are designed with management and maintenance in mind, to discourage crime in the present and the future; and,
- Avoiding the creation of open internal car parking courtyards unless gated with suitable locking gates.

6.2.32 Additional guidance can be found through the Secured by Design initiative[90], led by the police service and supported by the Home Office.

6.2.33 Where appropriate, the LPAs will use planning conditions to ensure that secure by design measures are included during the development process to reduce crime and the fear of crime.

6.2.34 When considering community safety and reducing opportunities for crime and the fear of crime in developments, Public Health England's guidance on suicide prevention: suicides in public places[91] should also be considered at this stage.

DEV20.9 – Public Art

6.2.35 DEV20.9 highlights how the LPAs are committed to ensuring public art is promoted in the PPA and is considered in the context of significant development proposals as a means of adding quality and interest for public enjoyment.

6.2.36 A Public Art Plan[92] for Plymouth has been produced to promote these objectives, and sets out clearly and concisely how public art will be promoted and secured in Plymouth. There is also The Plymouth Principles[93], which is a guide to support and nurture public art in the city.

[90] http://www.securedbydesign.com/
[91] https://www.gov.uk/government/publications/suicide-prevention-suicides-in-public-places
[92] http://plymouthculture.co.uk/wp-content/uploads/2016/11/Public-Art-Plan-2.pdf
[93] http://plymouthculture.co.uk/wp-content/uploads/2016/09/The-Plymouth-Principles.pdf

6.3 Development affecting the historic environment (DEV21)

What is this policy about?

6.3.1 DEV21 is a policy to protect the historic environment throughout the Plan Area, including both designated (World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas) and non-designated heritage assets and their settings.

6.3.2 LPAs are obliged to consult with Historic England[94] on a number of different designated assets and it is recommended that this SPD is read alongside guidance provided by Historic England which covers a wide range of heritage issues, including energy efficiency and renewable energy installations.

6.3.3 To find out whether a site or building is protected i.e. whether it is a listed building, scheduled monument, protected wreck or registered park and garden or please see the National Heritage List for England[95] (NHLE).

6.3.4 The relevant Historic Environment Record (HER) should also be considered. In Plymouth, PCC maintains the HER, whilst in South Hams and West Devon, DCC maintains the HER. The HERs include locally sourced information on historic assets and provide information to support development proposals. The Devon HER[96] is available online. To access Plymouth's HER applicants are advised to contact PCC.

6.3.5 In addition to planning permission, other consents may also be needed. Please note that commencement of work (planning or otherwise) without the appropriate consent can be a criminal offence which may result in legal proceedings, and/or enforcement action to secure appropriate remedial works.

What needs to be considered in the implementation of this policy?

DEV21.2 – Designated heritage assets

Listed buildings

6.3.6 Within the Plan Area there are a large amount of listed buildings and sites of different grades (I, II* and II). Whilst some works, such as minor repairs and maintenance, may not require consent, any physical changes (internal or external) to these buildings or sites that are deemed to affect their character or special interest will require Listed Building Consent from the LPA.

6.3.7 To find out if a building or site is listed, applicants are advised to consult the local HER or to search the NHLE on Historic England's website. Please note that the list description is only intended for identification purposes and *all* of the building is protected by designation unless otherwise stated in the description as not being of special interest.

[94] https://historicengland.org.uk
[95] https://historicengland.org.uk/listing/the-list/
[96] https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/

6.3.8 Certain religious buildings have what is known as Ecclesiastical Exemption[97] meaning that certain religious denominations in England, whose churches are in use as places of worship, may be exempt from applying for listed building consent.

Proposed alterations to a listed building

6.3.9 Proposed alterations or works to a listed building, including curtilage buildings and boundary walls etc., must respect historic character and special interest.

6.3.10 Proposals must demonstrate an appropriate level of understanding of the heritage asset and its significance. It should be clearly stated how the proposal will affect the asset, whether that is positive or negative.

Impact on the setting of a listed building

6.3.11 Impact on the setting of a listed building must be considered when applying for planning permission. The LPAs are under a duty to carefully consider whether proposed development is harmful and represents substantial or less than substantial harm.

6.3.12 Where substantial harm is identified then the development is unlikely to be regarded as acceptable.

6.3.13 Where less than substantial harm is identified then the LPA is required to consider whether other public benefits arising from the proposed development outweigh this harm. If this is considered to be the case, then the development may be approved.

Conservation areas

6.3.14 Within the JLP area there are a variety of conservation areas varying in size and key qualities, all have been designated because they have been assessed as possessing special architectural or historic interest and, for any changes proposed, the LPA's will look to reserve or enhance the special character and appearance of these areas.

6.3.15 Additional planning controls apply to conservation areas and planning permission may be required from the LPA for works such as:

- Demolition of all or part of a building or structure (including walls and outhouses);
- Minor developments (including alterations to roofs, the cladding of buildings or replacement doors and windows);
- Installation of satellite dishes; and/or,
- Tree works (including cutting, uprooting, lopping or topping of trees) which must be covered by a notification procedure to the LPA.

[97] http://www.legislation.gov.uk/uksi/2010/1176/made

6.3.16 Proposals within a conservation area (usually areas with historic settlement centres) may have a higher likelihood of below ground archaeological potential.

Conservation Area Appraisal and Management Plans (CAAMPS)

6.3.17 CAAMPS identify the key features of conservation areas and guidance on the types of development encouraged. To view the current CAAMP documents please visit:

- Plymouth conservation areas[98]
- South Hams CAAMPS[99]
- West Devon CAAMPS[100]

6.3.18 In addition to the CAAMPs and where there are no CAAMPS in place the following guidance for conservation areas should be considered.

Detailed guidance for conservation areas

6.3.19 Any new development being considered in or affecting the setting of conservation areas needs to be very carefully designed to preserve or enhance the quality of each area.

6.3.20 When permission is not required to carry out works, it will be for individual owners to decide whether or not their proposals are 'conservation friendly' and achieve the aim to preserve or enhance.

6.3.21 When permission is required, the LPA will base its decision on how well the works respect the features and characteristics of the area. Applicants will need to demonstrate how their proposals will preserve or enhance the area by showing respect and compatibility. This does not mean that new buildings must copy their older neighbours in detail, instead their design should represent an imaginative and contemporary interpretation of the site context that demonstrates an understanding of the buildings and spaces around them. Sound choices of layout, scale, form and materials will be considered basic requirements in such locations.

6.3.22 As a simple checklist, proposals are more likely to preserve/enhance the character/appearance of a conservation area if they involve:

- The retention or reinstatement of authentic/original features like authentic windows and doors, stone walls, cast-iron rainwater goods, chimney stacks, decorative architectural detail and distinctive wall finishes or claddings;

[98] https://www.plymouth.gov.uk/planningandbuildingcontrol/conservationandheritage/conservationareas
[99] https://www.southhams.gov.uk/article/3469/Conservation-Area-Appraisals-and-Management-Plans
[100] https://www.westdevon.gov.uk/article/3471/Conservation-Area-Appraisals-and-Management-Plans

- The avoidance of incongruous features like poorly designed windows and doors, panel fencing, satellite dishes and mass produced ‘add-ons’ like porches;
- The incorporation of wall or roofing materials that are prevalent in the area;
- The introduction of new buildings that add quality and interest to valued street scenes and views.

6.3.23 For further guidance on development in conservation areas please see APPENDIX 5: New work in conservation areas.

Registered parks and gardens

6.3.24 All works to registered parks and gardens require planning consent from the LPA. Registration is a 'material consideration' in the planning process, meaning that the LPAs must consider the impact of any proposed development on the landscapes' special character.

6.3.25 Applicants are advised to check the HNLE to search for registered parks and gardens and the relevant HER which may also hold locally sourced additional information.

Scheduled monuments

6.3.26 All works to scheduled monuments require Scheduled Monument Consent obtained by applying directly to Historic England. The LPA is not normally involved in this form of consent being granted but, as some Scheduled Monuments are also listed, there may be duplication and applicants will need to work with both Historic England and the LPA.

6.3.27 Applicants are advised to check the HNLE to search for scheduled monuments and the relevant HER which may also hold locally sourced additional information.

Protected wreck site

6.3.28 There is growing recognition of the importance of historic marine wrecks, all works on or near a protected marine/ship wrecks require a license to be granted by the Secretary of State via Historic England.

6.3.29 Applicants are advised to check the HNLE to search for protected wreck sites and the relevant HER which may also hold locally sourced additional information.

Archaeology (assessing significance)

6.3.30 Sites of archaeological potential may be identified through consultation with the relevant Historic Environment Records (HER). Applicants should be aware however that HERs contain information only on known remains and may not include recent discoveries.

6.3.31 The absence of site records for any specific area within an HER should not be taken as an indication that no archaeological remains exist. Early consultation with the Historic Environment Team of DCC (for sites in West Devon and South Hams) or the Historic Environment Officer of PCC (for sites within the unitary boundary of Plymouth) is strongly recommended.

6.3.32 Following initial consultation with the relevant officers, various levels of archaeological assessment and evaluation may be required. This may take the form of non-intrusive work (such as desk-based assessment and/or geophysical survey), intrusive ground-work (such as trench evaluation) or a combination of both. In each case such works should be conducted by a suitably qualified archaeological contractor on behalf of the applicant. These investigations will allow the survival and significance of any archaeological remains to be assessed and the appropriate mitigation measures recommended as necessary. Recommendations will be in line with Historic England's Guidance on Managing Significance in Decision-Taking in the Historic Environment[101].

DEV21.3 – Non-designated heritage assets (NDHAs)

6.3.33 Non-designated heritage assets (NDHAs) are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. The declaration of intent to designate Plymouth Sound as a National Marine Park is also of significance in this respect.

6.3.34 In some areas, local authorities identify some non-designated heritage assets as 'locally listed'. Non-designated heritage assets can also be identified through the neighbourhood planning process or through CAAMPS.

6.3.35 For sites not identified, the LPAs will take a criteria based approach within the decision making process. This allows for the effective consideration of buildings, structures and other features to be made based on real time threats and priorities as summarised in the following diagram:

[101] https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/

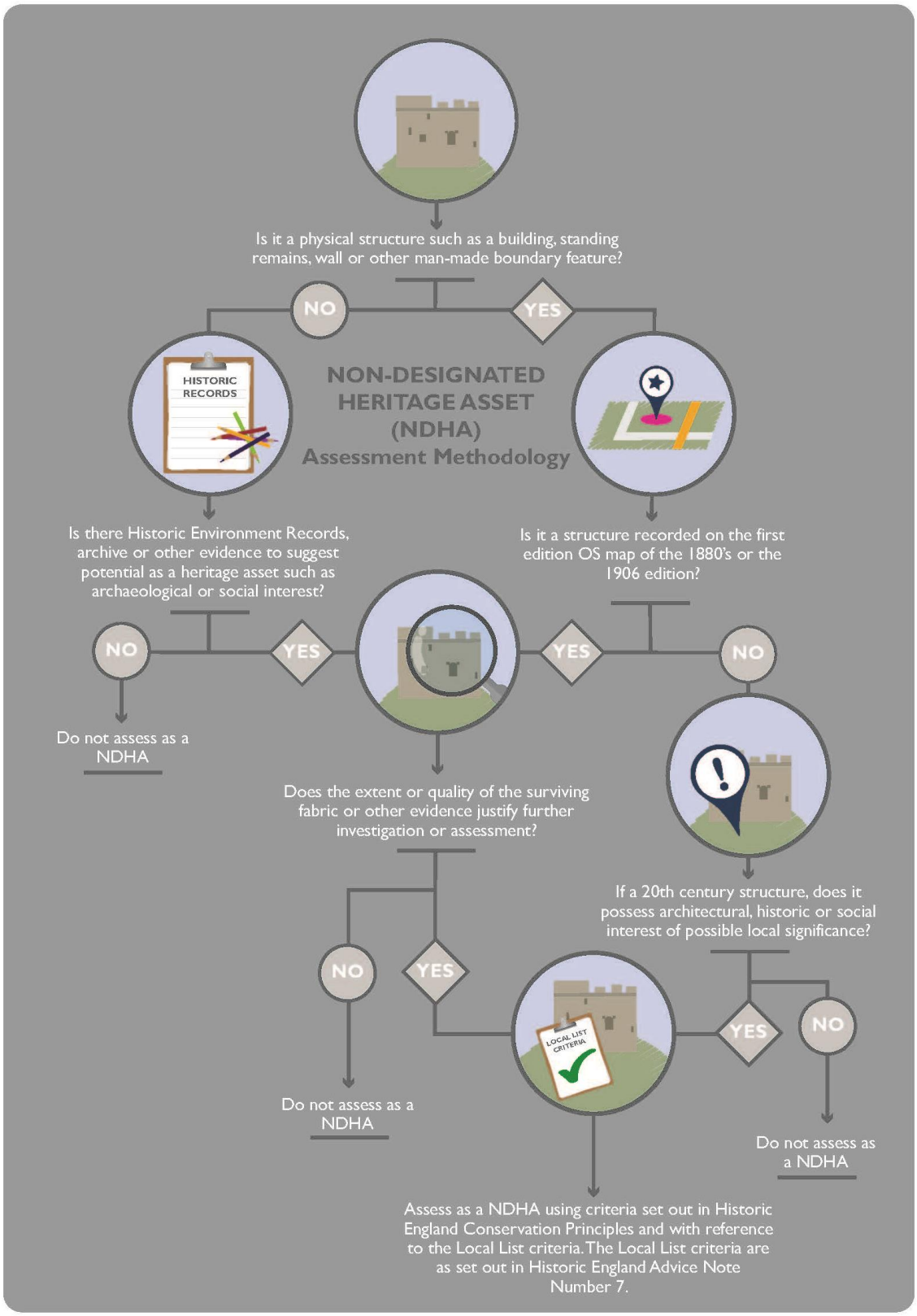

Figure 19: Non-designated heritage asset (NDHA) assessment methodology

6.3.36 Consideration of a feature as a NDHA should not be seen as an assumption that it should be retained. It is an acknowledgement that evaluation and assessment is required and that appropriate weight must be given to the asset in consideration of planning balance. NDHAs should also not be seen as a restriction on development in itself, but an opportunity to enhance proposals by proper consideration of features deemed to be of local significance.

6.3.37 When undertaking an assessment, the advice on local lists in Historic England's Advice Note Number 7: Local Heritage Listing[102] should be seen as a starting point and advice should be sought from DCC in relation to designated assets in South Hams and West Devon.

Historic shop fronts

6.3.38 For guidance on historic shop fronts, please see APPENDIX 3: Shop fronts, including ATMs.

Traditional farm buildings

6.3.39 Much of the Plan Area is rural and there are numerous traditional farm buildings which are no longer needed for agriculture but are about to be, or already have been, adapted to serve a different use. Early consultation with the relevant LPA is advisable for such proposals as a traditional farm building may be a significant element of an area's character. They are also a dwindling resource in terms of their traditional vernacular architecture and recording/research may be needed to inform planning decisions as well as in mitigation for consented change ('preservation by record').

6.3.40 Developers looking to adapt or re-use traditional farm buildings throughout the Plan Area are expected to follow the guidance available in the LPAs 'best practice' Barn Guide: Traditional Farm Buildings: Their Adaptation and Re-use which details how the building's character and interest can be successfully conserved through the planning process.

6.3.41 When developing traditional farm buildings, the following are the essential features which will need to be considered carefully during the development process:

- The original fabric of the walls, floors and roof structure, and any original window frames, doors and shutters. There may be fittings of interest too, both inside and out;
- An uncluttered exterior characterised by extensive blank walls and roofs with unbroken lines and few openings;
- An unpartitioned interior characterised by impressive proportions, long sight lines and the structural elements exposed; and,
- An agricultural setting characterised by hard-surfaced yards and open field surroundings.

[102] https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/

6.3.42 Applicants are expected to have a disciplined approach to design and carefully consider the setting and surrounding wildlife of traditional farm buildings.

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6.4 Cornwall and West Devon Mining Landscape World Heritage Site (DEV22)

6.4.1 The Cornwall and West Devon Mining Landscape World Heritage Site has its own Management Plan and supporting SPD which sets out how the planning system will fulfil its responsibilities to this designated heritage asset: Cornwall and West Devon Mining Landscape World Heritage Site, Supplementary Planning Document, May 2017[103].

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[103] https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-and-west-devon-mining-landscape-world-heritage-site-supplementary-planning-document/

7. Natural environment (DEV23-DEV28)

7.1 Introduction

7.1.1 The environment is of key importance to all people that visit, live or work in the Plan Area. A healthy environment is important for existing residents, and essential for biodiversity and wildlife habitats.

7.1.2 The guidance in this chapter primarily supports polices DEV23 to DEV28 in the JLP. It also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP. The guidance should also be considered in the context of the Climate Emergency declared by the three JLP Councils.

7.1.3 Please see Section 2 for further guidance on what part the SPD can play in responding to the Climate Emergency?

7.2 Landscape character (DEV23)

What is this policy about?

7.2.1 DEV23 is a policy to ensure new development conserves and enhances landscape, townscape and seascape character and avoids adverse landscape or visual impacts. This will be achieved by considering the character and distinctiveness of the area and how the siting and design of the proposed development responds to the landscape and townscape character. For instance through the conservation and enhancement of distinctive landscape features, the use of local design characteristics, materials and development patterns etc.

7.2.2 To support the JLP adoption process and the implementation of DEV23 the LPAs produced/commissioned Landscape Character Assessments which can be found online:

- Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment (Chapters 1 to 3)[104]
- Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment, (Chapter 4 onwards)[105]
- A Landscape Character Assessment for South Hams and West Devon[106]

7.2.3 Since the JLP was adopted there has been a declaration of intent announced to designate the Plymouth Sound as a National Marine Park whose context will also need to be considered in development.

7.2.4 In order to foster high quality development that respects, maintains, or enhances local landscape character and distinctiveness, all new development should

[104] https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapters1to3.pdf
[105] https://www.plymouth.gov.uk/sites/default/files/PlymouthAndPlymouthUrbanFringeLandscapeAndSeascapeAssessmentChapter4Onwards.pdf
[106] https://www.plymouth.gov.uk/sites/default/files/LandscapeCharacterAssessmentSouthHamsAndWestDevon.pdf

consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting or enhancing local design characteristics and, wherever possible, using local materials. Planning applications should detail the measures taken to ensure the building design will be of a high standard, as well as include detail of layout alternatives together with justification of the selected option in relation to the landscape context.

7.2.5 The LPAs will use the following flow chart to assess the compliance of a planning application with JLP policy DEV23:

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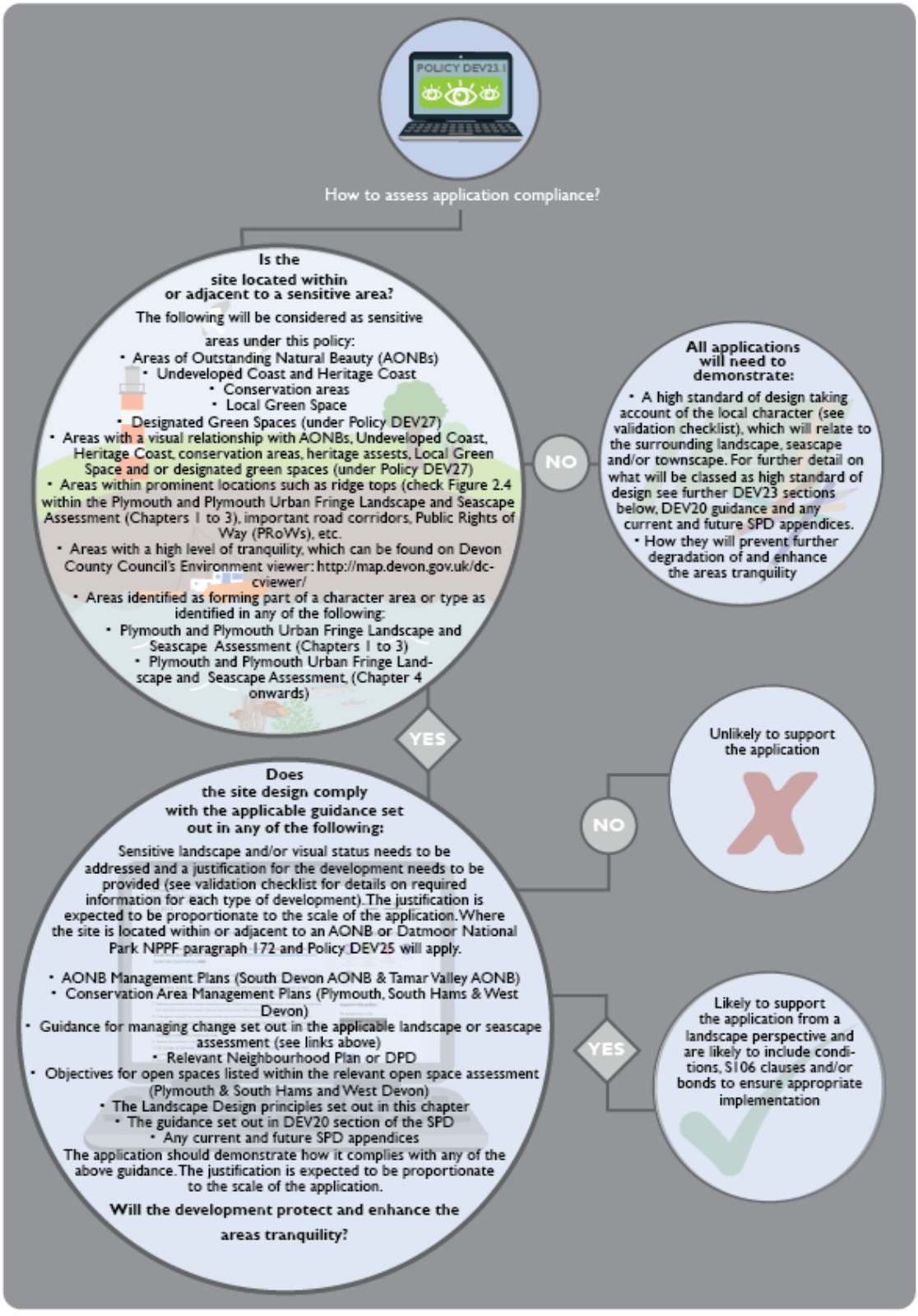

Figure 20: How to assess application compliance with DEV23

7.2.6 To determine whether a landscape and visual impact assessment (LVIA) is required, please see guidance at DEV23.6.

DEV23.3 – High quality design
Design advice

7.2.7 The Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment and the South Hams and West Devon Landscape Character Assessment include guidance on how to manage change. The LPAs will expect development within those character areas and on the edges of these character areas to adhere to this guidance to ensure the development does not degrade the character of the area.

7.2.8 Further detailed guidance on how to utilise the landscape character assessment can be found within Chapter 1 of the Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment, which includes a user guide for the use of the landscape and seascape assessment.

7.2.9 Existing landscape characteristics and features should be addressed as follows:

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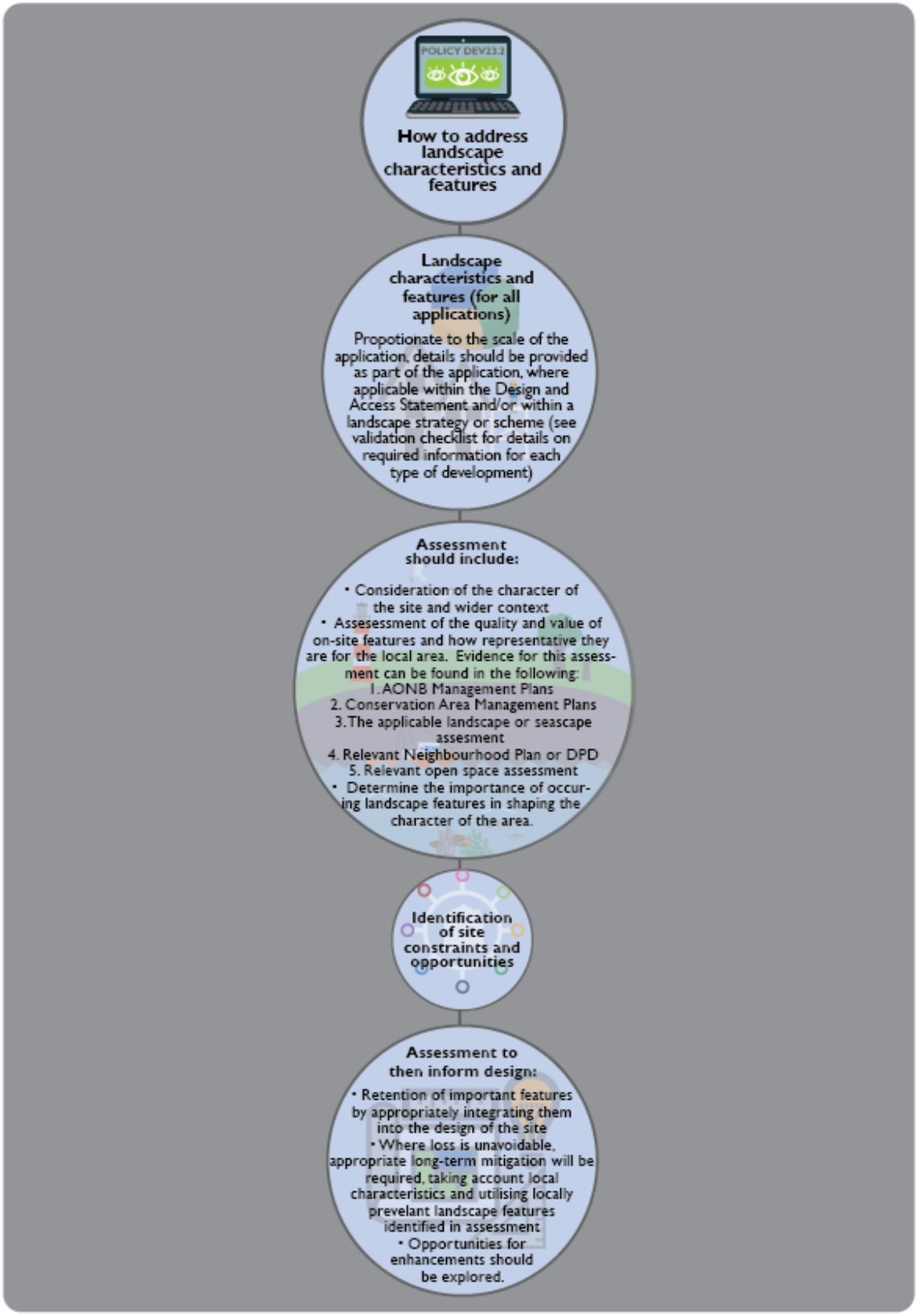

Figure 21: Landscape characteristics and features

DEV23.6 – Landscape and Visual Impact Assessment (LVIA)

7.2.10 DEV23.6 requires development, where necessary, to be supported by a LVIA or landscape appraisal.

7.2.11 A LVIA (within an EIA context) or landscape appraisal (where the assessment does not form part of an EIA) is necessary where a proposed development has the potential to result in a substantial negative impact to visual amenity or landscape character. A LVIA or landscape appraisal will need to be submitted to show how these impacts have been assessed and how the development has been designed to avoid, reduce and/or mitigate these impacts. Guidance on when a LVIA or landscape appraisal is needed has been provided below for both the PPA and the TTV Policy Area:

Key:

LVIA/Landscape Appraisal required
LVIA/Landscape Appraisal sometimes required
LVIA/Landscape Appraisal not required

Location **Development type**	**Within Plymouth administrative area**	**Within the Plymouth Urban Fringe** (PLY61) and within character areas as defined within the Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment	**Within a Strategic Green Space**	**Within 500m of AONB or National Park boundary** Within Plymouth administrative area	**Within 500m of AONB or National Park boundary** Within the Plymouth Urban Fringe (Policy PLY61)
Development with an overall height of 20m or more					
Development with an overall height of 15m or more	If edge of City LVIA/Landscape Appraisal is required.				
Development of 10 or more dwellings; with a floor space of 1,000m^2 or more; or a site area of 1ha or more in size.					

Location **Development type**	**Within Plymouth administrative area**	**Within the Plymouth Urban Fringe** (PLY61) and within character areas as defined within the Plymouth and Plymouth Urban Fringe Landscape and Seascape Assessment	**Within a Strategic Green Space**	**Within 500m of AONB or National Park boundary** Within Plymouth administrative area	**Within 500m of AONB or National Park boundary** Within the Plymouth Urban Fringe (Policy PLY61)
Development on previously undeveloped (greenfield) sites with a site area of 0.5ha or more.		On a case-by-case judgement.		On a case-by-case judgement.	

Figure 22: Matrix for Landscape and Visual Impact Assessment (LVIA) and Landscape Appraisals requirements: PPA

Location **Development type**	**Outside AONB** Within Main Towns[107] (TTV1)	**Outside AONB** Within Smaller Towns, Key Villages and Sustainable Villages (TTV1, TTV2 and TTV3)	**Outside AONB** Within Small Villages, Hamlets and the Countryside (TTV1 and TTV4)	**Within AONB (or within 500m of AONB or National Park boundary)** Within Main Towns (TTV1)	**Within AONB (or within 500m of AONB or National Park boundary)** Within Smaller Towns, Key Villages and Sustainable Villages (TTV1, TTV2 and TTV3)	**Within AONB (or within 500m of AONB or National Park boundary)** Within Small Villages, Hamlets and the Countryside (TTV1 and TTV4)
Development with an overall height of 20m or more						
Development with an overall height of 15m or more	If edge of settlement LVIA/Landscape			If edge of settlement LVIA/Landscape		

[107]The TTV Main Towns are: Dartmouth, Ivybridge, Kingsbridge, Okehampton, Tavistock and Totnes.

Location **Development type**	**Outside AONB** Within Main Towns[107] (TTV1)	**Outside AONB** Within Smaller Towns, Key Villages and Sustainable Villages (TTV1, TTV2 and TTV3)	**Outside AONB** Within Small Villages, Hamlets and the Countryside (TTV1 and TTV4)	**Within AONB (or within 500m of AONB or National Park boundary)** Within Main Towns (TTV1)	**Within AONB (or within 500m of AONB or National Park boundary)** Within Smaller Towns, Key Villages and Sustainable Villages (TTV1, TTV2 and TTV3)	**Within AONB (or within 500m of AONB or National Park boundary)** Within Small Villages, Hamlets and the Countryside (TTV1 and TTV4)
	Appraisal is required.			Appraisal is required.		
Development of 10 or more dwellings; with a floor space of 1,000m^2 or more; or a site area of 1ha or more in size.		If edge of settlement LVIA/Landscape Appraisal is required.		If edge of settlement LVIA/Landscape Appraisal is required.		
Development on previously undeveloped (greenfield) sites with a site area of 0.5ha or more.					If edge of settlement LVIA/Landscape Appraisal is required.	

Figure 23: Matrix for Landscape and Visual Impact Assessment (LVIA) and Landscape Appraisals requirements: TTV Policy Area

7.2.12 Despite falling outside the criteria above, development may require a LVIA as part of an Environmental Impact Assessment (EIA). This will be subject to a separate screening exercise.

7.2.13 The assessment work should be proportionate to the development it is assessing, and could range from a full assessment as part of an EIA to a short, focussed landscape appraisal of the impacts on a certain characteristic or view. Landscape and visual assessment work should be carried out by a qualified Landscape Architect and completed in accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition 2013 (GLVIA3) LI/IEMA[108], or any subsequent updates.

[108] https://www.routledge.com/Guidelines-for-Landscape-and-Visual-Impact-Assessment-3rd-Edition/Landscape-Institute-IEMA/p/book/9780415680042

7.2.14 LVIAs should:

- Map the local landscape character areas and/or elements at a scale appropriate to the development site and reference made to any existing character assessments, relevant management plans or strategies pertaining to the area;
- Identify key and representative views and visual receptors. Any viewpoints to be assessed should be agreed with the LPA and, where relevant, with key stakeholders prior to carrying out the assessment. Presentation of representative viewpoints should accord with best practice guidance;
- Where required, photomontages from agreed viewpoints should be prepared in accordance with 'Photography and photomontage in landscape and visual impact assessment' Landscape Institute Advice Note 01/11[109] or subsequent versions of this guidance;
- Include assessments of visual and landscape effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography; and,
- Provide evidence of landscape and visual impacts being considered in the design evolution of a scheme within the LVIA in accordance with the following hierarchy: Avoid; Reduce; Mitigate. This section should detail the measures taken to ensure the building and landscape design will be of a high standard, as well as details of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

DEV23.7 – Avoidance, mitigation, compensation and enhancements

7.2.15 The LPAs expect all applications to adhere to the mitigation hierarchy:

- AVOID: preference should be given to avoid impacts, for example, by positioning development away from the most sensitive areas;
- MINIMISE: constitutes measures to reduce impacts on-site;
- MITIGATE: ensuring all methods for design to deliver benefits to the landscape character, landscape features and visual amenity of the area have been included in the development;
- COMPENSATE: where the character, landscape features and visual amenity of the area has been lost, the LPAs will expect the applicant to deliver compensatory landscape measures such as the creation of new green space, tree and other planting, creation of new viewpoints, etc.

7.2.16 Besides following the mitigation hierarchy, the LPAs expect applicants to maximise the benefits landscape can deliver to communities by ensuring the design of the site explores means of delivering enhancements to the local landscape character and visual amenity of the local area.

[109] https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/01/LIPhotographyAdviceNote01-11.pdf

7.3 Undeveloped Coast and Heritage Coast (DEV24)

What is this policy about?

7.3.1 DEV24 is a policy to ensure the protection of the Undeveloped Coast and Heritage Coast across the JLP area. This is done by ensuring development which would have a detrimental effect on the undeveloped and unspoilt character, appearance or tranquility of the landscape is not permitted except under exceptional circumstances.

Defining the Undeveloped Coast

7.3.2 As part of the production of the JLP, the Undeveloped Coast was defined in response to NPPF paragraphs 170 and 173, the extent of which is available to view on the three JLP policies maps:

- Policies Map: Plymouth Policy Area[110]
- Policies Map: Thriving Towns and Villages Policy Area (South Hams)[111]
- Policies Map: Thriving Towns and Villages Policy Area (West Devon)[112]

7.3.3 A document was also produced stating how the LPAs decided to define the Undeveloped Coast through the policy designation: Undeveloped Coast Identification Process[113].

Defining the Heritage Coast

7.3.4 The South Devon Heritage Coast was defined in 1986, recognising it as one of the finest stretches of undeveloped coast in England and Wales. Heritage Coasts are now defined nationally by Natural England for the following purposes:

- Conserve, protect and enhance:
  - The natural beauty of the coastline;
  - Their terrestrial, coastal and marine flora and fauna;
  - Their heritage features.
- Encourage and help the public to enjoy, understand and appreciate these areas;
- Maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures; and,
- Take account of the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts.

What needs to be considered in the implementation of this policy?

7.3.5 In much the same way as policy DEV23 seeks to ensure new development conserves and enhances landscape, townscape and seascape character, policy DEV24 refines this approach to the characteristics and features of the coastal landscape that make it special: its undeveloped and unspoilt character, appearance and tranquillity. This will be achieved by considering the character

[110] https://www.plymouth.gov.uk/sites/default/files/PoliciesMapPPA.pdf
[111] https://www.plymouth.gov.uk/sites/default/files/PoliciesMapTTVSH.pdf
[112] https://www.plymouth.gov.uk/sites/default/files/PoliciesMapTTVWD.pdf
[113] https://www.plymouth.gov.uk/sites/default/files/UndevelopedCoastIdentificationProcess.pdf

and distinctiveness of the area and how the siting and design of the proposed development responds to the character of the area, for instance through the conservation and enhancement of distinctive landscape features, the use of local design proportions, materials, and development patterns.

7.3.6 The variety of high quality, open, coastal views in this landscape, from expansive coastal clifftops to intimate estuaries, are a unique characteristic of the area that needs to be retained clear of visual intrusion.

7.3.7 Development proposals will need to fully consider impacts upon the undeveloped character, appearance and tranquillity of the coastal landscape, including consideration of night-time impacts of any lighting of the proposals alongside cumulative effects of other development in the locality upon the undeveloped character of the area. This will often be through the production of a Landscape and Visual Impact Assessment or Appraisal (LVIA). For further guidance on the production of LVIAs please see sub-section DEV23.6.

DEV24.1 and DEV24.2 – Coastal location

7.3.8 Policy DEV24 contains strong principle policy tests to avoid development that does not require a coastal location and that can be located outside the Undeveloped Coast.

7.3.9 In order to justify a coastal location any development proposal needs to demonstrate what local need is being met that cannot be delivered outside the Undeveloped Coast. In terms of housing, the principle will only be acceptable if the proposal is meeting a localised need, defined in the terms of this policy as meeting a need from the immediate or adjoining parish. Any housing proposal will be restricted by a s106 agreement, restricting ownership or occupation to people who can demonstrate such a local connection. Accepting the principle of housing in an Undeveloped Coastal location does not override the requirement to meet all other policy tests applicable to sensitive and designated landscapes.

7.3.10 Applications for development on an agricultural holding will need to demonstrate that the applicant does not own alternative agricultural land outside of the Undeveloped Coast policy area that could reasonably accommodate the proposed development.

7.3.11 Applications for development to support leisure or recreational pursuits are unlikely to be supported on the basis that the proposal is not meeting a need that requires a coastal location, but rather responding to a personal preference or choice.

7.3.12 Where development meets the principle policy tests of DEV24.1 and DEV24.2, the following broad types of development will be considered under the policy:

Coastal defences

7.3.13 Coastal defences are likely to be a significant feature of sections of the Undeveloped Coast in the future. Proposals should consider the siting, design, scale, appearance and materials suitable to their location rather than simply an engineering solution.

Camping, caravanning, chalet or similar sites

7.3.14 There are significant pressures for holiday accommodation development in this landscape. Camping and caravanning sites often form large and visually intrusive features, detracting from the special undeveloped character of the coastal environment. In recognition of the pressure and existing impacts from such facilities, Policy DEV15 on the rural economy is not supportive of camping, caravan, chalet or similar facilities in the Undeveloped Coast, and such features are unlikely to meet the tests of DEV24.3.

Agricultural development

7.3.15 New industrial scale agricultural buildings that are located in prominent or sensitive locations, particularly where these are visually intrusive on skylines and ridges, impact negatively on the special character and scenic quality of the coastal landscape, and are unlikely to be supported. Wherever possible, new agricultural buildings should be located with existing farmsteads and buildings.

7.3.16 Where a new farm building in open countryside is the only available practical option, there should be a clear justification in the planning application describing how the location has been selected to minimise visual impact and best set the building into its landscape, involving the careful use of materials, colour, landform, screening and external landscape works.

Dwellings, residential conversions and other built facilities

7.3.17 Replacement or new dwellings, building conversions or other built facilities will need to carefully consider the positive aspects of the character and appearance of their built context, and will need to be modest in form and respectful of their highly sensitive setting so as to avoid visually intrusive development. This is likely to include a building form that reflects its context and topographical setting, often ‘stepping back’ with the topography rather than working against it to maximise views from the property.

7.3.18 Large or irregular expanses of glazing in dwellings and other buildings present particular problems with reflection and light spill in this landscape, impacting upon the undeveloped character and tranquillity of the coastal environment. There is a high degree of pressure to maximise coastal views from high value property, and the LPAs will seek to resist such features that are harmful to the landscape and scenic quality of the area. As with the building form, glazing proportions will need draw on the positive (often vernacular) proportions of development locally.

7.3.19 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 are considered to meet the aims of the Heritage Coast and will be supported in principle, provided that they meet the other criteria of the policy.

7.3.20 All development in the coastal landscape will need to consider its whole-life position on the site, particularly in areas identified as being subject to coastal change. Where there is a likelihood of failure or redundancy of development in the future, proposals should include for the restoration and removal of development, for example, when coastal defences fail or need replacing.

7.3.21 For further guidance on design please see guidance at DEV20.

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7.4 Nationally protected landscapes (DEV25)

What is this policy about?

7.4.1 Policy DEV25 protects nationally designated landscapes from inappropriate development and activity. It provides the basis for thorough consideration of development proposals such that any permissions granted will be for development and activity that conserves and enhances designated landscapes.

7.4.2 The nationally designated landscapes within (and extending beyond) the Plan Area are the:

- South Devon AONB;
- Tamar Valley AONB; and,
- Cornwall and West Devon Mining Landscape World Heritage Site (DEV22).

7.4.3 The setting of Dartmoor National Park and the declaration of intent in September 2019 to designate the Plymouth Sound National Marine Park may also be relevant in decision making.

7.4.4 The pressure for development in AONBs (Areas of Outstanding National Beauty) is well evidenced. By definition, the high quality landscapes and scenic beauty of AONBs act as an attractor for residential, tourism and increasingly business development. In addition, coastal AONBs are popular destinations for retirement and second home investments. This generates high demand for property driving up both land and property values, making AONBs attractive and profitable places in which to secure planning permission for development. Affordable housing delivery is often dependent upon market housing to support viability, which leads to a higher quantum of development needing to be accommodated. Conversely, the high quality environment of AONBs inherently has limited capacity to accommodate development without harm to their special qualities.

7.4.5 DEV25 formulates policy in relation to the management of the South Devon AONB and Tamar Valley AONB as required under Part IV, Section 89 of the Countryside and Rights of Way Act 2000. This SPD, in conjunction with the respective Management Plans, provides further guidance and support to fulfil the Section 85, ‘duty to have regard to the purpose of conserving and enhancing the natural beauty of the AONB’.

7.4.6 The AONB Management Plans for the South Devon AONB and the Tamar Valley AONB provide detailed guidance with respect to the special qualities that define the unique ‘natural beauty’ and are essential reading for anyone seeking planning permission for development within or affecting the setting of an AONB:

- South Devon AONB Management Plan[114];
- Tamar Valley AONB Management Plan[115].

[114] http://www.southdevonaonb.org.uk/about-the-aonb/looking-after-the-aonb/aonb-management-plan

[115] http://www.tamarvalley.org.uk/care/aonb-management-plan/

7.4.7 Strategic planning and decision making on development applications within or 'in the setting' of the AONBs are undertaken by the local planning authorities: SHDC; WDBC; Torbay Council; PCC; DCC; and, the Marine Management Organisation (MMO). The Management Plans are a material consideration in the plan-making and decision-taking process.

7.4.8 Development affecting the setting of Dartmoor National Park will be the subject of similar scrutiny, although development with the park falls within the remit of Dartmoor National Park Authority.

7.4.9 The Cornwall and West Devon Mining Landscape World Heritage Site has its own policy in the JLP (DEV22) and its own Management Plan and supporting SPD which sets out how the planning system will fulfil its responsibilities to this designated heritage asset: Cornwall and West Devon Mining Landscape World Heritage Site, Supplementary Planning Document, May 2017[116].

What needs to be considered in the implementation of this policy?

7.4.10 There is a clear need to manage growth both within, and in the setting of, nationally designated landscapes. Communities need to be economically viable and have access to adequate and appropriate housing types, employment, services and amenities to meet local needs. To achieve sustainable development, these needs should be met in ways that conserve and enhance the AONB's special qualities.

7.4.11 The Sustainable Villages Assessment provides guidance with respect to where development might be most suitably located, although it is recognised that development needs arise throughout the areas.

7.4.12 Given that AONBs are given the 'highest degree of protection', appropriate development is likely to be small scale and related to specific and clearly evidenced local needs.

DEV25.3 – Major developments in the AONBs

7.4.13 Permission for major developments will only be granted in exceptional circumstances and where it can be demonstrated that they are in the public interest. There is no specific definition in the NPPF of what constitutes major development. This judgement is the subject of consideration, by the relevant LPA, of harm and significance, not quantum of development. It is strongly advised that a prospective developer seeks an early view in this respect.

[116] https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/planning-policy-guidance/cornwall-and-west-devon-mining-landscape-world-heritage-site-supplementary-planning-document/

7.4.14 Where development is deemed to be 'major development' it will be necessary to consider alternatives and cumulative impacts.

DEV25.2-DEV25.4 – Conserving and enhancing natural beauty

7.4.15 The key test for any development proposal is the need to 'conserve and enhance' natural beauty. The respective Management Plans provide clear guidance in this respect, identifying themes and objectives to guide project proponents in developing proposals and in the context of which a judgement regarding acceptability will be made.

7.4.16 Natural beauty is not an easily defined term, with a judgement being made in each context on the basis of a series of factors including special qualities, natural heritage, local distinctiveness, historic and cultural heritage, dark skies and natural nightscapes, tranquillity, and the delivery of management plan objectives.

7.4.17 The respective Management Plans and AONB Planning Guidance describe special qualities in detail and require an approach of seeking to avoid, minimise or mitigate harm through careful selection of location, design and materials.

7.4.18 All policies relate to the statutory purpose of AONB designation whilst recognising that the natural world underpins the prosperity and wellbeing of the area and its communities. The ambition of this cross cutting strategy is to achieve environmental net gain, reduce potential harm and provide a framework for identifying actions that may enhance Devon's natural, built and cultural assets.

7.4.19 In this respect, whilst AONBs are entities in their own right, numerous other significant designations contribute to their special qualities. This includes nature conservation designations and historic environment designations: Special Areas of Conservation found within, overlapping or immediately adjacent to the AONB boundary; Sites of Special Scientific Interest; National Nature Reserves; Scheduled Ancient Monuments; Listed Buildings; Registered Historic Parks and Gardens; Conservation Areas and Protected Wreck sites.

DEV25.8 – Bringing forward proposals

7.4.20 The following diagram has been adapted from the South Devon AONB Planning Guidance[117] and provides a helpful flow diagram of the process of bringing forward proposals. Given the complexity of the necessary survey, assessment and design it is particularly important that early engagement is sought with the relevant LPA and it is strongly recommended that a prospective developer use the pre-application services.

[117] http://www.southdevonaonb.org.uk/about-the-aonb/looking-after-the-aonb/aonb-management-plan

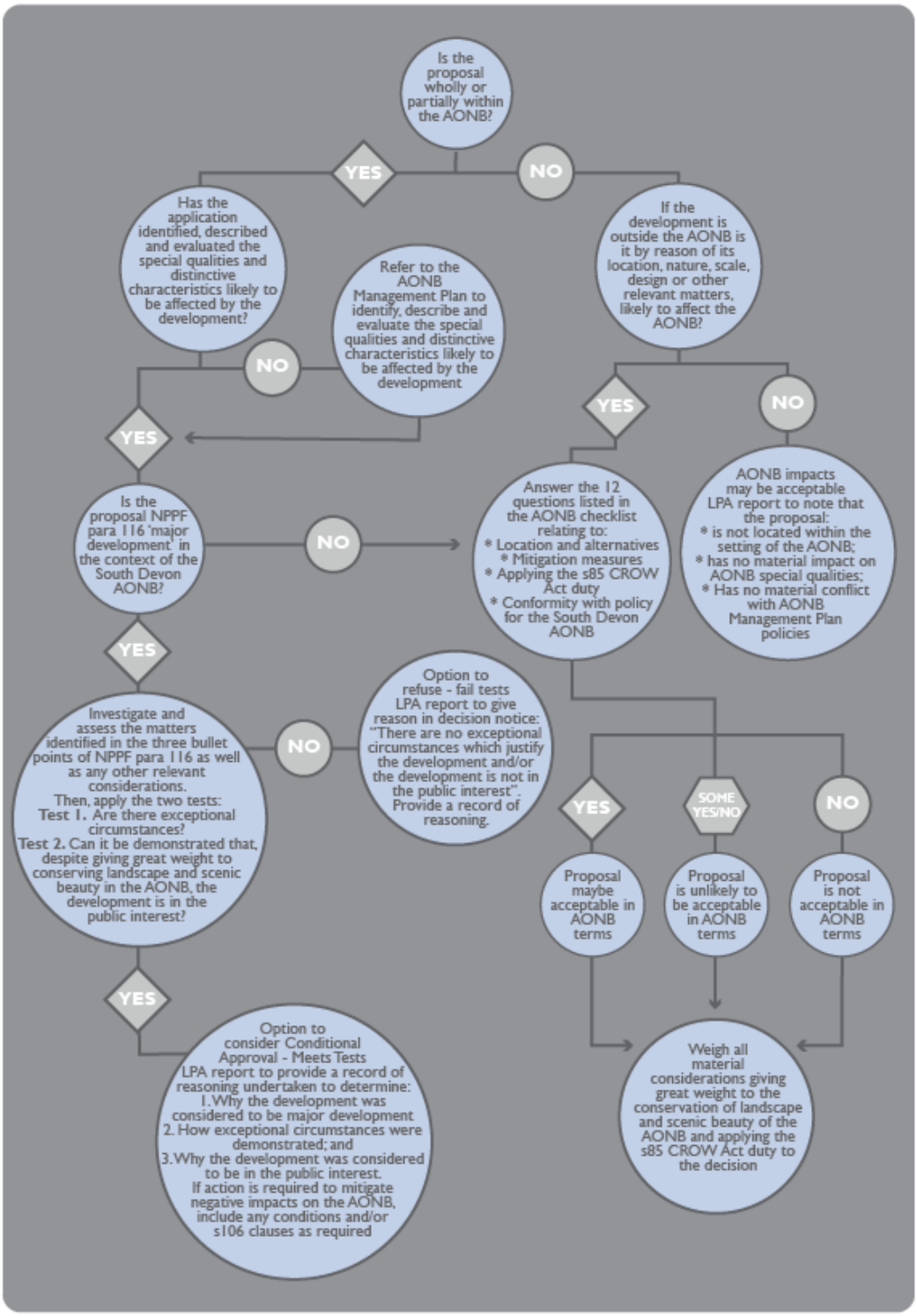

Figure 24: Considerations for decision-taking on development proposals in or affecting AONBs

7.5 Protecting and enhancing biodiversity and geological conservation (DEV26)

What is this policy about?

7.5.1 The JLP area has many characteristics which set it apart from others such as a high quality green city environment; a dramatic maritime setting and surrounding countryside. DEV26 is a policy to ensure that development supports the conservation, enhancement and restoration of biodiversity and geodiversity across the JLP area, alongside SPT12 (Strategic approach to the natural environment) which sets out the strategic approach to protecting the hierarchy of designated sites.

7.5.2 When considering habitat creation/restoration it is important to consider other guidance within this SPD, particularly with regards to the historic environment (DEV21) and landscape character (DEV23). There is potential for multifunctional outcomes if opportunities for enhancing the natural environment are considered alongside opportunities to conserve and enhance access to the historic environment.

7.5.3 The LPAs are required, through policy and legislation, to consider impacts upon biodiversity and geodiversity when determining applications. Relevant planning policy and legislation includes:

- Chapter 15 of the NPPF (Conserving and enhancing the natural environment);
- The 'Natural Environment' section of NPPG[118], particularly with regards to biodiversity and ecosystems;
- Government Circular 06/2005[119] (Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system);
- The Conservation of Habitats and Species Regulations 2017[120];
- Section 40 of the Natural Environment and Rural Communities Act[121] (NERC Act, 2006);
- Other legislation giving protection to species and habitats that may be of relevance includes:
    - Wildlife and Countryside Act, 1981 (as amended);
    - Protection of Badgers Act, 1992;
    - Hedgerow Regulations, 1997;
    - Environmental Impact Assessment Regulations, 2011; and/or,
    - Countryside and Rights of Way Act, 2000.
- The British Standard for Biodiversity - Biodiversity — Code of practice for planning and development BS 42020:2013[122]

[118] https://www.gov.uk/guidance/natural-environment#biodiversity-and-ecosystems
[119] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf
[120] http://www.legislation.gov.uk/uksi/2017/1012/contents/made
[121] https://www.legislation.gov.uk/ukpga/2006/16/contents
[122] https://shop.bsigroup.com/ProductDetail?pid=000000000030258704

- Biodiversity net gain – Good practice principles for development – A Practical Guide (CIEEM/IEMA/CIRIA, 2019)[123]
- Bat Conservation Trust (BCT) Bat Survey Guidance – Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition[124]
- Government standing advice for Protected sites and species[125].

What needs to be considered in the implementation of this policy?

7.5.4 In order to be successful new development will need to consider:

- Relevant planning policy and legislation;
- The protected sites hierarchy;
- Mitigation hierarchy;
- Protected species and associated planning policy and legislation;
- Ecology survey information required to support planning applications;
- Biodiversity Net Gain; and,
- Securing measures for biodiversity and ensuring long term management.

The protected sites hierarchy

7.5.5 Designated sites (on the basis of presence of particular species and/or habitats) receive protection according to their status within the protected sites hierarchy.

7.5.6 DEV26 sets out the hierarchy of protected sites for biodiversity and geodiversity:

1. European Sites:
    - Special Areas of Conservation (SAC); and,
    - Special Protection Areas (SPA).
2. Nationally significant sites for nature conservation:
    - A Site of Special Scientific Interest (SSSI);
    - National Nature Reserve (NNR);
    - Ancient Woodland; and,
    - Marine Conservation Zone (MCZ).
3. Locally designated sites:
    - County Wildlife Site (CWS);
    - Local Nature Reserve (LNR); and,
    - Regionally Important Geological Sites (RIGS) and their function as part of a local ecological network.

7.5.7 The location of most of the these sites can be found on the government's Department for Environment, Food and Rural Affairs (Defra)'s interactive map[126] with the exception of CWS and RIGS which can be found on the DCC Environment Viewer Map[127].

[123] https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development-a-practical-guide/
[124] https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-3rd-edition
[125] https://www.gov.uk/topic/planning-development/protected-sites-species
[126] https://magic.defra.gov.uk/magicmap.aspx
[127] http://map.devon.gov.uk/dccviewer/

Mitigation hierarchy

7.5.8 Overall, the LPAs approach is to implement a mitigation hierarchy as set out in Policy SPT12.1 when considering ecology:

1. AVOID by altering the design or restricting timing of proposed works;
2. MITIGATE to reduce the impacts as much as possible by, for example, precautionary or sensitive vegetation or roof removal methods; etc.
3. COMPENSATE for any loss of habitat/features such that there is no net loss of biodiversity, for example through new hedgerows, bat roosts or bird boxes etc.

7.5.9 Ecological surveys should be undertaken when there is a reasonable likelihood of protected species being present.

7.5.10 Based on the findings of the ecological survey, the first step in design should be to avoid and minimise impacts on biodiversity through site consideration (if possible) and good design.

7.5.11 Compensation is a last resort if the mitigation hierarchy has been applied and residual impacts on biodiversity remain. This will be secured by the LPA for any loss of habitat/features to ensure there is no net loss of biodiversity (using the Defra Biodiversity Metric for major developments).

7.5.12 The preference for compensatory habitats/features is on-site, however where this is not practicable then off-site compensation may be considered on a case-by-case basis.

7.5.13 The figure below shows how the mitigation hierarchy is applied in practice in planning:

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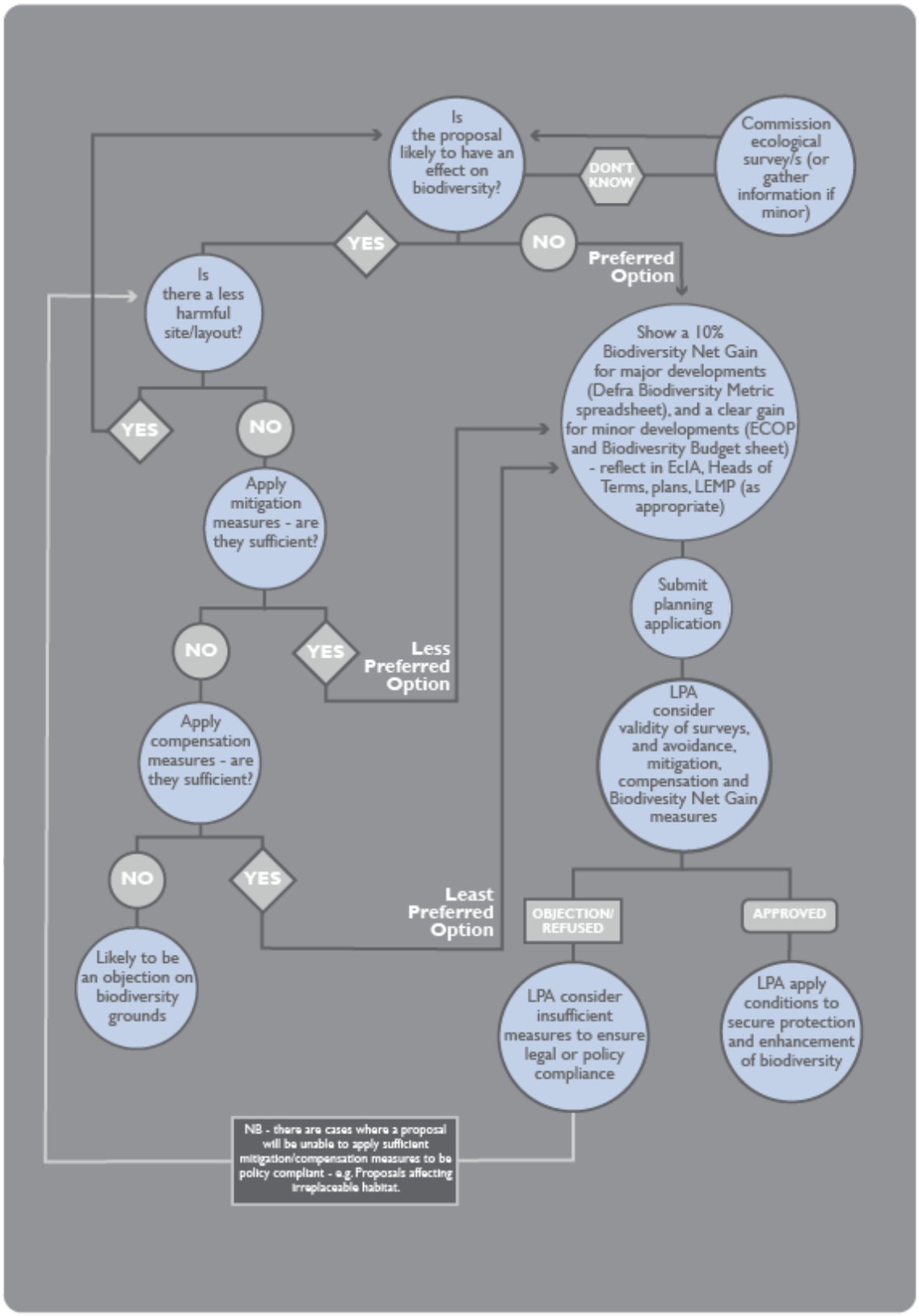

Figure 25: The mitigation hierarchy in practice

DEV26.1 - European Sites and Habitats Regulations Assessment (HRA)

7.5.14 European Sites are of international importance and receive the highest level of protection and include: Special Areas of Conservation (SAC); candidate SACs; Special Protection Areas (SPA) and provisional SPAs. The Tamar Estuaries Complex SAC and Plymouth Sound and Estuaries SPA are within the area covered by the declaration of intent to designate the Plymouth Sound National Marine Park.

7.5.15 The LPAs are required to consider the likelihood of proposed development having a significant effect on European Sites and ensure development does not have an adverse effect on their integrity. This is undertaken through the 'Habitats Regulations Assessment' (HRA) process. Where a significant effect is likely, the applicant will be expected to provide a document titled 'Evidence to inform a HRA.'

7.5.16 The HRA of the JLP concluded that the recreational impacts on designated sites arising from planned residential development, either alone or in combination with other plans or projects needs to be addressed. To enable the planned development to proceed, the Conservation of Habitats and Species Regulations 2017[128] requires that appropriate mitigation measures are in place to ensure that the proposed development will not result in an adverse impact on the integrity of the designated European sites.

7.5.17 Recreational mitigation will be delivered through the Plymouth Sound and Estuaries European Marine Sites Recreation Plan which requires all residential development within a 12.3km zone of influence to contribute towards the costs of the plan.

7.5.18 Further information about the HRA process, development within the Plymouth Sound and Estuaries European Marine Site Zone of Influence and the South Hams SAC Consultation Zone can be found within APPENDIX 6: Additional guidance for DEV26.

DEV26.2 - Nationally significant sites for nature conservation

7.5.19 Nationally significant sites for nature conservation receive a high level of protection and include Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Ancient Woodland and Marine Conservation Zones (MCZ).

7.5.20 Where development is likely to affect a SSSI or NNR, directly or within identified 'Impact Zones'[129] around them, the LPA will consult Natural England and, where development may have an effect on Ancient Woodland, Standing Advice published by Natural England and the Forestry Commission should be consulted.

[128] http://www.legislation.gov.uk/uksi/2017/1012/contents/made
[129] These zones are available on the Defra interactive map.

7.5.21 Where potential impacts are identified, the applicant will be expected to include avoidance and/or mitigation measures within their submission to ensure that the measures avoid or reduce impacts on the site to a negligible level. These measures should be reflected in supporting documents to the application.

7.5.22 For further advice with respect to Ancient Woodland please see guidance at DEV28.

DEV26.3 - Locally designated sites

7.5.23 Locally designated sites play an important function as part of the local ecological network either for interaction between communities and nature (Local Nature Reserves (LNRs)) or because they are of county importance for wildlife/geology in Devon (County Wildlife Sites (CWS) and Regionally Important Geological Sites (RIGS).

DEV26.4 - Protected species, Priority Habitats and Species and associated planning policy and legislation

7.5.24 The presence of protected species and Priority Habitats and Species and consideration of impacts of a proposed development upon them is a material consideration. Protected species receive levels of protection according to their designation (European, National and Priority Species).

- European Protected Species that are most likely to be encountered within the Plan Area are bats (17 species), dormice, otters and Great Crested Newts;
- Nationally protected species most likely to be encountered within the Plan Area are reptiles, Barn Owls and badgers;
- Priority Species/Species of Principal Importance are identified at a UK scale, focussed further at a Devon scale for which the county has a particular responsibility to look after the species and their supporting habitats;
- Priority Habitats/Habitats of Principal Importance of which there should be no net loss (otherwise an application may be refused). The vast majority of hedgerows in Devon are Priority Habitats, please see guidance at DEV28 for specific considerations and requirements relating to hedgerows.

7.5.25 Further information about the requirements relating to protected species in support of planning applications can be found in APPENDIX 6: Additional guidance for DEV26, including Habitats Regulations offences and European Protected Species derogation tests, protected species Standing Advice, and compensation for impacts on Cirl Bunting habitats.

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DEV26.5 – Biodiversity Net Gain

Context

7.5.26 DEV26.5 states that net gains in biodiversity will be sought from all major development proposals. Biodiversity Net Gain[130] will be sought from all major developments across the Plan Area and can be considered met when there is at least a 10 per cent increase in biodiversity units when applying the Defra Biodiversity Metric 2.0[131].

7.5.27 This policy and guidance should also be considered in light of the government's recent response report to its consultation on introducing a mandatory approach to net gain in the planned Environment Bill: Net gain - Summary of responses and government response July 2019[132]. In particular, the government is indicating the 10 per cent requirement will become mandatory and will apply to smaller developments

7.5.28 The guidance set out in this SPD anticipates this outcome and not only amplifies the implementation of DEV26.5 but encourages minor developments to also deliver net gain.

7.5.29 Applying Biodiversity Net Gain is not an alternative to the application of the mitigation hierarchy and it would be unacceptable practice for a developer to compensate without first seeking to avoid and mitigate. Biodiversity Net Gain is additional to 'compensation' which may be required for legal compliance.

7.5.30 Good practice with respect to applying Biodiversity Net Gain to a development can be found at:

- Biodiversity net gain – Good practice principles for development (CIEEM/IEMA/CIRIA, 2016)[133] and,
- Biodiversity net gain – Good practice principles for development – A Practical Guide (CIEEM/IEMA/CIRIA, 2019)[134]

Contributing to the biodiversity network

7.5.31 Where there is to be on-site or off-site compensatory and Biodiversity Net Gain habitat to be restored or created, DEV26.5 directs applicants towards ensuring measures secure: the restoration and re-creation of priority habitats; ecological networks; and, the protection and recovery of legally protected and priority species populations. It also helps support the delivery of the biodiversity network

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[130] *Please note – At the time of writing, UK policy, standards and practice relating to Biodiversity Net Gain is an area which is rapidly developing. As it matures, there may be updates to the approach outlined in this section – these updates may result from: Defra Biodiversity Metric; policy change; British Standard on Biodiversity Net Gain and latest good practice.*

[131] http://publications.naturalengland.org.uk/publication/5850908674228224

[132] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf

[133] https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/

[134] https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development-a-practical-guide/

across the Plan Area, established in the JLP evidence base, Biodiversity Network creation process, 2017[135] where there is the greatest need or potential for habitat restoration and creation.

7.5.32 The JLP area Biodiversity Network includes:

- Core Sites – European Sites; SSSIs; Ancient Woodland; NNRs; MCZs; LNRs; CWS'; and, RIGS, and in some cases, Priority Habitats;
- Future Core Sites – Cirl Bunting Enhancement Zones and Greater Horseshoe Bat Sustenance Zones.
- Corridors/Stepping Stones –Strategic Nature Areas; Other Sites of Wildlife Interest (OSWI); river corridors and the B-line (key pollinator) corridors; and, Greater Horseshoe Bat Landscape Connectivity Zone.
- Other sites which may include Town or Parish wildlife corridors that may benefit from restoration or creation as identified in 'made' Neighbourhood Plans, and areas where priority species are known to occur and where improving connectivity of habitats will have the most benefit for biodiversity (including Priority Habitats); and,
- Habitat opportunities and priorities identified through the Local Nature and Recovery Strategies.

7.5.33 In support of the Defra Biodiversity Metric 2.0, it is anticipated that further habitat opportunity mapping and prioritisation will be undertaken to identify opportunities for habitat restoration and enhancement to deliver the greatest benefit, and that this will guide compensation/net gain provisions. This will be through Local Nature Recovery Strategies.

Assessing biodiversity value and delivering net gain

Major development

7.5.34 Applying DEV26.5, the LPAs will seek 10 per cent measurable Biodiversity Net Gain from all major development. To validate any major development planning application, a completed Defra Biodiversity Metric 2.0 spreadsheet[136] should be completed by a suitably experienced and qualified consultant ecologist and submitted with the application.

7.5.35 The spreadsheet must show the assessment of existing/pre-development biodiversity units, proposed/post-development biodiversity units reflecting any proposed on or offsite habitat creation and restoration, and a value representing the change in biodiversity value – this figure must show a 10 per cent increase in biodiversity units to be policy compliant. See APPENDIX 6: Additional guidance for DEV26 for further information.

Minor development

7.5.36 Although DEV26.5 specifically relates to major development proposals, the LPAs will also encourage provision for biodiversity net gain where appropriate for

[135] https://www.plymouth.gov.uk/sites/default/files/BiodiversityNetworkCreationProcess.pdf
[136] http://publications.naturalengland.org.uk/publication/5850908674228224

smaller developments. Use of the Defra Biodiversity Metric 2.0 would be disproportionate for minor development applications. Nonetheless, minor developments are able to deliver proportionate (in relation to type, scale and impact of the development) with measurable net gain or enhancements for biodiversity.

7.5.37 Minor development planning applications will be encouraged to submit an Ecological Opportunities Plan (ECOP) and Biodiversity Budget. These may either be undertaken by a suitably qualified ecological consultant (if a requirement for an ecological survey has been triggered), or by the applicant for schemes which have not triggered an ecological survey.

7.5.38 An ECOP (with reference to section 5.4 of the Biodiversity — Code of practice for planning and development BS 42020:2013[137]) is a method of presenting in a plan how the habitats or features for protected species and habitats will be lost, retained, created and/or enhanced – i.e. the application of the mitigation hierarchy in practice.

7.5.39 An ECOP should be proportionate, it may be simple in format and content (e.g. if showing bat and bird features for a barn conversion), or more complicated if showing various habitat and species retention/provisions for a multiple dwelling proposal.

7.5.40 The accompanying Biodiversity Budget should record, in a table, the quantity of habitat currently on site (under broad headings if being completed by a non-professional), and the loss and gains of habitat as a result of the proposed development. Whilst it may not be possible to evidence a 10 per cent net gain for biodiversity (for example, if there is currently no biodiversity value) the principle of 10 per cent, or where not possible a clear biodiversity net gain, will be applied for policy compliance. An example of a Biodiversity Budget is given below:

Habitat/species	Existing provision	Loss	Gain
Hedgerow	75m	15m species poor	100m species rich
Grassland	600m^2 lawn	400m^2	
Woodland			
Scrub			
Trees		4 birch	3 apple, 3 cherry, 3 plum
Waterbodies			
Bats			3 inbuilt boxes
Birds			3 inbuilt boxes Nesting potential in new hedgerows

[137] https://shop.bsigroup.com/ProductDetail?pid=000000000030258704

Habitat/species	Existing provision	Loss	Gain
Reptiles			1 hibernacula
Invertebrates, small mammals, amphibians			3 log piles

Figure 26: Example Biodiversity Budget

7.5.41 Further information about how to consider compensation and Biodiversity Net Gain in planning applications can be found in APPENDIX 6: Additional guidance for DEV26.

7.5.42 Whilst there are various measures for biodiversity that can be included within minor developments to secure Net Gain, the following should be provided (unless structurally impracticable):

- One inbuilt bat box/brick/tube per dwelling;
- One inbuilt bird box/brick per dwelling;
- One inbuilt bee brick per dwelling; and,
- A hole for small mammals (such as hedgehogs) in each garden fence of 13 x 13cm.

7.5.43 Applying measurable net gain does not apply to permitted development, change of use of or alterations to buildings and house extensions. The process is also distinct from consideration of impacts relating to impact on European Protected Sites or Species or irreplaceable habitats (e.g. Ancient Woodland), and should not duplicate or seek to replace legislative or policy requirements in these cases.

Delivery of offsite compensation and Biodiversity Net Gain

7.5.44 The LPAs preference is for the restoration or creation of habitats onsite to deliver compensation and Biodiversity Net Gain measures, but where this is not possible, or there is a clear benefit, measures could be delivered offsite of which there are four main methods:

Method of offsite delivery	Requirements
Applicant/developer delivers on land within their control, in line with JLP Biodiversity Network priorities or 'made' Neighbourhood Plan.	Management Plan showing how the applicant/developer will maintain, monitor and resource the proposed measures into the long-term (30+ years).
Applicant/developer pays a sum to the LPA (based on biodiversity unit calculation and habitat creation costs) for the LPA to deliver measures in partnership with a third party, such as a nature conservation organisation in line with JLP Biodiversity Network priorities or 'made' Neighbourhood Plan.	Calculation showing habitat creation costs applicable to number of biodiversity units. This is likely to include: land purchase; habitat creation and ongoing management.

Method of offsite delivery	Requirements
Applicant/developer pays a sum to the LPA (based on biodiversity unit calculation and habitat creation costs) for the LPA to deliver measures on land in the LPA's ownership and in line with JLP Biodiversity Network priorities or 'made' Neighbourhood Plan.	Calculation, developed with the LPA, showing habitat creation costs applicable to the LPA's land.
Applicant/developer pays a sum to the LPA (based on biodiversity unit calculation and habitat creation costs) which will be held in a 'habitat bank.' Approved providers will be able to bid into the bank for funding to deliver compensation/Biodiversity Net Gain projects which accord with JLP Biodiversity Network, 'made' Neighbourhood Plan or Nature Recovery Network priorities.	Calculation showing habitat creation costs (which may include land purchase) applicable to number of biodiversity units.

Figure 27: Delivering offsite compensation and Biodiversity Net Gain

7.5.45 Key considerations for delivering successful compensation and Biodiversity Net Gain includes:

- Loss of habitats of high biodiversity value (priority habitats and habitats of 'high' distinctiveness) should be compensated for (and net gain provided) in the same type of high-value habitat.
- Compensation and net gain should be in the same habitat as that affected by development, or a habitat with a higher biodiversity value/distinctiveness that supports the same species affected (e.g. loss of semi-improved grassland could see creation of unimproved grassland) – provision should be ecologically equivalent or better.
- There should be no 'trading down' of habitats, with lost or damaged habitat being replaced with habitat of lower biodiversity value. Compensation and net gain should show an improvement in the extent or condition of specific features in qualitative terms as well as meeting the quantitative 10 per cent Biodiversity Net Gain.
- If offsite, compensation and net gain provision should typically be local to the development if this is consistent with identified delivery of restoration and creation of ecological networks and priority habitats.
- As well as creation of new habitat, beneficial compensation and net gain can be secured by enhancing or restoring degraded habitats that should have high biodiversity value.
- Offsite compensation and net gain provision should apply the Lawton principles of creating more, bigger, better and joined up areas for biodiversity.
- Well-designed on/offsite provisions may secure wider environmental/social-economic benefits contributing to thriving and sustainable communities.

DEV26.6 - Securing measures for biodiversity and ensuring long term management

7.5.46 To give the LPAs the assurance that measures for biodiversity have been properly considered and taken into account, the LPAs may require evidence to be provided as part of an application. This evidence will vary according to scale of development.

7.5.47 Policy DEV26 provides not only for the mitigation and compensation of unavoidable impacts on wildlife but also for Biodiversity Net Gain. Planning obligations will be used to secure the following:

- Off-site mitigation/compensation (including fees for the translocation of protected species);
- Off-site delivery of Biodiversity Net Gain (where it cannot be provided onsite);
- Long-term management of mitigation/compensation measures which have been delivered off-site in perpetuity, and for Biodiversity Net Gain measures, for a period of 30 years or longer (management either provided/secured by the applicant in accordance with a Management Plan, or by payment of an agreed commuted sum; and/or,
- Inspection fees or a bond to ensure correct implementation and management of the work on-site or off-site when carried out by the applicant or a third party, to ensure the scheme complies with Policy DEV26 in practice.

DRAFT

7.6 Green and play spaces (DEV27)

What is this policy about?

7.6.1 DEV27 is a policy to protect and support a diverse and multi-functional network of green space across the Plan Area, ensuring the delivery of multifunctional open spaces for wildlife, the historic environment, health, recreation, flood risk mitigation, carbon storage and food production. It relates both to sites with a specific designation and also to undesignated green spaces within the Plan Area.

7.6.2 To ensure that these spaces are protected and enhanced as a result of the growth in the Plan Area, a network of green spaces has been mapped and will be protected.

7.6.3 It is recommended that this guidance is read alongside the relevant Open Space Assessment (OSA) or any future versions, should they be updated:

- Plymouth Policy Area Open Space Assessment (POSA)[138];
- South Hams Open Space, Sport and Recreation Study 2017: Quantity, Quality and Accessibility Standards[139];
- West Devon Open Space, Sport and Recreation Study 2017: Quantity, Quality and Accessibility Standards[140]

PPA hierarchy of green spaces

7.6.4 DEV27 sets out a hierarchy of green spaces for the PPA, and areas directly adjacent, to afford greater protection to those green spaces that deliver the most benefits and services for communities. This is necessary to ensure the sustainability of the JLP's growth agenda.

7.6.5 The green space hierarchy set out in the JLP has been justified by the evidence provided within the Plymouth Policy Area Open Space Assessment (POSA), site specific information for the Strategic Green Space (SGS) sites, and the Thriving Towns and Villages (TTV) Policy Area Open Space, Sport and Recreation (OSSR) Studies.

7.6.6 The hierarchy of green spaces across the PPA is as follows:

- Strategic Green Space (SGS) - six SGS sites have been identified and allocated in the JLP due to their multi-functional nature that will deliver benefits for communities, wildlife and growth projects. A proactive approach will be taken to their delivery and works on these sites will be aligned to the timing of the surrounding areas growth. They will help to mitigate any potential recreational impacts on the South Dartmoor Woods SAC and protected landscapes. The six sites are set out below, with the objectives for each SGS set out in a specific JLP policy:

[138] https://www.plymouth.gov.uk/sites/default/files/PlymouthPolicyAreaOpenSpaceAssessment.pdf
[139] https://www.plymouth.gov.uk/sites/default/files/SouthHamsOpenSpaceSportAndRecreationStudy.pdf
[140] https://www.plymouth.gov.uk/sites/default/files/WestDevonOpenSpaceSportAndRecreationStudy.pdf

- Central Park (PLY19);
- Derriford Community Park (PLY41);
- Woolwell Community Park (PLY44);
- Plym Valley (PLY45);
- Sherford Community Park (PLY49); and,
- Saltram Countryside Park (PLY54) .

- City Green Space (CGS) – CGS sites meet the value threshold for their type of green spaces as defined in the POSA;
- Neighbourhood Green Space (NGS) – NGS sites are green spaces which were assessed within the POSA but did not meet their typologies value threshold.

What needs to be considered in the implementation of this policy?

DEV27.1 - Strategic Green Spaces

7.6.7 Development within a Strategic Green Space (SGS) will normally only be permitted where it enhances the value of the green space. In assessing whether development delivers a value enhancement to the SGS, the LPAs will review the application against the specific SGS allocation within the JLP, which sets out clear objectives for the green space. Any development which does not comply with these objectives may be refused.

DEV27.2 – Open spaces, including designated City Green Space and Neighbourhood Green Space

7.6.8 The policy seeks to safeguard open spaces throughout the Plan Area from built development except in certain circumstances. Within the PPA, this includes also designated City Green Space (CGS) and Neighbourhood Green Space (NGS) sites. Applicants bringing forward proposals will need to include an open space assessment with demonstrates that one of the following tests is satisfied:

- Test one - the open space is surplus to requirements;
- Test two - the loss will be replaced by equivalent or better provision in a suitable location; or,
- Test three - the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss.

7.6.9 Additionally, the policy provides that development will be resisted on sites where the functions and characteristics of the green space would be lost and mitigation would not be possible.

7.6.10 The above tests are considered further below.

Test one – Surplus to requirement

7.6.11 In making a judgment with regard to whether a site is wholly, or partly, surplus to requirements the LPAs will take account of the following:

a) The value of the green space - this is in relation to its typology and size as per the applicable LPA's Open Space Assessment (OSA), which takes

account of the site characteristics and functions. An overview of the applied typologies and associated size thresholds, where applicable are below:

Plymouth Policy Area	TTV Policy Area
Parks and Gardens ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	Parks and Gardens
Natural and Semi-natural Green Spaces ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	Natural Green Spaces
Green Corridors ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	Greenways
Amenity Green Spaces ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	Amenity Green Spaces
Allotments, Community Gardens and Urban Farms ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	Allotments
Churchyards and Cemeteries ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	Cemeteries and Churchyards
Provision for Children and Young People ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	Play/Youth
Agricultural Land ▪ Large: over 10ha ▪ Medium 2-10ha ▪ Small: under 2ha	
	Civic Spaces
	Beaches

Figure 28: Green space typologies and associated size thresholds

b) The potential to increase the value or quality of the open space to fulfill more functions, fulfill its function better, or mitigate any deficiencies - this will be particularly important within the PPA and towns across the TTV where the creation of new green space is more difficult due to the urban nature of these areas. The applicable OSA and any ‘made’ Neighbourhood Plans will also be taken into account.

c) The site's accessibility and potential neighbourhood catchment as identified within the JLP and the relevant OSA:

Measure	Plymouth Policy Area	TTV Policy Area
Walking distance to nearest local accessible natural space (this can include any of the aforementioned typologies except for the ones listed below and as long as they are publically accessible)	400m walking distance Identified as 240m buffer zone around the site (OSA)	300m walking distance (to a space of 2ha<)
Walking distance to nearest local playable space/ LEAP	400m walking distance identified as 240m buffer zone around the site (Plymouth Play Assessment, PPA)	400m walking distance
Walking distance to nearest neighbourhood/strategic playable space	1000m walking distance identified as 600m buffer zone around the site (PPA)	1000m walking distance

Figure 29: Accessibility parameters across the Plan Area

Taking account of a site potential to meet a local deficiency is essential to support sustainable growth as approval of development on a site could reduce the opportunities for the LPA to address a local deficiency and exacerbate the deficiency within the local area. This will be particularly important within the PPA and towns across the TTV Policy Area where the creation of new green space is more difficult due to the urban nature of the area.

d) Amount of green space in the area - If the loss, or part loss of the site, will result in the below then the site shall not be considered to be surplus to requirement:
   - The local area not meeting its quantity or accessibility standard as set out in the JLP Figure 3.2 (below);
   - Increasing an already existing deficiency; and/or,
   - Reducing opportunities for the area to address its existing deficiencies.

Measure	PPA	TTV Policy Area – Main Towns, Towns & Key Villages	Reason for difference in standard across Plan Area
Accessible natural greenspace[141]	5.09ha per 1,000 people	1.91ha per 1,000 people	City standard reflects urban

[141]Accessible natural greenspace – this includes any of the following typologies: parks and gardens, natural & semi-natural green spaces and amenity greenspaces.

Measure	PPA	TTV Policy Area – Main Towns, Towns & Key Villages	Reason for difference in standard across Plan Area
			context and need for major greenspaces to achieve liveable city
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		Urban local nature reserves have specific role in city environment

Figure 30: JLP Figure 3.2 extract re. green spaces

7.6.12 The existing low quality nature of a green space will not form a consideration in whether the site is surplus to requirements, unless the applicant is proposing to replace the green space with a better provision in a suitable location.

Test two – Equivalent or better provision in a suitable location

7.6.13 It will not always be possible to mitigate the impacts of a development satisfactorily and in these cases the proposal may be refused. However, in cases where appropriate mitigation or compensation can be achieved, the LPAs will expect this to include a net increase of the value and quality of the remaining green space or the delivery of new green space which provides an equivalent or better provision in perpetuity. Better provision will be deemed a provision which helps to address local deficiencies, which is of a similar or larger size than the space lost, meets its typologies and size value threshold and has been designed and delivered to meets it quality standard and includes provisions for its maintenance.

7.6.14 The acceptability of the mitigation or compensation will be assessed through comparing the original OSA site form, which can be found in the relevant open space assessment, with a completed audit form, which can be found in APPENDIX 7: Open space assessment form, for the remaining improved or proposed replacement green space. This will be accompanied by the necessary mapping, indicating which parts of the site fulfil, or will fulfil, which specific functions, or by a before and after, existing versus proposed, comparison of value/quality. For NGS' the LPAs will be seeking an up-lift in value to achieve CGS status.

7.6.15 The audit form is based on the following value criteria, which should be used to inform the design of the retained open space or proposed new provision:

Principle	Questions to ask
Designations	Does the proposal enhance an already existing designated area, including a historic designation? Does it provides scope for the delivery of additional designated areas?
Community involvement	Does the proposal encourage community involvement, for example, is there scope to host events, etc.?
Water bodies	Is there a water body proposed or is an already on-site feature being improved?
Informal recreation	What level and types of access is proposed? Does the proposal include any form of play provision? - When asking this question the type of green space should be taken into account, not every green space is suited to equipped play. What forms of informal recreation are provided for within the proposed green space?
Sports and other organised activities	Does the proposal include any sports provision? When asking this question the type of green space should be taken into account, not every green space is suited to sports provision.
Context	How does the site interact with neighbouring areas? What function do these neighbouring areas fulfil?
Accessibility	Does the proposal improve accessibility for users, including less-able users, within the site at entrances and off-site linkages?
Natural habitats/biodiversity	Does the proposal increase biodiversity on site? Does it tackle invasive species if present on site?
Character Setting	How will the proposal improve the setting of the wider area? How does it take account of the local character and improve it? How does it address views? How does it link into other local infrastructure? If there are any historic assets in the area, how does the scheme address these?
Amenity detractors	Does the proposal assist in addressing amenity detractors?
Educational Interest	Does the scheme incorporate means to enable educational benefits, e.g. interpretation boards, pond dipping decks, built facilities for local community use for education, etc…?
Productive landscape	Does the scheme incorporate any form of productive landscape such as community orchards, allotments, coppicing, forestry, etc?
	How does the scheme respond to the broad objectives set out in the original assessment?

Figure 31: Principles of value of green space to be considered

7.6.16 The audit form also includes quality criteria which should inform the design and long-term maintenance of the retained open space or proposed new provision. The long-term maintenance should be secured through conditions or a planning obligation (S106 agreement).

Quality criteria	Questions to ask
A welcoming place	Are the entrances clear and well-presented? How are the proposed boundaries defined? What is the quality of the proposed access? What is the experience of the green space? Has signage been provided?
A healthy, safe and secure place	What is the standard of the proposed amenities? Is there provision of natural surveillance? Have the approaches been designed to be open and clear? Has sufficient space for refuse been included in the design?
A clean and well-maintained place	Is the proposed management plan sufficient and does it include a sustainable funding stream?
A sustainable place	Does the site allow for composting? Do the proposals consider the impact of its management regimes on resources and biodiversity? Does the proposal include sustainable management practices?
Conservation and heritage	Is the design in keeping with its setting? Does it take account of its historic context, if applicable?
Community involvement	How does the new provision propose to increase community involvement?

Figure 32: Quality criteria and questions to be considered

7.6.17 The LPAs expect green space improvements and the design of proposed replacement green spaces to adhere to the guidance provided in chapter DEV20 and DEV23 and seek to deliver biodiversity benefits and any future guidance produced in addition to this SPD.

7.6.18 The LPAs expect the applicant to deliver and maintain the ‘appropriate mitigation’ in accordance with a management plan or provide a contribution to deliver and maintain all the necessary works associated with this proposed increase in net value and net quality related to the ‘appropriate mitigation.’ This will normally be secured through an adherence planning condition, with ongoing maintenance and funding secured through a planning obligation. For major schemes, appropriate implementation may be further secured through the implementation of inspection fees or a bond (for further detail refer to the landscape section of this document).

7.6.19 Where the applicant is unable to deliver on-site mitigation, off-site mitigation will be sought. In these circumstances, the LPA may seek a contribution to replace the lost green space and to maintain the new provision. The Developer Contributions Evidence Base document sets out a benchmark methodology for calculating the cost of mitigating this impact.

Test three – The development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss

7.6.20 The LPAs will consider development for alternative sports and recreation provision as direct delivery of sports and recreation facilities, whose need has clearly been identified within the respective LPA's playing pitch strategy or can be demonstrated through an independent study. Applications will be determined on case-by-case basis to assess whether their benefits outweigh the loss or partial loss of the green space having regard to relevant Open Space Assessment, the site specific environmental data, the relevant playing pitch strategy and the Plymouth and South West Devon Sports and Leisure Facilities Plan 2016 to 2034: Assessment report.

7.6.21 Further consideration will be given to the design of the site in line with the guidance provided above and in chapters DEV20 (design), DEV23 (landscape character) and DEV26 (Biodiversity).

7.6.22 In summary, for applications affecting open space, the LPAs require the applicant to submit a site open space assessment, which demonstrates how it meets the policy requirements. The open space assessment form is available at APPENDIX 7: Open space assessment form.

7.6.23 The applicant should be aware that a development could meet one of the three tests and still be considered unacceptable where it would result in the loss of the functions and characteristics of the greenspace and mitigation is not possible.

7.6.24 Please see Section 12 for further guidance on planning obligations.

DEV27.3 – Accessible green and play spaces
Delivery of new and improvements of existing green spaces

7.6.25 Development is expected to support the provision of accessible green space and place space taking account of the current relevant OSA and the standards set out in the JLP. The LPAs will welcome and encourage the delivery of new and appropriately managed accessible green space on-site. For smaller developments the LPAs will seek contributions through planning obligations to secure quantity, quality and/or accessibility improvements to existing local accessible green spaces. Contributions will be reasonable, proportionate and calculated based on the number of new residents resulting from the proposed development.

7.6.26 Within the PPA, where the applicant is intending to deliver new green space on-site, the LPAs expect the applicant to submit a completed open space assessment form for the proposed green space provision. The open space assessment form is available at APPENDIX 7: Open space assessment form

7.6.27 The LPAs expect the provided green space to meet both value and quality standards for its typology and size threshold to ensure the delivery of a well performing and high quality green space network. The assessment of which will utilise the same criteria as outlined above in the appropriate mitigation and compensation section. The submitted open space assessment form will be used to create an up-to-date list of proposed City Green Spaces to be designated within the next review of the JLP or within the preparation of the Local Green Space DPD.

Delivery of new/improvements to quality of existing play spaces

7.6.28 As part of proposed development, play spaces shall be provided taking account of the current play areas audit within the relevant open space assessment. The LPAs will welcome and encourage the delivery of new and appropriately managed play spaces on-site (where the development is of a sufficient scale and there is no play area within a 240m radius). For smaller developments, and/or developments within a 240m radius of existing play area, the LPAs will seek contributions through planning obligations to secure improvements to the quantity or quality of existing play spaces within the locality.

7.6.29 Please see Section 12 for further guidance on planning obligations.

7.6.30 Detail on expectations from new play spaces are detailed in the respective OSAs and play space audits, with new play spaces expected to comply with the latest playground equipment standard (currently BS EN 1176[142]) and playground surfacing methods (currently BS EN 1177), or any future versions, should they be updated. They should also be based on good design guidance including:

- Play England's design guide, Design for Play[143];
- The Fields in Trust guidance, Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard[144]; and,
- Any future guidance produced in addition to this SPD.

7.6.31 The standards relating to quality are set by the Fields in Trust and cover three types of play space:

- Local areas for play (LAPs);
- Locally equipped areas for play (LEAPs); and,
- Neighbourhood equipped areas for play (NEAPs).

[142] https://shop.bsigroup.com/ProductDetail?pid=000000000030292459
[143] http://www.playengland.net/wp-content/uploads/2015/09/design-for-play.pdf
[144] http://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England-Apr18.pdf

7.6.32 While, traditionally it has been commonplace for development to include these three types of place spaces, there is increased doubt as to the merit of an LAP due to their size and limited equipment which may not be best to stimulate children's imagination and free play. Typically, the LPAs will not be seeking LAPs unless there is a clear local need for such a space.

7.6.33 Accordingly, the LPAs continue to welcome provision of LEAPs and NEAPs, particularly based upon natural play, materials and space. These areas are commonly referred to as Local Landscaped Areas for Play (LLAP). The LPAs will look at these alternatives wherever possible and practicable.

7.6.34 In terms of youth provision the Councils and partner organisations, currently provide a range of spaces including: skate parks; BMX tracks and multi-use games areas (MUGAs). These facilities are provided to varying degrees in association with larger NEAPs, and the demand for new facilities will be considered based upon local evidence including the respective OAS, 'made' Neighbourhood Plans or Town/Parish Open Space, Sport and Recreation Plans.

7.6.35 When calculating equipped play space, this should extend to a fenced boundary or logical boundary on the ground. Equipped play spaces also require space surrounding the play equipment where a fundamental intention is that these should be playful spaces where families can make active use of the spaces (often considered to be 'buffer zones' between equipped play space and neighbouring dwellings). These 'buffer zones' should be based on Field in Trust guidance, and should be reflected around any proposed new play spaces. This informal play space can be multi-functional perform an amenity function, or, if well designed, can contribute towards accessible green space. The Fields in Trust propose a figure of 0.55 hectares per 1,000 population as a quantity standard for informal play space surrounding designated equipped playing space.

7.6.36 The LPAs expect play space siting to accord with the following standards:

Type	Size requirements	Buffer zones
Local Equipped Area of Play (LEAP) or potentially Local Landscape Areas for Play (LLAP)	0.04ha (minimum activity zone of 400sqm)	20m minimum separation between activity zone and the habitable room façade of dwellings
Neighbourhood Equipped Area of Play (NEAP)	0.1ha (minimum activity zone of 1,000m^2 comprising an area for play equipment and structures and a hard surfaced area of at least 465m^2 (the minimum needed to play five-a-side football))	30m minimum separation between activity zone and the boundary of dwellings

Figure 33: Play space siting standards

Planning obligations for green space

7.6.37 Planning obligations have an important role to play in ensuring that the green infrastructure impacts and needs of new development are met. The JLP, supported by the various Open Space Assessments and building on the 2010 Plymouth Green Infrastructure Delivery Plan[145], provides a strong local policy and delivery justification for the use of planning obligations in relation to both local and strategic green infrastructure impacts.

7.6.38 Each new home potentially has an impact on the existing green infrastructure, or creates a need for new green spaces. Developer provision of, or contributions to, green infrastructure delivery and/or management may therefore be necessary to make the development acceptable in planning terms.

7.6.39 Please see Section 12 for further guidance on planning obligations.

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[145] https://www.plymouth.gov.uk/sites/default/files/PlymouthGreenInfrastructureDeliveryPlan.pdf

7.7 Trees, woodlands and hedgerows (DEV28)

7.7.1 Trees, woodlands and hedgerows play a critical role in the Plan Area. Not only do they provide a visual contribution but also proximity to trees, woodlands and hedgerows has been proven to improve physical and mental health and wellbeing. Vitally, they also help us adapt to and tackle climate change by:

- Absorbing carbon dioxide and providing urban cooling through evapotranspiration;
- Creating micro-climatic effects that can reduce energy demands in buildings by reducing wind speeds;
- Reducing rain water runoff, providing shade, shelter and helping to improve air quality; and,
- Helping to deliver sustainable water flow and improved water quality through interception and filtration in our catchment area.

What is this policy about?

7.7.2 The LPAs aim to secure exemplary, constraint-led design that not only creates an early sense of place to new occupiers by the appropriate protection of existing trees, woods and hedges, but by also securing new tree, hedge and woodland planting on-site or, on occasion, as offset planting to ensure net gain in canopy cover is delivered.

7.7.3 New development should be designed to create harmony between retained, new trees and built structures. A layout design should create a positive spatial relationship between trees and buildings so that they enhance, not detract from, the quality of the development, allowing enough space, laterally and vertically for the retained tree to achieve its final full crown form without extensive tree surgery works. Wherever possible existing trees, woodlands and hedgerows should be retained in areas of communal land and /or public open space.

What needs to be considered in the implementation of this policy?

7.7.4 The guidance in this section should be read in conjunction with the latest British Standard, currently BS:5837:2012 Trees in Relation to Design, Demolition and Construction[146], whether or not planning permission is required. Developers should at all times refer to BS:5837 to ensure that its guidance is followed in the protection, incorporation or removal of trees.

7.7.5 The tree information in the table below must be submitted where there are trees, woodlands or hedgerows within a proposed application site, or on land adjacent to an application site (including in neighbouring gardens and street trees), that could influence or be affected by the development. Trees with a stem diameter of greater than 75mm when measured at 1.5m above ground level).

[146] https://shop.bsigroup.com/ProductDetail/?pid=000000000030213642

7.7.6 The amount of detail required will vary depending on the scale of the development proposed. If the necessary tree survey is not received an application may be refused on the grounds of insufficient information:

Type of application[147]	**Information required (see BS:5837 for full details)**[148]	**Comments**
Pre-application and/or Outline	Tree Survey	Based on accurate topographical survey
	Tree Constraints Plan (TCP)	Needed to inform the site design and layout
Major applications (Full and/or Reserved Matters) (A full application will still require a Tree survey and Tree Constraints Plan as detailed above)	Arboricultural Impact Assessment (AIA)	The assessment should clearly explain the criteria used to assess impact of development on trees
	Tree Protection Plan (TPP)	Plan should clearly indicate the trees to be removed/retained
	Mitigation planting plan	Plan should indicate proposed replacement planting to result in canopy cover gain
	Arboricultural Method Statement	Required when special protection measures are needed to be taken within the root protection area
	Proposed location of underground services, SUD systems, in particular attenuation tanks, site compounds and utility trenches.	Needed to avoid significant damage to root systems
Householder and/or minor applications (Some Minor applications *may* require the same level of information as major depending on the scale of development)	Scaled plan showing: • Location of trees affected by the proposal identified with adequate referencing (e.g., T1, T2) • Tree stem diameter when measured at 1.5m above ground	Plan should indicate trees to be retained/removed, including any work associated with the proposal such as access to the site and service runs Plan should also indicate proposed replacement

[147]The requirements of the local and national validation checklists will be expected to be adhered at all times. However the LPAs may, on occasion, accept a covering letter from an Arborist to confirm that no trees of merit are present that may prevent the need for a full tree survey.
[148]Submitted tree survey work and further methodologies are expected to be completed by a competent person within the field of arboriculture.

Type of application[147]	Information required (see BS:5837 for full details)[148]	Comments
	• Mitigation planting for any removed trees	planting to result in canopy cover gain
If any of the trees are covered by a Tree Preservation Order, then the level of requirement is as for a Full Application		

Figure 34: Amount of detail/information required per application type with regards to trees

7.7.7 Any approved tree moving or pruning should be carried out by qualified tree surgeons to the latest British Standard, currently BS:3998:2010 Recommendations for Tree Work[149].

Arboricultural Impact Assessment (AIA)

7.7.8 The process of assessing impacts on trees should be undertaken throughout the design process, this is not just an application submission requirement and is expected to be an iterative process for both the applicant and the LPA. Appropriate impact assessment will save abortive or unnecessary design costs and help to achieve a high quality layout.

7.7.9 The LPAs expect all applications to adhere to the mitigation hierarchy in relation to trees:

- Avoid loss;
- Mitigate;
- Compensate; and,
- Enhance.

7.7.10 Where negative impacts cannot be avoided they should be mitigated for. Where this is not possible they need to be compensated.

7.7.11 All developments should enhance the local landscape – space for new planting and improvement in the conditions of existing trees need to be incorporated into layout design.

7.7.12 Wherever possible early phased planting or protection of receiving soil environments should be made to aid in early integration of the scheme into the landscape.

7.7.13 Each layout should be assessed in terms of its impact upon the significant arboricultural features on-site. When submitting an application it must be accompanied by an AIA which:

- Provides a realistic assessment of the impacts of both tree loss and on retained trees;
- Assess' positive and negative impacts;

[149] https://shop.bsigroup.com/ProductDetail?pid=000000000030089960

- Uses a system to assess impacts that is transparent and repeatable;
- Assess' the impact of canopy loss;
- Assess' the impact on visual amenities;
- Assess' the impact on the health and viability of retained trees;
- Assess' the extent of root damage and loss of soil volume present for tree root growth; and,
- Provides an assessment of the spatial relationship between trees and buildings and from shading (positive and negative impacts).

7.7.14 When designing a scheme, ensure the appropriate level of advice is sought from an arboricultural specialist at the earliest early stage possible.

7.7.15 Where appropriate, the LPA will use planning conditions to ensure trees are protected during the development process. In addition the LPAs have a duty to protect trees, ensuring they are of good quality and of public benefit where it is considered necessary to do so. Where appropriate, Tree Preservation Orders will be served to ensure that such trees are retained.

Ancient woodland, ancient and veteran trees – assessment required

7.7.16 DEV28 states that development resulting in the loss or deterioration of the quality of irreplaceable habitats (such as ancient woodland, aged or veteran trees) should be refused, unless able to demonstrate the need for, and benefits of, the development in that location clearly outweighing the loss.

7.7.17 Where ancient wood pastures are identified, they should receive the same consideration as other forms of ancient woodland.

7.7.18 Natural England's and Forestry Commission's Standing Advice[150] gives further detailed guidance which will be used as the minimum benchmark for considering relationships between existing Ancient Semi-Natural Woodland (ASNW) and new development.

7.7.19 The following principles will be used when assessing development proposals that may affect ancient woodlands, ancient/veteran trees and their immediate surroundings:

Principle	Description
Identifying ancient woodland	The first step in identifying ancient woodland is to refer to the Natural England's Ancient Woodland Inventory (AWI)[151] and the Woodland Trust's Ancient Tree Inventory (ATI)[152]

[150] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
[151] https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodlands-england
[152] https://ati.woodlandtrust.org.uk/

Principle	Description
Avoidance of harm	In line with the Assessment Guide associated with Natural England's standing advice, the following questions will be considered: • Is the site of the ancient woodland the only possible place for this proposal? • Does it have to be on the ancient woodland site (i.e. is it location dependent) or can it go anywhere else?
Impacts of nearby development	Ancient woodland, the product of centuries of habitat continuity and undisturbed soils, is sensitive to indirect impacts such as additional usage (trampling), ground water disturbance, increased light pollution and potential construction and post occupancy pollution, and therefore, indirect impacts should be avoided or wholly mitigated. Further evidence is available via the Woodland Trust's publications, including the guidance on the retention and planting of trees in new development report Residential Development and Trees.
Buffers	In addition to the mitigation measures for indirect effects, a minimum 15 meter buffer should be maintained between a development and ancient woodland, including throughout all construction phases. A larger buffer is likely to be required for particularly significant engineering operations, or after-uses that generate significant disturbance.
Compensation	Ancient woodland is an irreplaceable resource and cannot be compensated for by creating new woodland. Therefore, discussions on compensation will not form part of the assessment of the benefits of the development proposal. However, in exceptional circumstances where it is deemed that there is unavoidable residual damage or loss to ancient woodland, the measures taken to "compensate" for this must be of a scale and quality commensurate with loss of irreplaceable habitat, this should aim to create 30 hectares of new woodland for every hectare lost.
Translocation	An ancient woodland ecosystem cannot be moved as stated in Natural England's Standing Advice.

Figure 35: Principles of assessing development proposals with regards to ancient woodlands, ancient/veteran trees and the immediate surroundings

Hedgerows

7.7.22 There are multiple benefits from hedgerows (wildlife, historic, landscape), and the clear preference is for the retention of existing hedgerows within development

schemes wherever possible. If hedgerows cannot be retained, and it is practical, they should be translocated.

7.7.23 Ancient and/or species-rich hedgerows are a Habitat of Principal Importance (and Biodiversity Action Plan (BAP) habitat). They are commonly the most important resource for wildlife on a site both before and after wildlife and should be seen as both a constraint and opportunity within a development.

7.7.24 To ensure the wildlife benefit of hedgerows is protected and enhanced by a development, the LPAs will consider the following factors:

- Buffering of a hedgerow;
- Boundary treatment adjacent to a hedgerow;
- Avoiding illumination of hedgerows;
- Management treatment of hedgerows; and,
- Restoration of poor quality hedgerows by management, repair or 'gapping up'.

7.7.25 When considering proposed development design/layout and hedgerows, the LPAs have the following hierarchy of preference:

1. Retention of hedgerows in public realm (buffered by public open space, dark and with both sides of hedgerow accessible for maintenance);
2. Retention alongside roads/public areas (with one side of hedgerow accessible for maintenance);
3. Retention of hedgerows with one adjacent private garden boundary, in which case 25 per cent of the hedgerow would be treated as lost due to long-term degradation and loss of biodiversity value;
4. Retention of hedgerows with two adjacent private garden boundaries, in which case 50 per cent of the hedgerow would be treated as lost due to long-term degradation and loss of biodiversity value.

7.7.26 Developments resulting in sandwiching of hedgerows between two adjacent private gardens must show how they have considered options 1-3 in the hierarchy. Where hedgerow is to be treated as lost, compensation will be required and should be calculated using the Defra Biodiversity Metric 2.0

7.7.27 If a section of hedgerow is lost, the LPAs will expect the replacement to be of the same type, for example, Devon Bank or no bank.

7.7.28 For further guidance on BAP habitats and Species/Habitats of Principal Importance please see sub-section DEV26.4.

New planting requirements

7.7.29 The mitigation hierarchy will be used in relation to tree planting:

- AVOID LOSS – retain suitable[153] existing arboricultural features on-site where ever possible;
- MITIGATE – replace trees lost with on-site planting in accordance with the following table:

Trunk diameter of tree lost to development (cms) (cm measured at 1.5m above ground level	No. of replacement trees
Less than 15	0-1
15 – 19.9	1
20 – 29.9	2
30 – 39.9	3
40 – 49.9	4
50 – 59.9	5
60 – 69.9	6
70 – 79.9	7
80+	8

Figure 36: No. of replacement trees needed based on trunk diameter of lost tree

- COMPENSATE– if replacement of all trees lost is not achievable on-site, contributions will be sought through the use of planning obligations; and,
- ENHANCE.

7.7.30 Please note that the loss of woodlands and hedgerows will be considered as a loss of habitat and will be assessed for contributions under policy DEV26.5.

7.7.31 Voluntary groups who champion the role of trees consider that trees should:

- Fit the space available;
- Need little attention over life;
- Thrive in local conditions ;
- Help local people relate to their surroundings in a positive way; and,
- Provide multiple benefits.

7.7.32 The LPAs fully endorses this approach and will also seek to plant larger and longer lived species of trees for the future and trees that are known to be able to adapt to climate change.

7.7.33 Successful planting and establishment relies on providing the correct growing conditions for each tree. This requires specialist knowledge about the way trees grow and the ability to anticipate their needs, especially with regard to:

- Volume of un-compacted soil;
- Soil quality;
- Nursery stock quality;

[153]Suitable is regarded as a tree, hedge or wooded features whose loss would either be highly detrimental to the local and wider landscape, non-replaceable in a reasonable time frame, lead to the loss of an important habitat feature, is of historic importance, serves as a screen to an otherwise unsuitable development etc.

- Depth of planting; and,
- Post-planting cultivation.

7.7.34 Information on these aspects can be found in British Standards BS 8545:2014 Trees: from nursery to independence in the landscape, BS 3882:2015 Specification for topsoil and BS 8601:2013 Specification for subsoil and requirements for use.

7.7.35 Developers should be able to demonstrate how:

- They plan to meet these standards as part of the design; and,
- They have met the standards once development is completed.

7.7.36 In the event that new trees fail to grow in line with reasonable expectations or other evidence comes to light which indicates that standards have not been met and the developer is unable to show otherwise, the LPAs may serve a breach of condition notice on the developer to carry out remedial works.

Mitigation - replacement trees, woodlands and hedgerows

7.7.37 DEV28 states that mitigation should be delivered on-site, but if this is not achievable, off-site compensation will be required to provide a net gain in canopy cover in line with local standards. In the PPA, the Tree Canopy Cover Assessment[154] 2017 report aims to increase the canopy cover from 18.5 to 20 per cent, focussing on areas which currently have low canopy cover compared to the city.

7.7.38 If tree loss cannot be adequately mitigated for within the site in accordance with the table below, compensation will be sought in the form of a planning obligation for tree planting off-site in line with local standards.

7.7.39 Obligations in respect of trees will be required where:

- New planting is required off-site to mitigate the impact of a development; or,
- Where A, B or C category trees (see BS:5837 - Trees in relation to Design, Demolition and Construction[155]) are felled as part of a development, where no planting opportunities exist on site, off site planting will be sought to achieve a net gain in canopy cover. However the LPA's starting point will be to retain trees on-site through design-led retention.

7.7.40 Tree planting will take place ideally on:

- Open ground in public open spaces, community land, etc.; and/or,

[154] https://www.plymouth.gov.uk/sites/default/files/PlymouthPolicyAreaTreeCanopyCoverAssessment.pdf
[155] https://shop.bsigroup.com/ProductDetail/?pid=000000000030213642

- In hard landscaping areas such as pavements and shared spaces using a recognised below ground crating system to provided adequate soil volume/soil quality for the chosen species, for example, 15-20m cubed for Streetwise Lime as derived from latest industry guidance.

7.7.41 Where planting can take place directly into open ground the contribution will be lower than where the planting is in areas of hard standing. This is due to the engineering practicalities of planting trees in areas of hard standing, for example, porous load bearing sustainable urban drainage system under parking bays.

7.7.42 Contributions to tree planting off-site, to include new street trees where appropriate, will be administered by the LPAs in accordance with local standards.

7.7.43 Please note that the loss of woodlands and hedgerows will be considered as a loss of habitat and will be assessed for contributions under policy DEV26.5.

7.7.44 Please see Section 12 for further guidance on planning obligations.

Plan for Trees - Plymouth

7.7.45 All tree planting in Plymouth will be carried out in accordance with the principles set out in Plymouth's Plan for Trees[156] which states 'we will enhance neighbourhoods by selecting, growing and planting high quality trees that also increase canopy cover and diversity'. Where appropriate such planting will be of native species.

[156] https://www.plymouth.gov.uk/planningandbuildingcontrol/treesandhedges/plantrees

8. Transport and infrastructure (DEV29-DEV31)

8.1 Introduction

8.1.1 Infrastructure needs to be provided when planning for growth and delivering development. 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.

8.1.2 The guidance in this chapter primarily supports polices DEV29 to DEV31 in the JLP. It also reflects national guidance and should be considered alongside:

- The NPPF, NPPG and the site specific policies set out in the JLP;
- The Chartered Institution of Highways and Transportation (CIHT) and the Institute of Highway Engineers (IHE)'s Guidance Note: Residential Parking[157];
- The government's Manual for Streets: Designing and modifying residential streets[158] and Manual for Streets 2: Designing and modifying non-trunk roads and busy streets[159]; and,
- Design Manual for Roads and Bridges (DMRB)[160].

8.1.3 Whilst PCC is a unitary authority, SHDC and WDBC are part of a "two-tier" local government structure. This means that DCC carries out the majority of the strategic functions in these areas. In terms of transport and infrastructure this means that, as the Highways Authority (HA), DCC has a duty to maintain the safety and functionality of roads and ensure that development has an acceptable impact on the highway network. In its work as HA, DCC also plans and delivers walking and cycling routes, maintains Public Rights of Way and works with other transport providers such as bus and train companies to improve multi-modal travel options.

8.2 Specific provisions relating to transport (DEV29)

What is this policy about?

8.2.1 DEV29 is a policy to ensure that new development contributes positively to the achievement of a high quality, effective and safe transport system, ensuring sustainable transport choices are promoted and the natural and historic environment is respected.

What needs to be considered in the implementation of this policy?

DEV29.2 - Parking dimensions

8.2.2 When applying parking standards for both residential and non-residential developments, the following minimum dimensions should be adhered to:

Parking space	Dimension
Parking bay	2.4m x 4.8m

[157] https://www.ciht.org.uk/media/4395/guidance_note_-_residential_parking.pdf
[158] https://www.gov.uk/government/publications/manual-for-streets
[159] https://www.gov.uk/government/publications/manual-for-streets-2
[160] http://www.standardsforhighways.co.uk/ha/standards/dmrb/

Parking space	Dimension
Parallel parking space	2.0m x 6.0m (3.0m x 6.0m if a HGV loading bay)
Parking bay in front of a garage	2.5m x 5.5m
Parking bay for persons with disabilities	3.8m x 5.0m
Domestic garage (internal dimensions)	6.5m x 3.5m
Additional width will be required where adjacent to a structure or where there is a shared pedestrian entrance.	

Figure 37: Parking dimensions

DEV29.3 – Parking provision: residential

8.2.3 Car parking standards for new residential development are important to avoid adverse impacts of inadequate parking such as excessive on-street parking or illegal parking and to protect the amenity of surrounding residential areas and ensure safety of the highway network.

8.2.4 The below table shows indicative car parking provision to be provided within any new residential development, including residential conversions. Any application that proposes a lower or higher level of parking will be required to provide evidence to justify this proposal. Evidence may be presented on the grounds of the impact to the function of the highway, the location within the Plan Area (for example, in rural areas, additional parking may be necessary as well as additional parking for visitors) future programmed infrastructure improvements, and/or availability or restrictions in the surrounding area.

Type/size of development	Indicative parking provision
1 bedroom dwellings	1 space per dwelling
2 bedroom dwellings	2 spaces per dwelling
3 bedroom dwellings	2 spaces per dwelling
4 bedroom dwellings	3 spaces per dwelling
HMOs	1 space per 2 bed spaces
Purpose-built student accommodation (PBSA)	The number of spaces will be looked at on a case-by-case basis and based on location and presence of a CPZ. A suitable number of spaces for the purposes of drop-off should be provided.

Figure 38: Indicative car parking provision for new residential development

8.2.5 In the South Hams and West Devon LPA areas, a higher number of parking spaces may be necessary due to greater reliance of residents and visitors on private cars. It will need to be demonstrated that sufficient parking is provided and that the number of spaces, their location, layout and design will not have adverse impacts with respect to highway safety, amenity and character.

8.2.6 Whether garages are counted as being included in the overall off street parking provision will be considered on a case-by-case basis as in many situations garages are not used for the parking of cars. This may be secured via condition. Garages of increased width (6.5 x 3.5) are considered necessary for the future roll-out of Electric Vehicle Charging Points in all new properties.

8.2.7 If larger new developments include new access roads, these could have on-street parking designed in and counted as part of the development.

8.2.8 For specific design details for off-road parking such as garages, car ports and hard standings please see APPENDIX 1: Residential extensions and alterations.

Car-free development

8.2.9 Car-free development can enable higher housing densities to be achieved on development sites, create pedestrian and child-friendly streetscapes, and help to embed sustainable travel habits among residents. They may be appropriate in certain areas throughout the Plan Area and will be considered on a case-by-case basis alongside any evidence to support it.

8.2.10 If a car-free development is proposed, the LPAs will carefully consider:

- The location and accessibility of the site;
- Any existing residents parking schemes;
- The proximity of the development to public transport;
- Whether there are good cycle links;
- The potential for overspill parking and the potential impact on the surrounding areas; and,
- Any proposed measures or features of the development designed to enable and ensure that car-free living can be achieved throughout the design life of the development.

8.2.11 The enforceability of the scheme by planning condition or planning obligations will also be considered.

8.2.12 Please see Section 12 for further guidance on planning obligations.

DEV29.4 – Parking provision: non-residential

8.2.13 The below table shows indicative car parking provision to be provided for non-residential applications, any deviations will be considered on a case-by-case basis:

Type/size of development	**Indicative parking provision**
A1 Shops less than 370m^2	1 space per 28m^2 gross floorspace
A1 Medium non-food shops 370–999m^2	1 space per 24 m^2 gross floorspace

Type/size of development	Indicative parking provision
A1 Large non-food shops more 999m^2	1 space per 20 m^2 gross floorspace
A1 Medium food and convenience goods shops 370-999m^2	1 space per 21m^2 gross floorspace
A1 Large food and convenience goods shops more than 999m^2	1 space per 14 m^2 gross floorspace
A2 Offices providing services mainly to visiting people	1 space per 30m^2 gross floorspace
A3 Restaurants and cafes	1 space per 5.5m^2 used by customers
A4 Drinking establishments	1 space per 2m^2 of floorspace used by customers for drinking. For dining floor space, the same standard will apply.
A5 Hot food take aways	1 space per 5.5m^2 used by customers
B1 General business uses	1 space per 30m^2 used by customers
B2 Manufacturing	1 space per 51m^2 gross floorspace. Lorry parking will be assessed on merits of each case
B2 Small industrial units less than 235m^2	1 space per 44m^2 gross floorspace. Small industrial units, particularly of the grouped or court variety will need a separate assessment. Parking provision will normally be communal.
B8 Warehouses less than 2,500m^2	1 space per 70m^2 gross floorspace. Lorry parking will be assessed on merits of each case
B8 Wholesale cash and carry	1 space per 200m^2 gross floorspace. Lorry parking will be assessed on merits of each case
C1 Hotels and guest houses	1 space per guest room + 1 space for the resident proprietor/resident manager. Conference/function space will be determined on merit Coach parking needs will be assessed on merits of each case
Hostels (sui generis)	1 space per 8 residents + 1 space per 2 non-resident staff + 1 space for any resident proprietor/manager

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Type/size of development	Indicative parking provision
C2 Convalescent/nursing homes	1 space per 8 residents + 1 space per 3 non-resident staff + 1 space for any resident proprietor/manager. Provision for visitors will be determined on merits of each case. For nursing homes, attention will be paid to need for adequate servicing, particularly for ambulances, and additional staff.
C2 Hospitals	1 space per 4 staff + 1 space per 3 visitors
CS Dwelling houses and C4 HMOs	Parking standards are set out in table above
C3 Communal housing for the elderly and less-able	1 space per 2 dwellings + 1 space per warden
Holiday caravans (sui generis) and chalets (C3)	1 space per unit. Additional spaces required where camping or other facilities are provided, or made available for non-residents.
D1 Primary schools	1 space per teacher + 1 space per classroom for support staff and visitors
D1 Secondary schools	1 space per teacher + 1 space per classroom for support staff and visitors
D1 Higher and further education	1 space per 2 staff + 1 space per 15 students
D1 Libraries	To be determined on the merits of each case
D1 Crèches, day nurseries or day centres	Attention should be paid to the safety of the children. Adequate facilities should be provided for the dropping off and collection of children.
D1 Doctors', dental and veterinary surgeries and other health services (excluding hospitals)	1 space per practitioner, 1 space per 2 additional staff, and 2 spaces per consulting room
D2 Cinemas and conference facilities larger than 1,000m^2	1 space per 5 seats
Concert halls, casinos, community centres, and indoor sports facilities larger than 1,000m^2	1 space per 22m^2 gross floorspace
D2 Dance halls less than 1,000m^2	1 space per 3 m^2 of net public floor area
D2 Community centres less than 1,000m^2	1 space per 5.5 m^2 of main assembly hall floor space

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Type/size of development	Indicative parking provision
D2 Snooker, billiards and pool halls less than 1,000m^2	1 space per table + 1 space per 2 tables
D2 Squash courts less than 1,000m^2	1 space per court + 1 space per 10 spectator seats Additional spaces may be required if a bar and/or other members' facilities are provided
D2 Swimming pools less than 1,000m^2	1 space per 6m^2 of water area
D2 Gyms less than 1,000m^2	To be assessed on the merits of each case
D2 Stadia with more than 1,500 seats	1 space per 15 seats
D2 Stadia with less than 1,500 seats	1 space per 10 seats
Launderettes and amusement centres	1 space per 28m^2 gross floorspace
Motor repair garages, car sales petrol filling stations and car washes	1 space per staff + 3 spaces for each service/fitting/testing bay. 1 space per 10 cars displayed Adequate provision shall be made for loading/unloading, servicing and fuel tanker supplies. For car washes, sufficient circulation space for waiting cars is required
Taxi and private hire vehicle offices	1 space per staff/driver

Figure 39: Indicative car parking provision for new non-residential development

Methodology for calculating accessibility - Plymouth

8.2.14 Within the Plymouth administrative area only, there is a methodology for calculating maximum car parking provision for non-residential development based upon the overall accessibility of the site and the above table, having regard to public transport journey times. These levels of provision include both operational and non-operational parking.

8.2.15 The following steps should be taken to determine the maximum car parking standard for a particular development in Plymouth:

1. Calculate the site's 'accessibility per cent score'. This is taken from the nearest point(s) on the following accessibility map. Then subtract this score from 100 to calculate the site's accessibility.
2. Add 20 per cent.
3. Multiply this percentage by the indicative car parking standard identified in the table above.

8.2.16 It should be noted that the following map is not site specific and a more detailed consideration may be required. The accessibility on the map is given as a band. The midpoint of the band should be used unless there is evidence to the contrary. This evidence may include a lower or higher accessibility level on the adjoining point with the site somewhere between the two.

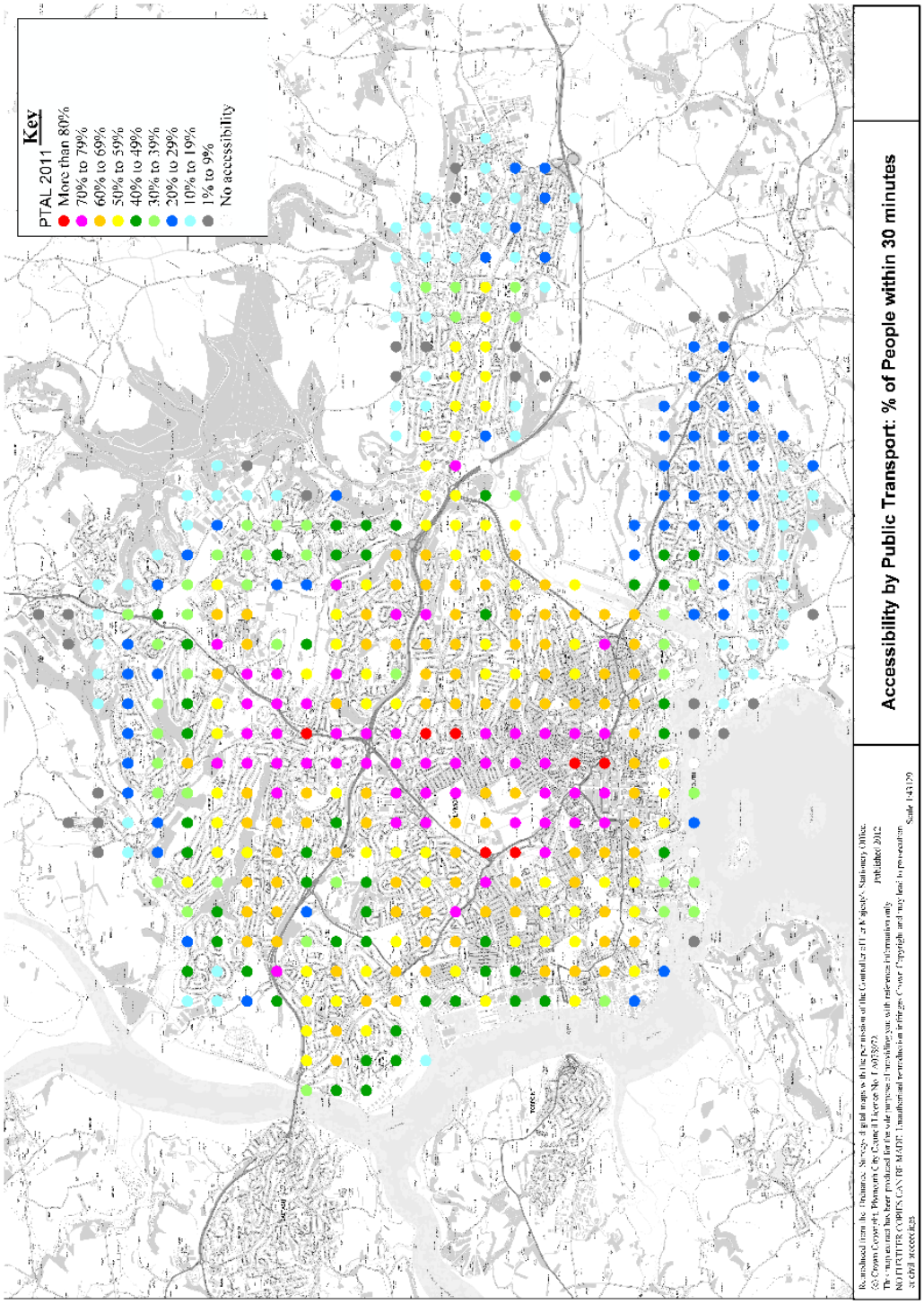

Figure 40: Public transport accessibility levels in Plymouth

Parking for motorists with disabilities

8.2.17 Parking for motorists with disabilities should be located as close as is practical to the main pedestrian entrance of the development and in line with DfT guidance for Inclusive Mobility[161]. Provision for such parking is included within the calculated parking levels above and should be calculated on the basis of the size of the car park before any reductions/additions have been applied. A minimum of 10 per cent overall provision.

8.2.18 The provision for dementia-friendly car parking should also be considered and should be:

- Larger spaces with bold and clearly defined boundaries;
- Located as close to walkways, elevators and ticket machines as possible;
- Brightly lit so as not to cast shadows;
- Signage should also:
    - Be clear, large and bold with not too many words, a yellow background with bold, black typeface is preferable.
    - Have a combination of both pictures and simple text, no jargon or acronyms;
    - Avoid the use of abstract images or overly stylised icons;
    - Have a tonal contrast between the sign and the surface it is mounted on;
    - Be mounted lower than at traditional eye level height (optimal height is 1.2 metres from the ground);
    - Be consistent around the premises so as not to add to confusion and anxiety;
    - Ideally be made from non-reflective materials; and,
    - If the signs are relating to doors, they should be fixed onto the doors they refer to and not on adjacent surfaces. Glass doors should also be clearly marked.
- Attendants should also be trained on how to deal with people who have dementia and their caregivers.

Controlled Parking Zones (CPZ)

8.2.19 Within Plymouth, should a development have the potential to increase levels of demand for parking which has the potential to adversely impact on residential parking, an applicant may be required to fund the process to consider the implementation of a CPZ in accordance with the Council's CPZ policy.

8.2.20 As part of this process the applicant will be required to fund the 'fact find' and community engagement, as set out within the CPZ policy and meet the cost to implement a CPZ where a CPZ is to be implemented.

[161] https://www.gov.uk/government/publications/inclusive-mobility

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8.2.21 Occupants of new developments likely to lead to an increase in demand for parking, within an existing, will be excluded from permits in accordance with the Plymouth Joint Highways Committee Report recommendation of May 1997. It must be checked that there are no adjoining areas where on-street parking could take place to the detriment of others.

8.2.22 Where the extension, amendment or implementation of a CPZ fails to meet the defined criteria, as set out within the CPZ policy, or not acceptable to the local community, alternative mitigation measures will need to be considered which could include engineering works or contributions towards more sustainable transport modes.

8.2.23 Please see Section 12 for further guidance on planning obligations.

Motorcycle parking

8.2.24 The LPAs encourage safe use of motorcycles. Therefore secure motorcycle parking should be included within all new developments, and should be provided in line with the IHE's Guidelines for Motorcycle Parking[162]. The dedicated number of spaces will be evaluated in the assessment of the overall parking provision for the site.

8.2.25 Where included, motorcycle parking should be well lit, covered and contain stands that allow the vehicles to be securely anchored.

DEV29.5 – Other parking facilities

Cycle parking

8.2.26 For both residential and non-residential development, as a starting point, cycle parking should be located within the building itself and then, if there is no option, communal stores should be provided. Whilst Sheffield hoops are acceptable for visitors/short-term use, when determining applications, the LPAs would require something more long-term and secure for residents such as lockers etc.

8.2.27 All cycle parking should be secure, clearly visible, well-signed, well lit, easily accessible, step free and preferably covered.

8.2.28 High quality and conveniently located, secure cycle parking should be incorporated into new developments in accordance with the minimum standards below:

Type/size of development	Minimum cycle parking provision
All dwellings	1 space per bedroom
HMO and purpose-built student accommodation (PBSA)	1 space per 2 bed spaces

Figure 41: Minimum cycle parking provision for new residential development

[162] http://www.motorcycleguidelines.org.uk/

DRAFT

8.2.29 For non-residential developments, the following standards apply:

Type/size of development	Minimum cycle parking provision
All uses	25 per cent of the indicative car parking provision (before any discounting on the basis of PT accessibility) or 1 space per 8 employees, whichever is greater.

Figure 42: Minimum cycle parking provision for new non-residential development

8.2.30 For developments of flats, secure communal stores should be provided. They should be well lit, fully covered, conveniently located and contain cycle stands that allow individual cycles to be secured by both wheels and frame with standard “D” Locks. Sheffield style racks are the standard, but can be supplemented by other designs providing that they can be used by those with limited strength. Individual lockers may also be acceptable.

8.2.31 For ground floor flats, where adequately sized lifts are provided or where it is appropriate, storage within accommodation is still the preferred option, but it will need to be expressly considered in the design. It will be important to ensure that cycles can be brought into the building easily and quickly and not become a nuisance for residents.

8.2.32 Where separate cycle parking is provided within the building, it needs to be conveniently located and close to the main point of access. Where cycle parking is to be provided separate to the building, such as a detached garage or other out buildings, it will need to be secure, with doors designed for easy access. The size of a garage may need to be increased to accommodate the cycle parking.

8.2.33 Visitor cycle parking will tend to be shorter stay and less likely to be overnight. Therefore the emphasis should be on convenience and natural surveillance and should allow individual cycle frames and wheels to be secured.

8.2.34 For staff, cycle parking should be located within the main building. If this is not possible then it should be located close to the entrances and closer than any corresponding car parking. Employers should also provide lockers for personal belongings, showers, and changing facilities.

8.2.35 For visitors, short-stay cycle parking should also be close to the appropriate building entrances and closer than car parking.

Electric Vehicle (EV) charging points

8.2.36 The JLP seeks to support the use of sustainable transport measures which includes the use of electric vehicles. In order to support the use of electric vehicles the LPAs need to ensure that there is a network of charging locations at places of work, rest and play.

DRAFT

8.2.37 EV charging points should be incorporated in new developments as set out in the table below in order to help reduce the carbon footprint and to promote the use of green energy sources:

Development type	Minimum provision
Residential dwellings with driveways/garages	One standard electrical vehicle dedicated charging point per house with garage or driveway. A switch inside the property will be provided so that power to the chargepoint can be switched off.
Other residential developments	A scheme to be produced detailing how at least 25 per cent of parking bays to be provided with dedicated freestanding weatherproof standard charging points. 50 per cent of all other spaces to be serviced with passive wiring to allow future charging point connection.
Staff parking provision for workplaces	A scheme to be produced detailing how at least 25 per cent of parking bays to be provided with dedicated freestanding weatherproof standard charging points. 50 per cent of all other spaces to be serviced with passive wiring to allow future charging point connection.
Supermarkets, leisure facility, or other high turnover car parking	A scheme to be produced detailing the proposals for electric vehicle charging points/serviced bays. As a minimum the LPAs would expect this to include some provision for Rapid charging points and cabling.

Figure 43: Electric Vehicle (EV) charging point's provision

8.2.38 If a development has city-wide or regional importance such as a hospital, leisure centre or entertainment complex then a greater level of active charging bays than the minimum may be required to help support and encourage EV demand both now and for the long term. Existing parking supply should be included within the calculation of parking needs and ratio of charging bay provision. Where there are a large number of short stay parking spaces (i.e. parking under an hour) then the preference may be for a lower number of rapid charging bays.

8.2.39 In the case of schemes of 200 homes or more, the LPA's will seek, in the provision of the development, communal charging facilities and details of their ongoing maintenance.

8.2.40 Reference to standard or rapid charging points shall refer to the latest guidance on vehicle chargepoint or workplace chargepoint scheme guidance from the Office of Low Emission Vehicles. Installation standards should also be taken from the following guidance documents:

- Electric Vehicle Homecharge Scheme minimum technical specification[163]

[163] https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-minimum-technical-specification

- Workplace Charging Scheme minimum technical specification[164]

8.2.41 All vehicle charge points should be provided with adequate protection to prevent accidental damage.

8.2.42 Consideration should be given to employing load balancing systems to enable the installation of a greater number of chargepoints to the available power supply.

8.2.43 Developers may wish to charge for the electricity provided to these points, where they do so the re-charge cost should be reasonable and based upon the average unit electricity cost as published by the Department for Business, Energy and Industrial Strategy and should be no more than 1.5x the average unit rate.

8.2.44 To achieve national and local carbon reduction targets, new development will be expected to incorporate low carbon technologies such as EV charging, renewables and storage. To accommodate these technologies, all new developments are required to provide a three phase electricity supply to all occupied buildings.

8.2.45 Development without its own off street parking that will generate car trips and use of existing car parking facilities will be expected to contribute towards the LPA's publicly accessible chargepoint network through an appropriate s106 contribution.

8.2.46 Please see Section 12 for further guidance on planning obligations.

Publicly accessible EV charging points

8.2.47 Chargepoints will be designed to meet the following specifications:

- The public charge points should have a Pay-As-You-Go and Contactless payment functionality without the need to sign up to a membership scheme;
- The associated parking bays should be designated for electric vehicles with appropriate signage;
- Once operating and available for use of the charge point should be added to the National Charge Point Registry[165];
- Charge points should be able to supply data on usage; and,
- The charge points should be maintained in a serviceable condition and accessible for 5 years from completion of installation.

DEV29.7 – Travel plans

8.2.48 DEV29.7 states that development proposals should, where appropriate, incorporate travel planning.

[164] https://www.gov.uk/government/publications/workplace-charging-scheme-minimum-technical-specification

[165] https://www.national-charge-point-registry.uk/

8.2.49 A travel plan is a long-term management strategy for integrating proposals for sustainable travel into the planning process. Travel plans are based on evidence of anticipated transport impacts of development and should consist of a package of measures aimed at promoting sustainable travel and reducing reliance on single occupancy car journeys.

8.2.50 When considering whether a travel plan will be required the LPAs will take the following into account:

- Relevant national and local policy including the NPPF paragraph 111 which states that *"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed." and* NPPG guidance on Travel Plans, Transport Assessments and Statements[166]
- The scale of the proposed development and its potential for additional trip generation;
- Existing intensity of transport use and the availability of public transport;
- Proximity to nearby environmental designations or sensitive areas;
- Impact on other priorities / strategies (such as promoting walking and cycling);
- The cumulative impacts of multiple developments within a particular area; and,
- Whether there are particular types of impacts around which to focus the travel plan.

8.2.51 For a definitive view on whether a travel plan will be required, developers should seek early advice from the Transport Planning Team at PCC in Plymouth and from the Highways Development Management Team at DCC in South Hams and West Devon. Decisions about whether or not a development will require a travel plan will be made on a case-by-case basis and will depend on the nature and travel impacts of the development.

Travel planning in Plymouth

8.2.52 Where a travel plan is requested, it should include the following:

- A site accessibility audit report giving a description of the site and information on how the site is accessed by all modes of travel;
- A quantified action plan to address and promote sustainable travel to and from the site covering staff, customers, residents and visitors (and pupils and parents in connection with a school travel plan);
- A monitoring strategy, to be agreed with the Local Highway Authority, which, provides a methodology and schedule for monitoring travel to and

[166] https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements

from a development site by all modes of travel. This also includes modal share targets agreed by the LPA and HA;
- A commitment from the developer to operate the travel plan and to ensure that the travel plan is delivered, including by the end user, if agreed at framework stage;
- A commitment to work with the relevant LPA travel plan officers or Highway Authority staff and to provide relevant data on progress against agreed modal share targets;
- Welcome packs for residential development;
- Fully funded Travel plan objectives and the provision of facilities to support sustainable travel and the appointment of a travel plan coordinator.

8.2.53 In order to allow for the sharing of car parking areas where mixed use developments are proposed, a Car Parking Management Plan may be implemented. Reference should be included within the Travel Plan and the need for such a plan may also be implemented via a condition of planning permission. The Car Parking Management Plan include details relating to the management of the car park, allocation of spaces, operating hours, enforcement and other details that affect the use of the car park. It may also include intentions for future charging for staff parking.

8.2.54 When developing a travel plan the following guidance documents offers helpful advice:
- The Essential Guide to Travel Planning[167]
- Good Practice Guidelines: Delivering Travel Plans through the Planning Process[168];
- Plymouth City Council's Travel Plan guidance for developers; and,
- Travel Devon Toolkit for businesses and employers.

8.2.55 In Plymouth where a travel plan is required, a travel plan management and audit fee will be payable to the LPA by the developer.

8.2.56 Please see Section 12 for further guidance on planning obligations.

8.2.57 As part of an application, voluntary sustainable travel policies or travel plans may also be submitted. These are welcomed from all developments where a travel plan has not been specifically requested by the LPAs but where the organisation/development has a commitment to encourage sustainable travel. It is recommended that reference to such be included within a Design and Access Statement.

[167] https://www.sustainabilityexchange.ac.uk/files/essential_guide_to_travel_planning.pdf
[168] http://www.greensuffolk.org/assets/Travel-Plans/Documents/Travel-Planning/Good-Practice-Guidelines-travel-plans-and-planning.pdf

Travel planning in South Hams and West Devon

8.2.58 In South Hams and West Devon the Highway Authority is DCC who will advise on the need for a travel plan. This will be determined on a case-by-case basis due to the different levels of public transport and active travel infrastructure across the market towns and wider rural area. The need for a travel plan is dependent on the development use being proposed, its scale, location, existing sustainable travel provision and the likely impact of the proposal.

8.2.59 DCC as Highway Authority currently does not charge a fee for travel planning in South Hams and West Devon. As in Plymouth, travel plan measures are implemented/funded by the developer. Monitoring is also undertaken by the developer with findings reported to DCC.

8.2.60 Travel plans should include the following:

- A welcome pack for each dwelling or, in the case of employment development, for each unit and staff. The welcome pack will include a travel pack and vouchers for sustainable travel;
- Travel vouchers to encourage the use of sustainable travel. The vouchers may be split between public transport, cycle provision, and as the network develops, car clubs;
- A travel pack providing information to facilitate the use of sustainable travel. Information will include the location of bus stops, timetables, bus service routes, cycle route maps and other appropriate information to support car sharing and car-clubs.

8.2.61 Welcome packs will be produced by the developer and approved by DCC prior to the commencement of development. The welcome pack will be provided prior to first occupation of each dwelling or employment unit.

8.2.62 In some cases, a travel plan will set out the need for, and a commitment to:

- Improving walking and cycling infrastructure;
- Improving public transport;
- Providing facilities as part of the development to facilitate sustainable travel, including shower rooms, drying rooms, cycle storage space, electric vehicle charging points and car-club spaces; and,
- The employment of a travel plan coordinator to promote sustainable travel, run travel events and monitor the travel plan.

DEV29.8 – Permeability and connectivity

8.2.54 New development and improvements to existing infrastructure should assist in creating a fine-grained network of walking and cycling routes (also referred to as 'filtered permeability'). This can help achieve a mode shift by providing a journey time benefit for pedestrians and cyclists, and also helps provide a network of “quiet ways” where the impact of motorised traffic as a barrier to walking and cycling is reduced.

8.2.55 Proposals that link to existing streets, public spaces and key attractions will be encouraged and should be enhanced as part of any new proposals. Routes should be maintained so that they remain attractive and safe.

8.2.56 Developers should ensure that routes are: well lit, overlooked and accessible. This will be determined through the undertaking of a site-wide Accessibility Audit. For all proposals the LPAs will consider whether:

- The opportunities for sustainable transport modes have been considered to reduce the need for major transport infrastructure
- Safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development.

8.2.57 A successful design would promote a good level of use and therefore natural surveillance is ensured, preventing concerns around crime.

DEV29.9 – Strategic transport infrastructure

8.2.58 New development should, where appropriate, contribute to meeting the wider strategic transport infrastructure needs generated by the cumulative impact of development in the area. This may include providing: cycling; pedestrian and public transport routes and facilities; travel planning; new roads; car parks; bridges and highway structures.

8.2.59 Construction (Design and Management) Regulations 2015[169] must be taken into account in terms of designing out risks whilst considering build-ability, ongoing maintenance, whole life cost and eventual demolition / decommissioning. Upon completion of construction the developer shall provide the LPA with the Health and Safety File in accordance with the regulations.

8.2.60 Development should be sustainable and encourage and contribute towards behavioural change. Planning obligations may be sought from applications to help facilitate this, mitigate the impact of new development and maximise the benefits from new strategic transport infrastructure.

8.2.61 Please see Section 12 for further guidance on planning obligations.

Highway design considerations

8.2.62 Manual for Streets[170] and Manual for Streets 2[171] (MfS) provides guidance for practitioners involved in the design, planning and approval of new residential streets, the layout of commercial estate roads and modifications to existing highway. MfS primarily focuses on residential streets, but many of its key

[169] http://www.legislation.gov.uk/uksi/2015/51/made
[170] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf
[171] https://www.gov.uk/government/publications/manual-for-streets-2

principles may be applicable to other types of street, for example high streets and lightly-trafficked lanes in rural areas.

8.2.63 In the South Hams and West Devon LPA areas, major developments will be expected to demonstrate an approach to streets whereby the hierarchy, layout and design is safe and would not have an adverse impact with respect to amenity and character.

8.2.64 There is also up-to-date guidance on designing streets around bus travel: Buses in Urban Developments[172]. If buses are to be accommodated within new development then early consultation with public transport providers is essential.

8.2.65 New areas of highway which are to be adopted and maintained public at expense should be constructed in accordance with requirements and procedures as set out in the Design Manual for Roads and Bridges[173], the accompanying Specification for Highways Works[174] and the DCC Design Guide[175] or any other technical specification/documentation as approved for use by the Highway Authority.

8.2.66 Roads to be adopted by the Highway Authority (HA) must meet HA specifications in respect of layout and construction and therefore early liaison to confirm this is advised.

8.2.67 Road safety, pedestrian and cycling audits are required at preliminary design and post-completion stages of any new development. Pedestrian and cycling audits should be undertaken in accordance with any Local Walking and Cycling Infrastructure Plans (LCWIP). This will help ensure that barriers to cycling such as one way streets are made two way for cycling wherever possible.

8.2.68 The design of new areas of highway should also take account of the Disability and Discrimination Act[176] along with reference to the document, Inclusive Mobility[177].

8.2.69 Please see Section 12 for further guidance on planning obligations.

Speed control

8.2.70 The default design speed and speed limit for residential streets within new developments should be 20 miles per hour.

Construction management plans

[172] https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf
[173] http://www.standardsforhighways.co.uk/ha/standards/dmrb/
[174] http://www.standardsforhighways.co.uk/ha/standards/mchw/vol1/index.htm
[175] https://www.devon.gov.uk/planning/apply-for-planning-permission/get-help-with-an-application/guidance-for-applicants
[176] http://www.legislation.gov.uk/ukpga/1995/50
[177] https://www.gov.uk/government/publications/inclusive-mobility

8.2.71 Whilst construction management plans cover many aspects of managing construction works during a development. To ensure no adverse effects, where considered necessary, the LPAs will request details as part of any construction management plan to ensure reinstatement of any roads/pavements which may be damaged during the construction of a development. In these cases, improvements to the public realm may also be sought and negotiated separately.

8.2.72 For further guidance on the public realm please see DEV20.

New bridges and highway structures

8.2.73 Developers will be required to prepare full drawings and an Approval in Principle (AIP) document in accordance with BD 2/12 (entitled Technical Approval of Highway Structures) of the Highways England's Design Manual for Roads and Bridges (DMRB)[178] for the design and construction of new bridges, retaining walls and other highway structures that will directly affect, or may affect, the highway or any other existing highway structures in close proximity.

8.2.74 The AIP documentation shall be submitted for technical review and approval during the planning and design development process. Subsequent to the approval of the AIP, a design/check certificate will be submitted for endorsement before commencement of the works. This should be funded by the developer.

8.2.75 In South Hams and West Devon, Devon County Council has published technical details with regards to new structures with potential highway implications, for further information visit their website: Technical approval for structures[179].

8.2.76 In the case of structures of minor significance it may be sufficient to provide outline drawings only, sufficient to show the scope, magnitude and complexity of the proposed works followed by the submission of a design/check certificate. Examples of such minor structures are retaining walls with a retained height not exceeding 2 metres and other structures or culverts with a span or diameter not exceeding 0.90 metres.

8.2.77 Proposals for new bridges, retaining walls and other highway structures must take into account aesthetics, form, function, material durability and environmental impact.

External Wall Insulation (EWI)

8.2.78 External Wall Insulation is used as a retrofit solution on existing buildings to improve their energy efficiency. Whilst this is supported in principle, it needs to be designed sensitively to respect the existing streetscene and installed using durable materials. House builders and providers need to be mindful that where EWI is proposed in areas adjacent to the public highway, it should not be

[178] http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol1/section1/bd212.pdf
[179] https://www.devon.gov.uk/roadsandtransport/make-a-request/technical-approval-for-structures/

installed so that it impacts on the public highway or endanger the public. In such instances, it is recommended that internal wall insulation is favoured.

8.2.79 If EWI is proposed, it should avoid overhanging the highway, should not create an obstruction on footways or carriageways, or prevent the authority carrying out routine maintenance to any part of the highway. If there is any utility company equipment near the property the applicant/agent will need to speak to them to agree the cost of any alterations that are needed. The Highway Authorities will not be liable for any damage to insulation caused by the maintenance of street furniture, footway or carriageway surfacing, or utility company equipment.

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8.3 Meeting the community infrastructure needs of new homes (DEV30)

What is this policy about?

8.3.1 The LPAs not only want to deliver new homes, but also deliver sustainable communities. DEV30 is a policy to ensure that extensive single use areas of housing are avoided and instead ensure that developments build in community infrastructure and help mitigate any adverse impacts**.**

What needs to be considered in the implementation of this policy?

8.3.2 Policy DEV30 refers to the community infrastructure needs of new homes in contributing to the delivery of sustainable communities. Extensive single use areas of housing should be avoided, instead new development should mitigate its impacts by contributing to community infrastructure through planning obligations or through the provision of new infrastructure as part of a development.

8.3.3 New housing development leads to population growth which places additional pressures on existing infrastructure, such as schools, healthcare, sports/recreation and community facilities/village halls etc. Consequently, in order to mitigate the impacts, it is considered appropriate that new housing development should make a contribution towards necessary improvements in community infrastructure.

8.3.4 Please see Section 12 for further guidance on planning obligations.

Digital connectivity

8.3.5 Given its geographical position and large rural population, the Plan Area's digital connectivity is essential for the areas sustainability. Both SPT2.3 and SPT8.5 aim to ensure development builds upon the area's digital connectivity.

8.3.6 To implement this, new planning applications should encompass future-proof digital connectivity, i.e. Fibre To The Premises (FTTP), to new developments/premises and superfast speeds with 25Mbps as a minimum. This will usually be secured via condition.

8.3.7 Digital infrastructure development should:

- Be designed and sited to avoid harmful impacts on public amenity or unacceptable street clutter in the public realm;
- Avoid harm to the significance of heritage assets or their settings and support local distinctiveness;
- Demonstrate an absence of alternative sites, including, but not only, the possibility of sharing of existing masts and sites;
- Provide self-certification to the effect that a mobile phone base station when operational will meet the International Commission on Non-Ionising Radiation Protection (ICNRP) guidelines; and,
- Provide a statement for each site indicating its location, the height of the antenna, the frequency and modulation characteristics and details of power output and where a mobile phone base station is added to an

external mast or site, confirmation that the cumulative exposure will not exceed the ICNIRP guidelines.

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8.4 Waste management (DEV31)

What is this policy about?

8.4.1 DEV31 is a policy which aims to achieve a sustainable solution to waste management whilst ensuring that refuse storage facilities, in their various forms, do not detract significantly from the appearance of the local environment. Appropriate design and location of waste storage and collection facilities can help and assist people to prioritise reducing, reusing, and recycling.

8.4.2 When considering waste management, in the South Hams and West Devon administrative areas, Policy W4 of the Devon Waste Plan[180] also applies, including the accompanying Waste Management and Infrastructure SPD[181] and should be considered alongside this SPD.

What needs to be considered in the implementation of this policy?

DEV31.1 – Design and access arrangements for refuse collection vehicles

8.4.3 The construction of all access roads for refuse collection vehicles will need to be designed to withstand the maximum payload of the vehicle (30 tonnes), including manhole covers and gully gratings etc.

8.4.4 In a new development, sufficient space should be provided for the refuse collection vehicles to manoeuvre. Roads and parking areas should be laid out to ensure reasonable convenience for the collection vehicles.

8.4.5 The Councils will generally collect bulk bins directly from communal stores. However, where access to stores is restricted by locked gates or similar, arrangements must be in place to ensure that collectors have access to the bins on collection day. Key coded access is preferable to keys or fobs and distance to be walked by collectors should be considered and will be controlled by planning condition.

8.4.6 The main factors to bear in mind are:

- Any structure under which the refuse vehicle has to operate should provide a minimum vertical clearance of 4.5 meters, with a minimum working area of 3.5 meters width, by 4 meters length, where the emptying of the containers will take place;
- Refuse collection vehicles should not be expected to reverse into or from a highway to make a collection. Where collection vehicles do have to enter a development, there should be sufficient on-site turning circles or hammerheads with no parking to allow safe manoeuvring and exit from the development;

[180] https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan

[181] https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/supplementary-planning-document

- Roads with inadequate width or turning facilities are inaccessible to collection vehicles and in such cases alternative presentation points on a nearby public highway have to be arranged;
- The length of a refuse collection vehicle plus container is generally 10m and the working length should take into account of the size of the container, making the length of the vehicle with the container in the emptying position 12 meters. A further 2 meters is required for the operatives to stand clear of the bin whilst being lifted;
- The emptying position that the vehicle manoeuvres to and operates from should be relatively level and flat for the entire length of vehicle and container;
- Any slopes or gradients (other than those necessary for surface water drainage) should be avoided. Ideally the vehicle should pull into a dedicated off road bay, without the necessity of reversing into or out of the bay;
- A minimum width of 4.5 meters clearance for refuse vehicles will be sought on access roads, taking into account of any additional width required for parking of vehicles on one or both sides of the road;
- All access roads must have a minimum of 4.5 meters vertical clearance along their length;
- Ideally, refuse collection vehicles should be able to continue moving forward at all times (due to their size, reversing and turning round is difficult) and therefore cul-de-sacs should be avoided. If this cannot be avoided, a turning circle must be provided at the end of the road. This must be a minimum of 24.6 meters in diameter excluding any additional width required for parking of vehicles;
- All roads must have hard wearing metalled surfaces;
- Applications for flats above garages/coach houses, must be carefully considered.

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Figure 44: Minimum road width clearance required where on-street parking is provided for on both sides of the road

DEV31.2 – Providing integrated facilities in new developments

8.4.7 The quality, design and provision of refuse storage should always be considered at the beginning of the design process for new developments in order to ensure:

- Adequate refuse and recycling facilities are provided;
- Storage of wheelie bins, communal waste bins and refuse sacks does not detract from the street-scene, obstruct access or detract from residential amenity;
- Separation of waste takes place at source to reduce landfill and improve recycling;
- There is access, both for users of the waste storage facility and for those who collect waste;
- Waste materials do not create odours or attract vermin; and/or,
- Waste storage does not create a fire hazard or impact on public health.

8.4.8 Under the Environmental Protection Act 1990 those that fail to carry out proper disposal design and methods may have a duty of care imposed on them or statutory nuisance and enforcement action may be invoked to secure an appropriate remedy.

8.4.9 The volume of refuse storage required depends on the type of development proposed. In the most common types of development the recommended storage

is as follows (the number of containers required should always be rounded up when calculating the amount of storage needed):

Type/size of development	Minimum volume of storage required
Flat for 1 person	70 litres per week for refuse and 40 litres per week for recycling
Per dwelling house (not flats or HMOs)	2 x 240 litre wheeled bins
Up to 6 residents living in flats	4 x 660 litre wheeled bin, two for refuse and two for recycling
Up to 10 residents living in flats	4 x 1,100 litre wheeled bin, two for refuse and two for recycling
Retail, office, commercial or industrial	Dependent on need

Figure 45: Volume of required refuse storage

8.4.10 When designing a scheme, the space intended for refuse storage should be big enough to fit the recommended amount of bins as above.

8.4.11 Please see DEV10.8 for guidance on refuse storage for HMOs.

Residential development

8.4.12 New residential developments should include adequate and appropriate means of storing refuse and recyclable materials, preferably enclosed.

Internal storage

8.4.13 Kitchen/utility room layouts should allow sufficient space for a minimum of two ten-litre waste bins and provision should be made for additional bins/ storage space for other recyclable items such as glass and textiles.

External storage

8.4.14 For detached, semi-detached and end of terrace dwelling houses with side access the external waste storage areas should be integrated with the fabric of the dwelling or an associated garage, or otherwise screened or sited out of public view, but readily accessible to the occupiers. The layout should enable bins to be moved easily to the point where they can be collected, e.g. the kerbside or a communal collection point.

8.4.15 Mid-terrace dwelling houses and other properties without side or accessible rear access must include an enclosed waste store integrated with the fabric of the dwelling and be readily accessible to both occupiers and the kerbside or area from which the waste bins are collected.

8.4.16 For low-rise flats (up to four storeys in height), houses in multiple occupancy and high density housing developments, if provision is made for individual waste storage for each dwelling, the principles outlined above for mid-terrace dwellings should be applied. Otherwise, as a general rule, a communal refuse enclosure or

store designed for an appropriate number of bulk refuse and recycling bins should be provided if six or more dwellings are present.

8.4.17 If the development has less than four dwellings, then a store or space (communal or individual) must be provided for each 2 x 240 wheeled bins for each dwelling.

8.4.18 In addition to the guidelines set out above, resident storage facilities should be designed to be:

- Fit for purpose – large enough to accommodate the volume of refuse anticipated from the residential development;
- Visually unobtrusive; and,
- Easy to access by refuse collectors and householders. Potential obstacles such as steps, heavy shale and steep slopes should be avoided.

8.4.19 There may be circumstances where stores need to be located in a prominent location, however storage should not be on the highway. This is likely to be acceptable only where alternative locations do not comply with other elements of this guidance. In these instances, it needs to be demonstrated that this will be done safely and in a visually acceptable manner and considerations should be made of the choice of building materials, the scale and position of the stores in relation to the proposed dwellings and the potential to incorporate bin storage areas into other structures such as porches, garages or high garden walls.

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Figure 46: Good and poor examples of provision for bin storage in residential design

Commercial development (including food and drink uses)

8.4.20 Premises should be served with one or more 1,100 litre bins with recycling and food waste storage provision. The number of bins to be provided will be based on a reasonable estimation of refuse generation by the premises. Where the premises will generate relatively little refuse, 240 litre wheeled bins may be used.

8.4.21 Adequate facilities must be provided for the collection and storage of waste from the premises. This is particularly important in terms of trade waste at commercial premises and especially premises in sensitive locations where good screening of waste storage areas will be required. Designs must consider:

- Prevention of nuisance from odour and noise or the potential for litter;
- Adequate size and layout for the anticipated number and type of waste receptacles;
- Access and egress for collection and potential for noise nuisance;
- Adequate lighting and drainage from the site;
- Hose pipe facilities to wash the floor after collection; and,
- Security from unauthorised access.

8.4.22 The provision of food can lead to significant amounts of fat/grease entering the drainage system. To prevent obstructions or blockages, suitable grease traps should be installed.

Shops with rear servicing

8.4.23 New shopping developments should normally be designed to enable servicing and deliveries by larger vehicles to the rear of the premises and normally will be the appropriate location for waste storage facilities. These should be designed so that they are integrated into the scheme, and accessible to users and collection vehicles.

8.4.24 For groups of shops it may be possible to design communal facilities.

8.4.25 Security should be provided for all waste storage areas, to design out opportunities for vandalism or fly-tipping.

Shops without rear servicing

8.4.26 In establishing commercial areas it may not be possible to provide rear servicing for shops, so waste collection will be provided from the street frontage.

8.4.27 In the design of new shopping developments of this type, it is essential to ensure that facilities are provided within the fabric of the building to enable the separation of waste and its collection from the street. This could take the form of an enclosed structure within the shop frontage that is capable of taking the requisite number of bins, or a screened sideway with easy access to the street frontage for collection purposes. Bag collection is not acceptable and everything should be containerised.

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8.4.28 When more than one shop unit is proposed, consideration should be given to designing in communal facilities that are easily accessible to all units as well as collection vehicles.

Mixed use developments

8.4.29 For mixed use developments, commercial and residential waste must be stored and collected separately with separate accesses to each.

Industrial or commercial development

8.4.30 All developments intended for industrial or commercial use must provide adequate space for solid waste storage and the numbers of refuse and recycling containers required will be dependent on the nature and size of the business.

8.4.31 The same considerations for volume and design above i.e. screening, location and security will also apply for industrial or commercial development.

8.4.32 Waste facilities at the front of the building may be necessary provided that they are not on the highway. Such facilities should be kept secure in order to prevent vandalism and fly tipping and the facility should not restrict access to the premises.

8.4.33 For efficient disposal and collection of industrial waste, it is preferable to store it in external enclosures which should be integrated with the design and layout of the rest of the development, accessible to users, screened and readily accessible to collection vehicles.

8.4.34 The developer must ensure that all facilities relating to the storage or pre-treatment of waste conform to any national guidelines and regulations that may be in place regarding the specific type of waste produced.

DEV31.3 – Site Waste Management Plan (SWMP)

8.4.35 For all major developments in the Plymouth administrative area, a Site Waste Management Plan (SWMP) will be required. This will need to demonstrate how the demolition, construction and operational phases of the development will minimise the generation of waste.

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9. Climate change, flooding, and coastal change (DEV32-DEV36)

9.1 Introduction

9.1.1 The JLP has an important role to play in delivering sustainable development whilst at the same time supporting national and international efforts to respond to climate change and build more resilient communities.

9.1.2 The guidance in this chapter primarily supports polices DEV32 to DEV36 in the JLP. It also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP.

9.2 Delivering low carbon development (DEV32)

What is this policy about?

9.2.1 DEV32 is a policy which aims to reduce carbon emissions, increase energy security, including through the deployment of decentralised energy, minimise resource use and ensure new developments mitigate and are adapted to climate change.

9.2.2 It is recommended that this section be read in conjunction with the following advice:

- Decentralised Energy Masterplanning – A manual for local authorities (ARUP, 2011)[182];
- CP1: Heat Networks: Code of Practice for the UK (CIBSE/ADE, 2015)[183]
- Guidelines for connecting to heat networks (Plymouth Part 1 and 2 Heat Network Connection Packs)[184];
- Guidelines for connecting to 5th Generation District Heating and Cooling networks (Plymouth Part 1 and 2 Plymouth 5DHC Network Connection Packs)[185];
- Heating, ventilation and air conditioning (HVAC) energy efficiency, overview guide (Carbon Trust, 2011)[186];
- AM12 Combined Heat and Power for Buildings (CHP) (CIBSE, 2013)[187];
- National Guidance on Combined Heat and Power and Community Energy[188];
- NPPG Guidance on Renewable and low carbon energy[189];
- NPPG Guidance on Climate change[190]; and,
- Site Layout Planning for Daylight and Sunlight: A guide to good practice (BR209)[191]

[182] https://www.theade.co.uk/assets/docs/resources/DENet_manual_lo_v10.pdf
[183] https://www.cibse.org/knowledge/knowledge-items/detail?id=a0q200000090MYHAA2
[184] https://www.plymouth.gov.uk/districtenergy
[185] https://www.plymouth.gov.uk/districtenergy
[186] https://www.carbontrust.com/resources/guides/energy-efficiency/heating-ventilation-and-air-conditioning-hvac/
[187] https://www.cibse.org/knowledge/knowledge-items/detail?id=a0q20000008I7nsAAC
[188] https://www.gov.uk/guidance/combined-heat-and-power
[189] https://www.gov.uk/guidance/renewable-and-low-carbon-energy
[190] https://www.gov.uk/guidance/climate-change
[191] https://bregroup.com/services/testing/indoor-environment-testing/natural-light

- CIBSE TM59 Overheating guidance[192]

What needs to be considered in the implementation of this policy?

9.2.3 The following diagram sets out the information that needs to be provided for the implementation of this policy, according to whether it is a major or minor application:

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[192] https://www.cibse.org/knowledge/knowledge-items/detail?id=a0q0O00000DVrTdQAL

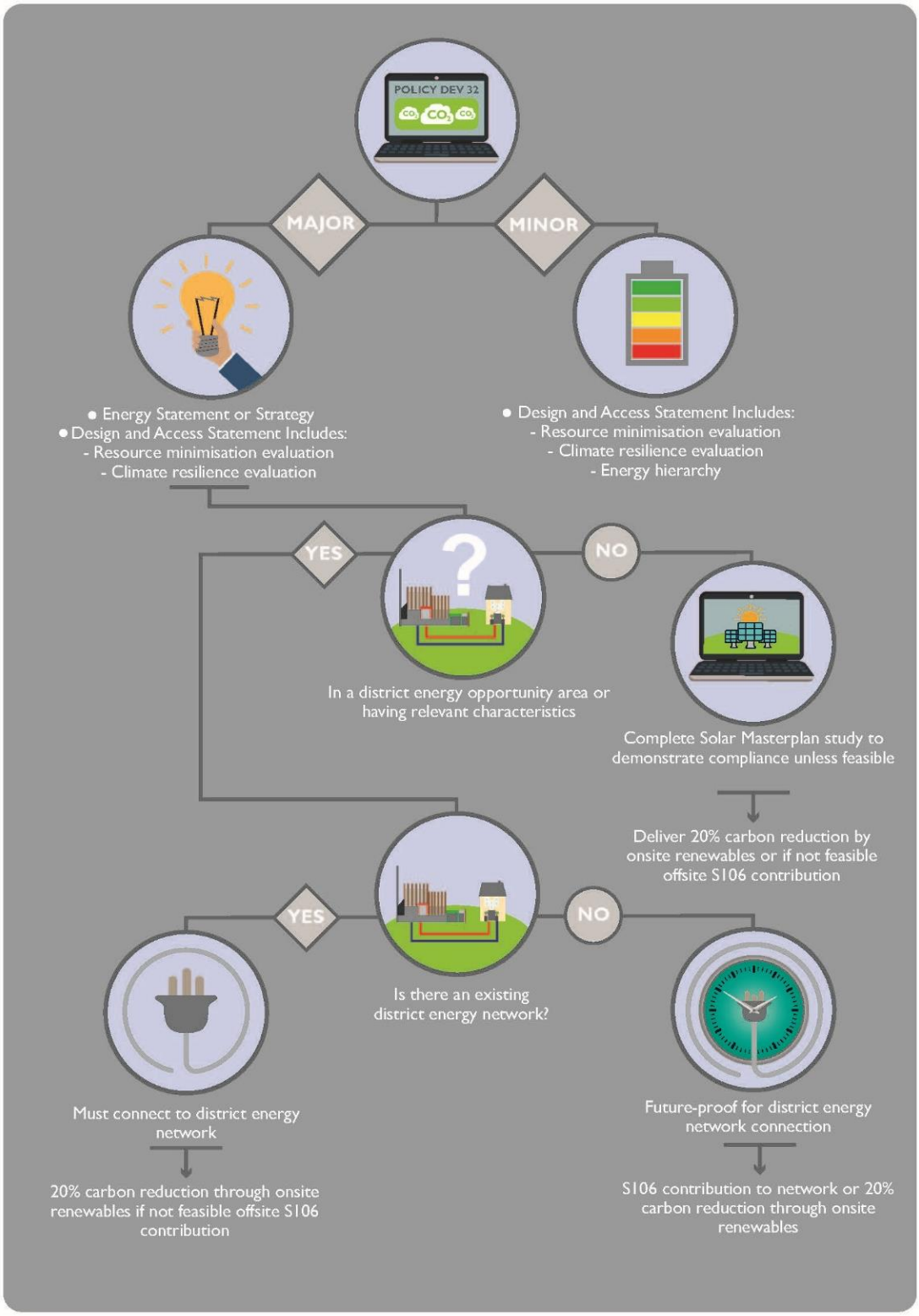

Figure 47: Application requirements for DEV32

DEV32.1 – Minimising natural resources in development

9.2.4 DEV32.1 aims to minimise the use of natural resources in the development over its lifetime. The structure, layout and design of places can help reduce their resource requirements in terms of both construction and in use, including energy demands, water and land take, and help to sustain natural ecosystems. Having a mix of uses and facilities within a neighbourhood can reduce travel demand and energy demands and efficient use of resources can take place at a number of scales. Designing multi-functional buildings and spaces for more than one purpose and provide greater flexibility for changing needs, can avoid duplication or prolong longevity.

9.2.5 The method of construction and materials used has a big impact. Embodied carbon emissions arise from the life-cycle material flows of buildings and infrastructure. Certain materials or construction methods have a greater impact on carbon than others. Cement, for example, has been attributed to about 8 per cent of the global carbon dioxide (CO_2) emissions[193]. Reducing construction waste and using recycled materials or existing buildings will help minimise use of resources. Ensuring a place is also designed to be durable will help make it less resource hungry over time, by extending lifespan or allowing materials to be reused and reducing maintenance and replacement. The consumption of resources, over the lifespan of the development, when it is in use should also be considered, this includes water, energy use and waste.

9.2.6 The LPAs will encourage the use of sustainable construction techniques that promote the reuse and recycling of building materials, maximise opportunities for the recycling and composting of waste on all new development proposals (residential and non-residential) and reduce CO_2 emissions. Developers should explore the potential to implement water recycling measures on a building or site-wide scale to significantly reduce mains water demand as part of all new development. New developments should be designed, wherever possible, in line with best practice (such as the UK Green Building Council's Embodied Carbon: Developing a Client Brief[194]) to minimise resource use and reduce the embodied carbon content. This should be set out in a section of the Design and Access Statement.

DEV32.2 – Taking account of the impact of climate change

9.2.7 Developments need to take into account the impact of a changing climate, including designing for resilience to climate change. Major developments should provide a climate change resilience section in the Design and Access Statement, to demonstrate that they will be resilient to the main anticipated effects of changing climate as specified in DEV32.2. These will vary according to the local context i.e. coastal/sea level, surface water drainage, temperature extremes and urban cooling etc.

[193] https://reader.chathamhouse.org/making-concrete-change-innovation-low-carbon-cement-and-concrete#

[194] https://www.ukgbc.org/wp-content/uploads/2017/09/UK-GBC-EC-Developing-Client-Brief.pdf

9.2.8 Local risk assessments can also be used to identify those climate risks, including those arising from severe weather events. Risk assessments should consider the implications for the built environment and development, infrastructure, services and biodiversity of the likely impact of climate change, taking account of projected changes in temperature, rainfall, wind and sea level in its design. This should set out the potential vulnerability of a development to climate change risk over its whole lifetime. It should set out the risk, its magnitude and whether it can be avoided or reduced through mitigation.

9.2.9 In terms of mitigating these risks, to improve resilience, the section in the Design and Access Statement should set the relevant measures incorporated into the design, such as:

- Building in flexibility to allow future adaptation if it is needed, such as setting back new development from rivers so that it does not make it harder to improve flood defences in future;
- By maximising summer cooling through natural ventilation in buildings and avoiding solar gain;
- Through district heating networks that include tri-generation (combined cooling, heat and power);
- Through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change, as well as contributing to a pleasant environment which encourages people to walk and cycle;
- Allowing sufficient space between buildings, tree planting, shading and street layouts which encourage air flow; and,
- Using light and reflective surfaces or vegetation on buildings, including green roofs.

9.2.10 Developments should also avoid the risk of maladaptation (adaptation that could become more harmful than helpful). For example, designing buildings to maximise solar gain in winter without thinking through the implications for overheating in summer. Reference is made to the latest CIBSE TM59 overheating guidance which should be used for all residential planning applications.

9.2.11 To achieve national and local carbon reduction targets, new development should be able to incorporate low carbon technologies such as EV charging, renewables and storage. To accommodate these technologies, all new developments are required to provide a three phase electricity supply to all occupied buildings.

DEV32.3-DEV32.6 – Energy statements and methodology

9.2.12 Details of how points DEV32.3 to DEV32.6 are considered in an application should be summarised within an Energy Statement. An explanation of what an Energy Statement comprises is set out below with subsequent details of the relevant policy requirements.

9.2.13 An Energy Statement is required for all major planning applications (including new build, conversion developments and outline permission applications) to assess how the proposal(s):

- Meet the aims of the policies;
- Takes into account any higher energy efficiency standards proposed over and above Building Regulations; and,
- Uses low carbon energy generation technologies.

9.2.14 Each assessment is required to demonstrate how the targets for regulated CO_2 emission reduction over and above 2013 Building Regulations will be met using the energy hierarchy. The Energy Statement should follow the following five stages of analysis:

1. Calculate baseline energy consumption of the development using SAP/SBEM or equivalent modelling software based on design to Building Regulations standard regulated use only. Planning applicants are encouraged to use updated Standard Assessment Procedure (SAP 10)[195] carbon emission factors to assess the expected carbon performance of a new development. Applicants should continue to use the current Building Regulations methodology for estimating energy performance against Part L 2013 requirements but with the outputs manually converted for the SAP 10 emission factors. It should be noted that the use of the SAP 10 emission factors in this context is for demonstrating performance against planning policy targets and, as such, is separate to Building Regulation compliance. Applications should therefore ensure that compliance with Building Regulations is maintained.
2. The Greater London Authority (GLA) Carbon Emission Reporting Spreadsheet[196] can be used for calculating and reporting the emissions results using SAP 2012 and SAP10 emissions factors, which should be submitted alongside an energy assessment. Baseline energy consumption to baseline CO_2 emissions should be converted using standard and appropriate conversion factors as provided by the Departments for Business, Energy & Industrial Strategy (BEIS) in Valuation of energy use and greenhouse gas (Supplementary Guidance to the HM Treasury Green Book on Appraisal and Evaluation in Central Government (2018)[197]. The baseline should include CO_2 emissions from all energy consumption. Emissions associated with water and space heating and cooling should be calculated from both a gas and electrical baseline.
3. Recalibrate baseline CO_2 emissions, taking account of reductions in energy consumption resulting from additional energy efficiency design measures beyond minimum standards in Building Regulations. As part of this, details of

[195] https://www.bregroup.com/sap/sap10/

[196] https://www.london.gov.uk/sites/default/files/copy_of_gla_carbon_emission_reporting_spreadsheet_v1.1.xlsx

[197] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/794737/valuation-of-energy-use-and-greenhouse-gas-emissions-for-appraisal-2018.pdf

the additional energy efficiency measures (in excess of those needed to comply with current Building Regulations) that will be incorporated into the development should be included and, where available, specific details such as building material 'U values'[198];

4. Calculate the target CO_2 emissions to be achieved through on–site renewable or low carbon sources (being equivalent to 20 per cent of the baseline);
5. Specify what options have been considered to meet this target and justify the proposed mix of approaches by:
    - Illustrating in the proposal how the use of heat pumps, waste heat/cooling, community/district heating or centralised heating system and co-location of uses has been explored (see DEV32.6 for guidance on district energy networks);
    - Evaluating energy storage and local distribution options with the objective of maximising efficiency of energy use. This applies to heat as well as to electrical energy;
    - Identifying how Domestic Hot Water and space heating are delivered efficiently and proposals take account of different demand profiles;
    - Where this approach/technology is not applicable or has been ruled out, give the reasons why this consideration has been excluded;
    - For each technology deemed to be suitable for the site, proposals should include:
        - Proposed system size;
        - Estimated energy generation;
        - Estimated CO_2 savings (to be expressed in tonnes of CO_2 per annum); and,
        - Site-specific design requirements (e.g. where the technology would be installed, maintenance requirements or estimated life cycle).
    - The location of any renewable or low carbon energy technologies should be shown in design plans, for example, proposed location of solar panels on roof; location of plant room for communal heating system etc.

9.2.15 For larger developments that are to be completed in a number of phases or over a number of years, an Energy Masterplan and Energy Strategy should also be produced and submitted. In particular, the energy masterplan should show the proposed energy infrastructure e.g. additional electricity or gas supplies and renewable energy technologies. Together, these documents should set out the overall energy characteristics of the development and calculated carbon emissions, and include full detail for the first phase. Reviews of the Energy Strategy may be required in advance of each respective phase and a full energy statement should accompany each reserved matters planning application.

[198]U-values (sometimes referred to as heat transfer coefficients or thermal transmittances) are used to measure how effective elements of a building's fabric are as insulators.

9.2.16 Baseline compliance with current Approved Document Part L (BRUKL)[199] should be met through sustainable design principles and energy efficiency measures alone, without the incorporation of renewable technologies. Energy Statements should be accompanied with relevant Standard Assessment Procedure (SAP)[200] and BRUKL documentation to confirm the calculations undertaken.

9.2.17 Further to compliance with Part L, a 20 per cent carbon reduction should be met through the following energy hierarchy in order of applicability:

1. Connection to a district energy network;
2. Provision of a communal heating system with the facility to connection to a future District energy Network;
3. Provisions of the following renewable energy options:
    - Bio-fuel boilers;
    - Wind Turbine;
    - Fuel Cells;
    - Ground Source Heat Pump;
    - Solar Water Heating;
    - Air Source Heat Pump; and,
    - Photovoltaic.

9.2.18 If this cannot be achieved onsite, an offsite contribution may be sought. This will be considered on a case-by-case basis.

9.2.19 Please note that direct electric or resistive electric heating is not permitted under DEV32 for a number of reasons. These include the finite capacity of the electrical distribution network in the city and an anticipated increase in demand on the network from other uses such as charging electric vehicles. Furthermore, projected reductions in the carbon intensity of grid electricity over time are predicated on the use of heat pumps, and not the widespread adoption of resistive heating as a replacement for gas boilers. Electric resistive heating is also significantly more expensive for the end users to run and it is likely to result in higher energy bills and are also not compatible with connection to district heating networks.

9.2.20 The following tables should be completed for each element of the development (e.g. retail, hotel and residential), and a final set should be completed for the development as a whole:

[199] https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l
[200] https://www.gov.uk/guidance/standard-assessment-procedure

	Carbon Dioxide Emissions (Tonnes CO_2 per annum)	
	Regulated	**Unregulated**
Baseline: Part L of the Building Regulations Compliant Development		
After Passive and Energy Efficiency Measures		N/A
After the use of renewable / low carbon technologies		N/A

Figure 48: Example table showing CO_2 tonnes per annum

	Regulated Carbon Savings (above compliance with Building Regulations Part L)	
	Tonnes CO_2 per annum	**%**
Savings from Passive and Energy Efficiency Measures		
Savings from the use of renewable / low carbon technologies		
Total Cumulative Savings		

Figure 49: Example table showing Regulated Carbon Savings

DEV32.3 – Energy hierarchy

9.2.21 Development should minimise energy demand, maximise energy efficiency and integrate the use of renewable and low carbon energy in line with the energy hierarchy shown at DEV32.3.

9.2.22 DEV32.3 highlights the 'energy hierarchy' concept, which offers a sequential approach to reducing CO_2 emissions from development, prioritising fabric energy efficiency measures:

1. Reducing the energy demand of the development;
2. Use energy more efficiency in the development;
3. Supply energy from renewable sources on-site;
4. Delivering carbon reductions through off-site measures.

9.2.23 The following should be considered when addressing energy efficiency through design:

- Building fabric measures (including retrofitting to existing development);
- Energy efficient heating and hot water;
- Energy efficient air conditioning (only use where necessary);

- Insulation and airtightness measures;
- Demand management systems;
- Energy efficient lighting and appliances (use of low energy fittings);
- Solar Master Planning (building orientation) and,
- 'Smart' systems and storage (balancing demand and supply of energy)

DEV32.4 – Solar master plans

9.2.24 DEV32.4 states the need for a solar master plan for major developments. This is to show how availability of passive solar energy has been considered in a scheme's layout. The potential benefits of passive solar design can only be realised by careful siting and layout. For example, access roads could predominantly run east-west, with local distributors running north-south and glazing minimised on north facing elevations to reduce heat loss. Passive solar design principles can be applied equally effectively in housing and commercial developments.

9.2.25 It is important that passive design considers the potential for overheating in the summer, as well as reducing need for heating in the winter. A range of design solutions can be considered to help avoid overheating and the need for air conditioning. For example, high levels of thermal mass, maximising natural ventilation, passive cooling using planting for shade, roof overhangs to provide shade for high-sun angles, and smart glazing materials.

9.2.26 Winter Probable Sunlight Hours (WPSH) is a commonly used solar master planning metric and a simple measure of useful sunlight and daylight, reducing heating requirements over winter, whilst Vertical Sky Component (VSC) measures access to natural light, reducing the need for artificial lighting requirements.

9.2.27 A report should be prepared setting out how the proposed development meets the requirements and any conclusions should be addressed in the Design and Access Statement. Developments should show how sunlight solar access has been optimised by:

- Aiming to achieve a minimum of 10 per cent WPSH (when applied to one window on a wall oriented within 90 degrees of south in the main living space);
- Aiming to achieve a minimum VSC of 27 per cent; and,
- Providing a quantitative and qualitative report, detailing calculations of VSC and WPSH following the methodology set out in guidance Site layout planning for daylight and sunlight: a guide to good practice (BR209)[201].

9.2.28 Proposals should also set out the balance of glazing on northern orientated building elevations compared to southerly orientated elevations, achieving at

[201] https://www.brebookshop.com/details.jsp?id=326792

least 60 per cent on southerly facing elevations. This should be done whilst still preventing a negative impact on neighbour amenity.

9.2.29 Consideration should also be given to the risk of overheating and any mitigation measures should be incorporated into the development. These measures may include: shading of higher sunlight angles; glazing design or thermal mass. This is an important issue as keeping buildings cool can also use significant amounts of energy. Proposals for mitigation should be clearly set out, including the measures considered and the reasons for the approach taken. Reference is made to the latest CIBSE TM59 overheating guidance which should be used for all residential planning applications.

9.2.30 Where groups of buildings are planned, the site layout design should aim to maximise the number of dwellings with a main living room that meets the above recommendation.

9.2.31 It may be difficult to achieve the improvements where there are existing site constraints, such as neighbouring buildings, developments or features which shade the development. If 10 per cent WPSH or 27 per cent VSC is not achievable a report should be submitted outlining how daylight and sunlight have been optimised and other measures adopted to reduce carbon emissions.

9.2.32 Where developments meet the standards and the applicants also commit to deliver glazing proportions, this may count as a credit of 5 per cent in relation to the 20 per cent overall target for renewable or low carbon energy to the 20 per cent overall target for renewable or low carbon energy.

DEV32.5 – On-site renewable energy

9.2.33 DEV32.5 requires all major development proposals to 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[202]. All major development proposals should incorporate low carbon or renewable energy generation to achieve a 20 per cent reduction in the regulated carbon emissions rate over above Part L and any additional energy and passive saving measures introduced. The reduction should also take account of the predicted degression in any technologies used. Any development falling below this target will require additional justification with an assessment of the technical feasibility and viability.

DEV32.6 – District energy networks

9.2.34 DEV32.6 requires developments to connect to existing or be able to connect to new district energy networks which supply heat/cooling energy more efficiently to buildings, by:

[202] https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l

- Providing a means to utilise waste energy from an energy intensive process;
- Producing and distributing heating/cooling from low carbon process; and,
- Through greater efficiencies of scale and where possible sharing heating/cooling.

9.2.35 All major development proposals within a District Heating Opportunity Area must either:

- Design their space heating, Domestic Hot Water and, where relevant, cooling systems, to be compatible and able to connect to a heat network;
- Where an energy network exists in the vicinity of the development, the applicant must prioritise connection, and provide confirmation from the network operator that the network has the capacity to serve the new development, together with supporting estimates of installation cost and timescales for connection;
- Where a development is outside of these areas, but has at least one of the following characteristics, the applicants should carry out a detailed technical feasibility of the development to deliver an on-site heat network, or, where this is not possible, demonstrate that they are designed to connect to a future district energy network, agreeing the brief for the work in advance with the relevant LPA:
    - Consisting of over 100 dwellings;
    - Having a heat demand density of 30kWh/ meters squared of land area;
    - Having a mixed use nature e.g. more than one use and being of large-scale (e.g. greater than 3,000 meters squared gross floor area);
    - Including high process energy use such as data centre, swimming pool, laboratory, industry or other similar uses with high-energy demand; and/or,
    - Predicted to have a total heat or cooling demand in excess of 500MWh/annum including ‘unregulated’ energy demand; and,
- Where developments within the Plan Area meet the above criteria, they should implement the proposals where these are technically feasible and viable, either for the applicants to deliver directly, or through a separate Heat Network Operator.
- All proposals should aim to use low temperature heating systems compliant with recommended connection guidance (Part 1 and 2 Plymouth Heat Network Connection Packs).

District heating and low temperature building zone in the PPA

9.2.36 In Plymouth, district heating opportunity areas have been identified:

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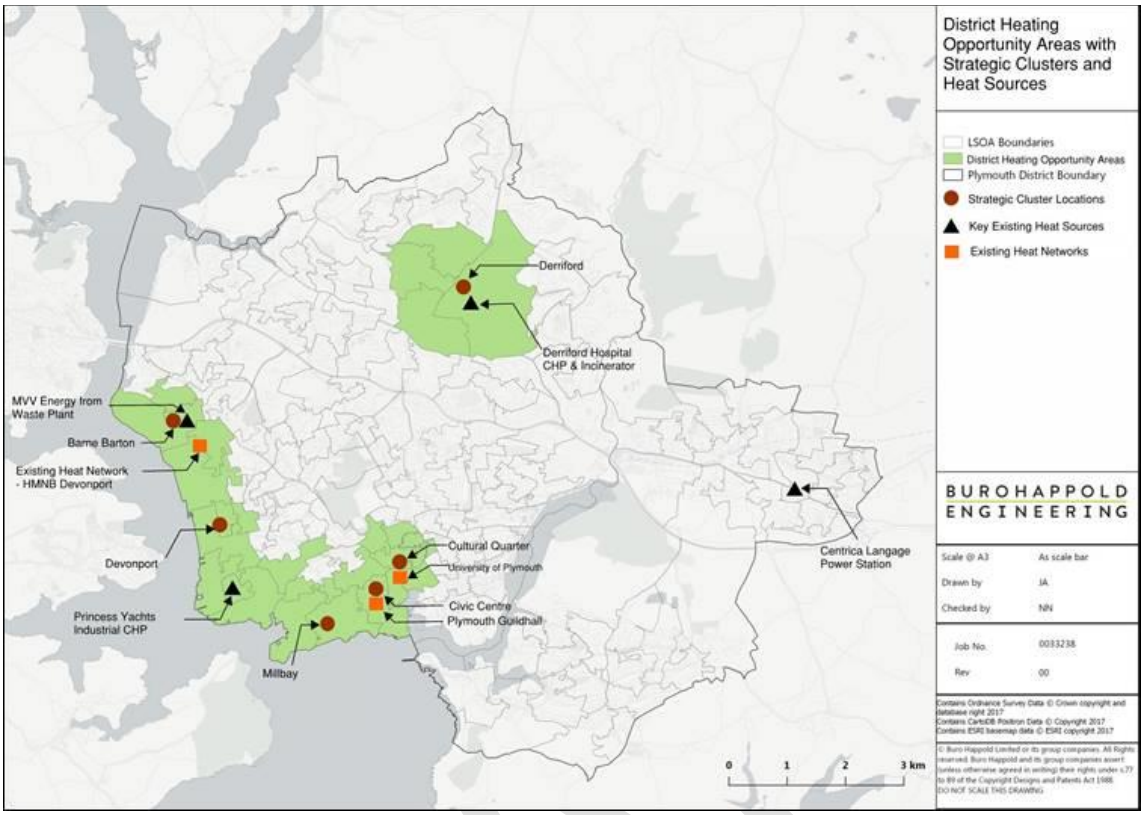

Figure 50: District heating opportunity areas in Plymouth

9.2.37 A low temperature building zone (LTBZ) has also been designated in Plymouth:

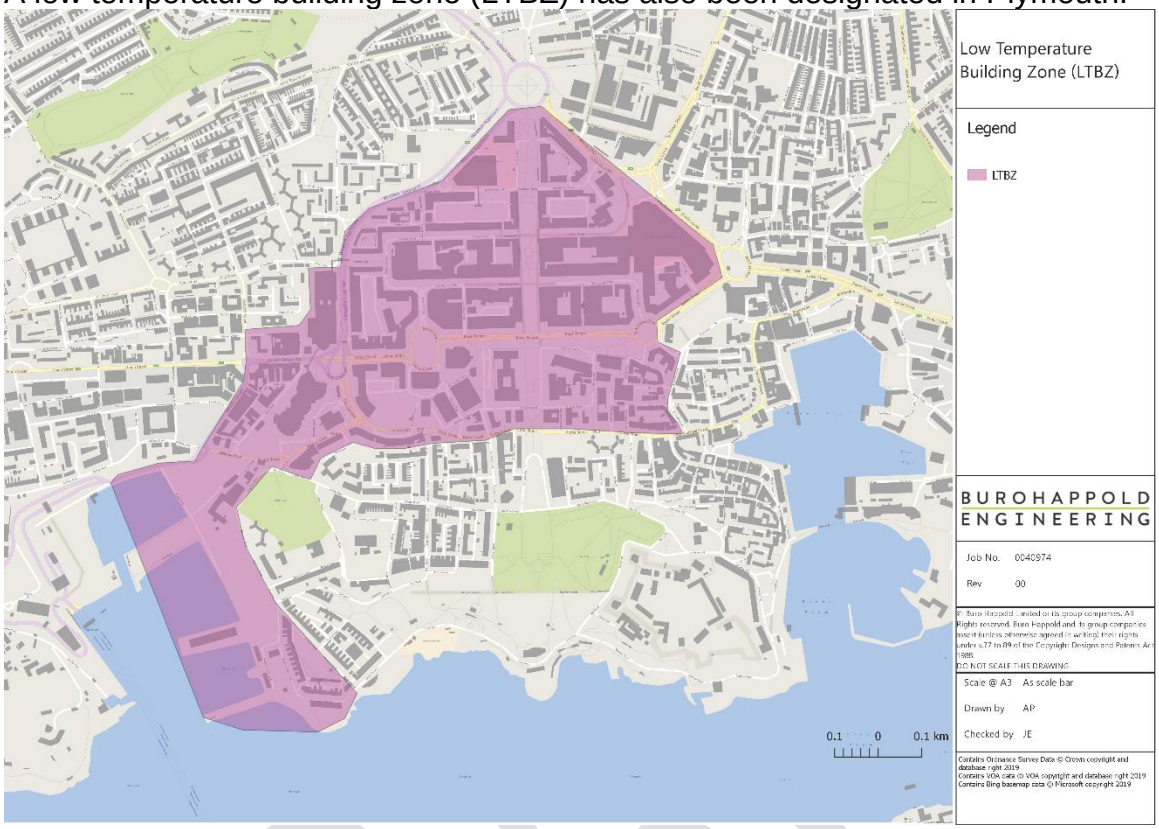

Figure 51: Low temperature building zone (LTBZ) in Plymouth

9.2.38 Developments coming forward within the low temperature building zone in Plymouth should have centralised wet heating designed for flow temperatures less than 60c (but preferably less than 50c for space heating) and a wide temperature differential between flow and return of at least 20c (preferably 30c).

9.2.39 This integrated network approach will allow developers the flexibility to connect as-and-when their development comes on stream. Applicants should work with the LPA on the mechanical environmental (heating and cooling) systems proposed for their new development to ensure the lowest carbon solution possible.

9.2.40 These systems should be low temperature (heating), centralised plant, water based and where possible electrically fuelled e.g. heat pumps supplying ‘wet’ central systems. This should also include allowances for access routes for heat network pipework from buried street infrastructure to the central plant areas;

9.2.41 High temperature cooling systems (12C and above cooling temperature) should be utilised and this cooling be delivered from a centralised plant room, utilising the same central plant that the heating uses where possible (i.e. heat pumps), or separate plant if the shared plant approach can be proved to be beyond viability;

9.2.42 The reduction in heating temperatures and raising of cooling temperatures is required to enable future proofing for the deployment of low temperature district systems. The aim is to supply both heating and cooling from a single ultra-low temperature heat network, avoiding the need for separate cooling systems;

9.2.43 Further details for the low temperature building zone design requirements can be found in the Part 1 and 2 Plymouth 5DHC Heat Network Connection Packs.

9.2.44 Micro-district energy can also be used in much lower density areas, utilising heat pumps and similar technologies, with shared ground arrays.

9.2.45 Certain commercial and manufacturing premises and processes generate quantities of waste heat. This represents a wasted resource that can be captured and used to fuel other premises or processes. The planned co-location of uses can provide significant benefits for energy efficiency.

9.2.46 The following aspects in relation to district energy (heating and cooling) should be taken into account in the:

- Designed in accordance with Part 1 and 2 Heat Network Connection Packs and in line with the latest best practice, including meeting the minimum standards set out in the CIBSE/ADE Heat Networks Code of Practice CP1[203] or any future version of this document;
- Where a site energy network is to be integrated with an existing area/site network, the proposal will be assessed in the context of the need to maximise/optimise the efficiency of the combined network;
- Consideration should be given to the feasibility of utilising renewable, low carbon energy sources or waste heat from the start, and to the design requirements to enable a phased transition to these where they are not initially viable;
- Design to minimise energy losses and high costs to residents – pricing should be shown to be reasonable and fair;
- Consideration should be given to the arrangements for operation and management of the system, including for energy sales;
- Applications for large installations of heat based renewable energy or waste to energy schemes should include a review of alternative sites, setting out significant heat users in these areas, influencing the final location of this plant to optimise opportunities for use of surplus energy. Applications should state what off-site energy network infrastructure and whether additional significant investment to the plant would be required to be able to export the energy;
- The LPA will require heat networks to sign up to the Heat Trust Scheme in order to ensure good customer satisfaction.

9.2.47 Where the district wide network is not yet operational in relation to the particular development under consideration the LPA will:

[203] https://www.cibse.org/knowledge/knowledge-items/detail?id=a0q200000090MYHAA2

1. Seek an off-site contribution to the establishment of the network;
2. Require heating and cooling systems that are compatible with and allow for future easy connection to local district energy networks;
3. Safeguard locations for a potential Energy Centre;
4. Seek to ensure that any costs to residents are deemed reasonable and fair for the proposed development energy system prior to connection to the heat network.

9.2.48 If the proposals do not incorporate these measures, then justification will be required with an assessment of the technical feasibility and viability of using district heating and/or cooling.

9.2.49 Within the TTV Policy Area, applicants for development schemes with at least one of the below characteristics should provide a feasibility study to inform whether a heat network is included as part of a proposal or not:

- Consisting of over 100 dwellings;
- Having a heat demand density of 30kWh/ square metres of land area;
- Having a mixed use nature e.g. more than one use and being of large-scale (e.g. greater than 3,000 square metres gross floor area);
- Including high process energy use such as data centre, swimming pool, laboratory, industry or other similar uses with high-energy demand; and/or
- Predicted to have a total heat or cooling demand in excess of 500MWh/annum including ‘unregulated’ energy demand.

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9.3 Renewable and low carbon energy (including heat) (DEV33)

What is this policy about?

9.3.1 DEV33 is a policy to support renewable energy development to help contribute to national targets through the production of renewable and low carbon energy.

9.3.2 When considering this policy, in the South Hams and West Devon administrative areas the Devon Waste Plan[204] also applies, including the accompanying Waste Management and Infrastructure SPD[205].

What needs to be considered in the implementation of this policy?

9.3.3 Some smaller scale renewable energy schemes can be built under a property's General Permitted Development rights if they are designed within certain parameters, but larger schemes will require express planning permission from the relevant LPA.

9.3.4 Renewable energy technologies are available in a variety of forms, some having specific planning considerations. The most commonly utilised are:

- Electricity generating
  - Solar PV
  - Wind
  - Hydro, tidal
- Heat generating
  - Biomass
  - Heat pumps
  - Solar thermal
- Energy storage.

9.3.5 Renewable energy technologies are rarely able to provide energy on demand 24 hours of the day. Energy storage (thermal, electrical, compressed air etc.) can increase the efficiency of energy use and should therefore be seen as an integral component of a scheme.

DEV33.8 – Energy generation facilities

9.3.6 DEV33.8 concerns proposals for new energy generation plants or energy from waste plants. Developments will be considered alongside all other policies and guidance and against the following criteria:

- Ability to maximise energy recovery or efficiency of generation. In the case of heat-based fuels, the proximity of uses (existing and new) that can utilise this energy should be considered;
- Efficiency of operation (use of waste heat, energy storage, distribution losses);

[204] https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan

[205] https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/supplementary-planning-document

- Impacts specific to energy from waste facilities, as set out in National Guidance on the Incineration of Municipal Solid Waste[206].

9.3.7 Applications for large installations of heat based renewable energy or waste to energy schemes should include a review of alternative sites, setting out significant heat users in these areas, influencing the final location of this plant to optimise opportunities for use of surplus heat.

9.3.8 Applications should state what off-site heat network infrastructure and whether additional significant investment to the plant would be required to be able to export the heat.

9.3.9 For applications that propose to generate energy from waste, or developments which generate surplus heat, the primary consideration for the energy assessment is that the electricity generation plant is designed with a heat off-take facility to provide heat to an existing or future district heating network. It should also provide space for heat exchangers, storage, pumps, and pipes to the edge of the site, and have a costed strategy for how this will be done.

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[206] http://www.wtert.co.uk/content/Defra%20report.pdf

9.4 Community energy (DEV34)

What is this policy about?

9.4.1 DEV34 is a policy to support community energy projects. The LPAs consider that community-led energy development projects 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. Community energy projects can include renewable energy generation or energy efficiency schemes.

What needs to be considered in the implementation of this policy?

Community ownership of energy developments

9.4.2 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 - typically between 5 and 25 per cent of a development to be owned by the community. One-off payments in cash or in kind to community groups or organisations do not constitute shared ownership.

9.4.3 The LPAs expect shared ownership to comprise a minimum of 20 per cent of the development and 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.

9.4.4 The offer of shares to private investors in the community does not of itself constitute shared ownership in the context of this policy, although this mechanism may be a means to deliver community benefit.

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9.5 Managing flood risk and water quality impacts (DEV35)

What is this policy about?

9.5.1 DEV35 is a policy to manage flood risk and water quality impacts by directing development away from areas at highest risk, but, where development is necessary, ensuring that it is safe without increasing flood risk impacting on the designated sites or pollution elsewhere. The policy also requires applicants to utilise sustainable water management measures to ensure development reduces water use, increases its re-use, minimises surface water run-off and does not increase flood risk or adverse impacts on water quality.

9.5.2 Across the Plan Area there are two Lead Local Flood Authorities (LLFA) who produce flood management strategies, help to manage flood risk and liaise with planning on flooding matters. PCC covers the administrative area of Plymouth whist DCC covers South Hams and West Devon.

9.5.3 When designing schemes, applicants in South Hams and West Devon should consult DCC's Flood and Coastal Risk Management Team (LLFA) as LLFA. In Plymouth applicants are advised to contact PCC.

9.5.4 Applicants are also advised to contact other relevant organisations about their proposals such as South West Water (SWW) and the Environment Agency (EA) and consider how their proposal links to other aspects of the development such as the design of the public realm etc.

Plymouth Local Flood Risk Management Strategy (LFRMS)

9.5.5 The Local Flood Risk Management Strategy (LFRMS)[207] is produced by PCC as Lead Local Flood Authority (LLFA). The LFRMS is formed of two parts: Part 1 is a non-technical summary, and Part 2 (A Technical Guide) is a reference for developers, designers and other parties wishing to undertake works that either require the management of surface water or will impact upon the fluvial and inland coastal water environment.

9.5.6 Other Risk Management Authorities (RMAs) collaborating with Plymouth City Council to manage flooding are the Environment Agency (EA) and South West Water (SWW). Responsibilities for managing flood risk across the city are assigned as follows:

- Tidal - EA and PCC (LLFA)
- Fluvial - Main rivers (managed by the EA)

Ordinary watercourses (managed by PCC)

- Surface water - PCC (LLFA)
- Public Sewers - SWW
- Groundwater - PCC (LLFA)

[207] https://www.plymouth.gov.uk/emergencies/severeweather/flooding

9.5.7 The Plymouth LFRMS sets out the principles by which these RMAs will manage these risks, namely:

- Effective planning of new development, taking current and future flood risk into account;
- The improved management of surface water for future developments
- Ensuring Sustainable Drainage Systems (SuDS) meet PCC and national design criteria;
- A consistent standard of flood defence, within practical and financial limitations; and,
- A prioritised programme of flood risk management schemes and interventions.

The role of Devon County Council in flooding and approach taken

9.5.8 In South Hams and West Devon, DCC is the LLFA, DCC's role in terms of flood risk and the approach taken is outlined below:

- DCC are statutory consultee on all major planning applications with surface water implications and provides comments to the district councils and two national parks. DCC encourage the use of sustainable drainage techniques on all major applications;
- DCC prioritise the delivery of flood schemes to vulnerable communities across Devon often working with other risk management authorities such as the EA and SWW;
- DCC take enforcement action when required where activities have been undertaken which causes an increase in flood risk on Ordinary Watercourses;
- DCC are responsible for the granting of Land Drainage Consents on Ordinary Watercourses. This is required for any works temporary or permanent, within the banks of an Ordinary Watercourse;
- DCC also maintain an asset register as required under the Flood and Water Management Act 2010.This register records all structures and features which are anticipated to have an impact on the flood risk in the area.

What needs to be considered in the implementation of this policy?

DEV35.2 – Exception test

9.5.9 Applicants must assess whether and to what extent flood risk should be taken into consideration in any development proposal and, 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 and demonstrated through a site-specific flood risk assessment.

9.5.10 The NPPG provides guidance on how to complete an exception test[208].

[208] https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants

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DEV35.2 and DEV35.7 – Flood Risk Assessment/Drainage Strategy requirements

9.5.11 DEV35.2 and DEV35.7 requires a Flood Risk Assessment (FRA) or a Drainage Strategy to be submitted when meeting validation requirements. When preparing these they should be proportionate to the scale of the development. The FRA should assess the sources and risks of flooding to the site and assess the risk of flooding from the site.

9.5.12 The FRA should demonstrate that:

- The development is not at risk from flooding and does not increase flood risk elsewhere;
- Any necessary fluvial flood defences must provide a minimum standard of defence of 1 in 100 year return period with a 40 per cent allowance for climate change for the lifetime of the development;
- Developments at risk from tidal and coastal flooding must provide a minimum level of defence of 4.81mAOD, or be able to provide protection to this level with approved flood boards or flood-proof doors;
- Flood defence designs must be supported with calculations and or modelling outputs that demonstrate the development is protected for the lifetime of the development;
- All developments outside of Flood Zone 1 must demonstrate that safe access and egress is possible at all times;
- In order to manage any residual tidal flood risk over and above the required flood defence standard, it is recommended that ground floor should be made flood resilient with the use of waterproof floors and walls and by raising electric and communications services. Using the ground exclusively for garage space, car parking or bin storage is also good practice, though safe access and egress should still be provided; and,
- Demonstration that water quality and amenity/habitat value have been taken into account, are not impacted upon and are positively promoted within the proposals in accordance with current best practice guidance (CIRIA SuDS Manual).

9.5.13 To find out whether a site is within a flood zone, please see the government's flood map for planning[209].

9.5.14 The Drainage Strategy should demonstrate that:

- A viable surface water drainage system can be implemented;
- Sufficient space has been allowed for the drainage system;
- Sufficient space has been allowed for above and below ground attenuation features;
- Suitably sized components have been specified; and,
- A maintenance and management plan for the operation of the surface water drainage system has been included.

[209] https://flood-map-for-planning.service.gov.uk/

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9.5.15 The Flood Risk Assessment/Drainage Strategy should include:

- Details of a drainage scheme design, whether infiltration or positively drained, to a minimum of 1 per cent AEP (1 in 100 year return period) with 40 per cent allowance for climate change;
- Calculations and or modelling outputs that demonstrate the drainage system is designed to the required standard, taking into account any tidelocking effects.
- Detailed design of the proposed drainage system, including: pipe sizes; manhole schedule; pipe materials and any proposed outfalls; tanks or other drainage features and their locations and demonstrate coordination with landscape or townscape designs;
- Infiltration rates for the site to support the decision to use an infiltration or piped drainage strategy, tested to BRE 365 (soakaway) standard[210];
- A maximum discharge rate for positive systems, an identified point of discharge and written confirmation of acceptance by the sewerage undertaker;
- Assessment of any surface water flowing onto the site from third party land that may compromise the design standard of the drainage system;
- A surface water exceedance flow route identified on a plan that shows the route exceedance flows will take both on and off site from the point of surcharge, and demonstrating that these flows do not increase the risk of flooding to properties on and off the site and or to Third Party Land including the Public Highway. Exceedance flows should be intercepted and contained on site as far as this is reasonably practicable and safe to do so, ensuring that flows are directed away from public access areas.
- Supporting hydraulic modelling should be undertaken using an industry approved package such as Microdrainage, Causeway or Infoworks. The Lead Local Flood Authority (LLFA) should be consulted regarding modelling criteria;
- Demonstration that water quality and amenity/habitat value have been taken into account, are not impacted upon and are positively promoted within the proposals in accordance with current best practice guidance (CIRIA SuDS Manual[211]);
- Requirement for groundwater monitoring when infiltration systems are being proposed. A ground investigation study should assess and confirm the anticipated path the water will take having been discharged to a proposed soakaway. This is to confirm that water will not follow a pathway that ultimately impacts upon third party land or property.
- A works programme with details of when the drainage is to be installed and how it is to be protected during construction;
- Future management, maintenance and any adoption proposals;

[210] https://www.eden.gov.uk/media/1072/bre_digest_soakawaysdesign.pdf
[211] https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS

- A Construction Environment Management Plan (CEMP) is required that demonstrates that the proposed drainage system is protected from silt and pollution, and is inspected during the construction phase. Details of any pollution control measures should be marked up on a plan. The CEMP must also contain a construction programme.

9.5.16 If is it proposed to implement drainage infrastructure on land not within the applicant's ownership, permission in principle should be sought from the relevant land owner.

9.5.17 For major developments, a 10 per cent increase in impermeable area should be included to allow for urban creep over the lifetime of the development.

DEV35.3 – Flood Zones 2 and 3

9.5.18 DEV35.3 states that development proposals located in flood zones 2 and 3 will be discouraged unless wider sustainability benefits can be demonstrated, following the application of the sequential and, if required, the exception test approach.

9.5.19 To find out whether a site is within a flood zone, please see the government's flood map for planning[212].

DEV35.4 – Surface water drainage hierarchy

9.5.20 DEV35.4 looks to ensure development incorporates sustainable water management measures. For all new and existing development sites, surface water should be separated from foul flows in a separate drainage system.

9.5.21 PCC's LFRMS sets out a drainage hierarchy which differs from DCC in that discharge of surface water to a waterbody is identified ahead of infiltration, both hierarchies are set out in the relevant LFRMS and summarised as below:

9.5.22 PCC:

- Discharge to a waterbody (if available and with sufficient capacity) with written permission from the riparian (wetlands adjacent to rivers/streams) owner or necessary consents;
- Infiltration;
- Discharge to a surface water sewer, highway drain or culverted watercourse with attenuation as required with written permission from SWW or the sewer undertaker;
- Discharge to a combined sewer (as a last resort, and with written permission from SWW or the sewerage undertaker).

9.5.23 DCC:

- Infiltration;

[212] https://flood-map-for-planning.service.gov.uk/

- Discharge to a waterbody (if available and with sufficient capacity);
- Discharge to a surface waterbody (with written permission from the riparian owner);
- Discharge to a surface water sewer, highway drain, or other drainage system with permission from SWW, DCC Highways or the riparian owner, respectively;
- Discharge to a combined sewer (with written permission from SWW).

9.5.24 Evidence should be provided that demonstrates these options have been assessed and appraised ahead of any proposal to discharge surface water to a combined sewer.

9.5.25 For positive drainage systems located in a Critical Drainage Area (CDA), discharge rates will be limited to 1 in 10 year greenfield run off rates. Outside of a CDA, discharge rates may be restricted if there is an increased risk of flooding or drainage issues downstream. Written confirmation of acceptance by the sewerage undertaker is required for all new discharges to a sewer.

9.5.26 Where surface water is discharged to a waterbody, the surface water design standard must take into account any tide-locking effects. Discharge rates may be unlimited to tidal waters and where it is demonstrated that there is sufficient capacity in a watercourse and no detriment to the watercourse quality. Surface water discharged to a waterbody must be free of contaminants with reference to the pollution risk matrix and mitigation indices in the CIRIA SuDS Manual.

Surface water and climate change

9.5.27 In planning for the area's future, it is important to consider the increased risks of flooding caused by climate change. The projections used for sea level rise and storm events over a period of 100 years, as recommended by the NPPF, are plus 40 per cent for rainfall intensity and river flows, and plus 10 per cent for wave heights.

9.5.28 A climate change allowance for 100 years is included in the PCC tidal flood defence standard of 4.81mAOD.

DEV35.4 – Sustainable Drainage Systems (SuDS)

9.5.29 DEV35.4 supports national requirements for all major development to incorporate sustainable drainage systems (SuDS) as an integral part of new development schemes. The use of SuDS offers huge benefits to the Plan Area in terms of reducing flood risk, reducing pollution, and incorporating opportunities for new green infrastructure which is both aesthetically pleasing and supports wildlife.

9.5.30 All development proposals should be accompanied by a drainage report which identifies the drainage strategy to be adopted. Where the development requires sustainable drainage because of the nature of the proposal or its location, the report should evidence how the proposal complies with the hierarchy of drainage

options. Departures from the sequential application of the hierarchy should be fully justified.

9.5.31 To enable assessment of the adequacy of the proposed drainage strategy, the report should also;

- Set out the surface water management strategy for the whole site, including for any individual catchments within the site;
- For each catchment, the infiltration potential should be assessed and design-parameters of surface water volume and flow rate should be calculated, taking account of likely climate change;
- Demonstrate that the scheme is deliverable as designed, especially in relation to necessary consents and permissions;
- Ensure the scheme is fully coordinate with other aspects of the development and maximizes the potential of the drainage measures proposed to deliver additional water quality, amenity and biodiversity benefits taking account of the JLP design guide and the current CIRIA SuDS Manual; and,
- Specify the maintenance standard and management arrangements for drainage that will apply for the lifetime of the development, and how this will be implemented;

9.5.32 For developments not requiring SuDS, applicants are nevertheless encouraged to consider SuDS solutions, which are more sustainable and provide additional benefits for wildlife, recreation and other amenity when well designed.

9.5.33 In general, the LPAs will refrain from adopting SuDS. Where necessary, the LPAs will only adopt SuDS schemes through the use of a drainage agreement. A drainage agreement will also be necessary for drainage schemes implemented on Council or other third party land where the applicant, future owners or a third party instructed by either of the aforementioned will deliver the maintenance of these measures to ensure appropriate implementation and maintenance of the proposed drainage scheme. Failure to have such an agreement in place could result in a refusal of the application.

9.5.34 Further guidance, applicable across the Plan Area, is provided in Sustainable Drainage Systems: Guidance for Devon (2017)[213] guidance.

[213] https://www.devon.gov.uk/floodriskmanagement/sustainable-drainage/suds-guidance/

9.6 Coastal Change Management Areas (DEV36)

What is this policy about?

9.6.1 DEV36 is a policy to ensure inappropriate development, or any development that could add to the impacts of physical change to the coast is not be permitted in the Coastal Change Management Area (CCMA), as designated on the Policies Map.

What needs to be considered in the implementation of this policy?

9.6.2 Policy DEV36 uses the term 'inappropriate development'. The following requirements provide greater clarity over what is considered to be 'inappropriate' within the CCMA:

- Proposals for development within the CCMA will only be supported where they are for small, temporary structures that will not add to the erosion risk. Residential development will not be supported;
- Proposals for redevelopment, enlargement or extension of existing buildings that fall within the exclusion zone will not be supported;
- Proposals to change the use of existing buildings into residential usage will not be supported;
- Proposals to undertake minor works to improve sea defences and strengthen or stabilise cliff faces will be supported where it can be demonstrated that the works are consistent with the management approach in the relevant Shoreline Management Plan (SMP) and there will be no material adverse impact on the environment. A detailed schedule of works, including materials to be used, must be submitted to the relevant LPA and agreed prior to works commencing. Proposals for major works to stabilise or strengthen cliff faces in areas where the SMP management approach is for 'No active intervention' will not be supported;
- Development proposals that require stabilisation, strengthening or other interference with the cliff before development can commence will not be supported; and,
- Proposals to stabilise or strengthen cliff faces will be supported where such work is necessary to ensure that existing safe public access to beaches is maintained.

9.6.3 In addition, when considering applications within the CCMAs the Environment Agency's national guidance for flood risk and coastal change[214] which advises how to take account of and address the risks associated with flooding and coastal change in the planning process will be considered, in particular the section regarding CCMAs.

[214] https://www.gov.uk/guidance/flood-risk-and-coastal-change

10. Detailed provisions relating to the PPA

10.1 Introduction

10.1.1 Plymouth plays a key strategic role in providing essential services and facilities at both a sub-regional and regional scale. The guidance below specifically refers to PPA only policies. Guidance is included for:

- Improving Plymouth's city centre (PLY6); and,
- Plymouth airport (PLY42).

10.1.2 It also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP.

10.2 Improving Plymouth's city centre (PLY6)

What is this policy about?

10.2.1 The Plymouth City Centre Strategic Masterplan[215] 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.

10.2.2 The Masterplan also sets out a series of key opportunity sites and major interventions.

10.2.3 PLY6 sets out the framework within which these initiatives will take place. It is also policy to ensure Plymouth City Centre not only remains the heart of the city and a place where people live, but remains Plymouth's shop window as the commercial and cultural centre driving the economy and attracting visitors.

What needs to be considered in the implementation of this policy?

PLY6.3 – Tall buildings

10.2.4 Tall buildings can have a dramatic impact over a wide area and can act as markers for key locations, buildings, spaces or facilities. For the purpose of this guidance a 'tall building' is any building or structure which is significantly higher than its neighbours and/or which recognisably changes the skyline. This is the definition established by English Heritage and CABE in their 2007 tall buildings

[215] https://www.plymouth.gov.uk/sites/default/files/PlymouthCityCentreStrategicMasterplan.pdf

guidance (since updated in Historic England's *Tall Buildings: Advice Note 4,* which has informed the guidance below).

10.2.5 Tall building opportunities exist within Plymouth's City Centre and Waterfront areas and are identified in the relevant site policies in the adopted Joint Local Plan. The Plymouth City Centre Strategic Master Plan (2017) recommends building heights of around 6 to 8 storeys in the City Centre, and this is therefore the maximum height that will normally be supported here.

10.2.6 Tall buildings can have a dramatic impact over a wide area and it is important proposals are critically assessed at pre-application stage by the local planning authority (LPA) and other relevant parties, such as Historic England. It will be important through this process to:

- Identify the visual impact of the tall building proposal and understand the character of affected areas;
- Review and improve the design; and,
- Understand what information and illustrative material is needed to allow accurate assessment of the impacts of the tall building proposal. Thorough urban design analysis that clearly demonstrates impact will be required. Outline tall building applications are unlikely to be acceptable.

10.2.7 Design and Access Statements must accompany tall buildings proposals and must demonstrate high quality in urban design and architecture, and a well-considered, positive response to the context.

10.2.8 Tall building planning applications will likely require an environmental impact assessment (EIA), to assess the proposed building and its cumulative impact, including:

- Accurate and realistic visualisations of the proposal in context
- Consideration of the character of surrounding areas and the settings of
- heritage assets
- Consideration of impact on significant views
- Consideration of impact on townscape and public realm
- Other relevant environmental issues, particularly sustainability and environmental performance, e.g. the street-level wind environment

10.2.9 A successful application will have fully addressed a range of design criteria. Delivering architectural quality includes consideration of:

- Scale;
- Form and massing;
- Proportion and silhouette;
- Elevation materials;
- Design details;
- Relationship to other structures;
- Impact on streetscape and near views;

- Impact on cityscape and distant views; and,
- Skyline impact.

10.2.10 Tall buildings must set exceptional standards in design because of their scale, mass, wide impact and longevity. Architectural competitions are strongly encouraged. Tall building design must take the opportunities available for improving the character and quality of an area and respond to local character and history. It is important that a high standard of architectural quality is maintained throughout the process of procurement, detailed design, and construction, through the use of conditions and reserved matters.

10.2.11 It is important that social and environmental effects of tall buildings are assessed, including:

- Contribution to public space and facilities; and,
- Impact on the local environment, including microclimate, overshadowing, night-time appearance, light pollution, vehicle movements and the impact on the pedestrian experience.

10.2.12 Well-designed tall buildings provide an inclusive environment and improve permeability, accessibility and the legibility of the wider townscape.

Plymouth city centre shop fronts

10.2.13 For specific design guidance on Plymouth city centre shop fronts please see APPENDIX 3: Shop fronts, including ATMs.

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10.3 Plymouth Airport (PLY42)

What is this policy about?

10.3.1 Policy SPT8 (Strategic connectivity) sets out that the Plymouth airport site will be safeguarded for general aviation uses until the first review of the JLP. 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.

What needs to be considered in the implementation of this policy?

PLY42.1 – Protection from prejudicial development

10.3.2 No development will be permitted on the Airport Site that will prejudice its possible future use for general aviation purposes. This includes development that would by itself prejudice this objective, or that when combined with possible further development, would do likewise.

10.3.3 Historically, an airport Public Safety Zone (PSZ) has existed to safeguard the surrounding areas of the airport site from high intensity development. The PSZ is set out in response to the level and type of activities taking place at an airfield. A new PSZ would need to be produced when the airport becomes operational again, based on the new operations. Until that time, and in the absence of a formally defined PSZ, decisions on development near to the airport will be guided by the PSZs which existed when the airport was last operated, as shown below:

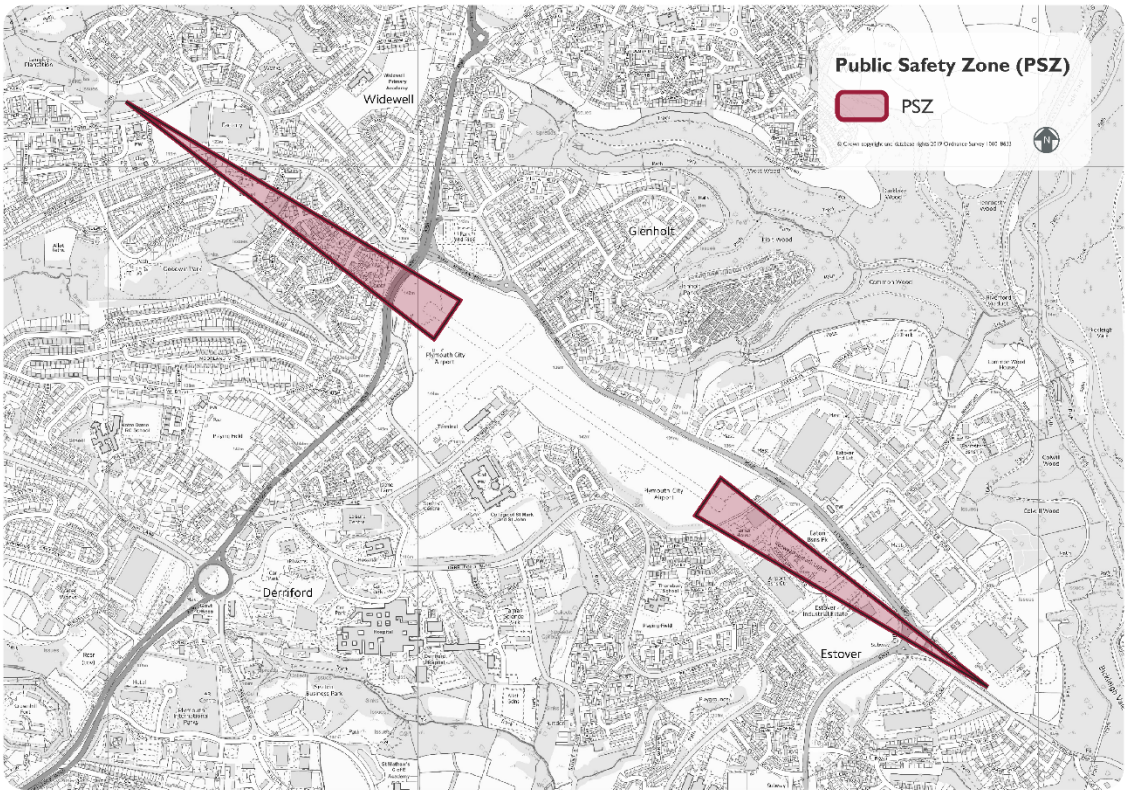

Figure 52: Public Safety Zone

PLY42.3 – Temporary uses

10.3.4 PLY42.3 states that temporary uses at the Airport Site will be acceptable provided these do not prejudice the future aviation use of the site. Any temporary uses that are approved will need to comply with the following requirements:

- The use(s) being approved for a period not exceeding three years, or beyond the anticipated JLP First Review date;
- The use(s) not to involve physical works or alterations to the site that would prejudice its future use; and/or,
- The use(s) complying with other guidance contained in this document.

PLY42.4 – Environmental improvements

10.3.5 PLY42.4 acknowledges the importance of maintaining the Airport Site in a good condition and in a form that does not harm the amenities of the local area to the detriment of neighbours and visitors to the area.

10.3.6 The LPA will encourage the following works with this objective in mind:

- Regular maintenance of the grounds of the Airport Site and its boundary margins; and,
- The provision of additional landscaping of an appropriate type at the boundary margins.

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11. Detailed provisions relating to the TTV Policy Area

11.1 Introduction

11.1.1 The characteristics of the Thriving Towns and Villages Policy Area (TTV) 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 Section 5 of the JLP.

11.1.2 The guidance below specifically refers to TTV only policies to address some of the specific challenges. Guidance is included for:

- Prioritising growth through a hierarchy of settlements (TTV1);
- Delivering sustainable development in the Thriving Towns and Villages Policy Area (TTV2);
- Development in Sustainable Villages (TTV25);
- Development in the countryside (TTV26);
- Meeting housing needs in rural areas (TTV27);
- Horse related developments in the countryside (TTV28); and,
- Residential extensions and replacement dwellings in the countryside (TTV29).

11.1.3 In addition to the above, there is also specific design guidance available for sites in Tavistock and Okehampton, incorporated from the previous East of Okehampton Masterplan SPD and the South and South West of Tavistock Masterplan SPD which have been superseded by this document.

11.1.4 Specific design detail below at sub-section 11.9 is applicable for the following JLP policies in Okehampton:

- Policy TTV14 - East of Okehampton

11.1.5 Specific design detail below at sub-section 11.10 is applicable for the following JLP policies in Tavistock:

- Policy TTV16 - Callington Road, Tavistock
- Policy TTV17 - Plymouth Road, Tavistock

11.1.6 The guidance also reflects national guidance, and should be read alongside the NPPF, NPPG and the site specific policies set out in the JLP.

11.2 Prioritising growth through a hierarchy of settlements (TTV1)

What is this policy about?

11.2.1 Policy TTV1 identifies a settlement hierarchy to direct the location of new development to the most sustainable locations within the TTV Policy Area:

- The Main Towns
- Smaller Towns and Key Villages
- Sustainable Villages
- Smaller villages, Hamlets and the Countryside

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11.2.2 The sustainable settlements in the top three levels of the hierarchy are named in paragraphs 5.8 to 5.10 of the JLP. There are no named settlements in level four of the settlement hierarchy, although there may be circumstances where is it considered acceptable to grant planning permission in settlements that fall within the bottom tier of the hierarchy.

11.2.3 National guidance states that all settlements are considered to be able to support the delivery of homes in rural areas, subject to site specific proposals meeting the relevant policy requirements of the adopted development plan. For the purposes to applying Policy TTV1 (and Policy TTV26), this document provides a characterisation of the smallest settlement, the 'hamlet' – beyond which is considered to be countryside for policy purposes.

11.2.4 No definition of 'settlement' is provided within the JLP, or within national policy/guidance. Instead, the LPAs will apply professional judgement and an understanding of the rural settlement pattern when considering if a proposal site can be considered to be in a sustainable location. Key to this is the connectivity between settlements, and whether a hamlet or smaller village, that is not named in the JLP or has a Neighbourhood Plan, plays a functional part of a hinterland around an identified sustainable settlement. The further from a sustainable settlement a proposal site is, the less chance of it being able to demonstrate how local services and facilities can be accessed without significant reliance on a private car.

11.2.5 The NPPF acknowledges that in rural areas sustainable transport alternatives to the private car are less prevalent than in urban areas, but this is only one part of the wider consideration of sustainability, and not justification for permitting development in locations that are constrained by the rural road network and will increase a reliance on travel by private car.

11.2.6 As identified within Policy TTV1, outside the top two layers of the settlement hierarchy, only housing proposals that can demonstrate that they are meeting a local housing need will be supported. This is consistent with NPPF paragraph 77, and with the delivery strategy of the JLP, which seeks to direct development towards the more sustainable settlements in the settlement hierarchy.

11.2.7 Housing proposals may be considered acceptable, alongside other policy considerations, if they can demonstrate that the proposal will result in a tangible local benefit. Housing proposals within the third tier (sustainable villages) and forth tier (smaller villages, hamlets and countryside) of the settlement hierarchy will be expected to meet local needs by restricting ownership or occupation to people with a demonstrable local connection, or by supressing the open market value of a house by a minimum of 20 per cent against the open market value in perpetuity. These restrictions will be written into a s106 agreement attached to the relevant planning permission.

11.2.8 Policy DEV8 (Meeting local housing need in the TTV Policy Area) requires applicants to show how a proposal is meeting a local need by diversifying the housing stock and broadening the choice for home ownership, but in sustainable villages and other rural settlements outside the top two levels of the settlement hierarchy is considered necessary to attach other requirements onto a planning permission in order to make the proposal acceptable in planning terms. The main tool that will be used to ensure local housing needs are being met in specific areas will be local connection requirements that will be written into a planning obligation prior to a planning permission being granted. This will require a prospective owner or resident to demonstrate that they meet the eligibility requirements before being able to take possession of, or move into, a home that has been permitted because of the benefits it provides to local people.

11.2.9 It will be possible for ‘local connection’ to be meet in a number of ways, as various definitions are used to determine if someone has a local connection:

1. Living and/or working with the parish or adjoining parishes for a minimum of three full years out of the last five;
2. Living and/or working within the Plan Area for at least five full years out of the last seven;
3. Living within the parish or adjoining parish for at least eight of the first 16 years of their life;
4. Living within the Plan Area for at least 12 of the first 16 years of their life.

11.2.10 For further guidance on Affordable Housing please see sub-section 4.5.

11.2.11 Where a proposal site is within the Undeveloped Coast or AONB, it may be necessary to restrict eligibility to an area more closely aligned to the policy designation, such as a coastal parish and adjoining coastal parishes, rather than the wider Plan Area.

11.2.12 Evidence of eligibility could be taken from Council Tax accounts, employee and tax records and school attendance information from the education authority.

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11.3 Delivering sustainable development in the Thriving Towns and Villages Policy Area (TTV2)

What is this policy about?

11.3.1 TTV2 sets out high level principles that will be applied in the assessment of planning applications within the TTV policy area.

TTV2.1 and TTV2.2. – Vitality and vibrancy

11.3.2 The concept of vitality and vibrancy (TTV2.1 and TTV2.2) within the TTV Policy Area has been considered alongside TTV1, explaining that while the vast majority of development will be expected to be delivered in settlements in the top two tiers of the settlement hierarchy, the plan does make provision for how and where some low-level growth could take place within tiers three and four of the settlement hierarchy.

TTV2.3 – Rural business and enterprise

11.3.3 TTV2.3 creates a positive and proactive policy framework that will enable the rural economy to thrive. This high level policy will need to be balanced against site-specific constraints and opportunities, and does not override the need to respond to the established settlement hierarchy or protect the natural environment. The great weight given to the conserving and enhancing of protected landscapes will not be undermined by the pursuit of economic development.

TTV2.4 – Diversification of rural businesses

11.3.4 TTV2.4 references the diversification of agricultural and land-use businesses and makes provision for certain types of expansion. Businesses that will be supported will be those that also require a countryside location, or can demonstrate a tangible link between the new commercial activity and the original business. Diversification in itself does not mean that any additional business will be supported simply to cross-subsidise an existing business.

TTV2.5 – Sustainable rural tourism and leisure developments

11.3.5 TTV2.5 should be read along with the specific provisions of policies TTV1, TTV26 and DEV15. This policy seeks to ensure that new tourism facilities respond to opportunities within the established pattern of sustainable settlements, and avoid dispersed and detached tourism facilities that will add seasonal strain on the rural road network.

TTV2.6 – Rural services and community facilities

11.3.6 TTV2.6 recognises the importance of the limited range of services and facilities in the TTV settlements, and the critical role they play in ensuring these settlements remain sustainable. The loss of such facilities will be resisted. Opportunities to enhance existing facilities will be pursued when they arise.

TTV2.7 – Sustainable transport accessibility

11.3.7 TTV2.7 recognises that opportunities to improve sustainable transport options in some parts of the TTV Policy Area may be challenging. Any chances to improve the accessibility and range of sustainable transport options, particularly where this will enable some modal shift, will be supported.

TTV2.8 – Natural infrastructure

11.3.8 TTV2.8 requires applicants to identify and respond to opportunities for net gains in natural infrastructure.

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11.4 Development in Sustainable Villages (TTV25)

What is this policy about?

11.4.1 Policy TTV25 makes provision for 550 homes to be brought forward in Sustainable Villages and looks to Neighbourhood Plans (NPs) to allocate suitable sites. Where a NP is not prepared the LPAs will support development that meets local need, responds positively to the indicative figures and satisfies NPPF and JLP policies.

11.4.2 As such, the JLP does not identify sites for development in Sustainable Villages. In taking this stance the LPAs will support the preparation of NPs leaving it to NPs themselves to determine which sites to bring forward. The Indicative Housing Figures included in figure 5.8 of TTV25 identifies the potential number of homes that could be supported by the current provision of services, facilities and connectivity in the named Sustainable Villages. These figures should be used to inform both NP preparation and, where a NP has not been prepared, development-led proposals.

11.4.3 Policy compliant development proposals of 5 or more dwellings within or adjoining a sustainable village that are not allocated for residential development within a made neighbourhood plan, may be considered to be making a positive contribution to the housing supply figure in Policy TTV25. In this scenario the contribution towards meeting the identified housing needs for a settlement in figure 5.8 of the JLP will override the Policy TTV26 requirement to demonstrate that the proposal requires a countryside location and an occupation need.

11.4.4 The LPAs will monitor the number of houses coming forward in Sustainable Villages and take measures to address shortfalls if they arise. This could involve the LPA proactively promoting sustainable development where shortfall in provision is apparent or supporting acceptable developer-led planning applications.

11.4.5 It is acknowledged that figure 5.8 does not include villages within the AONBs but recognises that despite this, NPs within designated landscapes may wish to positively allocate sites where the landscape and visual impacts have been appropriately assessed and considered acceptable.

11.4.6 The Indicative Figures provide a guide to the level of development considered appropriate in the Sustainable Village based on a desktop assessment of services, facilities and connectivity. As a NP progresses the accumulated evidence base will enable the actual and appropriate number of houses to be identified by detailed refinement based upon capacity of the settlement overall and also of the site(s) identified, and an up-to-date Housing Needs Survey. This may indicate a lesser or greater number of houses should be allocated than identified in figure 5.8. For proposals being advanced to gain the support of the LPAs, they will need to be robustly evidenced and have paid due regard to TTV25 and the indicative figures identified.

11.4.7 As such the Indicative Figures are not prescriptive and should not be seen as minimum/maximum numbers. NPs should be robust and explicit in justifying how the indicative figures have informed site selection and the amount of development promoted. Groups choosing not to meet the indicative housing figure for their village/area should be mindful that policy TTV25 requires that the indicative figures 'should be provided through neighbourhood plans, unless such provision would conflict with other policies of the JLP'. In order to satisfy this requirement, a NP that proposes delivering a lower level of housing than identified in figure 5.8 needs to be justified using the other relevant JLP policies.

11.4.8 The indicative levels of new housing listed in JLP figure 5.8 relate only to new housing in the Sustainable Villages list in JLP paragraph 5.10. As indicated in the justification of Policy TTV25 in the JLP, paragraph 5.157, the commitments and completions within Sustainable Villages prior to the end of March 2017 are not considered to make a contribution towards the Indicative Figures. These had already been counted in the JLP housing supply figures.

11.4.9 Where a NP has been made or is being prepared, the contribution toward the Indicative Figure is counted only from sites allocated by the NP where completions were delivered after end March 2017 or where the first planning applications on those allocated sites were approved after end March 2017.

11.4.10 NPs are required to play a proactive role in identifying and allocating the sites that will meet the requirement set out in JLP Policy TTV25 to deliver 550 dwellings.

11.4.11 In terms of commitments and completions since March 2017, not all of these will be considered as making a contribution towards the Indicative Figures. The LPAs, in preparing the JLP housing supply figures, included an allowance for "windfall developments". These are, generally, small scale proposals of less than 5 dwellings that gain approval but have not been predicted or formally allocated. The figure included in the JLP calculations for "windfall developments" is largely based upon past development activity of this type. This is projected forward to provide a predicted estimate of the amount of residential development that will arise from "windfall provision" and be delivered from April 2017 to March 2034. Such provision falls outside the 550 units allocated to fulfil the Sustainable Village allowance identified in Policy TTV25 and cannot be counted in the Indicative Figures. As such, not all approvals and completions since March 2017 can be counted towards the Indicative Figures.

11.4.12 Proposals of less than 5 dwellings that have arisen through no active involvement in the NP process, will be classed as "windfall". NPs can, however, formally allocate larger development sites (sites of 5 dwellings or more) that have come forward through development-led proposals and have not commenced building work on-site. It may be appropriate to extend the Settlement Boundary to

take account of these allocations and incorporate them within the boundary. Such actions would extend the “life” of the allocation beyond that of the planning consent and would enable the development to contribute towards the Indicative Figure. Other proposals, such as minor infill developments and one off conversions, would be classed as “windfall” and, hence, not count towards the indicative figure.

11.4.13 Development-led proposals of 5 or more dwellings will be counted towards the figure of 550 stated in Policy TTV25 where they are within or adjoining a sustainable village, are well related to the built form and benefit from safe access to local services and facilities, along with the other policy considerations of the plan.

11.4.14 As indicated in para 5.165 of the JLP, NPs in AONBs may wish to bring forward positive allocations to meet local housing need. The LPAs will encourage groups to undertake Housing Needs Surveys and use these and other evidence to identify appropriate allocations. Groups may also wish to provide evidence for the identification of Sustainable Villages where such allocations would be best located.

11.4.15 It must be borne in mind that neither the NPPF nor the JLP advocate or encourage a freeze on development in AONBs. Indeed both the NPPF and JLP contain policies against which appropriate development in AONBs could be brought forward. NPs provide the best mechanism through which local housing need can be assessed and best accommodated. NPs that do not take a positive stance run the risk of development-led proposals being approved that may not satisfactorily meet either local needs or community aspirations, and may not be located on a site that has the greatest support of the local community.

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11.5 Development in the countryside (TTV26)

What is this policy about?

11.5.1 Policy TTV26 seeks to protect the special characteristics and role of the countryside from inconsistent and inappropriate development that could undermine the rural character and settlement pattern of the TTV Policy Area. The broad spatial strategy of the JLP seeks to direct the vast majority of development to named settlements within the settlement hierarchy. Provision is made within the policy for supporting proposals that can demonstrate why a countryside location is required; these policy tests are necessarily high, and emphasise that development in the countryside should occur only in exceptional circumstances.

11.5.2 Paragraph 5.5 of the JLP indicates that TTV26 will be applied 'outside built up areas'. In conjunction with TTV1, a pragmatic approach will be taken to where TTV26 applies. Professional judgement will be informed by the rural settlement pattern and other factors when considering what can be considered a 'built-up area'. TTV1 refers to settlement types in a descending order of scale, with the smallest scale of settlement being the hamlet. This may mean that some development could come forward in a settlement best described as a 'hamlet', but a range of factors will be considered, including connectivity with other settlements, the location of the hamlet within the rural pattern of settlements, the relationship with the rural road network, the ability of the proposal to demonstrate it meets a local need and the potential impact on the existing built and natural landscapes.

11.5.3 Sites adjoining settlements in the top two tiers of the settlement hierarchy, the main towns and smaller towns and key villages, may be considered to be rural in character, but if the proposal accords with policies SPT1 and SPT2 and benefits from good connectivity with local services, it may not be assessed against the requirements of TTV26, in recognition that the development is being directed towards one of the more sustainable locations within the TTV policy area. Proposals of this type will still be considered against all other policies in the plan.

11.5.4 TTV26 will be applied to all applications considered to be outside the built up area of any settlement in tiers 3 and 4 of TTV1, providing the settlement is of sufficient size to be considered a hamlet, and that forms part of a functional rural network of settlements that includes at least one settlement from the top three tiers of the settlement hierarchy. Where a hamlet comprises of a compact core of buildings, these may collectively form a built-up area as described in paragraph 5.5.

11.5.5 For the purposes of applying JLP policies TTV1 and TTV26, a building or collection of buildings that originated in support of a single business or function, such as a farm or mill, that are distinct and detached from a rural settlement will not be considered as either a 'hamlet' or 'settlement', and will be considered as being in the countryside.

11.5.6 Hamlets that comprise a linear form, typically associated with a road or roads may be considered as forming a built up area providing that the built up area forms a continuous line of buildings, and is not interrupted by agricultural fields or large gardens. Opportunities to consolidate the core of such settlements are considered preferable to proposals that further elongate the linear form.

TTV26.1 – Isolated development

11.5.7 Provision TTV26.1 of the policy refers to proposals considered to be in isolated locations. In order to assess whether a proposal site is isolated, the Court of Appeal ruling of 28 March 2018 between Braintree DC and 1) Secretary of State for Communities and Local Government, 2) Greyread Ltd and 3) Granville Developments[216] will be applied (unless superseded by a later judgement). In particular, the ruling concluded that in planning the term 'isolated' should be considered to have its ordinary objective meaning of "far away from other places, buildings or people (Oxford Concise English Dictionary)". The reasoned justification for policy TTV26 states this policy seeks to restrict development that is distant from existing services and amenities, unless exception circumstances are met.

11.5.8 Policy TTV26.1 is broadly consistent with NPPF paragraph 79, although there are some divergences between the exceptions under TTV26.1 and the NPPF paragraph 79. Of note TTV26.1 (iii) only supports the reuse of redundant buildings for an appropriate use, whereas para 79 requires an immediate enhancement to the setting. In the case of a divergence in the exceptions, either exceptions shall apply.

11.5.9 With regard to TTV26.1(i) the term 'Rural Worker' is used to describe someone employed in an activity typically associated with an enterprise requiring a countryside location, such as agriculture, forestry or other land-based enterprises.

11.5.10 TTV26.1(iii) the term 'appropriate use' suggests a use that requires a countryside location, and is highly unlikely to include housing on the basis of the isolated location and lack of relationship with settlements in the hierarchy identified in Policy TTV1.

11.5.11 TTV26.1(iv) sets a necessarily high bar in terms of architecture and design that is required to mitigate the unsustainable nature of isolated locations. The significant enhancement required to meet the policy should demonstrate how the proposal responds to the unique circumstances of the proposal site. Identifying opportunities for enhancement and a proportionate response to these are critical elements of responding to this requirement. The scale of the proposal should also reflect the rural character of the location, and not seek to introduce new domestic dwellings that would form an incongruous mass of built form or

[216] https://cornerstonebarristers.com/cmsAdmin/uploads/braintree-dc-v-ssclg-judgment-28-march-2018.pdf

curtilage into the countryside nor introduce an alien form of activity or domestic paraphernalia into an area. Where appropriate, and in order to determine if a proposal meets this particular exception test, the councils may refer applications to the Design Review Panel. This would be at the expense of the applicant, and the case officer would need to attend the review.

TTV26.2 – Development in the countryside

11.5.12 Any development proposals outside a built up area should also meet the relevant provisions of TTV26.2.

11.5.13 TTV26.2(ii) 'significant alterations' refers in particular to supporting structures that require repair, replacement or introduction.

11.5.14 TTV26.2(iii) 'other viable uses' refers to uses that are considered to need a countryside location, and are demonstrably land-based.

11.5.15 TTV26.2(iv) in order to meet this policy requirement an applicant should provide operational details of the farm business or land-based enterprise to demonstrate the requirement to live onsite. This will be subject to an independent agricultural needs assessment.

11.5.16 TTV26.2(v) Best and Most Versatile Agricultural Land (BMV) typically refers to classes 1, 2 and 3a. If there is uncertainty over the exact classification it will be up to the applicant to demonstrate what the land classification is for a piece of land. Development proposals on land that is classified as 3b may be resisted if 3b is considered to be the best quality agricultural land within the predominant local character area.

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11.6 Meeting housing needs in rural areas (TTV27)

What is this policy about?

11.6.1 Policy TTV27 recognises that in certain circumstances the benefits associated with delivering housing that meet specific local needs could outweigh the harm associated with developing in a location that is less that optimum in terms of relationship with the existing built form and connectivity to services and facilities.

11.6.2 TV27 provides the basis for bringing forward proposals that are an exception to adopted policy providing that they are demonstrably Affordable Housing-led. This policy may be applied to proposals of any scale, including single dwellings.

11.6.3 For proposals of one or two dwellings it will not be possible to include a proportion of open market share that does not exceed the 40 per cent permitted in policy. For this reason, proposals for one or two dwellings will need to offer a 100 per cent affordable dwelling to be considered policy compliant, as this is the only practical way for the dwelling to meet the aims of the policy. Proposals of three or four dwellings could comprise of no more than one open market housing product in order to meet the specific requirements of this policy.

11.6.4 If an initial assessment of the suitability of a housing proposal that adjoins a sustainable settlement, or is within or adjoining a smaller settlement that forms part of a network of rural settlements, is likely to result in a recommendation of refusal when considered against the policies of the JLP, it may be appropriate to consider if the outcome would be different if the housing proposal delivered a specific and tangible local benefit. The greater level of public benefit will contribute to outweighing the negative impacts of locating housing in a less than optimum location. Whilst a single affordable dwelling may have limited benefit, it does make a contribution to increasing the accessibility of rural housing to people who may otherwise find it difficult to live in areas where they have a local connection. When weighing the benefits of a proposal against the impacts it should be recognised that once a site goes beyond the edge-of-settlement it is highly unlikely that any social benefit will be able to mitigate the negative impact of introducing built form into a countryside location.

TTV27.1 – Meeting the need for affordable housing

11.6.5 TTV27.1 this policy uses the same definitions for affordable housing as taken from the NPPF, which includes discount open market housing, as long as it is secured in the form of a s106 requirement that restricts open market values to no more than 80 per cent of the open market average. ‘Proven need’ can be taken from a range of sources, but does not exclusively require an up-to-date Housing Needs Survey. The term ‘local’ is considered as part of TTV1, and may vary depending on the specific impacts of a development and the benefits required to mitigate that impact.

11.6.6 The policy relies on securing the maximum benefit for local people. Local connection requirements will be written into a planning obligation agreement to secure this, as described previously in this document.

11.6.7 Please see Section 12 for further guidance on planning obligations and sub-section 4.5 for further guidance on affordable housing in the TTV Policy Area.

TTV27.2 – Housing mix

11.6.8 Where cross-subsidy is required to deliver affordable housing, the amount of open market housing required will be considered on a case-by-case basis. The LPA will require a viability assessment of the overall scheme to demonstrate why the amount of open market housing proposed is required.

11.6.9 40 per cent is the maximum permissible amount of open market housing, and is not the default threshold. If a proposal concludes that greater than 40 per cent open market housing is required to make a scheme financially viable it will not be considered policy compliant, and will not be considered as sustainable development. The proportion of tenures within the affordable housing offer needs to comply with the most up-to-date needs figures held by the relevant LPA. A proposal that only seeks to deliver discount open market housing will be resisted where there is evidence of need for alternative tenures.

TTV27.3 – Management of the scheme

11.6.10 Rented and shared ownership accommodation permitted as part of a TTV27 development will be allocated according to the most up to date allocation policy adopted by the Local Planning Authority. Discount open market dwellings will require a local connection eligibility for any owner or occupier, and will have a minimum 20% discount applied against open market value written into a s106 agreement and applied in perpetuity. The amount of discount may be increased depending on affordability levels within the local housing market.

11.6.11 Local connection restrictions applied in the Undeveloped Coast and Heritage Coast policy area (DEV24) and the Nationally Protected Landscapes (DEV25) may be worded to meet locally specific needs by either settlement or parish.

11.6.12 Any open market discount will be applied in perpetuity. The ‘value’ will be taken as an average of three valuations, and may include a valuation from surveyors appointed by the LPA. The value will be determined by the relevant LPA and will be considered final and non-negotiable.

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11.7 Horse related developments in the countryside (TTV28)

What is this policy about?

11.7.1 Policy TTV28 provides specific guidance relevant to equine facilities and is in addition to policy TTV26 due to the specific impacts and potential for harm associated with this type of development.

TTV28.2 – Existing and new buildings

11.7.2 TTV28.2 refers to the extent of building and land contained within a proposal needing to be 'commensurate in size with the number of horses to be kept on the land'. The British Horse Society recommends a ratio of two horses per hectare on permanent grazing (1-1.5 acres per horse). The ratio of number of horses per area will also be used to consider whether the scale of building and associated infrastructure is acceptable. The number of horses being kept on the land is considered to be the correct measure at the time of determination of the application, a proposal will not be considered acceptable if additional space is being planned for the future acquisition of future horses.

TTV28.3 – Management

11.7.3 TTV28.3 requires that certain parts of the development be detailed in a scheme of management as part of the planning application. The scope of which should reflect guidance from the British Horse Society, including:

- New tracks should follow contours of the land – darker, porous surfacing materials are best;
- Choosing the right natural materials and colour of roof can be enormously effective in helping to blend a new building into the surrounding landscape;
- Keep lighting to the minimum for working and security purposes. Always minimise light spill by angling lighting to the ground and using night sky friendly lamps;
- Consider making space for wildlife in stabling buildings – barn owl boxes, swallow or house martin ledges or bat bricks will be valuable additions;
- Choose a relatively level site and avoid excessive cut and fill. Avoid artificial mounding of soil;
- Group developments with existing features in the landscape such as farm buildings – avoid open fields or remote corners; and,
- Surface dressing should blend with the surrounding landscape, ideally as close to the colour of the local soil as possible. Materials such as sustainably sourced wood chip, sand, or sand mixed with natural fibres are recommended. Avoid the use of synthetic materials.

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11.8 Residential extensions and replacement dwellings in the countryside (TTV29)

What is this policy about?

11.8.1 Policy TTV29 provides further guidance about how replacement dwellings and extensions will be considered.

11.8.2 This policy will apply in all areas considered to be within the countryside. The same rationale will be applied as for TTV26 and TTV1 when considering whether a proposal is within the countryside.

TTV29.2 – Size of replacement dwelling

11.8.3 In the interests of maintaining a supply of homes that meet the needs of the households living within the TTV Policy Area and in keeping with the aims of DEV8, replacement dwellings should not increase the gross internal floorspace of the previous dwelling by more than 20 per cent.

TTV29.4 – Position of replacement dwelling

11.8.4 TTV29.4 makes provision for retaining elements of the previous built form of a replacement dwelling by using the same footprint as the previous building. Circumstances may dictate that this is either not possible or practical, in which case an applicant should discuss an alternative location within a plot with the LPA before submitting an alternative location within a planning application. In most cases the relocation of a dwelling will not be supported if it is not substantiated by a sound planning or engineering reason.

TTV29.5 – Extension scale and design

11.8.5 TTV29.5 considers appropriateness of scale of residential extensions. Extensions that may be considered ‘significant’ in scale will be those that require planning permission, and that seek to increase the existing internal floorspace of a dwelling by more than 50 per cent. The implications of extending a dwelling to such an extent will be to substantially change the affordability of the property, and as such proposals that do seek to bring about such a significant uplift in floorspace will also be subject to the provisions of policy DEV8, which seek to avoid perpetuating imbalances in the housing stock of the TTV Policy Area. The net loss of a smaller dwelling that is proposed to be extended to make a much larger dwelling will be considered as part of the planning balance.

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11.9 Specific design details for Okehampton (TTV14)

11.9.1 The East of Okehampton Masterplan SPD included specific design guidance on allocated sites situated on gateway locations. These gateway sites have been allocated within the JLP and offer opportunities to create high quality built form that defines how the town is initially perceived. Specific design detail below is relevant to the following JLP policy:

- Policy TTV14 - East of Okehampton.

Okehampton character areas

11.9.2 The below image shows the indicative character areas of Okehampton which have been considered within the wider context of the town, taking into account the existing character areas and the creation of a transitional landscape into the countryside and into Okehampton Hamlets.

Figure 53: Indicative character areas of Okehampton

11.9.3 The densities associated with each character area needs to be considered alongside the housing mix requirements identified within the Strategic Housing Market Needs Assessment (SHMNA) that forms part of the JLP evidence base. While the SPD identifies where it may be applicable to deliver lower densities, this does not override the requirement to deliver a mix of dwellings size, types and tenures as identified within DEV8.

Traditional Okehampton character area

11.9.4 The ‘traditional Okehampton’ character area should contain a mix of detached, semi-detached and terraced housing types that are generally two storeys in height. An element of properties which contain third floor living within the roof space, reflecting the character of the town centre, will also be appropriate where

the amenity of neighbouring properties is not compromised (i.e. by overlooking), there is minimal impact on the landscape and where such properties contribute in a positive manner to the quality of design of the local street scene. On these properties, there should be gable end windows and/or dormer rooflights. The differing topography in these areas may also lend itself to an element of split level housing.

11.9.5 There should be a higher density of dwellings along the main routes within this character area, reflecting the proximity to public transport routes, education and community facilities. There should be a strong built frontage along the main roads through the development. Key/focal buildings should be located along the main routes and around the neighbourhood centre.

11.9.6 Streets should be laid out in a compact built form which is similar in character, form and layout to the residential neighbourhoods in the centre of Okehampton. They should be designed as subtly defined carriageways and should not have a major strategic role.

Rural hamlet character area

11.9.7 Dwellings in the 'rural hamlet' character area should be appropriately grouped or clustered in an inward facing manner around a central courtyard or green space reflecting the rural hamlet characteristics of the farmsteads in the area. Typically these clusters should comprise of one larger unit/higher status building set within a larger curtilage (to replicate the traditional farm house), with a smaller grouping of buildings to reflect traditional barns, thereby creating a range of different housing types.

11.9.8 This character area should have strong pedestrian and cycle links to the Stockley Valley and to the rest of Okehampton (including the area covered by the 'traditional Okehampton' character areas, as well as good access to the surrounding countryside.

11.9.9 Hedgerows and existing trees should be a positive and strong feature of the built form, supplemented by additional planting, particularly along the boundaries, to create a strong landscape structure within which the development sits.

Materials

11.9.10 Typical materials that have been used historically in the Okehampton area are natural slate, stone and render. New development should aim to incorporate these locally sourced materials in buildings, rooftops and surfaces wherever possible. The use of render has also featured on more recent 20th century developments in the town and more modern sustainably sourced materials can be incorporated effectively into new developments where they are in keeping with the style of the area and can complement the more traditional materials.

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11.9.11 Natural slate should be used on roof surfaces. Ideally, a mix of differing natural slates will be used throughout the new development to provide texture and interest to the roofscape. This is particularly important for the views into the site from the Dartmoor National Park and wider countryside. Concrete roof tiles will be resisted.

11.9.12 Where natural stone is to be used, particularly on key buildings and vistas, it should be randomly laid in lime mortar. Natural stone is encouraged on ancillary buildings and boundaries (for example on garages where the house is rendered). Brickwork will be discouraged as it is not typical of the local style.

11.9.13 There is a clear palette of colours which are distinctive to Okehampton and the Hamlets and should be used as the basis of building and street colour design in the new development for both residential and employment uses. These are shown below and can be used to reflect the existing buildings in the new whilst also providing identities to different areas of the new development.

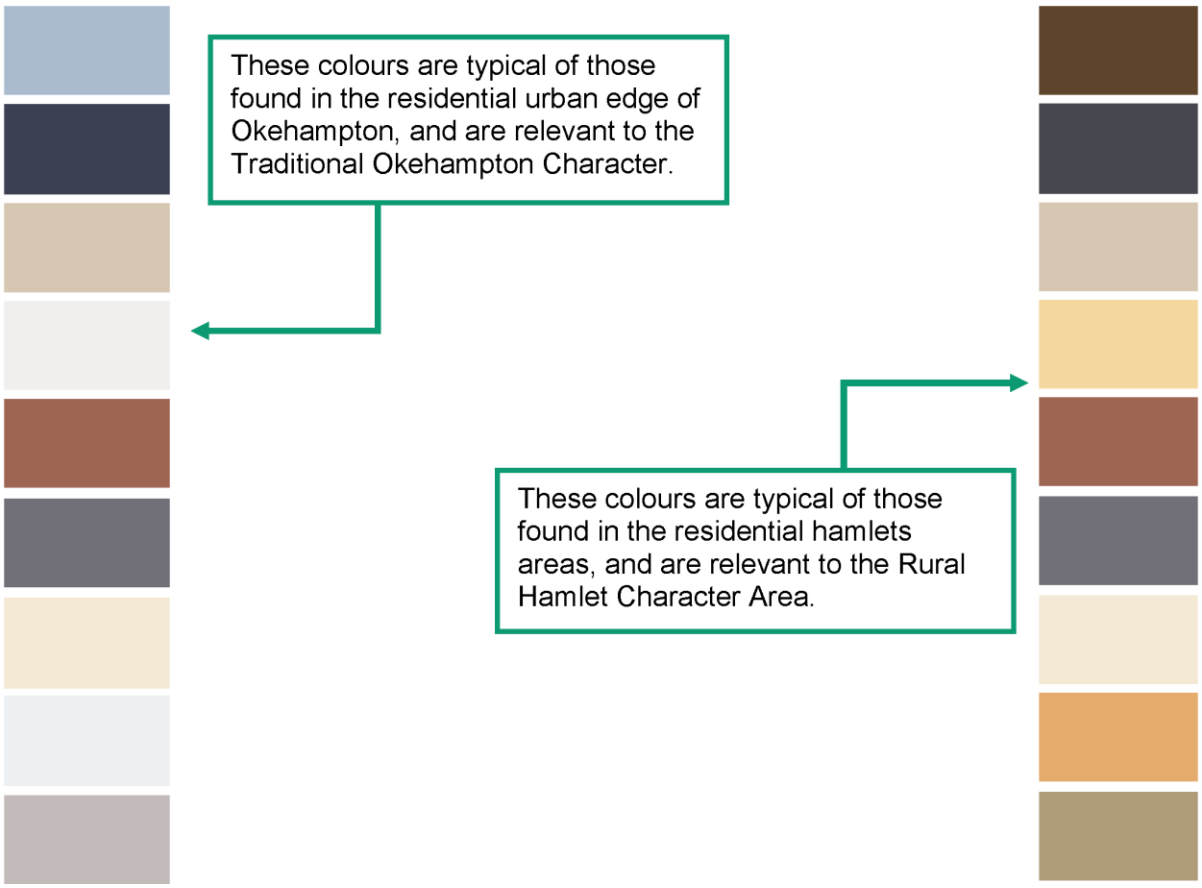

Figure 54: Okehampton colour palette

11.10 Specific design details for Tavistock (TTV16 and TTV17)

11.10.1 The South and South West of Tavistock Masterplan SPD included specific design guidance on allocated sites situated on gateway locations. These gateway sites have been allocated within the JLP and offer opportunities to create high quality built form that defines how the town is initially perceived. Specific design detail below is relevant to the following JLP policies:

- Policy TTV16 - Callington Road, Tavistock; and,
- Policy TTV17 - Plymouth Road, Tavistock.

11.10.2 The concept map for TTV16 shown below establishes broad locations and uses, and does not seek to fix specific uses to particular locations.

Tavistock character areas

11.10.3 The below image shows the indicative character areas of Tavistock which have been considered within the wider context of the town, taking into account the existing character areas and the creation of a transitional landscape into the countryside.

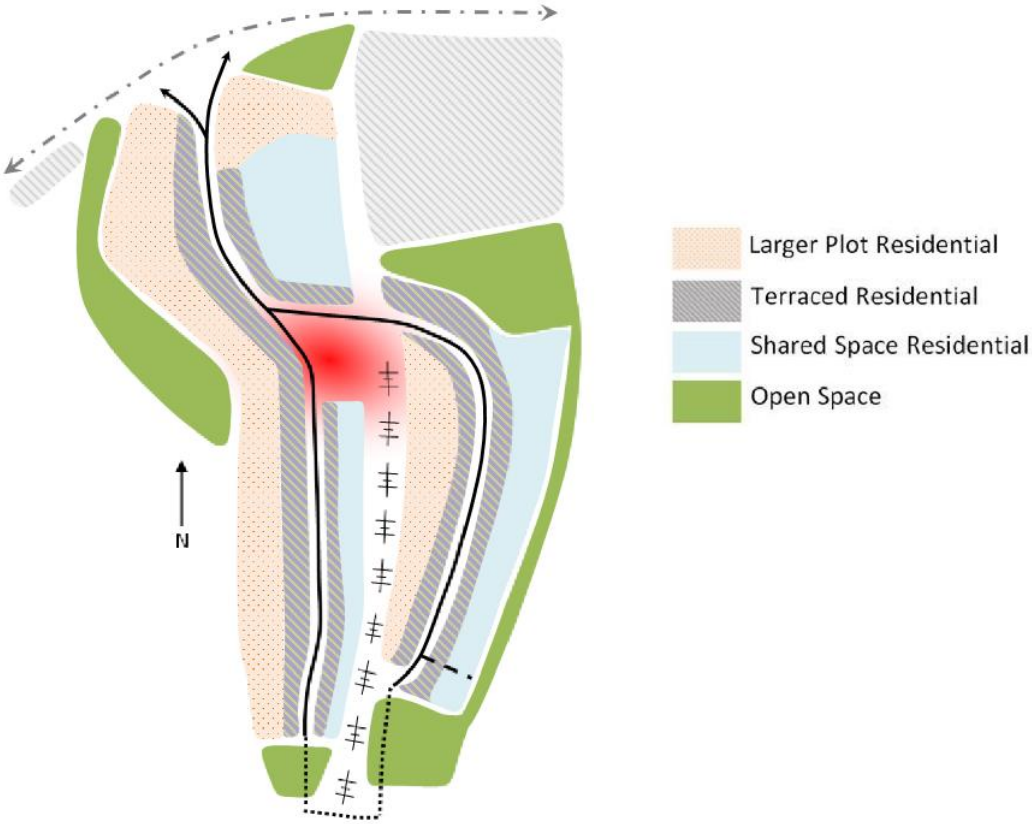

Figure 55: Indicative character areas

11.10.4 The densities associated with each character area need to be considered alongside the housing mix requirements identified within the Strategic Housing Market Needs Assessment that forms part of the JLP evidence base. While the SPD identifies where it may be applicable to deliver lower densities, this does not override the requirement to deliver a mix of dwellings size, types and tenures as identified within DEV8.

Larger plot residential character

11.10.5 This character area will comprise a lower density layout of predominantly semi-detached and detached properties. Situated on the higher ground, buildings should be interspersed with dense tree clusters and hedgerows so that these form the dominant features on the ridgeline, rather than the homes themselves. Skyline development will be resisted and buildings should be set down on the appropriate contour to avoid roof break across the ridgeline.

11.10.6 The streets in this area should be designed as subtly defined carriageways with no major strategic movement role. Their primary use should be for walking, cycling and an extension of the outdoor living environment.

Terraced residential character areas

11.10.7 This character area does not simply mean rows of terraced properties but refers instead to a strong building line facing onto the main vehicle routes within the development. Pedestrian footpaths should be provided along the building line so that the homes do not directly front the street. Along this building line, there should be an appropriate mixture of terraced town houses and semi-detached properties which have direct access onto the street. This should be interspersed by green frontages of hedges and/or trees to reflect the developments location on the fringes of the town. The main open spaces and community areas within the development should form part of this character area, benefiting from being easily accessible and overlooked by these homes. Higher densities of development can be accommodated within this character area, including opportunities for some flatted developments around the central ‘hub’.

Shared space residential character areas

11.10.8 This character area should be found on the lower slopes of development and where there are opportunities for residential development to flow seamlessly into the surrounding countryside. They should be located on the peripheries of the allocation and have a dominant character of quiet spaces in a safe and social environment where pedestrians and cyclists are given priority over the private car. To encourage this, no through traffic should be permitted within this character area.

Materials

11.10.9 In Tavistock, the design of new buildings should draw inspiration from the World Heritage Site and the buildings within the town’s conservation area. Typical materials that have been used historically are Hurdwick stone, Dartmoor granite,

copper, local slates and timber. New development should aim to incorporate these locally sourced materials in buildings, rooftops and surfaces wherever possible. The use of render on other materials has also featured on more recent 20th century developments in the town and more modern materials can be incorporated effectively into new developments where they are in keeping with the style of the area and can complement the more traditional materials.

11.10.10 It is not necessary for new development to replicate the urban form of the past but to take inspiration from the special qualities of the historic built environment. The Council will encourage developments which successfully integrate features of the past with innovative, sustainable and modern design and construction methods. The 'fabric first' principle should be applied which means that the need for energy is reduced at the outset and the use of appropriate materials is key to this. This should be supported by overall energy efficient design which incorporates high standards of insulation, glazing and ventilation.

11.10.11 The overarching aim is to achieve a high quality, locally distinctive development which embodies the enduring character of the town whilst creating a sustainable development of its time.

11.10.12 Some materials (such as some mixes of self-coloured render) which have been used on recent developments have led to premature ageing of buildings and staining and the Council is keen to avoid the continued use of such materials and techniques. The Council will actively encourage the use of materials which will weather appropriately over time and contribute to the long-term attractiveness of the development. The highest specifications of design and materials possible will be sought across the development.

11.10.13 There is a clear palette of colours which are distinctive to Tavistock and should be used as the basis of building and street colour design in the new development. These are shown on the below:

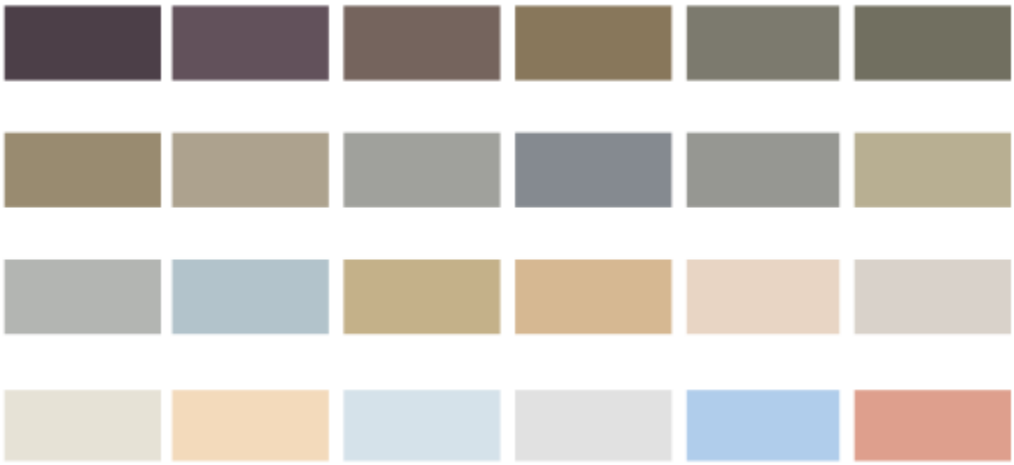

Figure 56: Tavistock colour palette

12. Planning obligations, conditions, the Community Infrastructure Levy and development viability

12.1 Introduction

12.1.1 Almost all development has some impact on the environment or amenities, or on the need for infrastructure, facilities and services. Sometimes, the impacts may be of such significance that development should not be permitted. However, often they can be mitigated through the design of the scheme and the use of planning conditions and/or through appropriate mitigation measures, including financial contributions and provisions to help address the cumulative impacts of development on infrastructure.

12.1.2 The section below helps provide clarity to developers, planners, stakeholders and local residents about how planning obligations will be sought and the impacts of development mitigated.

Policy context

12.1.3 The guidance in this section operates within the context of Strategic Objective SO12 (delivering infrastructure and investment) and primarily supports policy DEL1 in the JLP which sets out the policy approach that the LPAs will take in considering planning applications and in planning negotiations. It also reflects national guidance in the NPPF, in particular paragraphs 34 and 54-57.

12.1.4 Unless indicated otherwise, the guidance below applies to both the PPA and the TTV Policy Area.

12.1.5 The impacts of development are not constrained by administrative boundaries; where this is the case planning obligations and conditions may need to provide for mitigation measures in the adjoining area.

12.1.6 This SPD should be considered alongside the Developer Contributions Evidence Base document which sets out the methodologies for calculating benchmark developer contributions towards infrastructure required to mitigate the impacts of development. Whilst consistency of approach has been sought wherever possible, this is not always appropriate given the different geographies of the Plan Area and local government structures.

12.1.7 The evidence base document includes evidence and formulae to help provide a proportionate approach for determining the costs of mitigating the impacts of development, ensuring planning obligations are necessary, directly related and fairly and reasonably related in scale and kind to the development. The basis for the relationship between the JLP, the SPD and the Developer Contributions Evidence Base is shown below:

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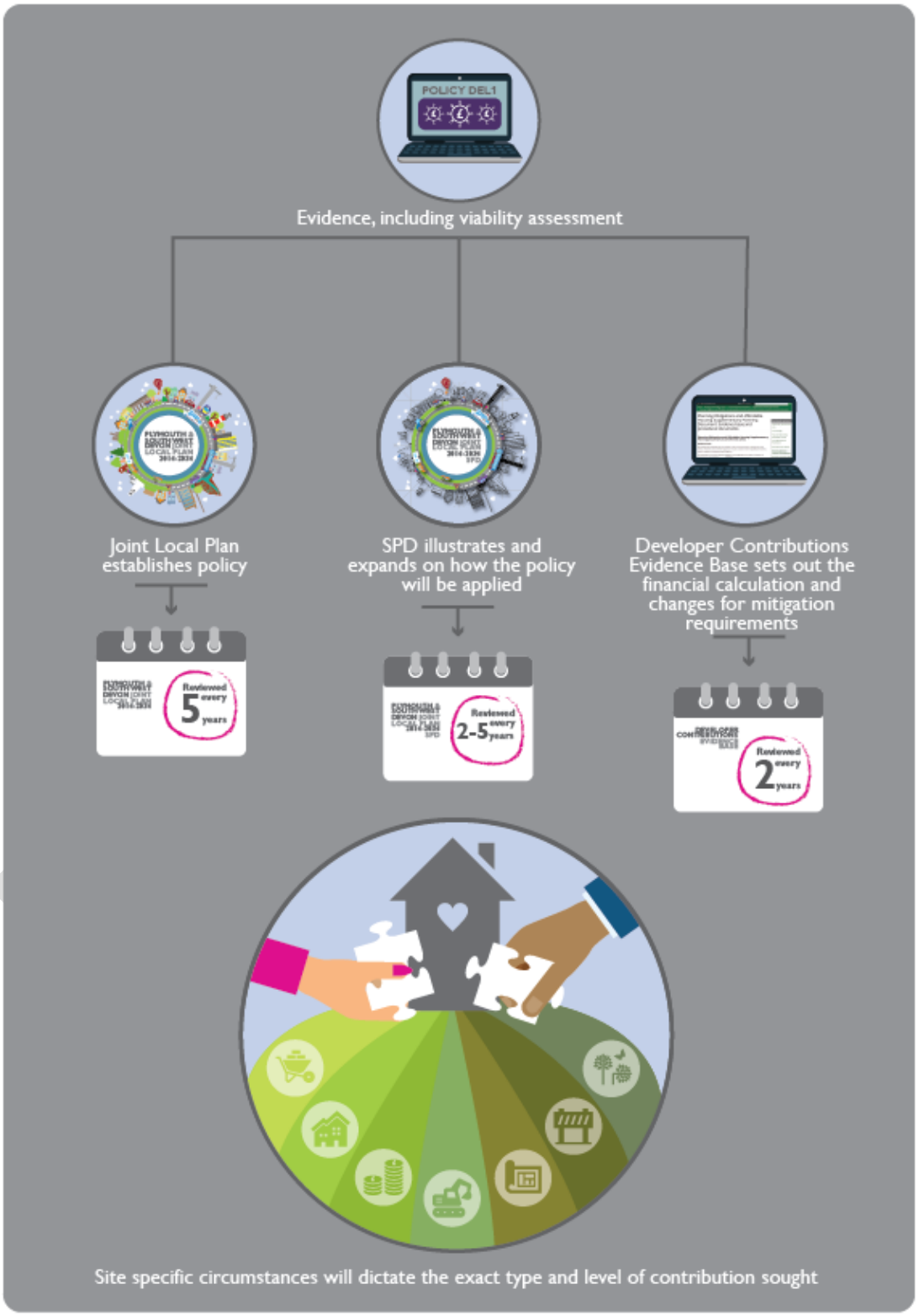

Figure 57: Relationship between the JLP, SPD and evidence base

12.1.8 Site specific circumstances will dictate the exact type and level of planning obligation to be negotiated.

12.1.9 Policies within the plan identify the strategic infrastructure measures for both the PPA and the TTV include:

- PLY37 (Strategic infrastructure measures for the City Centre and Waterfront Growth Area);
- PLY47 (Strategic infrastructure measures for the Derriford and Northern Corridor Growth Area);
- PLY57 (Strategic infrastructure measures for the Eastern Corridor Growth Area); and,
- TTV3 (Strategic infrastructure measures for the Main Towns).

12.1.10 Whilst not exhaustive, Annex 1 (infrastructure schedule) of the JLP also lists significant infrastructure interventions required to deliver the overall thrust of the plan and its key objectives.

Infrastructure Needs Assessment (INA)

12.1.11 To support the identification and delivery of infrastructure and facilities across the Plan Area, an Infrastructure Needs Assessment (INA)[217] was produced which included an infrastructure schedule for both the PPA (Appendix 3)[218] and TTV (Appendix 4)[219]. The INA forms part of the Plan for Investment and Infrastructure[220] and is used to inform decisions on plans, programmes and priorities. It also demonstrates to funding bodies and investors that the LPAs have a clear understanding of the area's infrastructure needs through to 2034.

12.1.12 The INA 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 (CIL) 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 INA 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. The INA provides a complete list of infrastructure interventions and was used to inform the content of Annex 1 of the JLP.

12.1.13 The Plan for Investment and Infrastructure, with the most up-to-date INA, and other infrastructure planning tools, such as funding calculators, will be used to help determine the value and prioritise developer contributions to achieve their most effective use alongside other funding sources.

[217] https://www.plymouth.gov.uk/sites/default/files/InfrastructureNeedsAssessment2017.pdf
[218] https://www.plymouth.gov.uk/sites/default/files/PPAInfrastructureSchedule.pdf
[219] https://www.plymouth.gov.uk/sites/default/files/TTVInfrastructureSchedule.pdf
[220] https://www.plymouth.gov.uk/sites/default/files/PlanForInfrastructureAndInvestment2017.pdf

12.2 Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy (DEL1)

12.2.1 The Community Infrastructure Levy (Amendment) (England) (No.2) Regulations 2019[221] came into force on 1 September 2019. Changes include the removal of the restriction on pooling of S106 agreements and the replacement of regulation 123 lists with annual Infrastructure Funding Statements. As such, both S106 and CIL can be spent on the same infrastructure project, with details of the Council's intentions being set out in annual Infrastructure Funding Statements.

What is this policy about?

12.2.2 DEL1 is a policy which recognises that a positive and strategic approach needs to be taken in relation to planning consents, planning obligations/agreements, and the Community Infrastructure Levy (CIL) in order to accelerate the delivery of development and secure developer contributions to meet the Plan Area's infrastructure needs.

What needs to be considered in the implementation of this policy?

DEL1.2 – Community Infrastructure Levy (CIL)

12.2.3 CIL was introduced through the Community Infrastructure Levy Regulations 2010[222] and currently only operates in the Plymouth administrative area.

12.2.4 CIL is a charge which local authorities can place on certain development types to help fund infrastructure improvements needed to support new development in their areas.

12.2.5 CIL can finance measures to mitigate both cumulative and direct impacts of development which might otherwise have been sought through the Section 106 planning obligations process. Unlike planning obligations, CIL receipts from a particular development are not earmarked for particular infrastructure. Instead, the majority of CIL monies are pooled into one fund which can then be used to pay for a wide range of infrastructure at different levels (strategic, citywide and local) that are required to support the needs of sustainable development.

12.2.6 To charge CIL the authority must have an adopted CIL Charging Schedule in place. Plymouth's CIL Charging Schedule, came into effect on 1 June 2013.

12.2.7 Whilst CIL can only make a limited contribution to the provision of infrastructure, in Plymouth it will normally be prioritised towards mitigating the cumulative impacts of development and the delivery of selected large strategic projects, especially where reliance on S106 contributions is likely to be difficult or insufficient. CIL is targeted at strategic infrastructure with S106 being primarily about local mitigation but supporting strategic infrastructure projects.

[221] https://www.legislation.gov.uk/uksi/2019/1103/contents/made
[222] https://www.legislation.gov.uk/uksi/2010/948/contents/made

12.2.8 Consequently, the positive use of S106 agreements will support other types of strategic infrastructure, where the three statutory tests (detailed below) can be met. This can include: transport; education; health; natural infrastructure and playing pitches. S106 agreements will also support local infrastructure provision and initiatives such as: play areas; local green space and transport improvements and community infrastructure such as: youth or other services; libraries; community buildings and recycling centres.

DEL1.3 – Planning obligations

12.2.9 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.

12.2.10 A Section 106 Agreement is normally drawn up to include all relevant parties with a legal interest in the site. In some circumstances, an applicant may draft and submit a Section 106 Obligation without LPA involvement in the drafting of it, in the form of a 'unilateral' planning obligation. In both instances this is a legal agreement that is binding on the part of the signatories including the landowner and any subsequent owner of the land.

Planning obligation tests

12.2.11 Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010[223] and the NPPF makes it unlawful for a planning obligation to constitute a reason for granting planning permission unless it meets the three statutory tests:

1. The obligation is necessary to make the development acceptable in planning terms;
2. The obligation is directly related to the development; or,
3. The obligation is fairly, and reasonably, related in scale and kind to the development.

12.2.12 All planning obligations will be negotiated on a case-by-case basis in order to ensure that the three tests outlined above are complied with. The guidance in this SPD and the information contained in the supporting Developer Contributions Evidence Base Document will help to ensure that the LPAs take a consistent approach in applying the tests:

- **Test One** *(necessary to make the development acceptable in planning terms)* – the SPD provides guidance on the policy justification and the overall need for a planning obligation, which in the case of infrastructure

[223] http://www.legislation.gov.uk/uksi/2010/948/made

impacts is related to evidence of infrastructure capacity. The LPAs published the evidence of infrastructure need in the form of the Infrastructure Needs. The LPAs will keep this evidence under ongoing review and publish updates on its website where appropriate.

- **Test Two** *(directly related to the development)* – the SPD and evidence base is fully consistent with the principle that planning obligations will only be sought which are directly related to the development. In respect of mitigation of the development's impacts, where these are local (e.g. an impact on a local transport junction) then the mitigation sought will be for the relevant local improvement; and where it is strategic (e.g. an impact on the need for strategic sports and leisure facilities) then the mitigation sought will be for the relevant strategic improvement. It will not always be possible to identify the precise project that a planning obligation will relate to. For example, there may be two or three projects under consideration, each of which would address an impact but where the service provider has yet to decide on which one to advance. However, the planning obligation will clearly commit the developer contributions to an appropriate project so that the obligation is directly related to the development.
- **Test Three** *(fairly and reasonably related in scale and kind to the development)* – the SPD provides guidance to ensure that obligations are proportionate and do not seek measures beyond what is needed to mitigate the particular impacts of the development. The LPAs will have regard to the formula based approaches to calculate the cost of impact mitigation for each unit of development. This is set out in the Developer Contributions Evidence Base document. This approach will help ensure that planning obligations are fair and reasonably related in scale and kind to the development.

Thresholds

12.2.13 The indicative thresholds to help determine the scale of development below which negotiated infrastructure contributions are set out in the table below:

Development type	Plymouth	South Hams and West Devon
Residential	10 or over	5 or over

Figure 58: Thresholds below which infrastructure contributions are unlikely to be sought

12.2.14 Commercial development may also have an impact and require contributions. This will be considered on a case-by-case basis, based on the size and type of development proposed.

12.2.15 Please note that these thresholds are a guideline only and there may be circumstances where infrastructure contributions would still need to be sought, for example, in relation to a smaller development on a green space which needs to mitigate its impacts off-site in order to satisfy the requirements of DEV27.

12.2.16 'Made' Neighbourhood Plans also need to be considered as some may set thresholds which are different from the above. Where they are different from the

above table, thresholds identified in adopted Neighbourhood Plans will take precedence.

12.2.17 The progress and status of Neighbourhood Plans across the Plan Area can be found here on the South West Devon Neighbourhood Plans page[224] and the Plymouth Neighbourhood Plans page[225].

Planning obligation types

12.2.18 Planning obligations generally fall into four types which are outlined at Policy DEL1.3:

- **Type 1** An obligation which prescribes the nature of the development so that it meets policy requirements (such as the delivery of affordable housing or future proofing for district energy);
- **Type 2** An obligation which offsets 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);
- **Type 3** An obligation which provides for the ongoing maintenance or upkeep of facilities provided as a result of the development, or secures commuted maintenance sums for facilities that a developer would like the responsible agency to adopt;
- **Type 4** An obligation which mitigates 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.

12.2.19 Contributions to mitigate the infrastructure impact of development (Type 4 obligations) will be negotiated on a case-by-case basis, and only where there is evidence of an impact and an identifiable means for mitigating that impact. Such contributions can be sought retrospectively where an infrastructure scheme has been forward funded to unlock growth potential in anticipation of future development contributions. To assist the negotiation process, the SPD Developer Contributions Evidence Base document identifies need and sets out formulae which enable an average infrastructure mitigation cost per unit of development to be calculated. This Evidence Base document will be updated when necessary to reflect changing evidence and costs.

12.2.20 In order to ensure a consistent approach to Type 4 planning obligations, the following sections consider a number of the matters that a planning obligation might seek to address. However, an obligation will only be sought in relation to these matters where to do so would comply with Regulation 122 of the CIL Regulations 2010.

12.2.21 The primary infrastructure types, where contributions may be sought through the planning obligation process, include:

[224] https://www.neighbourhoodplanning.swdevon.gov.uk/
[225] https://www.plymouth.gov.uk/neighbourhoodplanning

- Transport – including strategic transport projects to address the cumulative impacts of growth, public transport provision, travel planning and local highway and sustainable transport measures, including electric vehicle chargepoints;
- Education – including primary, secondary, early learning, special educational needs (SEN) provision and school transport;
- Healthcare – including primary care facilities in South Hams and West Devon and Wellbeing Hubs in Plymouth;
- Natural infrastructure – including strategic spaces needed to address the cumulative impacts of the growth of the city and city green spaces that meet wider than local community needs for recreation, as well as local spaces to meet community needs for recreation and play;
- Energy – including district energy or where measures for on-site carbon mitigation cannot be achieved;
- Sports infrastructure – including playing pitch provision;
- Community facilities – including libraries, waste/recycling facilities, village halls/community centres, youth provision, extra case housing and flood risk infrastructure;
- Public realm;
- Coastal defence measures;
- Low carbon / district heating measures;
- Plan for trees (PCC only);
- European Marine Site (EMS); and/or,
- Local employment and training initiatives.

12.2.22 If a planning obligation is required to mitigate development a planning obligations draft Heads of Terms (HoT), applicant's and solicitor's details and title information will need to be submitted as part of the validation process for what is willing to be provided as a contribution.

12.2.23 The following table sets out the four types of planning obligations together with infrastructure examples linked to the relevant JLP Policies. Earlier Sections of the JLP SPD, as indicated in the final column, provide an explanation of the relevant JLP Policies:

Planning obligation type	Infrastructure example with JLP Policy reference	SPD Section
Type 1 – Planning obligations which prescribe the nature of development so that it meets a policy requirement	**Affordable housing provision** DEV7 – Meeting local housing need in the PPA DEV8 – Meeting local housing need in the TTV Policy Area DEV9 – Meeting local housing need in the Plan Area	4
	Local employment and skills DEV19 – Provisions for local employment and skills	5

Planning obligation type	Infrastructure example with JLP Policy reference	SPD Section
	Protecting and enhancing biodiversity and geological conservation DEV26 - Protecting and enhancing biodiversity and geological conservation	7
	Delivery of landscape and biodiversity measures DEV23 – Landscape character DEV26 – Protecting and enhancing biodiversity and geological conservation	7
	District heating future proofing DEV32 – Delivering low carbon development	9
Type 2 – Planning obligations which offset the loss of any significant amenity or resource through compensatory provision elsewhere	**Loss of employment uses** DEV14 – Maintaining a flexible mix of employment sites DEV15 – Supporting the rural economy	5
	Impact on Areas of Outstanding Natural Beauty (AONB) DEV25 – Nationally protected landscapes	
	Impact on wildlife DEV26 – Protecting and enhancing biodiversity and geological conservation	7
	Mitigating impacts on valued Green and play spaces DEV27 – Green and play spaces	7
	Mitigating tree loss DEV28 – Trees, woodlands and hedgerows	7
	Loss of community facilities DEV30 – Meeting the community infrastructure needs of new homes	8
	Offsetting carbon emissions DEV32 – Delivering low carbon development	9
Type 3 – Planning obligations which provide for the ongoing maintenance of facilities and measures provided as a result of development	**Commuted payments for maintenance of facilities and measures provided** DEV3 – Sport and recreation DEV4 – Playing pitches DEV20 – Place shaping and the quality of the built environment DEV26 – Protecting and enhancing biodiversity and geological conservation DEV27 – Green and play spaces DEV28 – Trees, woodlands and hedgerows	7
Type 4 – Planning	**Sports, recreation and playing pitches** DEV3 – Sport and recreation	3

Planning obligation type	Infrastructure example with JLP Policy reference	SPD Section
obligations which mitigate the impact of development on infrastructure through direct provision or a financial infrastructure contribution	DEV4 – Playing pitches	
	Public realm (including public art) DEV20 – Place shaping and the quality of the built environment	6
	Area of Outstanding Natural Beauty (AONB) DEV25 – Nationally protected landscapes	7
	European Marine Site (EMS) DEV26 – Protecting and enhancing biodiversity and geological conservation and SPT14 – European sites – mitigation of recreational impacts from development	7
	Play areas DEV27 – Green and play space	7
	Green infrastructure, including trees DEV27 – Green and play spaces DEV28 – Trees, woodlands and hedgerows	7
	Transport and highways DEV29 – Specific provisions relating to transport	8
	Education DEV30 – Meeting the community infrastructure needs of new homes	8
	Healthcare DEV30 – Meeting the community infrastructure needs of new homes	8
	Libraries DEV30 – Meeting the community infrastructure needs of new homes	8
	Community facilities DEV30 – Meeting the community infrastructure needs of new homes	8

Figure 59: Planning obligation 'type', infrastructure example and relevant SPD section

Implementation of obligations and conditions

12.2.24 The following paragraphs detail the LPA's approach to the procedural elements of implementing DEL1.

Validation process

12.2.25 Planning applicants will be required to comply with the requirements of the relevant LPA's Local Validation List. Meeting these requirements will enable the LPA to process planning applications more efficiently and within the tight timescales set by Government.

12.2.26 It is important that applicants and their agents developers understand and familiarise themselves with the legal responsibilities that they have in respect of CIL, planning obligations and the planning application process.

Outline applications and pre application discussions

12.2.27 The LPAs encourage pre-application discussions with regard to planning obligations and conditions. The early discussion of planning obligation matters, specific proposals and potential abnormal development costs will provide greater clarity and certainty for developers as to the type and scale of contributions potentially sought and the conditions that may be needed to mitigate development impacts.

Drafting of agreements

12.2.28 Planning Agreements will normally be drafted by the LPA based on the use of 'Standard Agreements' to speed up the preparation of the S106 agreement. The LPAs will provide standard legal agreements and standard unilateral undertakings.

Financial contributions

12.2.29 All financial contributions contained in S106 agreements are expected to be paid within six months of the date of the agreement unless otherwise agreed. If any of the contributions are not paid within the timeframe, contributions will be index linked by increasing the specified sum in accordance with the following formula:

Y=(CxB)/A
Where:

- A is the value of the retail price index (RPI) compiled and published by the Office for the National Statistics last published before the said date of the agreement;
- B is the value of the RPI last published before the contribution is given;
- C is the amount of the contribution specified in the agreement; and
- Y is the amount of the contribution to be paid.

Figure 60: Index linking formula for late financial contributions

12.2.30 However, to support development viability the LPAs recognise that this will not always be practical. In these circumstances, the LPA will accept payments at specific stages during the development process, for example, upon first occupation of half the dwellings etc. Trigger dates for the payment of financial contributions will be included in the S106 Agreement, as will any time periods by which the contribution is to be committed or spent.

12.2.31 In addition to index linking, late payment interest at 4 per cent above bank base rate will be added in the event of late payment of any invoices or demands for payment.

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12.2.32 Contributions remaining unspent at the end of any time period specified in the S106 agreement will, on request, be returned to the payee along with any interest accrued.

12.2.33 The LPAs will, in most cases, seek to negotiate a five year time period to implement planning obligations where these involve the payment of a developer contribution. This is considered to be a reasonable timescale for the delivery of many mitigation measures. However, where a more strategic or complex intervention is needed, or resources need to be pooled from a variety of developments, then a longer time period will be sought, up to a maximum of 15 years.

12.2.34 The LPAs aim to take a strategic approach to infrastructure delivery, which includes taking a view on the most appropriate funding routes and identifying investment and delivery plans for its growth areas. It will use this process to consider which infrastructure needs are best supported through CIL revenues and to anticipate development proposals which may make contributions through planning obligations.

Monitoring, management and implementation of obligations and conditions

12.2.35 The monitoring and management of planning obligations will be undertaken by the LPAs to ensure that all obligations entered into are complied with on the part of both the developer and the Council, and that all financial contributions are committed and spent in accordance with the Agreement. Enforcement action may be taken by the LPAs where conditions or planning obligations are not being complied with.

12.2.36 Monitoring information detailing the agreements and the progress of agreements will be kept on a database maintained by the LPAs. The process will provide assurance that obligations have been spent in full and appropriately.

Fees

12.2.37 Applicants will be required to meet their own and the Council's reasonable costs, such as legal costs, of producing planning obligation agreements, whether the agreement is completed or not.

12.2.38 In addition, a Planning Obligation management fee will be payable on the signing of Section 106 agreements to meet the LPA's costs in administering and monitoring the agreement. Separate contributions may also be required for other specialist work in order to meet the Council's costs. The level of fee will be reviewed on an annual basis and published in the relevant LPA's Planning Services Fees Policy.

DEL1.5 – Development viability

12.2.39 The JLP has undergone comprehensive viability testing, including consultation with the development industry, and the plan policies found to be viable.

Developments which comply with those policies are assumed to be viable and do not require a viability assessment. The majority of developments within the JLP area are expected to be both policy compliant viable and therefore the use of viability assessments should be considered as exceptional.

12.2.40 Where an applicant contends that planning obligations sought would make a proposal economically unviable DEL1.5 requires robust viability evidence to be submitted. It is expected that the applicant will submit accurate, complete and detailed information at the earliest opportunity in order to support a thorough appraisal of the scheme's economics. It is for the applicant to demonstrate whether the particular circumstances of their scheme justify the need for a viability assessment. Any viability assessment submitted must refer back to the viability study that informed the JLP and should clearly articulate and provide evidence for what has changed since then.

12.2.41 Financial viability should be considered by applicants as a material consideration at the earliest opportunity. Where an applicant engages with the LPAs prior to the submission of a planning application this matter will form part of the advice provided to the applicant.

12.2.42 If during the course of determining a planning application it becomes apparent that viability is a material consideration it is expected that an extension of time will be required in order to review the viability position.

12.2.43 The financial viability assessment should be undertaken in accordance with the NPPF and reflect the recommended approach in the NPPG. Industry guidance, such as that provided by the RICS, may be referenced but it should be considered secondary to Planning Practice Guidance. If there is any conflict between Planning Practice Guidance and other guidance then the other guidance should be disregarded.

12.2.44 Any viability information which the applicant wishes the LPA to consider when determining the planning application will be publicly available unless specific commercial sensitivity or harm that outweighs the public interest can be evidenced. Any submitted viability assessment will be published on the planning portal other than in these exceptional circumstances.

12.2.45 The applicant will be required to fund the LPA's reasonable costs associated with the assessment of a viability assessment, as outlined in the LPA's fees policies.

Viability considerations following the grant of planning permission

12.2.46 Where a development has been identified by the LPAs as genuinely stalled due to unforeseen circumstances the LPAs may, at their discretion, and in line with planning policy, renegotiate Section 106 obligations.

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12.2.47 The applicant will be required to fund the LPAs' reasonable costs in assessing the new assessment and supporting evidence in line with the Council's published fees policy. Should the LPAs agree to vary the section 106 agreement, the applicant will be required to meet the LPAs' reasonable costs for varying the agreement, including legal costs.

12.2.48 Applicants will be expected to identify and evidence what has materially changed between submission of the original planning application and the renegotiation. Errors in the original viability assessment would not normally be justification for a renegotiation of planning obligations.

12.2.49 Realisation of risk or underperformance against profit expectations are not considered to be justification for a post planning permission viability review.

12.2.50 A revised financial viability assessment will be required to support the application provided to the same standards as described in this Supplementary Planning Document.

DRAFT

Cabinet

Date of meeting:	08 October 2019
Title of Report:	**Financial Update on The Box**
Lead Member:	Councillor Mark Lowry (Cabinet Member for Finance)
Lead Strategic Director:	Andrew Hardingham (Service Director for Finance)
Author:	Melanie Haymes, Finance Business Partner (Commercial)
	David Northey, Head of Integrated Finance
Contact Email:	Melanie.Haymes@plymouth.gov.uk
Your Reference:	AH.MH.09/2019
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of Report

The Council is embracing financial challenges in driving up revenue, reducing cost, utilising the full range of its resources and assets whilst ensuring customers receive high quality services and value for money.

The Box, a multi-million pound gallery and museum complex on North Hill, will house Plymouth's most important heritage collections on one site. A programme of high profile exhibitions, artist commissions and events will run alongside the permanent gallery displays, making The Box a key cultural attraction for the city and region. The Box is an historic asset, with a contemporary expansion that will provide a high quality home for the city's collections and a unique food and beverage venue aimed at supporting growth in the city economy. The report also includes provision to include the Elizabethan House and Smeaton's Tower as part of the wider Box portfolio.

The Elizabethan House, one of Plymouth's oldest buildings, is getting a new lease of life as part of the Mayflower 400 commemorations. Smeaton's Tower is a centrepiece on Plymouth Hoe, and has become one of the South West's most well-known landmarks. It's earned the description of a 'must-see' in Plymouth and is accredited as a VisitEngland Quality Assured Visitor Attraction.

References in this report to "The Box" will mean The Box itself, plus The Elizabethan House and Smeaton's Tower.

The purpose of this report is to recommend setting up two flexible, scalable, and not for profit companies for The Box. This will allow the Council to take advantage of innovative solutions to a broad range of financial challenges it currently faces and may well face in the future.

Recommendations

Cabinet is recommended to

1. Approve the creation of a Company Limited by Guarantee (and wholly owned by the Council) and a Charitable Foundation (partially owned)

2. Endorse the proposed names of the two entities as:
    a. Arca (Plymouth) Limited and
    b. The Box Foundation

3. Note the development of a detailed Business Case for the creation of the two new entities to protect the historic and economic vitality of the city, including the approval of the leasing of The Box, Elizabethan House and Smeaton's Tower (the "assets") from PCC to Arca (Plymouth) Limited

4. Nominate the Service Director for Finance (S151 Officer) as Member Representative of Arca (Plymouth) Limited and to exercise all voting rights on behalf of the council (subject to Key Decisions being reserved to the Leader/Cabinet) and bring back a future Report to Cabinet setting out the detailed governance arrangement required to protect, safeguard, and effectively manage the council's interest in Arca (Plymouth) Limited.

5. Authorise the Service Director for Finance (S151 Officer):
    a. to nominate officers of the council to act as the Executive Board Directors of Arca (Plymouth) Limited on an interim basis pending development of full governance arrangements
    b. to bring back a full report setting out the governance arrangements including the recommendations for appointment of Trustee Directors to the Box Foundation

Alternative options considered and rejected

Do nothing. This would prevent appropriate contractual arrangements being made for the opening of The Box.

Relevance to the Corporate Plan and/or the Plymouth Plan

A Democratic Council - The Council continues to adopt a pioneering approach to find flexible and innovative solutions to the challenges it faces, some of which are technical finance issues whilst others will resolve operational challenges to ensure best value for customers and the citizens of Plymouth. Adopting a strategic forward thinking approach will also ensure the company is set up to adapt, flex and ensure scalable solutions. Protecting the investment in co-operative assets will also assist with creating a more financially sustainable model so that visitors to The Box can enjoy it for years to come.

Implications for the Medium Term Financial Plan and Resource Implications:

There will be direct and indirect implications relating to the setting up of the companies:

1. Two legal entities will be created; both will be a Company Limited by Guarantee. Arca (Plymouth) Limited will be VAT registered due to expected levels of turnover. Supporting this company will be a Charitable company with the purpose of receiving charitable donations, sponsorship and fundraising.
2. The cost of setting up the companies will be in the region of £170k covering all legal and tax advice and leases/licences

Carbon Footprint (Environmental) Implications:

None for the purpose of this report.

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

The directors of Arca (Plymouth) Limited will be responsible for all aspects of Health & Safety and Risk Management associated with the management of The Box although all such aspects are expected to be delivered by the Council on Arca's behalf, The Elizabethan House and Smeaton's Tower. There will be no impact on child poverty, with school visits scheduled plus free entry for The Box. Where charges are applied, for specific exhibitions and The Elizabethan House and Smeaton's Tower, children will continue to enjoy free entry.

Appendices

Ref.	Title of Appendix	**Exemption Paragraph Number** (if applicable) *If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.*						
		1	**2**	**3**	**4**	**5**	**6**	**7**
A	Briefing Report							

Background papers:

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	**Exemption Paragraph Number** (if applicable) *If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.*						
	1	**2**	**3**	**4**	**5**	**6**	**7**

Sign off:

Fin	pl.19.20.122	Leg	lt/33440/0110	Mon Off		HR		Assets		Strat Proc	

Originating Senior Leadership Team member: Andrew Hardingham

Please confirm the Strategic Director(s) has agreed the report? Yes

Date agreed: 20/09/2019

Cabinet Member approval: Councillor Mark Lowry (approved verbally)

Date approved: 30/09/2019

Financial Update on The Box – Briefing report

Introduction

1.1 The Council is embracing financial challenges in driving up revenue, reducing cost, utilising the full range of its resources and assets whilst ensuring customers receive high quality services and value for money. The purpose of this report is to set up two flexible, scalable, wholly or partly owned companies to allow the Council to take advantage of innovative solutions to a broad range of financial challenges it currently faces and may well face in future.

The Company Solution

2.1 The companies will need to deal with the following range of potential challenges and opportunities

- Technical Financial Solutions
- Cost Reduction Initiatives
- Revenue generation
- Trading potential
- Potential to perform activities more effectively and efficiently
- Technical Employment Solutions
- Tax efficiency (in both the cost base and the efficient collection of income, sponsorships and donations)
- Supporting the delivery of The Box, Elizabethan House and Smeaton's Tower objectives

2.2 The company solution is not an off the shelf model so there will be some set up costs to ensure both companies are scoped to deal with the range of needs The Box may require. The set up costs are estimated in the region of £170k which will include the tax and legal advice and the company registrations.

2.3 Arca (Plymouth) Limited will be wholly owned by the Council. The Council owner is The Leader but it is recommended this is delegated to a Senior Council Officer. This report recommends the Service Director for Finance (S151 Officer) with appropriate reserved matters in place. A board of directors will be set up to manage the company.

2.4 A new charitable company, The Box Foundation, will support The Box vision for education and outreach and to fundraise on a tax efficient basis to obtain commitment of significant financial corporate sponsorship and donations from philanthropists.

2.5 The primary activities of the charity at this early stage will be establishing its governance arrangements, entering into contracts with third parties in relation to fundraising, receiving money and then granting it out to The Box.

Cabinet

Date of meeting:	08 October 2019
Title of Report:	**Director of Public Health Annual Report**
Lead Member:	Councillor Kate Taylor (Cabinet Member for Health and Adult Social Care)
Lead Strategic Director:	Ruth Harrell (Director of Public Health)
Author:	Ruth Harrell
Contact Email:	Ruth.harrell@plymouth.gov.uk
Your Reference:	RH 20190927
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of Report

The Director of Public Health publishes a report annually. This provides the opportunity to update a wide audience, raise awareness of particular issues and stimulate debate.

In this year's annual report, I have aimed to achieve two things; firstly, to update on year 4 of Thrive Plymouth, where the focus was mental wellbeing. Good mental wellbeing is the foundation for a healthier lifestyle; and similarly, healthier lifestyles can promote positive wellbeing. Part I of the annual report describes just some of the activities and interventions that the partnership of Thrive Plymouth has enabled.

Unfortunately, Part 2 of the report contrasts with the asset-based approach of part 1, since it highlights some of the national emerging trends with reducing life expectancy for some sectors of the population, increases in infant mortality and therefore growing inequality. It is important that we are aware of these national trends, and are questioning what more we should be able to do; whether this is lobbying for national factors to change, or doing things differently locally.

Recommendations and Reasons

1. Note the content (including recommendations) of the DPH annual report
2. Commit to considering what each partner organisation could contribute to these recommendations
3. Consider our response, if any, to the national picture

Alternative options considered and rejected

Not applicable.

Relevance to the Corporate Plan and/or the Plymouth Plan

The DPH annual report supports the Plymouth Plan aim to become a Healthy City, reporting on our work to reduce inequalities, and the challenge from the national picture.

Implications for the Medium Term Financial Plan and Resource Implications:
None.

Carbon Footprint (Environmental) Implications:
None.

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:
** When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*
None

Appendices
**Add rows as required to box below*

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) *If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.*						
		1	2	3	4	5	6	7
A	Director of Public Health Annual Report 2019							

Background papers:
**Add rows as required to box below*

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) *If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.*						
	1	2	3	4	5	6	7

Sign off:

Fin	djn/ 19.20. 21	Leg	lt/ 33248 /2709	Mon Off		HR		Asset s		Strat Proc	
Originating Senior Leadership Team member: Ruth Harrell											
Please confirm the Strategic Director(s) has agreed the report? Yes Date agreed: 18/09/2019											
Cabinet Member approval: *Kate Taylor approved by email* Date approved: 18/09/2019											

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Thrive PLYMOUTH

Building wellbeing and resilience in a time of austerity

Thrive Plymouth Year 4

Director of Public Health Annual Report 2019

Director of Public Health Annual Report 2019

Foreword

This year, my report is in two very distinct sections: part 1 reviews the progress made in Year 4 of Thrive Plymouth, where we focussed on wellbeing. The Five Ways to Wellbeing is an evidence-based but simple tool to help people to consider and take positive steps to improving their wellbeing; often, these steps are the things that we miss out from our lives when we start to feel under pressure and yet they can make a massive difference to the way we feel. They can also help to divert us from some of the unhealthy behaviours that we tend to turn to.

Part 2 of my report is, unfortunately, very different in tone. I, along with colleagues, have become increasingly concerned about the national picture, where data shows that life expectancy rises have not only stalled, but have started to reduce, particularly for women in more deprived communities. This has produced a widening of the health inequality gap. We know that the causes of poor health are complex, and so it is no surprise that the causes of this widening are also likely to be complex.

These early indications are easiest to detect when there are large numbers; if we try to compare national trends to local, we can see that we *may* be following similar trends but it is too soon to be certain. Though I am naturally an optimist, I want to highlight to you the risk that Plymouth will follow national trends, discuss some of the drivers of that, and question whether there is more that we, as a city, can do.

Ruth Harrell

Director of Public Health

Plymouth City Council

Recommendations

Recommendation 1

Reduce stigma and discrimination by increasing mental health and wellbeing literacy across the whole population.

Recommendation 2

Work to improve understanding of the impact stigma and discrimination have on the lives of people with mental health problems.[1]

Recommendation 3

Make it easier for people to seek support around mental health problems.

Recommendation 4

Adopt a life course approach. The foundations of mental health are laid down in infancy in the context of family relationships. Place-based intervention in settings such as schools, workplaces and communities complement the life course approach and makes the most of existing opportunities.

Recommendation 5

Help the population to build resilience through initiatives to build self-esteem and connection with others.

Recommendation 6

Create an environment where people can be their best self and be resilient to setbacks

Recommendation 7

Close monitoring of emerging evidence base around reducing life expectancy and increasing infant mortality, both nationally and within Plymouth, to detect any intelligence that can lead to actions

Recommendation 8

Embed the approach that we are taking in Plymouth, working together as partners to deliver the Plymouth Plan, including our approach to the wider determinants of health as well as integrated health and wellbeing. Whilst we have made good progress, we need to increase the speed that services are transformed.

Recommendation 9

Continued lobbying for appropriate funding for public sector services for the residents of Plymouth, to enable the services that they need to be accessible and effective, and tailored to their needs.

Recommendation 10

Use this additional funding to support and develop the interventions that we have in place, scaling them up, refining them and spreading good practice, and continue to develop new ways to get people the support that they need.

Part one: Thrive Plymouth Year 4

Mental Wellbeing

1. Why is Mental Wellbeing Important?

Mental illness is responsible for a large portion of disease within the UK – an even larger burden than both cancer and heart disease. People with mental illness die on average 20 years earlier than the mentally healthy. Affecting one in four people, mental health is estimated to cost the UK economy £105 billion a year.[1] It, therefore, stands to reason that as a society we need to do more to help identify, prevent and reduce the impact of mental health issues. One way of doing this is to promote overall wellbeing.

The UK Government Foresight report on mental capital and wellbeing describes mental wellbeing as "a dynamic state, in which the individual is able to develop their potential, work productively and creatively, build strong and positive relationships with others, and contribute to their community. It is enhanced when an individual is able to fulfil their personal and social goals and achieve a sense of purpose in society."[2]

Mental wellbeing and mental capital, therefore, can be considered as an important underpinning for a healthy life. Improving mental wellbeing can lead to a healthier lifestyle and leading a healthier lifestyle can improve mental wellbeing, in turn improving mental capital. Thrive Plymouth, therefore, took Year 4 to promote better mental wellbeing through various channels and interventions and using the engagement framework of the Five Ways to Wellbeing. The year was to demonstrate that Thrive Plymouth is as much about those with mental illness as any other resident. It was important to ensure that mental wellbeing was as well integrated into Thrive Plymouth as were the behaviours of Smoking, Eating, Drinking and Moving that were emphasised in the previous year.

The Prevention Concordat for Better Mental Health

The Prevention Concordat for Better Mental Health is a cross-sector, signatory agreement that aims to facilitate local and national action around preventing mental health problems and promoting good mental health. It is based on evidence and a preventative approach, it has been shown to improve population level mental health and lessen the financial burden on the health care system, with the aim of creating a fairer and more equitable society.[3]The consensus statement for the concordat has seven key commitments all based around partnership, promotion and the prevention of mental health.

Reduce Stigma and Loneliness

The Equality Act 2010 makes it illegal to discriminate directly or indirectly against people with mental health problems in public services and functions, access to premises, work, education, associations and transport. However, nearly nine out of ten people with mental health problems say that stigma and discrimination have a negative effect on their lives.[4] Reducing the negative views and connotations attached to mental illness is a key goal of the concordat. The government and supporting bodies recognise that this needs to be a joint effort across sectors and disciplines with early education playing a key role. Over three quarters of mental health problems emerge before the age of twenty; this makes childhood determinants an important factor for future mental health and wellbeing.[5] Therefore, focus should be given to early intervention such as school physical activity schemes[6], universal parenting support interventions[7] [8]and school educational intervention programmes.[9] That said, it is also important for partners to continue implementing recommendations from NICE guidelines in order to continue supporting and improving mental well-being across the life course.

This includes addressing social isolation and loneliness, a valuable approach to preventing common mental disorders especially in older people.[10] Loneliness can have a negative effect on our health, with studies reporting an association with higher blood pressures, compromised immune system function and increased stress hormones. The cumulative effect means that being lonely can be as bad for your health as being a smoker. [11] [12] Loneliness can lead to a higher risk of developing dementia and experiencing depression.[13] [14] Many people will avoid seeking help due to the stigma they expect to face and the self-stigma of feeling a burden, and believing they have undesirable attributes[15]

Recommendation 1

Reduce stigma and discrimination by increasing mental health and wellbeing literacy across the whole population.

Recommendation 2

Work to improve understanding of the impact stigma and discrimination have on the lives of people with mental health problems.[16]

Recommendation 3

Make it easier for people to seek support around mental health problems.

Recognise Symptoms

A life course approach provides a framework for understanding the development of mental health across the population and aims to identify points in the life course when there are opportunities to promote wellbeing and intervene when appropriate. Such times could include school years/education, times of ill health/hospitalisation and targeting pregnant women and new parents. It is estimated that 10-20% of women develop a mental health problem during pregnancy or within the first-year post childbirth.

Recommendation 4

Adopt a life course approach. The foundations of mental health are laid down in infancy in the context of family relationships. Place-based intervention in settings such as schools, workplaces and communities complement the life course approach and makes the most of existing opportunities.

Recognising the signs of mental health is important in order to enable early intervention and to prevent people moving into illness. This can be done by providing health and mental health literacy training to frontline organisations and individuals to provide them with the tools to support and recognise poor mental health.

Symptoms can include, but are not limited to, the following:

- Unexplained high emotional states; fear, worries, guilt
- Confused thinking and lack of concentration
- Inability to cope with daily problems
- Social withdrawal, mood swings and a change in sleep patterns
- Change in eating habits
- Abuse of drugs/alcohol

Building Resilience

Resilience is the capacity of people and societies to confront and cope with life's challenges; to maintain their wellbeing in the face of adversity. Encouraging people with mental illness to build resilience is key to supporting overall health and preventing physical illness and disease states.

Mental wellbeing and resilience are protective factors for physical health as they reduce the prevalence of risky behaviours such as heavy drinking, illegal drug use, smoking and unhealthy food choices which are often used as coping and management mechanisms in the absence of other support.

Recommendation 5

Help the population to build resilience through initiatives to build self-esteem and connection with others.

Figure 1: Simple model illustrating the two-way relationship between mental wellbeing and the Thrive Plymouth four key behaviours

Crucially it is important to identify that the determinants of poor mental health and mental wellbeing are the same as the determinants of physical health and illness. The following six principals are particularly relevant to mental health and wellbeing

1. Interventions which focus on the positive have added value over those which focus on finding or preventing the negative. Promoting mental wellbeing moves the focus away from illness and is central to an individual's resilience, social purpose, autonomy and ability to make life choices.
2. The social, economic, cultural and environmental determinants of mental health need to be considered and addressed. Different interventions can potentiate (increase power/effect) each other.
3. A proportionate universalism approach, which addresses whole population mental wellbeing promotion and provides additional support for high risk groups, is the optimum approach.
4. Engagement, both community and individual, are central to public mental health. The former is concerned with building on assets and involving communities in framing the issues and the solutions, the latter with developing individual strengths and resilience.

5. Since personal risk and protective factors are determined in early childhood, primarily in the context of family relationships, a life course approach is essential.

6. A truly multidisciplinary and inter-sectoral approach must be adopted, as no one discipline has all the knowledge or power to affect the required level of change.

The Sustainable Development Commission recognise that empowering people through self-care reduces health inequalities. Peer to peer support is an effective and cost saving tool that can be used to build confidence and autonomy within at-risk populations. The following four points are focused on services that should be provided to increase self-directed recovery.

1. Increasing people's capacity to use psychological treatment methods can prevent the development of mental health problems, particularly if used during periods of transition and pressure, such as redundancy, after birth or after a bereavement. Simple interventions and promoting available services such as cognitive behavioural therapy, have been successful in this way, particularly with those at increased risk of mental health problems, such as those with long term conditions and those who are isolated[17],[18]
2. Provide bereavement counselling [19] and relationship support.[20]
3. Support unemployed working age adults into high quality work, ensure those who are unable to work have access to a reasonable standard of resources, and are supported to lead fulfilling lives, moving towards employment as appropriate.
4. Increase mental health literacy,[21] especially for people with limited financial and social resources, including older people, people with long term health conditions, refugees, people from Black and Minority Ethnic communities and people living with disabilities. Low mental health literacy limits opportunities for vulnerable groups to be actively involved in decisions about their health[22] and increases delays in help-seeking and access to appropriate treatment.

Everybody will at some point suffer a setback, for example, bereavement, job loss, relationship breakdown or something similar. Having a reasonable level of personal resilience will make it easier to cope in these circumstances and make it easier to bounce back.

Recommendation 6

Create an environment where people can be their best self and be resilient to setbacks

Five Ways to Wellbeing – Connect, Learn, Be Active, Notice, Give [CLANG]

The Five Ways to Wellbeing provide a way to create an environment where people can build their own resilience and improve their wellbeing. It was adopted during Thrive Year 4 as an engagement tool. NHS Bristol had previously used the Five Ways to Wellbeing successfully as an engagement tool and the evidence is summarised in *The Happy City Initiative (2012) Five Ways to Wellbeing: Report on research into the best practice in successfully marketing the five ways to wellbeing to the general public and specific target groups*.

http://www.happycity.org.uk/wp-content/uploads/2016/10/Happy-City-NHS-5-ways-to-Wellbeing-Messaging-Report.pdf

For Thrive Plymouth Year 4, partners were asked to use the Five Ways to Wellbeing as a communications and engagement tool in the following two ways

1. Directly: by embedding the Five Ways to Wellbeing resources across communications with staff and clients
2. Indirectly: by increasing the opportunities across the city for people to connect, learn, be active, notice and give.

Figure 2: The Five Ways to Wellbeing

While the Five Ways to Wellbeing has been shown as an effective guide and tool, it is important to acknowledge it does have limitations in that it is a theoretical framework and therefore should be used alongside evidence-based interventions.

Wellbeing is a broad concept that has different meanings depending on the context. The term mental wellbeing is frequently used interchangeably with other terms around positive mental or emotional health. The World Health Organisation (2007) defines mental wellbeing as a state 'in which the individual realises his or her own abilities, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to his or her community'. By this definition, mental wellbeing has an important part to play in an individual being able to lead a healthy lifestyle.

Subjective wellbeing has a two-way relationship with health. Health influences wellbeing, and wellbeing itself influences health, possibly through increasing the likelihood that an individual will lead a healthy lifestyle. It is important to take into account mental and emotional wellbeing as part of a holistic approach to encouraging healthy lifestyle behaviour change, and further to take into account the social and wider determinants of health that affect psychosocial pathways and health outcomes. There are a number of evidence-based guidelines and interventions that are recommended to improve mental wellbeing at population level and in specific target groups.

The Five Ways to Well-being were created as the mental health equivalent of 'Five a Day' for fruit and vegetables. The Five Ways can be used effectively as a communications and engagement tool. It should be used alongside, but not instead of, evidence-based interventions. All mental wellbeing interventions undertaken during Thrive year 4 were evaluated, wherever possible, using the Warwick-Edinburgh Mental Wellbeing Scale (WEMWBS).

2. Prevalence of Mental Wellbeing in Plymouth

The Office for National Statistics measures personal wellbeing through the collection of data based on 4 questions in the Annual Population Survey. The questions are;

Table 1 : Four measures of personal well-being (answers on scale 0-10)

Measure	Question
Life Satisfaction	Overall, how satisfied are you with your life nowadays?
Worthwhile	Overall, to what extent do you feel the things you do in your life are worthwhile?
Happiness	Overall, how happy did you feel yesterday?
Anxiety	On a scale where 0 is "not at all anxious" and 10 is "completely anxious", overall, how anxious did you feel yesterday?

Source: ONS

The following data is reported through the Public Health Outcomes Framework relates to Plymouth. It focuses on the percentage of the local population reporting poor scores across the questions. Comparison is made to the regional and national average scores.

Table 2 : % of people with a low life satisfaction score

Year	Plymouth	South West	England
2011/12	5.3	5.8	6.5
2012/13	4.7	5.3	5.7
2013/14	5.8	5.3	5.6
2014/15	5.8	4.7	4.7
2015/16	4.2	3.7	4.6
2016/17	3.8	4.1	4.5
2017/18	4.1	3.8	4.4

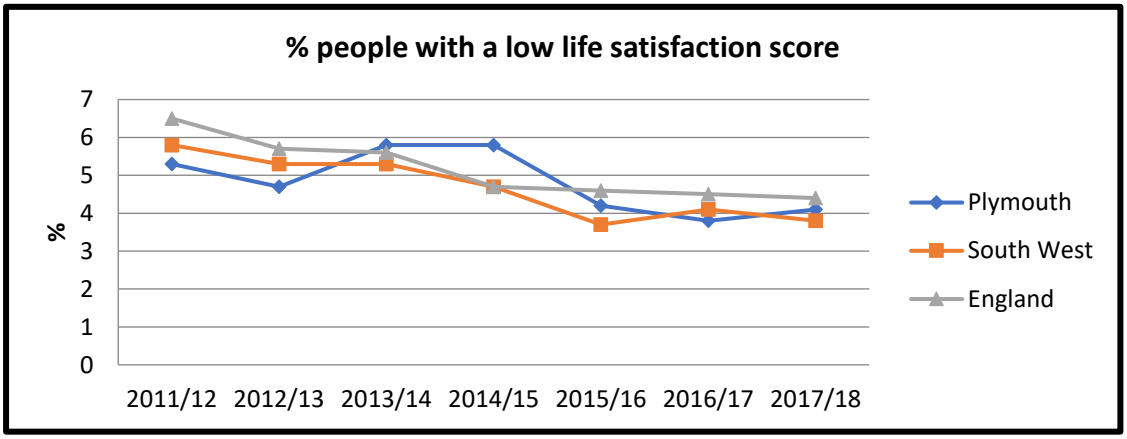


Figure 2: Graph showing the % of people with low life satisfaction score (ONS)

Table 3 Showing % of people with a low worthwhile score

Year	Plymouth	South West	England
2011/12	5.1	4.1	4.8
2012/13	5.5	3.9	4.3
2013/14	6.0	4.4	4.2
2014/15	4.5	3.9	3.8
2015/16	5.6	3.3	3.6
2016/17	3.9	3.7	3.6
2017/18		3.4	3.6

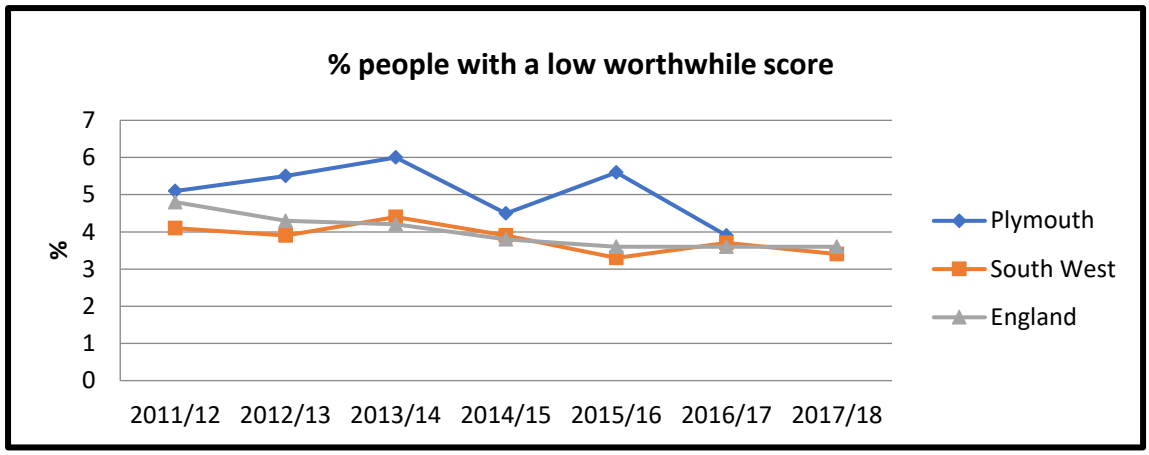


Figure 3: Showing % people with a low worthwhile score

Table 4 : % of people with a low happiness score

Year	Plymouth	South West	England
2011/12	11.5	10.0	10.7
2012/13	10.8	10.0	10.3
2013/14	11.0	9.6	9.6
2014/15	13.0	8.8	8.9
2015/16	9.4	8.4	8.9
2016/17	9.5	8.6	8.5
2017/18	7.9	7.4	8.2

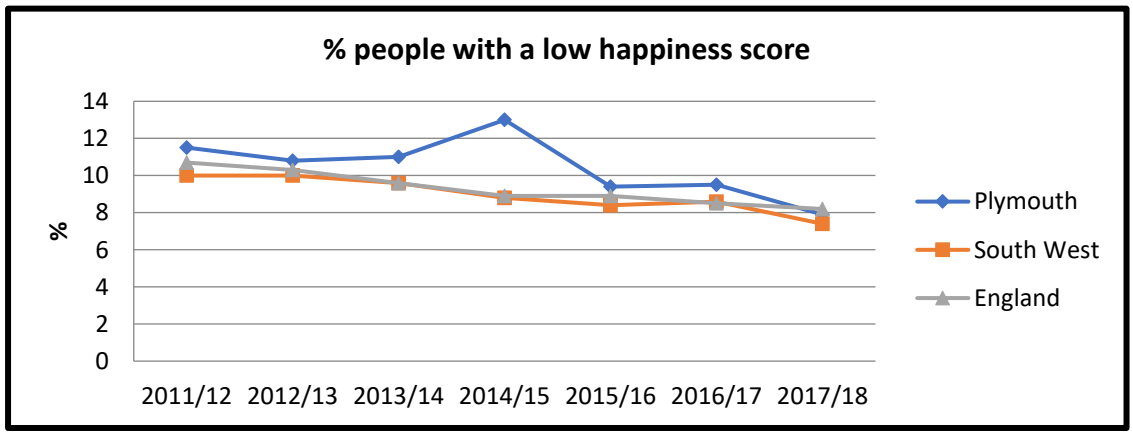
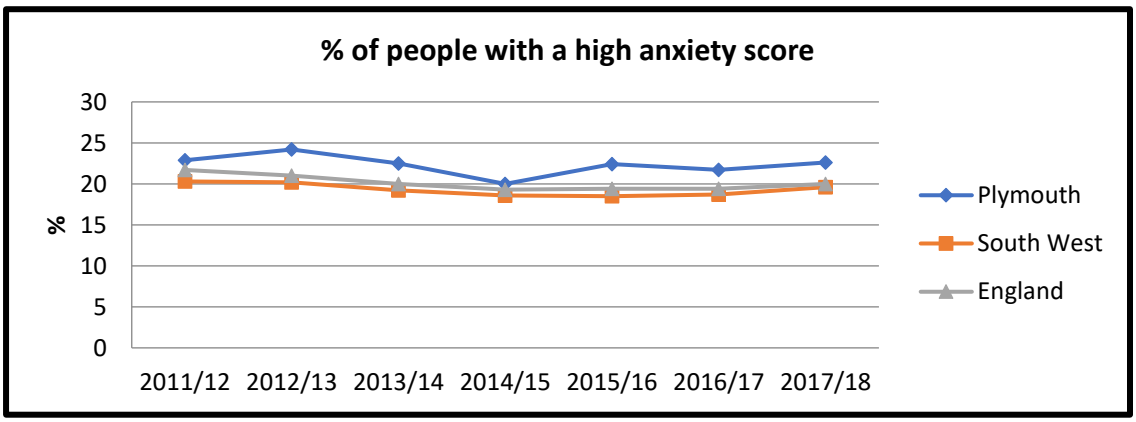


Table 5 : % of people with a high anxiety score

Year	Plymouth	South West	England
2011/12	22.9	20.3	21.7
2012/13	24.2	20.2	21.0
2013/14	22.5	19.2	20.0
2014/15	20.0	18.6	19.3
2015/16	22.4	18.5	19.4
2016/17	21.7	18.7	19.4
2017/18	22.6	19.6	20.0



The data shows that whilst people surveyed in Plymouth have slightly worse scores across the wellbeing measures, these are not generally statistically different from the national or regional average scores.

3. Thrive Plymouth Year 4 – What we did and why

Year 4 of Thrive Plymouth was co-designed with the people who know the most about wellbeing in the city; the Plymouth Mental Health Network. We circulated a questionnaire to our partners asking for their knowledge of what was already happening in the city and how we could support and encourage better wellbeing through the year. We got a lot of great recommendations from partners experience and knowledge and we agreed collectively that a year focusing on the Five Ways to Wellbeing was a great idea. We then held a summer away day with the Thrive Plymouth Network where we collected ideas about how the Five ways to Wellbeing were already being used in the city and how they could be used in the future.

Launch Event

We held our launch event to coincide with World Mental Health Day in October 2018. At the launch we had 172 delegates representing 71 organisations attend.

We were pleased to have videos from Duncan Selby CEx Public Health England, Johnny Mercer MP, Luke Pollard MP and Carole Burgoyne MBE, Ruth Harrell DPH talking about how they use the Five Ways to Wellbeing – how they Clang'ed

The event had a great cast of speakers, including the creator of the Warwick Edinburgh Mental Wellbeing Scale, who also gave a seminar on the tool after the launch event.

During the event we had a marketplace demonstrating some of the schemes and activities available to support mental wellbeing in the city.

At the end of the launch event we encouraged attendees to sample some of the activities intended to support mental wellbeing.

- Knitting activity
- Mindfulness activity
- Wellbeing History Walk around the campus
- Planetarium activity
- Sports Taster sessions in the University Gym

Offer and Ask

At the launch event we used our Offer and Ask approach to attendees:

We offered:

- A local authority signed up to the Mental Health Challenge and committed to supporting positive mental wellbeing in the city
- Training resources from Livewell Southwest to support the understanding and promotion of mental health and wellbeing
- One You Plymouth support for improving healthy lifestyles
- Membership of the Thrive Plymouth Network – support, advice, events
- Resources on the Five Ways to Wellbeing

We asked:

- Spread the word about the Five Ways to Wellbeing and use the available resources
- Create opportunities for people to engage in the Five Ways to Wellbeing
- Signpost to One You Plymouth – Sleep Well and Stress Less
- Consider your own wellbeing and try the Five Ways to Wellbeing
- Participate in the Thrive Plymouth Network

Membership of the Thrive Plymouth Network increased from 52 to 105 members representing 78 teams/organisations throughout the year.

Events/Campaigns

There were a number of wellbeing related events that happened across the city during Year 4.

Yarn Bombing Smeaton's Tower

Colebrook SW's Opportunity Knocks project worked hard to encourage people in the city to knit or crochet 10 x 10 squares as part of their outreach to isolated and vulnerable adults in the city. Throughout the project an amazing number of squares were created and this allowed us to Yarn Bomb Smeaton's Tower. The squares were then sewn into blankets and donated to two projects in the city, a nursing home and a charity working with victims of sexual and domestic violence.

Picture of Yarn Bomb

Social Prescribing and Wellbeing Hubs launches

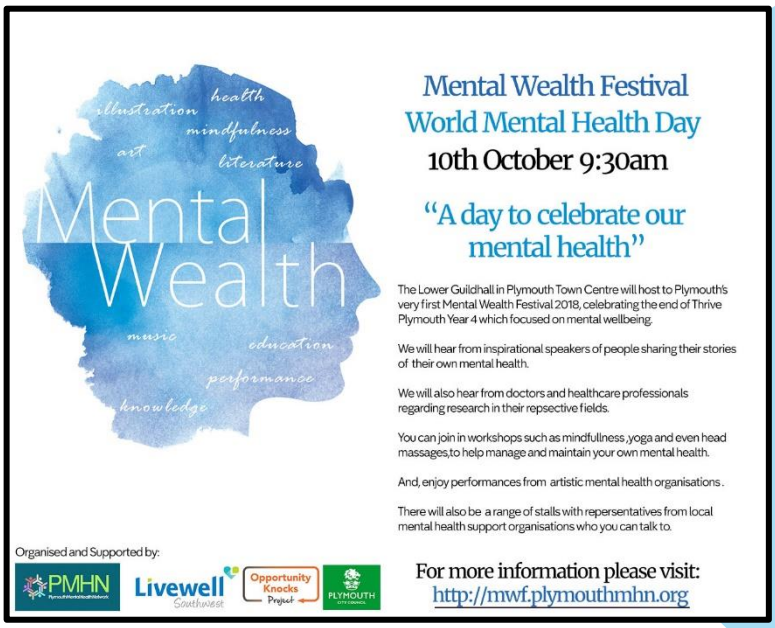
During Year 4 of Thrive the first of the new Wellbeing Hubs was launched at Jan Cutting Centre in Keyham, Four Greens Centre in Whitleigh and the Improving Lives Centre in Mannamead. There will be twelve of these centres before the end of 2020 and they are designed to support the social prescription programme to progress. All centres allow for drop in and run numerous groups designed to reduce social isolation and tackle low level depression, anxiety and stress.

Headspace Peer to Peer Mental Health Support Café launch within Wellbeing Hub

We were pleased to see the new Crisis Café launched within the Jan Cutting Centre. This provides a place for Blue Light responders to bring people who are in a mental health crisis. The café is manned by volunteers with expertise in counselling and befriending. Since they opened in they have provided hospitality to people who would otherwise have been taken to the Police Station or A&E. This has reduced pressure on these services. The Crisis Café is managed by Heads Count a mental health charity based in the city.

Street Factory Graffiti

During our launch event we were delighted to have a local graffiti artist who spent the event creating art based on the event. He is a magnificent success story for one of our partner organisations, Street Factory, who work with disaffected youth and children in the city around urban dance to give them a hope for their future, build their aspirations and find and support their motivation so they can become their best selves. We have been privileged to witness this organisations amazing rise to national reputation during the past year. A highlight of the launch event was Toby G getting everyone in the room to do 'the move' during his presentation



Mental Wealth Festival

We celebrated the end of Thrive Plymouth Year 4 with The Mental Wealth Festival, a joint event organised by Thrive Plymouth, One You Plymouth and Colebrook SW –at the Plymouth Guild Hall. This event coincided with World Mental Health Day 2018 and was attended by over 120 people. The day was organised around a series of workshops, creative activities, practical seminars and speeches. The purpose of the event was to raise the profile of the incredible work being done in the city around creativity and mental wellbeing. There was music, art, mindfulness, yoga, sharing of lived experience. We hope to make this annual event.

Resources

In support for Thrive Plymouth Year 4 we created a series of resources for use by organisations when talking about the Five Ways to Wellbeing.

HEADLINES FOR YEAR

We received end of year reports from some of our Thrive Plymouth network organisations and they told us this year:

Part Two: National trends in life expectancy

Every year, the Office of National Statistics (ONS) publish new figures estimating life expectancy; an estimate of how long a newborn baby might expect to live, on average. This is calculated by looking at the age that people die, and taking into account factors such as their age and the profile of the population so that it can be compared between areas, even between countries. Because all births and deaths have to be recorded, it is a very accurate and robust measurement.

In September 2018 there was a release of data from ONS[23] that caused concern, as it reported that;

Life expectancy at birth in the UK did not improve in 2015 to 2017 and remained at 79.2 years for males and 82.9 years for females.

Life expectancy had been growing in England since records began. There have been a few years where there have been falls, but these have been due to a well-defined cause, for example, the two world wars. Though there is an argument that it cannot continue climbing for ever, other countries such as Japan have shown that we are nowhere near the point where we are reaching a natural limitation on length of life. There was no clear cause for this plateau and it raised alarm bells across the country particularly amongst the public health community.

Since then, there has been much analysis carried out, which has confirmed this trend, but even worse has identified that life expectancy has changed differently for different groups; in the wealthier groups, life expectancy has continued to rise, but in more deprived groups it has reduced (especially for women) meaning that the gap has widened, and inequality has grown.

In addition, the latest data release from the ONS for infant mortality[24] is showing a statistically significant increase in deaths of infants for 2017, which is in line with the small increases seen for the last few years but which had not reached a test for statistical significance. This is the first proven rise for many decades.

As you will be aware, the aim of Thrive Plymouth is to ensure that Plymouth is doing all it can to tackle inequality in health outcomes. Life expectancy is an excellent measure of inequality; but it can take a long time for any change made to show up in changes to life expectancy, and statistically it is hard to measure changes at local level with a high degree of certainty. Though I am not currently able to confirm a worsening of Life Expectancy in Plymouth or a widening of the gap between local areas, the trends observed across England may well be playing out locally – the numbers are just too small to measure with the level of statistical certainty required. We should be very concerned at this national emerging trend, and we should not wait to see this trend in Plymouth before asking ourselves what more we could do.

In Part 2 of my annual report, I want to highlight this emerging trend, summarise some of the analysis and consider what it might mean for Plymouth's population, and the direction of Thrive Plymouth.

As the Director of Public Health for Plymouth I would welcome an open discussion about the following chapters. All research I have referenced is open source and I am keen to have a frank discussion about what I say below.

DEFINING LIFE EXPECTANCY

Life expectancy is an estimate of the length of time that a child born today might be expected to live, if the current circumstances impacting on health are maintained as they are today. It is calculated by looking at the ages of death of people living in that area over a defined time period. Since it has been a legal requirement for almost two centuries to record all births and deaths, it is based on a very robust and complete set of data. It provides a measure that can be compared regardless of the population structure. By comparing the results for different time periods, we can see whether it is changing and therefore whether the circumstances that people are living in are promoting health more or less than during other time periods.

It is not sophisticated enough to take into account people's movements throughout their lives, and would be less meaningful in areas where people moved around considerably compared to areas where people are settled.

1. What has happened to life expectancy historically?

Historically, the improvements in life expectancy have been a triumph for the power of 'the organised efforts of society' to improve the conditions that people live in and to develop ways to prevent and treat disease. We have some measurements for life expectancy going back to the 1700's; these measurements became more accurate from 1837 when registration of all deaths became required. The life expectancy for a baby girl born in England then was 43 years.

What does this mean?

Although the average Life Expectancy was 43, we know that many children died in infancy. There were no vaccinations or antibiotics and many of the illness that we consider to be minor – or that have been eradicated – would have killed many of the children affected. The reduction in childhood deaths has made a massive difference to overall life expectancy. The next high-risk time was for women, many of whom died giving birth; without many of the healthcare treatments that we take for granted today, childbirth was a lottery, but without modern day contraceptives, was also difficult to avoid.

Work tended to be a dangerous place to be, and many men in particular worked in environments where serious accidents and exposure to dangerous materials without adequate protection were the norm. We see the legacy of this still in Plymouth's high rates of mesothelioma caused by asbestos, for example.

If someone survived childhood, then it was not unusual for them to live to their 70s; life expectancy for someone who survived childhood was mid 70's from 1837 up until around 1920's[25]. Of course, this was more likely to happen in wealthier families, who had better living conditions, more choice of work, which tended to be less manual and therefore risky, and the ability to isolate themselves to some extent to avoid the spread of diseases.

This highlights that simply looking at the average life expectancy hides a huge amount of information.

There is a persistent story of improvement since records began. Childhood vaccinations and antibiotics made a huge positive difference, as did improvements in living and working conditions. As healthcare improved, and became accessible to all, we have continued to see improvements.

Though the main trend has been to improve, there have been variations to this, and we can plot key events in our country's history; the two World Wars, and particularly virulent strains of influenza. Others have a more gradual impact, which can be much harder to spot, such as the rise of smoking where the impact can be seen from years to decades after the behaviour starts. It can be difficult to understand how much of a contribution each element makes, because people's lives (and causes of death) are complicated. Different interventions might be having a positive effect, but might be masked by another risk factor appearing.

Frustratingly, as this historical data shows, it can be many years before we can look back and see, or at least estimate, the impact of different factors.

2. Life expectancy in recent years

The earlier indications that improvements in life expectancy had slowed were alarming, and these have now been thoroughly verified by the Office of National Statistics. They identified that the slowdown probably began around 2011, though it cannot be precisely pinpointed, and the effects were too small to measure with any statistical certainty at the time (several data points are needed to identify a trend).

This finding and the concern it created have led to much analysis. In this initial section, I will set out what is factually known, drawing on a PHE report[26].

National and International comparisons

The slowdown has been seen across the UK, at similar rates but with some slight differences in details of trends. Currently it is very difficult to interpret these differences.

The UK is not alone is seeing this slowdown of improvements; many other developed countries have seen this too. However, the UK is second only to the US in terms of severity of the slowdown.

Some countries such as Switzerland continued to improve, despite having the highest life expectancy at birth for males and the third highest for females in 2016. This demonstrates that there is no fundamental reason for this slowdown to have occurred.

Age profiles

Detailed analysis by age shows that improvements in life expectancy continued at a similar rate only in one age group, 5 to 9 years; all other age groups have been impacted by the slowdown.

For the age groups between 10 and 49 years, and over 90 years, life expectancy actually decreased.

Infant mortality, the number of babies who were born alive but died within their first year as a proportion of all live births, is a very important measure. Many improvements in life expectancy have historically been driven by improved chances of babies surviving, and also it is a measure that gives a good indication of inequality, since babies born into more deprived areas are almost twice as likely to die within their first year as babies born into least deprived groups.

National data is published annually. Last year, we were concerned that there seemed to be signs of this measure going in the wrong direction, but the changes did not pass the statistical tests. However, this year's data (from 2017) has confirmed that there has been a statistically significant **increase** in infant mortality since 2014; previously to 2014, rates had been dropping. Current figures are 3.9 deaths per 1,000 live births compared with 3.8 in 2016.

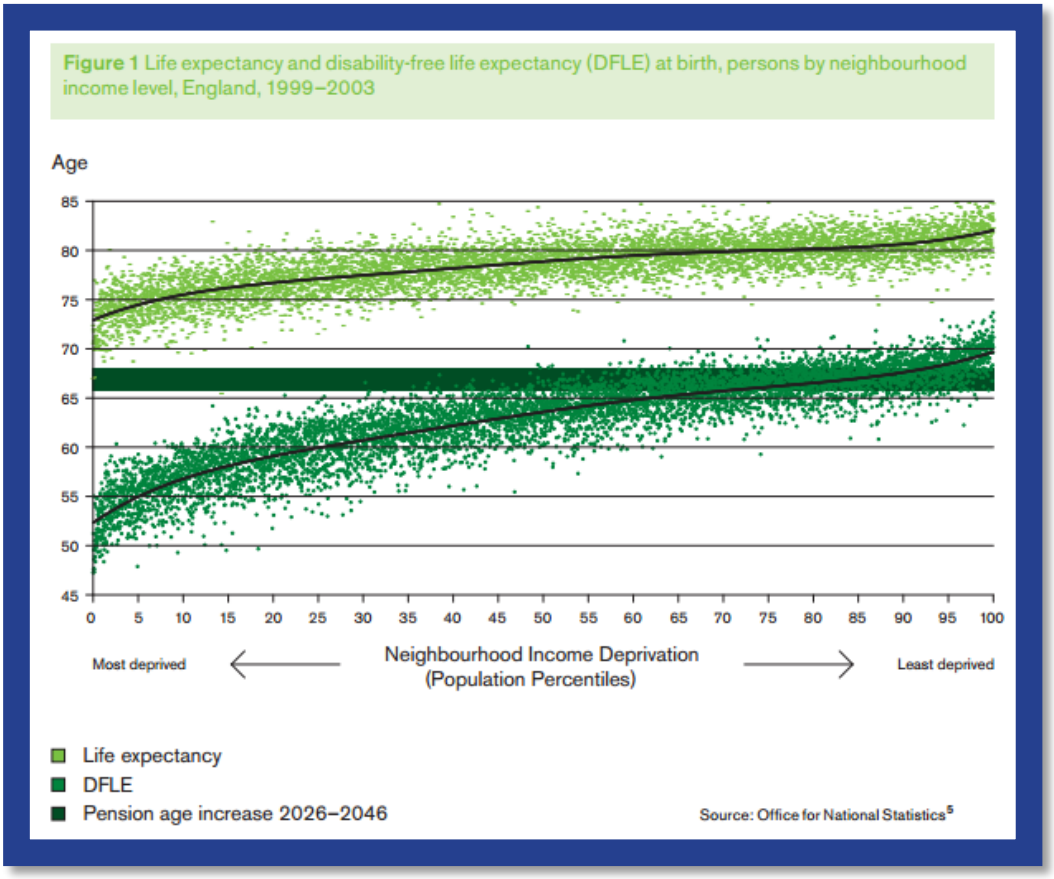
Statisticians will argue that further data is required to be certain that this is trend; however, taking this change in conjunction with the observed plateau in life expectancy (and decrease in life expectancy for more deprived women), there are very clear indicators that we are seeing worsening health.

Inequality

Inequalities relating to deprivation have increased; life expectancy continued to rise for the wealthiest groups, for both men and women, but in the most deprived groups life expectancy dropped for women, and remained the same for men, meaning that the gap increased for both women (by 6 months to 7.4 years) and men (by 4 months to 9.4 years).

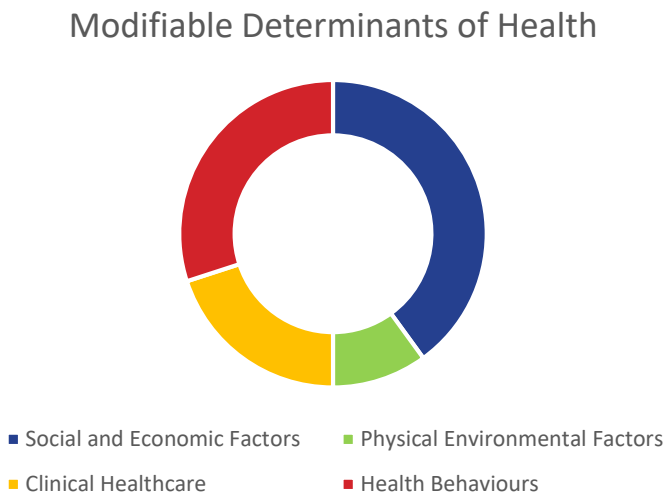
Infant mortality has historically been very high in deprived areas. It remains much higher, rates are still almost twice as high for the most deprived 10% compared to the least deprived, but the gap has narrowed over the last 10 years. It is not clear, with this new release of data, whether the inequality gap has changed, but this may be hidden in the statistical 'noise' (absence of evidence not absence of effect). Low birth weight is associated with social deprivation and so it seems plausible that we may see a widening when further data is available.

Another inequality, that between male and female life expectancy, has actually reduced but it has reduced because LE worsened for women. This is obviously not what we are looking for when we reduce inequality; our goal is always to see overall improvements, with the group with the poorest outcome improving more quickly so that it catches up.



What do we know about the cause of death?

Though there has been much conjecture, and multiple hypotheses, it is worth starting with what is factually known, using the PHE report referenced above (A review of recent trends in mortality 2018). They have been able to articulate three areas of focus which are having an impact on the slowing down of life expectancy improvements; along with insight on why that would be impacting the more vulnerable in our communities. These are reducing 'winter deaths' through controlling influenza and keeping people warm, focussing on heart disease and stroke, and supporting those at risk of death through 'accidental poisoning' (generally substance misuse).



Source: Park,H., Roubal, A.M.Jovaag, A.,Gennuso, K.P. and Catlin, B.B., 2015

Reducing the impact of seasonality on deaths.

We have a growing population of older people, and sadly older people tend to be vulnerable to the kinds of illnesses that circulate in the winter time; influenza being the most dominant of these. We know that the circulating strains of 'flu in 2014/15 were particularly harmful, and strain circulating in the winters of 2016/17 and 2017/18 also caused increases in deaths particularly in older people. Though there is a vaccine available each year, the effectiveness varies both depending on the strain but also based on the individual; in the most vulnerable, the immune system may not be strong enough to fight off the 'flu, despite vaccination. This is why vaccination of staff in care homes and healthcare facilities, as well as carers and family members of vulnerable people is promoted. There have been changes made to the vaccine and work is underway to test the effectiveness of these changes.

Usually as people age they develop chronic illnesses and these can make them more vulnerable to the cold; keeping homes warm can reduce the impact of cardiovascular and respiratory diseases, and reduce the risk of trips and falls.

The trend seen in inequality may be explained through this also; women currently have a longer life expectancy than men but spend more years in poor health, and so it is feasible that they would be more vulnerable to 'flu related deaths. People living in the more deprived areas tend to become ill with chronic conditions at much younger age; their homes may be colder and draughtier with less efficient heating systems; and they will have less disposable income. The shortening of lives that we are seeing may be the combined impact of colder homes and increased vulnerability.

Focus on Heart disease and Stroke

Heart disease and stroke have historically been a key factor in driving the improvements in life expectancy. This is likely to be caused by multiple factors, including reductions in risk factors such as smoking, improvements in early interventions such as statins and anti-hypertensives, and treatment even at advanced stages of the diseases.

Accidental poisoning

There are increasing numbers of middle aged adults who are dying as a result of accidental or deliberate overdoses of substances such as drugs and alcohol. A similar but more severe pattern has been seen in the US where these deaths have been termed 'Deaths of despair'; the combination of deteriorating job prospects, relationship breakdown and social isolation leading to declining physical and mental health and driving substance misuse and suicide.

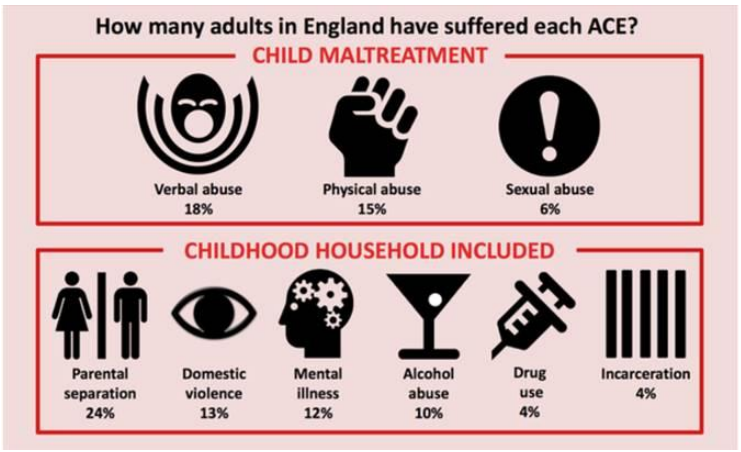
Though the worsening trend and rates are not as pronounced in England, there is little doubt that we are seeing similar patterns and this is very concerning.

The information above comes from looking at the recorded cause of death. To understand more we need to look at the causes of the causes, which is harder than it at first seems. The lives that people lead, and the places in which they live them, all have a bearing on their health and their life expectancy.

3. The causes of the causes of death

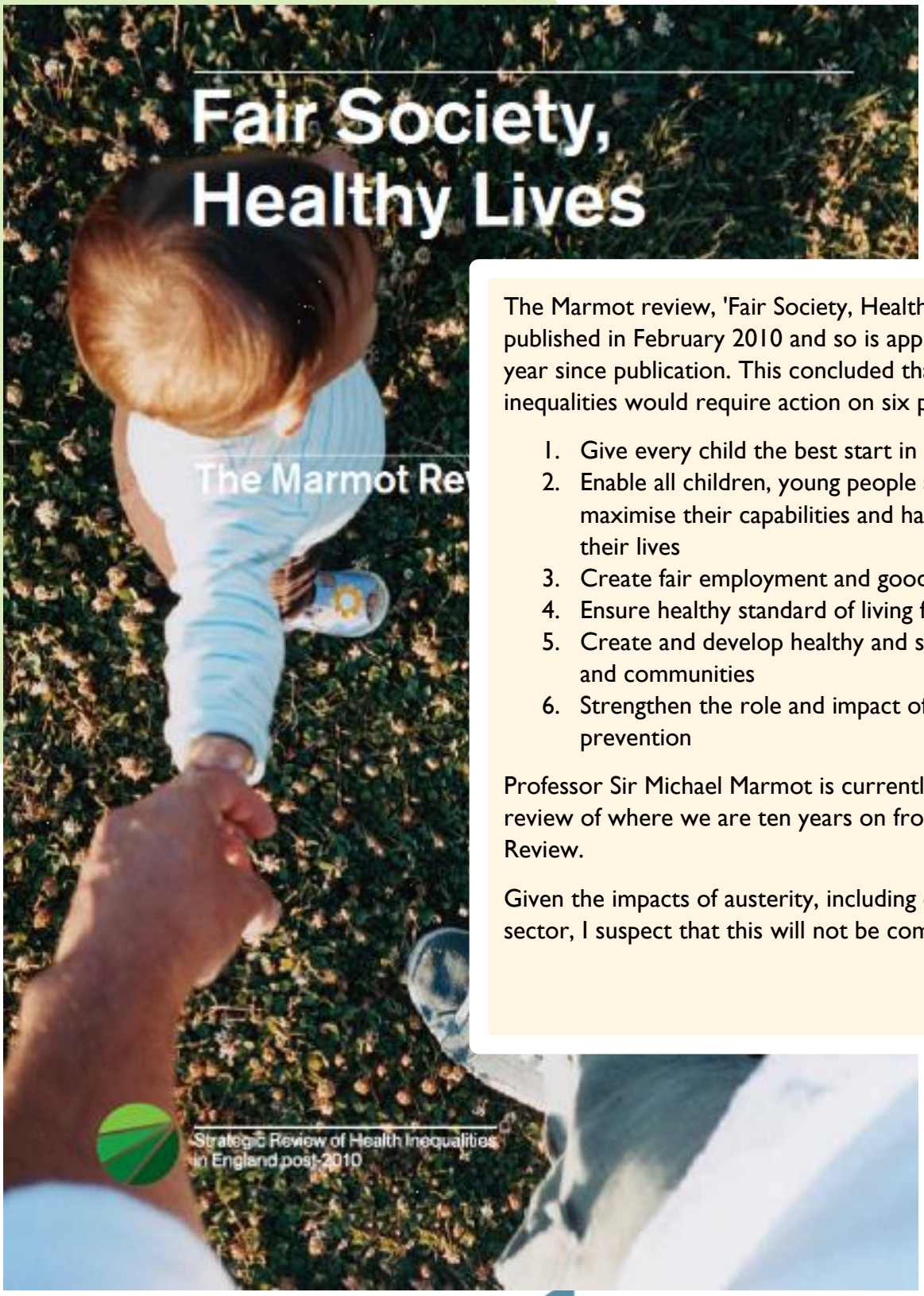
Estimated figures suggest that healthcare contributes somewhere around 15% towards our health, behaviour accounts for around 40% and socio-economic and environmental factors around 45%; and these three factors interact (percentages are approximate, see [6] for references and discussion around these models).

The term 'behaviour' oversimplifies the issues here; whilst this refers to factors that are modifiable, such as smoking, alcohol use, lack of physical activity and poor diet, these factors are heavily influenced by these socio economic and environmental factors referred to above, as well as a wider range of factors, such as adverse childhood experiences, which can change brain chemistry and correlate very highly with a wide range of negative outcomes from imprisonment to health impacts of smoking. [see box] This is why the rhetoric of 'personal responsibility' does not and will not result in a reduction on health inequalities. Some people need additional support at least initially, to overcome some barriers, and to take some steps to regain control over their lives.



An area of emerging research is around what is termed 'adverse childhood experiences'; a range of different events that are likely to be traumatic for children, such as neglect, abuse, or witnessing domestic violence. Evidence shows that children who have been subject to high levels of these types of traumatic events, without the protective resilience factors, are impacted by changes in their brain chemistry from a very early age. This can lead to a wide range of impacts, including that they are more likely to take risks, and childhood traumas correlate with a wide range of behaviours that can be harmful. There are a number of ways in which these impacts can be either prevented or minimised, and Plymouth is developing a trauma-informed approach across the city, working through the Plymouth Trauma Informed Network.

There has been much discussion and published studies on the impact of austerity on life expectancy. Overall, it has not been possible to prove a causal link; though there are a number of hypotheses that seem plausible. Locally, we are not going to be able to reverse the impact of some of these changes; but there are things that we can do to tackle health inequalities.



The Marmot review, 'Fair Society, Healthy Lives', was published in February 2010 and so is approaching its 10th year since publication. This concluded that reducing health inequalities would require action on six policy objectives:

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Create fair employment and good work for all
4. Ensure healthy standard of living for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill-health prevention

Professor Sir Michael Marmot is currently working on a review of where we are ten years on from the Marmot Review.

Given the impacts of austerity, including cuts to the public sector, I suspect that this will not be comfortable reading.

4. What is the situation in Plymouth?

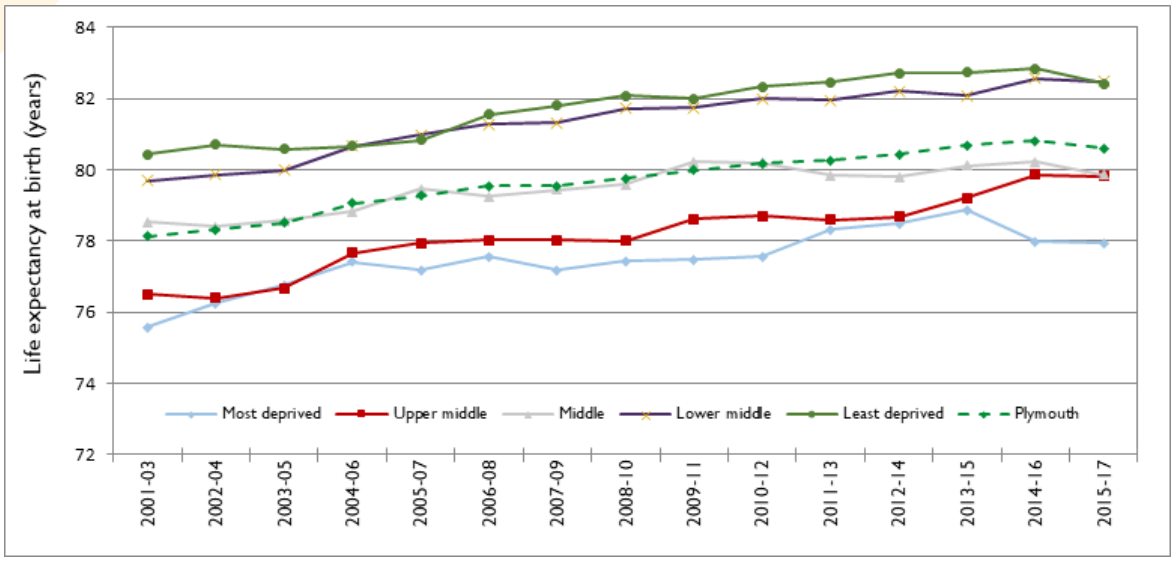
Data on Life Expectancy

Because we have much smaller numbers in Plymouth, it takes longer to prove a trend. We are not able to say with statistical certainty that we are seeing the same reductions in improvements in life expectancy, but the data that we do have suggests that we may be.

Live expectancy for women in Plymouth is below the level for England; historically, we have tended to be very close to the England value but always a little below, which is likely to be due to higher levels of deprivation in Plymouth. The data is showing a reduction in life expectancy over the last two years, but this is within the statistical variation that we would expect to see so it is difficult to interpret. I would suggest that we are likely to be following the same trends described at the England level, of a reducing life expectancy for most deprived groups of women.

For men, the gap we are currently seeing compared to England has remained fairly constant over the years. We are not seeing a decline in life expectancy to date, in fact we are still seeing small improvements, but again this is within the statistical 'noise' and so is difficult to interpret. The graph below shows the latest data for life expectancy by deprivation quintile for the Plymouth population; we can see that the average (green dashed line), which was steadily increasing, has reduced for the last data point. Whilst not conclusive, this does suggests we may be following the national trend.

Infant mortality in Plymouth is currently below the level for England, and appears to have improved over the last few years; but again, this is within the statistical noise and is too early to interpret.



Life expectancy in Plymouth, men and women combined, separated out by deprivation. Each data point is a three-year rolling average. The bottom line (pale blue) shows the most deprived 20% of the population, and then upper (dark green) the least deprived 20%

5. What should we be doing to try to counter this?

It is national as well as a local imperative to tackle inequalities in health. The types of interventions required to make a difference range across the principles cited by the Marmot report given above; whilst many might take the form of national interventions, there is much that can be done in local areas.

As a city, Plymouth has clearly stated its ambition to reduce inequalities in health, and our local response is set out in the Plymouth Plan (and the Joint Local Plan). We are working together as a city to try to improve the context in which people are living their lives, to support healthier lifestyles, to intervene early and effectively to reduce harm, and to provide accessible and appropriate services for people when they do need our health and social care services.

One action we have been taking is to consider how services need to be delivered differently; how do we help people to know when they might benefit from support, how do we help them to access that support when they need it, and how are the services organised such that the person needs are met in the most efficient, effective and cost-effective way?

It is very well evidenced that the poorest in our communities often are less likely to ask for support than others, certainly where it concerns their health. People become used to the norm, and if the people around you and your own family history suggest that you will succumb to serious illness or die young, you tend to have that expectation. The phenomenon is called the 'inverse care law'; those who need it most, seek it least. An example is hip or knee replacements; a recent change to prioritise these based on clinical need has highlighted that people from more deprived areas were only seeking help when their condition was very advanced, and their symptoms were significantly worse. This means they were spending a longer proportion of their lives in considerable pain and disability, probably getting by only by using pain medication. They may have had more emergency attendances to deal with the cause of the problem, or side effects caused by the medication.

Inverse Care Law

"The availability of good medical care tends to vary inversely with the need for it in the population served."

Julian Tudor Hart

Lancet 1970: 405-12

We are working across the health and social care system (including VCSE), to overcome this and to provide the right interventions, at the right time, and in the right way for people; examples include Thrive Plymouth, Plymouth's Alliance contract, Wellbeing Hubs and the work of the Plymouth Trauma Informed Network. We work in a 'systems leadership' way across Plymouth, meaning that we work together, focusing support around the person, patient or client in a way that meets their needs.

An example of a different service delivery model is given below;

Plymouth's Alliance Contract

Plymouth City Council commissions a broad range of statutory and non-statutory interventions for people who have support needs in relation to homelessness and may also have support needs around substance misuse, mental health, offending and risk of exploitation. Traditionally contracts have been commissioned in silos, often resulting in duplication, inefficiencies and poor outcomes for the person using multiple services.

Plymouth had previously adopted the Making Every Adult Matter (MEAM) vision of ensuring that people experiencing multiple needs are supported by effective coordinated services and empowered to tackle their problems, reach their full potential and contribute to their communities. In order to achieve this it was agreed that an Integrated Substance Misuse, Homelessness and Offender System utilising an Alliance approach would be commissioned and Mental Health services would be aligned.

An Alliance is in effect a virtual organisation, where partners work collectively to create an environment without the need for a new organisational form. An Alliance agrees to behave in a certain way to achieve a shared goal and everyone is jointly responsible for implementing the decisions made. By having one alliance contract, all parties are working to the same outcomes and are signed up to the same success measures. It is a relationship based on trust, transparency and collective accountability and the Local Authority is a member of the leadership team, enabling us to have an active role in the development of the Alliance. An Alliance model enables both small and large organisations to work together in an equal way with decisions being made unanimously. This can inevitably mean that there are some decisions which are harder to make, but must ultimately be made through a 'best for user' decision making process.

A recent audit of a part of this approach (the Creative Solutions Forum) found consistent reductions in the use of hospital care, emergency services, evictions, bed and breakfast use and other high cost services. Staff report better risk management, less anxiety over high risk cases and huge improvements in inter-service relationships, trust and co-operation.

Funding

We are subject to financial inequity in Plymouth. Unfortunately, much of the money that the health and social care system current receives is based on historical spend, which is not the same thing as need. This is partly because of payment mechanisms within the system, where providers were paid by the activity carried out; you can see from the information above that a hospital in a less deprived area might carry out more operations and therefore receive more income than one where its population are less likely to ask for the appropriate healthcare support.

This has been recognised locally, across the Devon Clinical Commissioning Group area, and there has been a stated aim to shift that funding back across. This is very welcome; it should be emphasised that the difference in spend has not been driven by any intention to be unfair, and now that it has been highlighted there are steps being put in place to put this right. Exact numbers, and pace of change, are yet to be agreed, but this will be many millions of pounds.

There is a ring-fenced public health grant given to local government; this comes with a number of conditions and defined services to be provided. This includes the commissioning of sexual health services (NHS and community), Health visitors, school nurses, substance misuse treatment, national child measurement programme, health checks and health promotion. This budget has been cut year on year, by around 2.6% each year, and yet demand has grown. Even more importantly, out of the total pot of money available nationally, there is a formula that shows how this should be distributed based on need; obviously places where there are more children and more deprivation should have a higher payment per head because of the types of services required. However, despite a stated intention to move towards this formula, after the first year of changing the allocation, the government changed tack and instead reduced every area by the same amount. This means that Plymouth is 22%, £3 million, underfunded each year.

Imagine what we could do with millions of pounds extra each year?

Some of the things we might like to do include;

- Strengthen primary care, provide outreach services into communities (based around Wellbeing Hubs), improve access to acute services and strengthen our community services.
- Take a trauma-informed approach across the city, recognising the impact of childhood experiences throughout the life course
- Provide wrap-around support for those most vulnerable; support families to give every child the best start in life, support carers and the people they look after, help people with physical and mental illness and disabilities to have lives they control and employment or activities that maximise their capabilities.
- Support those in despair to rebuild their lives, reducing homelessness and reversing the trends in substance misuse and related deaths.

What Would You Do?

Some of these things seem hard to achieve, but don't underestimate the power of people, of communities, and of yourself.

Maybe there are changes that you would like to make for yourself, or maybe you could offer support to others; maybe you would like to get involved in helping us to face these challenges.

Recommendation 7

Close monitoring of emerging evidence base around reducing life expectancy and increasing infant mortality, both nationally and within Plymouth, to detect any intelligence that can lead to actions

Recommendation 8

Embed the approach that we are taking in Plymouth, working together as partners to deliver the Plymouth Plan, including our approach to the wider determinants of health as well as integrated health and wellbeing. Whilst we have made good progress, we need to increase the speed that services are transformed.

Recommendation 9

Continued lobbying for appropriate funding for public sector services for the residents of Plymouth, to enable the services that they need to be accessible and effective, and tailored to their needs.

Recommendation 10

Use this additional funding to support and develop the interventions that we have in place, scaling them up, refining them and spreading good practice, and continue to develop new ways to get people the support that they need.

“Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has.”

Margaret Mead

Links
One you Plymouth – https://www.oneyouplymouth.co.uk/ To join the Thrive Plymouth network contact thrive@plymouth.gov.uk

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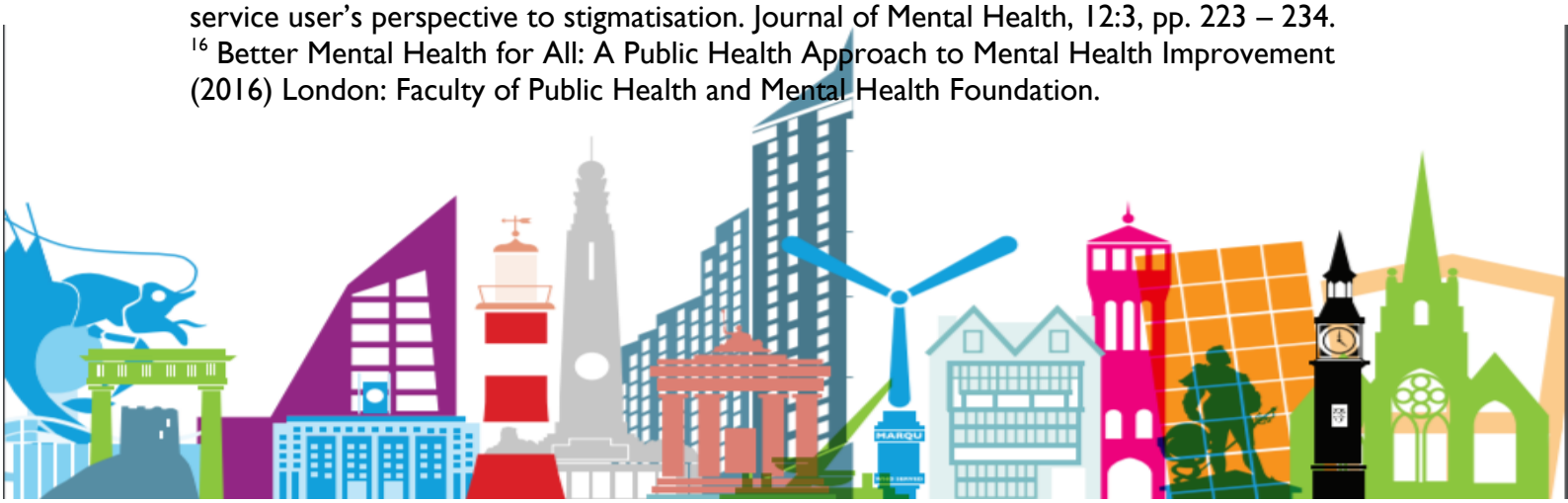

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Public Health
Office of the Director of Public Health
Plymouth City Council
Windsor House
Plymouth
PL6 5UF
Tel: 01752 398606
odph@plymouth.gov.uk

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