

APPENDIX B

Plymouth and South West Devon Joint Local Plan Five Year Review Report, March 2024

1. Introduction, background and purpose of the review

- 1.1 The Plymouth and South West Devon Joint Local Plan 2014-2034 (JLP) was adopted in March 2019¹. It sets a vision, spatial strategy, strategic objectives and policies as well as site specific allocations and detailed development management policies to deliver sustainable growth across Plymouth, South Hams and West Devon up to 2034. The JLP is five years into its fifteen year life at March 2024 and as such a review is required to assess whether the plan needs updating.
- 1.2 This JLP Five Year Review Report fulfils the legal requirement² to undertake a five year review of its local plan. The requirement is that a local planning authority must complete a review every five years. The context is set by the National Planning Policy Framework (NPPF) requirements at paragraph 33:
- 33. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.*
- 1.4 The assessment draws upon advice in the Planning Practice Guidance³ as well as the Planning Advisory Service Local Plan Route Mapper and Toolkit to inform the conclusions.
- 1.5 A review must be seen in the context of a plan-led approach that provides certainty and it is not the aim to continually change the spatial strategy and vision, which would undermine the intention of setting long term requirements.
- 1.6 National policy and guidance recognise that policies age at different rates according to local circumstances and a local plan does not become out-of-date automatically after five years. The High Court clarifies that the passage of time is not sufficient to conclude that a policy is out-of-date, but the

¹ Plymouth City 26 March 2019, South Hams District 21 March 2019 and West Devon Borough 26 March 2019.

² Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

³ NPPG, Plan making, Plan reviews, paragraphs 062 to 070 (July 2019)

question is whether or not the passage of time has led to the policy being overtaken by events⁴.

2 Assessing the Joint Local Plan

- 2.1 The JLP councils have carried out an assessment of the JLP, in accordance with national policy, guidance and legislation, to assess the performance of the JLP and how it is functioning as well as its delivery against the strategic development requirements. It explores whether there are any significant changes have occurred since adoption that demonstrate the plan is not delivering in line with expectations or where national policy has changed to such an extent that our local policies may no longer be in line with the national policy. This Five Year Review Report establishes whether any part should be considered out of date or in need of updating through a full or partial JLP review.
- 2.2 The review considers the implications on the JLP and its policies from the following:
- Latest legislation, national policy and guidance
 - Monitoring information about performance and delivery
 - Decision making and planning appeals
 - Changes in circumstances and economic, social and environmental priorities
 - Latest demographic information
 - Cross boundary issues.

3. Implications from changes to legislation, national policy and guidance

- 3.1 An assessment has been made to check whether the JLP still reflects current legal requirements and latest national planning policy.

The Environment Act 2023

- 3.2 Since the JLP was adopted, the Environment Act has introduced a 10% Biodiversity Net Gain requirement. The JLP includes a policy requiring biodiversity net gain within Policy DEV26 'Protecting and enhancing biodiversity and geological conservation'. This policy is amplified in the Plymouth and South West Devon Supplementary Planning Document (SPD), which anticipates and makes provision for an updated position as a result of further legislative changes. The councils are already seeking and achieving biodiversity net gain on major sites and negotiating a proportionate contribution on other developments. The current JLP, as supported by its

⁴ Peel Investments (North) Ltd vs Salford City Council. Para 61 (May 2019)
www.bailii.org/ew/cases/EWHC/Admin/2019/2143.html

SPD, is therefore considered to remain valid and up to date in relation to these new legislative provisions.

- 3.3 The Environment Act also introduced Local Nature Recovery Strategies (LNRS). Devon County Council has been agreed as the responsible authority, with Plymouth City Council, South Hams District Council and West Devon Borough Council as supporting authorities. Preparation of the Devon LNRS has commenced, and it is expected that this work will be completed by summer 2024. The exact relationship between the LNRS and a Local Plan has not yet been clarified, but it will be an important evidence base and regard will be had to it going forward. As the LNRS is not yet published there are no current implications for the JLP and its policies. Any implications in the future will be able to be considered in the next iteration of the plan.

The Levelling-up and Regeneration Act 2023

- 3.4 The Levelling-up and Regeneration Act was granted royal assent on 26 October 2023. This provides a new legislative context for future plan making. Secondary legislation and regulations are required to implement many of the Act's provisions, especially relating to plan making. Most of these changes are not in place and therefore there are no current implications for the JLP and its policies that render them out of date.

Changes to Use Classes and permitted development rights

- 3.5 There have been notable changes relating to Use Classes and extended permitted development rights.
- 3.6 There are a number of policies within the JLP that refer to Use Classes that no longer exist, with the implication that some elements of the JLP are no longer as clear as originally intended. However, the impact is in relation to how the policy objectives are implemented rather than whether or not the intent of the policies remain valid. This point relates particularly to Policies SPT4, 5 and DEVI6, 17, 18. There are also some wider site specific implications for how the mixed use allocations are implemented. However, overall the strategy, role and purpose of these policies remains valid and appropriate.
- 3.7 There have been considerable changes to permitted development rights that mean some developments no longer need planning permission. While this has implications for the means of implementation of those policies affected, it does not mean that the policies themselves are out of date.
- 3.8 The approach in the JLP is still in line with national legislation, policy and guidance.

Changes to National Planning Policy Framework

- 3.9 Despite being prepared against the NPPF 2012, the July 2018 revision and February 2019 update were in force prior to adoption. Although the July 2018 revision was not considered by the Inspectors for the purposes of their decision making, in practice many of its policy intentions had already been foreshadowed and included as part of the JLP. There have been further updates of the NPPF since adoption, in July 2021, September 2023 and December 2023.
- 3.10 While there have been some changes to the NPPF since the plan was adopted, none change the substance of policy sufficiently to render the JLP and its policies out of date. The notable changes are in relation to design, climate change, flood risk, renewable energy, affordable housing and 10% home ownership/small sites, housing need methodology, housing requirement for neighbourhood plans, employment sectors, rural business needs, public safety of defence sites, lorry parking, tree lined streets. These are mostly minor issues that the JLP largely already covers, and where it doesn't, the NPPF provides a policy context for decision-makers. The next evolution of the local plan will provide an opportunity to pick these matters up, if appropriate.
- 3.11 The JLP councils have assessed the policies of the JLP against the current version of the NPPF using Part 2 of the PAS Route Mapper and Toolkit. This is attached at Appendix A.

Design

- 3.12 Design has become more important in planning policy. The Levelling-up and Regeneration Act has introduced an area-wide design code requirement, meaning that a local planning authority needs to ensure that, for every part of their area, the development plan includes requirements with respect to design that relate to development, or development of a particular description.
- 3.13 Paragraph 133 of the NPPF sets out that in order 'to provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences'. Paragraph 134 goes on to clarify that 'Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. In this regard, the JLP already includes design policies that relate to the entire plan area and these are amplified by the SPD, which includes design guidance. Consequently, there are no current implications for the JLP arising from these new requirements, and the next iteration of the plan will provide an opportunity for the councils to consider how they integrate design codes into either a local plan or supplementary planning documents or indeed both.

The new standard method for assessing housing need

- 3.14 Since adoption of the JLP, the government has introduced the standard method for calculating local housing need. From December 2020, this incorporated an arbitrary 35% uplift which applies to each of the top 20 cities across England (Plymouth is currently the seventeenth largest city).
- 3.15 NPPG sets out the following in relation to plan reviews:

... Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method ... This is to ensure that all housing need is planned for as quickly as reasonably possible. (Paragraph: 062 Reference ID: 61-062-20190315, Revision date: 15 03 2019).⁵

This is supported by NPPF paragraph 33 which says that: ‘Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.’

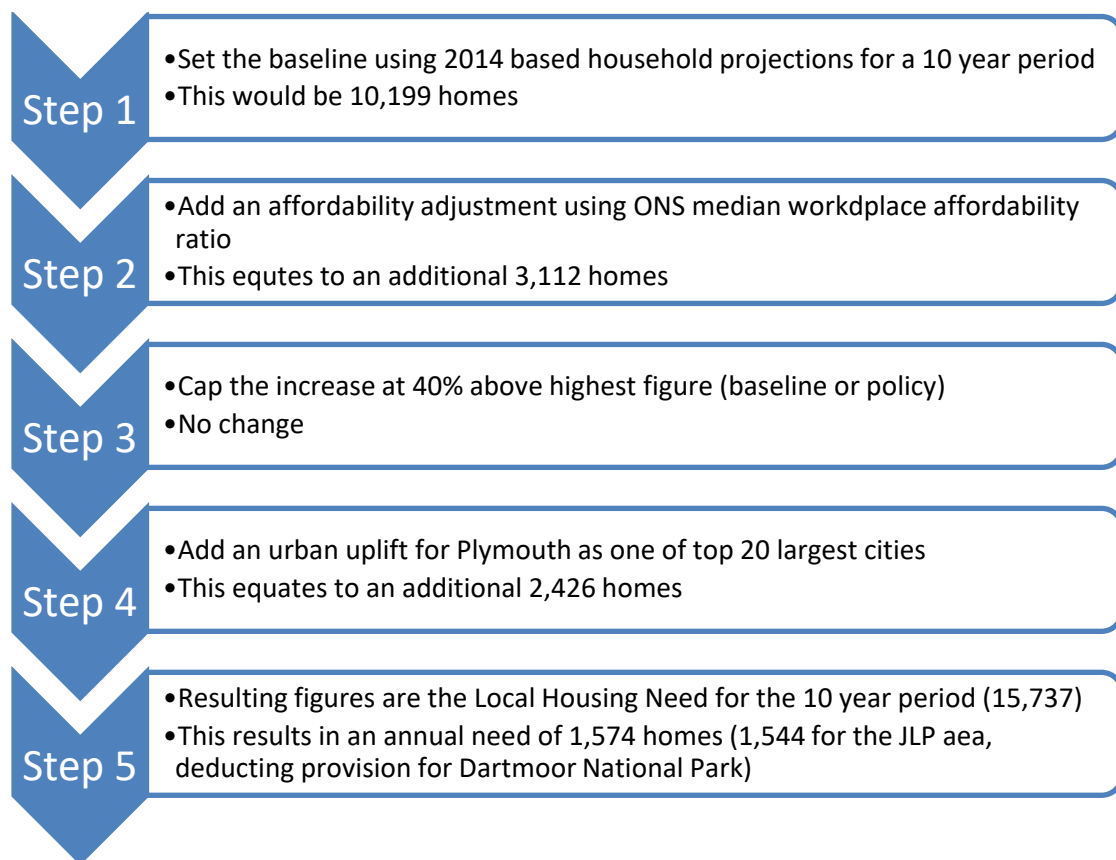
- 3.16 Given that the JLP was adopted prior to the standard method being implemented, the consequence of this guidance is that the JLP councils must consider whether or not the JLP housing requirement is significantly below that which would be generated by the standard method.
- 3.17 The rationale for this provision in the NPPG is clearly explained as being ‘to ensure that all housing need is planned for as quickly as reasonably possible’, the implication being that the standard method is a safeguard against local plans that are not providing for sufficient housing to meet needs.
- 3.18 In this respect, it seems relevant that a local planning authority’s Housing Delivery Test performance is something that can be considered in determining whether or not a plan or policies should be updated. (Paragraph: 065 Reference ID: 61-065-20190723, Revision date: 23 07 2019).
- 3.19 The JLP councils consider that the housing provision set out in Policy SPT3 is not significantly below the number generated using the standard method, and therefore that Policy SPT3 and the associated housing requirement remains up-to-date and appropriate for the JLP area. There is no need to review this

⁵ It should be noted that the December 2023 update of the National Planning Policy Framework (NPPF) change the provisions of national policy relating to the standard method, by making it clear that the ‘outcome of the standard method is an *advisory* starting-point for establishing a housing requirement for the area’ [our emphasis] (Paragraph 61, NPPF). This reference to ‘advisory’ has not yet been followed through to a change in the NPPG. However, in the government’s response to the ‘Levelling-up and Regeneration Bill: Reforms to National Planning Policy Consultation’, it has committed to reviewing the approach to assessing housing need once the implications of the 2021 Census-based household projections are understood.

strategic policy at the current time, and this will instead happen at the next plan-making iteration for the JLP area, once the government has put in place the necessary legislation, policy framework and guidance for the proposed new planning system.

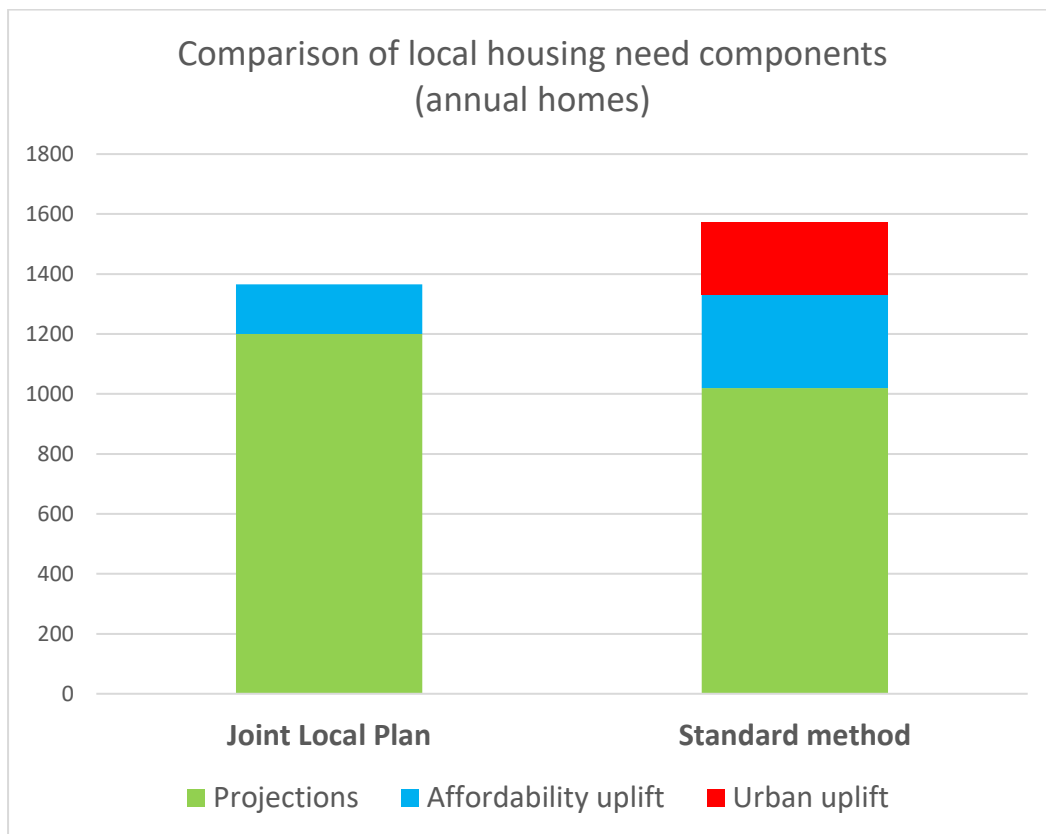
- 3.20 In reaching this judgment, the following matters have been taken into account.
- 3.21 Firstly, without the 35% urban uplift, the standard method produces an almost identical housing need for the JLP housing requirement set out in Policy SPT3 of the JLP.
- 3.22 The standard method figure for the Plymouth, South Hams and West Devon is 1,574 homes per year, but excluding the uplift it would be 1,331 homes (see Figure 1 below). It should however be noted that the South Hams and West Devon parts of Dartmoor National Park are included in this figure, and that the Dartmoor National Park Local Plan provides for 30 dwellings per annum in this area. It would be reasonable therefore to say that for the JLP area itself the standard method figure is 1,544 homes, and excluding the uplift it would be 1,301. This compares with a current JLP housing requirement of 1,335 homes per year.

Figure 1: Standard method calculation for Plymouth, South Hams and West Devon at 2023



3.22 Figure 2 shows the different components used in the calculations. Please note that this includes Dartmoor and detailed figures are provided in the SHMA⁶. It demonstrates that despite the different type of projections (green) used for the JLP and the standard method, and despite the varying amounts of affordability uplift (blue) applied, there is clear similarity across the two different approaches. Such corroboration indicates that in relation to the key components of local housing need there is a clear rationale that the JLP strategic policies continue to provide a reasonable estimate of housing to be planned for.

Figure 2: Components of local housing need - JLP v standard method



Source SHMA 2017, ONS, 2014 projections and affordability ratio
 Note includes Dartmoor National Park

3.23 When the urban uplift (red) is added, there is a gap of 239 homes between the standard method figure and the JLP housing requirement, which is reduced to 209 when the Dartmoor housing provision is removed. This is about 15% of the overall housing requirement set out in the JLP, and itself arguably not significant in the context of a JLP area and three JLP councils which have consistently been high performing and highly proactive in relation to housing delivery.

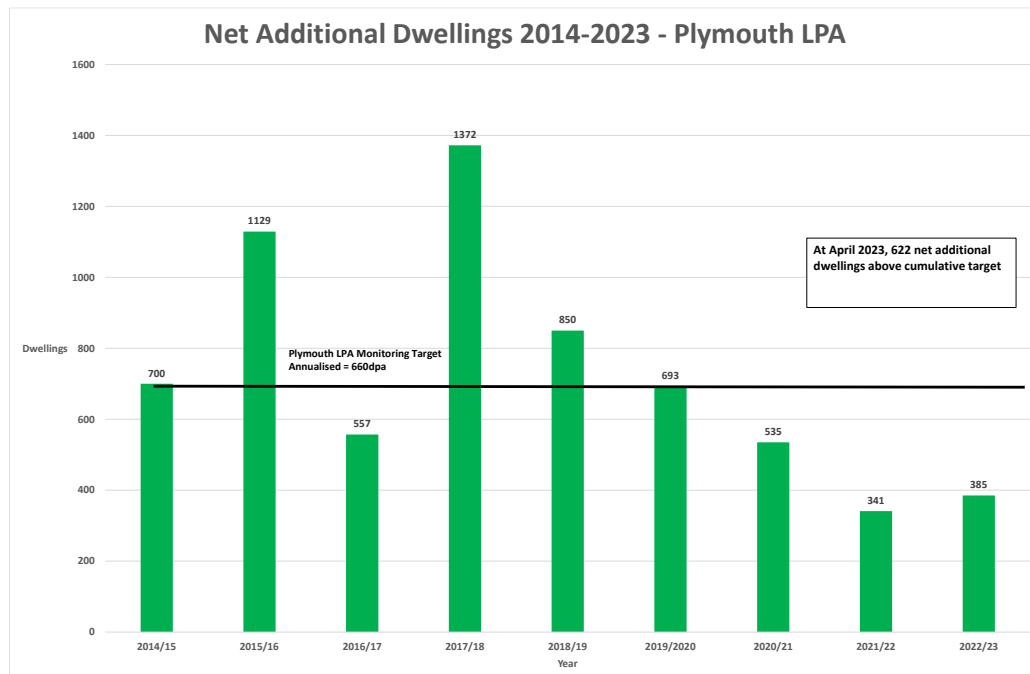
3.24 In this respect, the local context is of crucial importance. The government’s intention is to seek a greater concentration of housing development in urban

⁶ [SHMA Part I: The housing market area and updating the objectively assessed need, PBA 2017](#)

areas, but this is the very basis of the JLP’s spatial strategy itself, with 71% of the overall housing requirement being planned for the Plymouth Policy Area (PPA). This strategy was justified, tested and found sound at examination. The Inspectors’ recognised that *“The spatial strategy seeks to focus most growth within the PPA, to promote a step change in the city’s economy and housing delivery and to prioritise regeneration and the use of previously developed sites. The Plan achieves this through identifying three substantial Growth Areas within the PPA, delivering significant levels of development including a large urban extension at Woolwell and a new community at Sherford.”* They concluded that the overall spatial strategy is justified and found the plan sound on that basis.

3.25 The JLP includes 69 allocations for housing development (including as part of mixed use schemes) within the Plymouth LPA area. The City Council’s positive planning approach and proactive delivery interventions (see paragraph 3.28 below) have enabled significant levels of delivery, with particularly strong delivery in the first few years of the plan period. However, given the nature of the city, with substantial environmental, geographic and topographical constraints and major viability challenges, delivery has started to drop off, with the ‘low-hanging fruit’ of easy-to-develop sites being taken (see Figure 3 below). The City Council continues to be highly proactive in seeking urban regeneration funding and its desire to see a major step change in delivery – for example, in Plymouth city centre. Adding an arbitrary urban uplift in Plymouth will not mean more previously developed sites in the city are developed.

Figure 3: Net additional dwellings 2014-2023 – Plymouth LPA area



3.26 With regard to demographic trends in the city, when looked at in comparison to the national picture, Census 2021 data shows the following:

- Plymouth’s population is 264,700 and has increased by 3.2% over the

last decade 2011 - 2021. This is nearly half that of England and Wales increase (6.3%).

- Plymouth's rate of population growth across the last decade 2011-2021 (3.2%) has decreased compared with the rate between 2001 and 2011, when the population grew by 6.5% (15,570 people).
- Plymouth's working age population saw a decrease of 0.2% compared to 2011. England saw a 3.6% increase in the same period.
- Plymouth's 2021 working age population, those aged between 15-64, saw a decrease of 0.2% compared to 2011. There are currently 172,400 people in this group. 87,200 females and 85,400 males. In England there was an increase of 3.6% in people aged 15 to 64 years over the same period.
- Plymouth's population increase in 2021 is lower than the increase for the South West (7.8%).
- Plymouth is ranked 62nd for total population out of 309 local authority areas in England, which is a fall of six places in a decade.

3.28 The performance of the JLP councils in housing delivery is also of relevance. Increasing delivery of housing was clearly a key objective of government in introducing the standard method, and this makes particular sense when local planning authorities are not planning positively for meeting housing need in their area. However, this is not the case in relation to the JLP area, and each council is highly proactive in driving delivery. Specific interventions include:

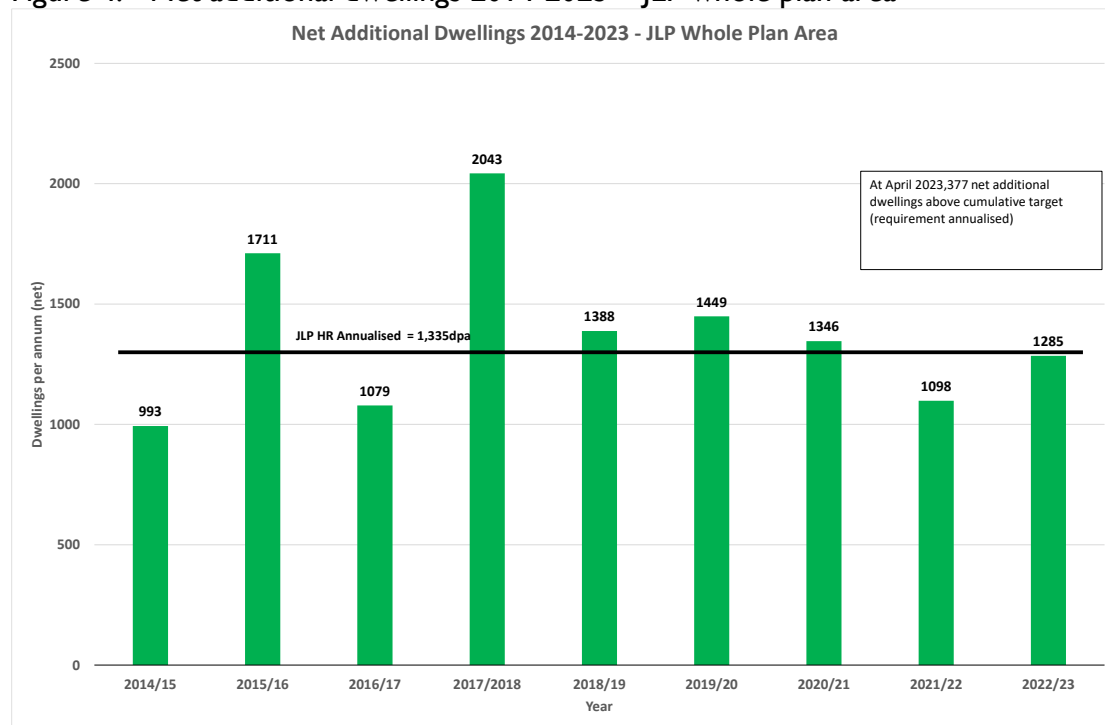
- Establishing Planning Performance Agreements for key site and developers to ensure sufficient resources to ensure planning process does not limit or restrict delivery.
- For Plymouth, through its Plan for Homes and other initiatives:
 - The release of 48 Council owned sites (allocations and small scale windfalls) over the period 2014-2023 to deliver 1,550 new homes of which 1,022 (66%) are affordable.
 - 1,045 homes delivered to date on 28 sites of which 627 (60%) are affordable.
 - Estate regeneration – over £450m of investment in 2,924 new homes in Devonport, North Prospect and Barne Barton replacing poor quality existing stock with new high quality market and affordable housing stock.
 - Approximately £2.5m of Land Release Funding from One Public Estate secured to support the delivery and supply of 337 new affordable homes.
 - 385 empty homes brought back into use since 2014.
 - Enabled bulk purchase of Ministry of Defence homes in partnership with a Registered Provider to provide 86 new affordable homes.
 - Council building homes again for first time in 40 years with first 10 dwellings approaching completion at Broadland Gardens on surplus Plymouth City Council owned site.
 - The delivery and supply of innovative specialist housing projects such as; service veterans, Passivhaus, learning disability, extra care, rentplus, downsizing bungalows, self-

build, community-led housing, accessible housing and emergency respite homes.

- For South Hams and West Devon:
 - Establishing a dedicated Urban Fringe Team to manage and drive forward delivery of the strategic Allocations for new communities at Sherford and Woolwell to deliver the growth in the urban fringe of Plymouth.
 - The declaration of a Housing Crisis in 2021.
 - A range of initiatives to ensure a more streamlined approach during the planning application process.
 - A dedicated planner allocated to the Affordable Housing Team to progress Affordable Housing lead sites. This post also supports the team providing early advice for additional affordable housing sites on windfall and exception sites.
 - A new method established for interrogating Local Housing Need using secondary data and the Devon Home Choice register to create parish profiles for specific areas.
 - The commissioning of housing needs surveys throughout the TTV area to identify needs which exists for affordable housing within specific locations.
 - Innovative schemes for delivering housing have been supported through the planning process, securing which additional affordable housing. For example, this includes schemes at Collaton Cross in Newton Ferrers and a direct build scheme in St Anns Chapel.
 - Within the South Hams area of the TTV, the Council has introduced the South Hams Housing offer. It is offering pre-planning financial assistance up to the value of £10,000. Other assistance being offered is affordable housing expertise and site introductions with Registered Providers.

3.29 Over the first 9 years of the plan 12,392 net additional homes have been delivered. This represents 46% of our housing requirement and is around 380 homes above the cumulative monitoring target.

Figure 4: Net additional dwellings 2014-2023 – JLP whole plan area



Source HPS published

3.30 Delivery has been above the cumulative target (Housing Requirement annualised) since 2018 i.e. under delivery has not occurred since adoption of the JLP and the plan has always been in a surplus position for 5YHLS purposes. At April 2023, a supply of 7,362 deliverable dwellings are identified in the 5YHLS against a requirement of 6,298 dwellings⁷. Delivery is currently in a surplus position against the JLP Housing Requirement and a 5.84 year land supply is identified.

3.31 A 5YHLS has been demonstrated and unchallenged every year since adoption of the JLP and the Housing Delivery Test⁸ has been passed in every year since its inception (see below):

- 2018: 163%
- 2019: 139%
- 2020: 144%
- 2021: 128%
- 2022: 121%

3.32 There is still sufficient flexibility in the identified supply from consents and allocations. The trajectory (see Appendix 11 of the Housing Position Statement⁹) identifies a deliverable and developable supply of 29,740 over the plan period, which represents a headroom of 11% above the JLP Housing Requirement. The headroom is sufficient to cater for the non-delivery of

⁷ This accounts for an oversupply of 377 dwellings at the 2023 monitoring point.

⁸ Measurement at the JLP whole plan level was agreed with the Ministry of Housing, Communities and Local Government on 10 May 2019 [MHCLG Letter Revised HDT 2018.pdf \(plymouth.gov.uk\)](https://www.plymouth.gov.uk/mhclgletterrevisedhdt2018.pdf)

⁹ [5 Year Housing Land Supply Position Statement and Housing Delivery Test result | PLYMOUTH.GOV.UK](https://www.plymouth.gov.uk/5-year-housing-land-supply-position-statement-and-housing-delivery-test-result/)

some consents or allocations or -allocations taking longer to build out due to macroeconomic factors.

- 3.33 In addition to the 12,392 homes already delivered, at April 2023 a further 13,733 dwellings had consent in the whole plan area. This represents 10 years' worth of the annual housing requirement. 1,662 of these dwellings had commenced construction. Therefore, a total of 26,125 dwellings have either been delivered, are currently under construction or have planning consent at April 2023, which represents 98% of the JLP Housing Requirement.
- 3.34 Delivery clearly is not restricted by lack of a consented flexible and diverse supply of sites across the three LPA areas. It seems reasonable therefore to assume that the standard method figure, including the urban uplift, is unlikely to represent actual local housing need across the JLP area. The rate of delivery in light of the consented supply coupled with the standard method household projections and affordability uplift excluding the urban uplift suggest the JLP housing requirement remains up to date to meet local housing need.
- 3.35 The JLP councils acknowledge that when it comes to preparing the next iteration of the local plan the issue of the standard method and urban uplift will need to be revisited as set out in paras 61 and 62 of the NPPF and Paragraph: 003 Reference ID: 2a-003-20190220 of NPPG. However, this process has not yet started and therefore, taking all of the above together, it seems clear that the current JLP housing requirement as set out in Policy SPT3 remains up-to-date and appropriate for the JLP area. Therefore, there is considered to be no policy requirement at this time to use the standard method for determining of local housing need, nor would there be any logical planning purpose to be gained from doing so.

The Five Year Housing Land Supply

- 3.36 National planning policy sets out that housing supply '*should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old*' (NPPF, paragraph 77).
- 3.37 A related footnote includes the following caveat to this provision:
- Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance. (NPPF, footnote 42).*
- 3.38 The clear implication is that where a strategic policy is reviewed and found not to require updating, then the default requirement to use the standard method for strategic policies more than five years old does not apply.

- 3.39 However, the previous section has demonstrated that the housing requirement set out in Policy SPT3 of the adopted JLP remains the most robust and appropriate for the JLP area. As a result, there is no need to review this strategic policy at the current time, and this will instead happen at the next plan-making iteration for the JLP area, once the government has put in place the necessary legislation, policy framework and guidance for the proposed new planning system. The 5YHLS will therefore continue to be monitored against the provision set out in SPT3 and at the 'whole plan area' level as has been the case since the day the JLP was adopted.

4. Implications from monitoring information about performance and delivery

- 4.1 Since the JLP was adopted, an Authorities Monitoring Report (AMR) has been produced each year that provides detailed consideration of the JLP and its performance. In addition, the councils produce a Housing Position Statement and Five-Year Land Supply Statement with detailed information and trajectories on an annual basis. These documents can be found [on the monitoring and delivery webpages](#)
- 4.2 The key findings show we have:
- A consistent five-year housing land supply every year since adoption. The position as at December 2023 is a net supply of 7,362 homes which represents a 5.84 year housing land supply.
 - A robust net supply of 17,348 deliverable and developable homes identified in the remainder of the plan period. This represents a headroom of 11% above the adopted housing requirement figure.
 - Passed the Housing Delivery Test every year that it has been reported with no penalties. The latest result (2022) was 121%.
 - Delivered 12,392 net new homes across the whole plan area in the first 9 years of the plan period. This represents a surplus of 377 dwellings above the annualised housing requirement.
 - Delivered (including homes under construction) or granted consent for total of 26,125 dwellings at April 2023, which represents 98% of the JLP housing requirement.
 - Directed the building of new homes through our spatial strategy, distributing 79% of new homes to the Plymouth Policy Area and our main towns which are the focuses of local services and employment opportunities.
 - Delivered over half of all new homes on previously developed land in line with the spatial strategy.
 - Made progress with the delivery of affordable housing with 2,413 net additional completions over the plan period. The current shortfall is caused by losses from the demolition of poor quality affordable homes within early phases of regeneration projects in Plymouth, and this loss is expected to be recovered later in the plan period.
 - Delivered over 91,000 sqm of new employment floorspace with a further 60,099 sqm under construction. The plan is on track to deliver the target

for light industrial uses, while the office market is uncertain due to shifting future demand, changes to the Use Class, permitted development and implementation of mixed use development.

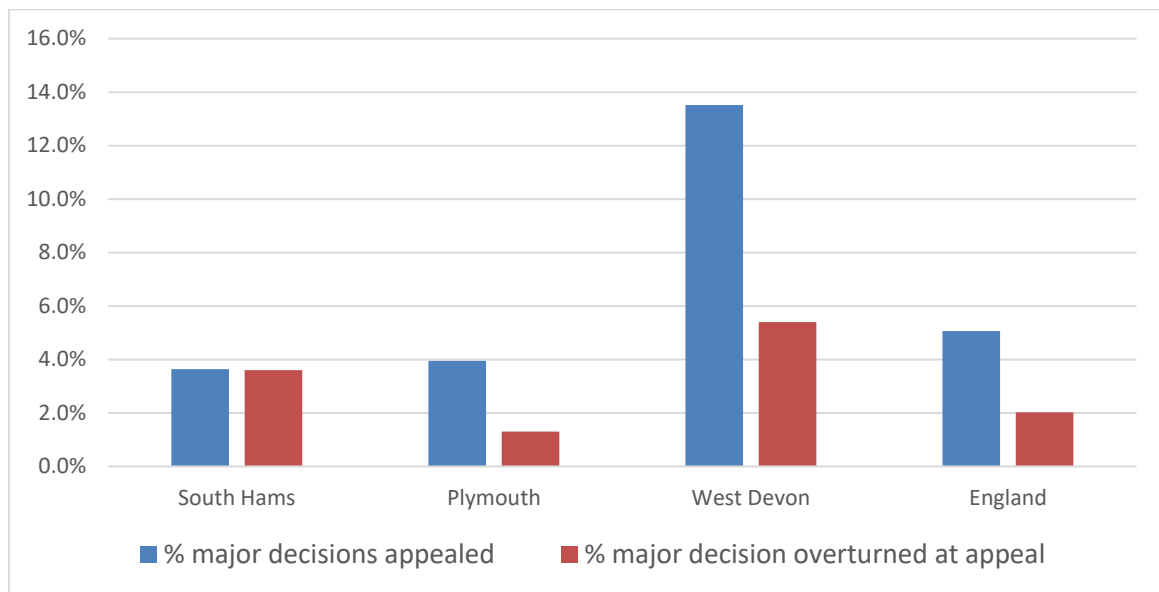
- Directed the delivery of 74% of all new employment floorspace to the Plymouth Policy Area consistent with our spatial strategy.
- Supported the strong performance of our retail centres in our main towns, evidenced by limited vacancy rates. A future investment strategy is addressing the challenging context of Plymouth city centre with a variety of stakeholders, as envisaged in the JLP.
- Delivered new food floorspace beyond identified indicative capacity in both our policy areas.
- Made strong progress towards the delivery of plan led development with 54% of land use allocations already complete, under construction or having gained detailed planning permission, with 11 years of the plan period remaining.
- Delivered key sites and infrastructure in our strategic growth areas and are on track to actively and positively progressing applications on our large sites
- Achieved considerable travel improvements in Plymouth's Northern Corridor with 73% of planned improvement either completed or under construction.
- Delivered green infrastructure with over 50% of planned greenspace improvement complete or commenced.
- Seen 28 Neighbourhood Plans 'made' across the JLP area since 2019, with another five are in various stages of preparation.

- 4.3 This demonstrates that overall the plan is on track to deliver our spatial strategy and meet our development needs to 2034.

5. Implications from decision making and planning appeals

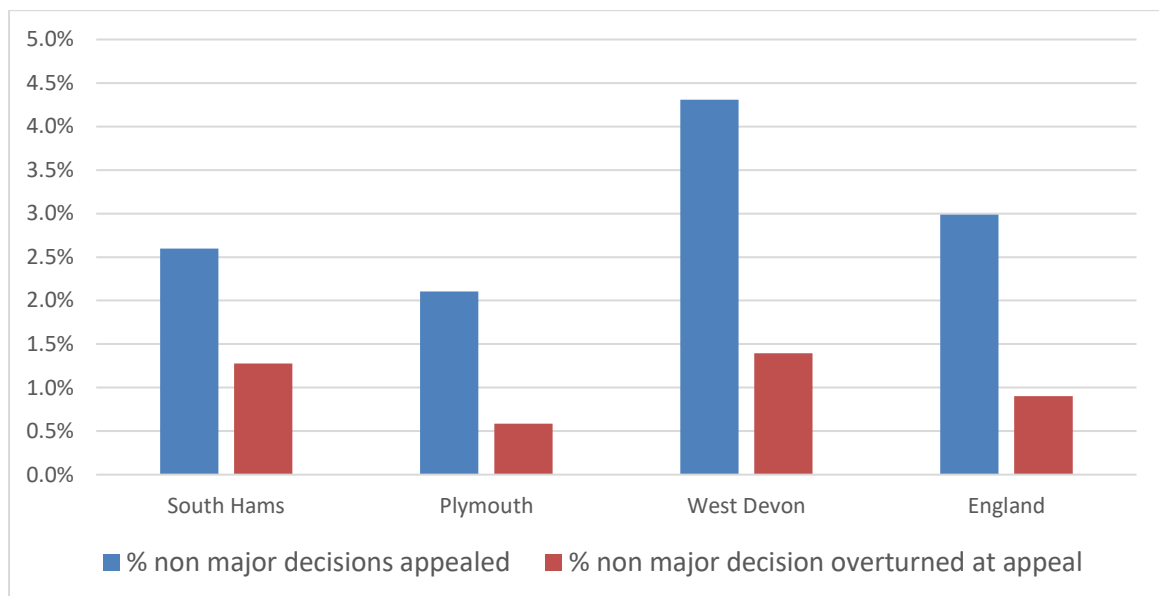
- 5.1 The JLP policies are being used effectively in decision making and being supported in appeal decisions.
- 5.2 Data on decision making and appeal performance is collected by DLUHC in [Live tables on planning application statistics - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/collections/live-tables-on-planning-application-statistics) and are summarised below for the Councils making decisions within the JLP area.

Figure 5: Major decisions appeal performance 2020-2022



Source: DLUHC Local planning authority performance table P152a: quality of major decisions

Figure 6: Non major decisions appeal performance 2020-2022



Source: DLUHC Local planning authority performance table P154: quality of non-major decisions

5.3 The analysis indicates that most appeals have been dismissed and shows that Inspectors are generally upholding our policies and the spatial strategy set out within the JLP. All three councils are well below the 10% threshold for intervention. West Devon have a larger percentage of applications subject to appeal than the proportion of England as a whole. This is largely due to the very small actual numbers involved (5 major appeals of which 2 were upheld). One of which was refused on the basis of a lack of education contribution which was then offered at the appeal stage!

- 5.4 The decisions on appeals that have been upheld are generally about how policies have been applied to specific development and it is finely balanced in relation to design, conservation, amenity issues or other impacts. There have been no decisions that have suggested our policies are out of date and there is no particular trend that demonstrate the policies are being undermined. This reflects the nature of the planning balance required to consider applications on a case by case basis.
- 5.5 Two appeals have raised issues that need further consideration as follows:
- Appeal (reference APP/N1160/W/19/3228) was dismissed on 6 April 2022 but the Inspector concluded that our Gypsy and Traveller evidence is out of date, due to a High Court decision¹⁰ reversing the Written Ministerial Statement relating to the correct definition that should be used. The Inspector did not conclude that the policy itself (Policy DEV13) was out of date. Given that Policy DEV13 is a positively worded policy that allows sites for traveller and travelling show people to come forward subject to meeting various criteria, this can continue to be used effectively.
 - Appeal (reference APP/N1160/W/22/3299743) was allowed on 21 December 2022 and the Inspector recognised that while the policies seek to ensure active frontages (Policies DEV18 and DEV20), there is nothing to define what is an inactive frontage. The Inspector did not conclude these policies were out of date. The opportunity to address the point about what an inactive frontage is can be considered as part of the next iteration of the plan.
- 5.6 This review shows the policies are being supported at appeal, demonstrating they are effective, operating as expected and in line with national policy.

6. Implications of any significant changes in economic, social and environmental circumstances

- 6.1 It is important to consider whether there have been any external changes that have affected the policies and our ability to implement them effectively and to appropriately respond. The key changes include:

Climate Emergency

- 6.2 Since the JLP was adopted all three councils have declared a Climate Emergency, with South Hams and West Devon also declaring a Biodiversity Emergency. The JLP promotes sustainable development and seeks to deliver low carbon development in line with the goals of the Climate Emergency. It is one of only a few plans across the country to include an explicit carbon

¹⁰ [Lisa Smith -v- The Secretary of State for Levelling Up, Housing and Communities and Others](#)

emissions reduction target, albeit this target pre-dates the Climate Emergency Declarations made by each council.

- 6.3 The Climate Emergency has increased the importance of our policies which are now being used more effectively and are being supported at planning appeals. In recognition of this significant issue, the JLP councils adopted the Climate Emergency Planning Statement in November 2022. This supports our existing JLP policies and sets out additional measures that new development should take to mitigate for and adapt to the challenges of climate change. This Climate Emergency Planning Statement provides additional weight to our policies, taking their delivery further pending the next iteration of plan making.

Covid-19 and health issues

- 6.4 The Covid-19 pandemic that occurred between 2020-2022 has had a significant impact on many aspects of life, and is so doing has reinforced the importance and relevance of our policies on matters such as greenspace, health and wellbeing, design and placemaking, local community infrastructure and mixed use developments.
- 6.5 The increase in childhood obesity as shown by the Plymouth Joint Strategic Needs Assessment (see Plymouth Report 2023) reinforces the importance of the existing JLP policy that restricts hot food takeaways in Plymouth within 400m of a secondary school. This policy has been consistency supported on appeal and demonstrates the role planning polices can play in promoting health and wellbeing.

Economic conditions

- 6.6 National economic conditions have been very significantly affected in recent years by Brexit, the Covid-19 pandemic, energy price increases resulting from the war in Ukraine, and rising inflation and interest rates. There is currently a severe cost of living crisis that is impacting on many of our communities and families. The JLP continues to play a role in responding to these challenges, through its policies to support the local economy and the wellbeing of our communities. The JLP continues to provide a strong context for strategic initiatives, including the establishment of the Freeport, the Levelling Up fund investment of nearly £20 million in Plymouth's Waterfront and Port, and of £13 million for the West Devon Transport Hub. This demonstrates the importance of continuing to implement the JLP policies to bring forward sites to support the economy of the area and support the new economic strategies that are emerging.

Housing affordability

- 6.7 Affordability ratios across the JLP area have worsened since the commencement of the plan. The ONS identify the following changes between 2014 (plan start date), 2019 (plan adoption date) and 2022 (the latest data available):

- Plymouth: Plymouth 5.69 (2014); 6.44 (2019); 7.01 (2022)
- South Hams: 11.1 (2014); 11.8 (2019); 12.79 (2022)
- West Devon: 8.77 (2014); 10.62 (2019); 9.9 (2022)
- England & Wales: 6.95 (2014); 7.73 (2019); 8.16 (2022)

- 6.8 The South Hams and West Devon ratios exceed the national average. Even though Plymouth continues to have a lower ratio than the national average, a gap between house prices and earnings of over 7 is still a major social and economic problem and is part of the wider housing crisis facing the nation.
- 6.9 The primary issue for JLP is not the delivery of housing *per se*, nor an inadequate supply of housing sites, but the need for more affordable housing. The focus needs to be not on requiring even greater numbers of houses beyond what the evidence justifies, but on ensuring greater levels of provision of affordable housing, especially in the rural locations. Otherwise the consequence for the plan area could be inflating overall housing numbers that are not deliverable with little discernible impact on affordable housing provision.
- 6.10 Despite our ambitious redevelopment and regeneration growth plans, the allocation of considerable sites, consistent delivery record and good supply of sites for housing, there is an ever growing need for more affordable housing, particularly social rented accommodation throughout the whole plan area. South Hams and West Devon have declared a Housing Crisis, but this is an Affordable Housing Crisis that is a result of system failure of the housing market and not of the JLP. As it currently operates, the housing market delivers affordable homes as a percentage of market homes depending on viability. This is unrelated to the existing needs of the population and the planning system is not equipped to deliver the quantity of affordable housing needed to meet the needs of the existing population.
- 6.11 Significant additional affordable housing is delivered through housing delivery partnerships across the plan area. Due to viability challenges in Plymouth on previously developed land in particular, affordable housing delivery via this route significantly exceeds that achieved via open market led developments. Between 2017/18 and 2020/21 delivery via housing delivery partnerships accounted for 71% of overall affordable housing provision.
- 6.12 Radical reform of the whole housing market and state intervention to prioritise increased delivery of social housing is required to address this crisis. Notwithstanding this, considerable work is being undertaken by the housing teams of each council, for example:
- In South Hams and West Devon, updating the local needs survey and work with communities to bring forward sites through Community Land Trusts and other initiatives.
 - In Plymouth, releasing public land, working to de-risk and unblock difficult sites, submitting and securing funding bids, and working closely with Registered Provider partners through the Plymouth

Housing Partnership to support major additional affordable housing supply in the city (see examples set out in paragraph 3.28 above).

- 6.13 With regard to the JLP, this challenge demonstrates the importance of ensuring the planning system takes every opportunity to maximise the supply of affordable housing through continuing to implement the existing affordable housing policies robustly and ensuring the existing policy framework is used effectively to support the development of affordable housing across the whole plan area. It also highlights the necessity and reliance upon Registered Provider led schemes particularly in Plymouth to ensure our affordable housing needs can be met and sustainable communities supported throughout the plan area.

7. Implications from latest demographic information

- 7.1 The 2021 Census information provides a useful check on how the area is changing and whether it is performing in line with anticipated projections.
- 7.2 In the 2011 Census, population of the three Local Authority areas was 393,150. By the 2021 Census it was 410,450, an increase of 17,300 (nearly 4.5 per cent). In 2014, at the start of the JLP period, Mid-Year Estimates put the population at 399,900. So, the Census data demonstrates that there has been a growth in population of 10,550 in the 7-year period between the base date of the plan and the 2021 Census.
- 7.3 The Census Population across the whole JLP area of 410,450 is nearly 2,000 people less than anticipated based on the 2014 projections and for Plymouth City Council area there were nearly 4,500 less people than anticipated.

Table 1: Population at 2021- Census compared to 2014-based projections

	Census 2021 population	2014 based projections population at 2021	Difference between actual and projected population
Plymouth	264,700	269,200	-4,500
South Hams	88,600	86,200	+2,400
West Devon	57,150	56,900	+250
JLP Area	410,450	412,300	-1,850

Sources: ONS

Note this includes population covered by Dartmoor National Park

- 7.4 A comparison of the Census 2021 household information with the 2014 based projections reveals that the number of households in the plan area as a whole at the time of the Census in 2021 was lower than predicted when the JLP was prepared.

Table 2: Households at 2021- Census compared to 2014 projections

	Census 2021 Households	2014 based projections at 2021	Difference between actual and projected households

Plymouth	114,557	116,329	-1,772
South Hams	39,337	39,182	+155
West Devon	24,818	25,038	-220
Whole Plan Area	178,712	180,549	-1,837

Sources: ONS

Note this includes population covered by Dartmoor National Park

- 7.5 Notwithstanding the earlier discussion in relation to housing need, there is nothing in the latest demographic data to suggest that the current JLP needs to be updated at this time to deliver a higher level of housing provision, including an urban uplift.

8. Implications of reaching the five year point in March 2024

Five Year Housing Supply

- 8.1 This is address in paras 3.36 – 3.39 above.

Plymouth Airport

- 8.2 Only two policies in the JLP make specific reference to the five year review of the plan: Policy SPT8 ‘strategic connectivity’ and PLY42 ‘Plymouth airport’. Policy SPT8 (point 1) safeguards the opportunity for the potential future use of the airport site as a general aviation airport ‘until the five-year review of this plan’. Policy PLY42 gives effect to the safeguarding policy by protecting specific airport infrastructure and resisting development at the airport site and nearby sites which would prejudice the resumption of future aviation use ‘until the next review of this plan’. Given that the JLP has reached its five-year review point it is therefore necessary to provide an updated position in relation to these policies.
- 8.3 First, it must be emphasised that the mere fact of the plan reaching its five-year review point does not mean that these policies are no longer part of the development plan. They will be so until such time as they are replaced or revoked. As such, Policies SPT8 and PLY42 remain policies that must be considered in relation to relevant planning decisions as a matter of law.¹¹
- 8.4 In considering these policies, it is also important to understand the wider context that led to their inclusion in the plan. The JLP explains that aviation is seen as an important element of its approach to strategic connectivity and therefore identifies the need to safeguard land at Plymouth airport for general aviation purposes as a clear plan objective (see Strategic Objective SO4, point 9). This Strategic Objective applies to the entire plan period up to

¹¹ Section 70 of the Town and Country Planning Act 1990 requires that regard be had to the development plan, national development management policies, local finance considerations, and any other material considerations. Section 38(5B) of the Planning and Compensation Act 2004 requires that applications are to be determined in accordance with the development plan and any national development management policies, taken together, unless material considerations strongly indicate otherwise.

2034 and is not time limited in relation to the five-year review. Additionally, in Annex I of the JLP, Plymouth airport is listed as one of the strategic infrastructure measures that is required to deliver the spatial strategy.

- 8.5 In paragraph 3.63, the JLP recognises that the site of Plymouth airport is one of the city's most strategic assets and the importance of protecting the opportunity the site gives to deliver strategic infrastructure and connectivity, highlighting that once gone it would be gone forever. The intention of the safeguarding policy is to provide an adequate opportunity for the re-opening of Plymouth airport for general aviation and to provide sufficient time for a private sector led business plan to be finalised and put into action to deliver aviation uses at the site. The five-year period was considered at the time to be a reasonable period for this to happen.
- 8.6 However, since the plan was adopted there have been a series of seismic global events that have impacted on the environment for business planning across many sectors, including aviation; most notably, the COVID 19 pandemic, and the economic consequences of the Russia/Ukraine war and other events on global markets, with significant inflationary pressures. Additionally, there have been significant technological developments in relation to aviation with greener options emerging that will help decarbonise the sector. New technologies, for example, include electric and hybrid/electric aviation and last mile delivery drones that will require aircraft testing, manufacture and repair facilities and vertiport developments. Undoubtedly, the next 10 years will play a defining role in the future of UK aviation and Plymouth has an opportunity to become a part of this dynamic shift. Although the JLP included the five-year provision, these macro-environmental events could not have been foreseen at the time.
- 8.7 The impact of the COVID-19 pandemic on the aviation industry cannot be understated. In particular, it has been well reported that the recovery of commercial air traffic has been slow due to international travel restrictions, the contraction of economic activity and changes in transport behaviour by cautious customers¹². Similarly, COVID-19 has had a largely detrimental impact on the general aviation sector; it created financial strain and uncertainty through the loss of income and membership fees, training fees and events, which was exacerbated by the continued payment of overheads, the depletion of 'current' pilots, with uncertainty surrounding how they would return and the postponement of routine relicensing and medical checks¹³. Therefore, as the general aviation sector continues to emerge from the pandemic, it is reasonable to assume the delivery of aviation uses at the former airport site have been set back and will take longer to achieve than first anticipated.
- 8.8 National planning policy is also a relevant consideration for planning decisions. Paragraph 110f of the NPPF says the planning policies should:

¹² <https://www.oecd.org/coronavirus/policy-responses/covid-19-and-the-aviation-industry-impact-and-policy-responses-26d521c1/>

¹³ Department for Transport General Aviation Research Report, Ipsos MORI, April 2021

‘recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy’.

- 8.9 In this regard, the Government’s General Aviation Strategy¹⁴ recognises the significant economic benefits of the general aviation sector, with ‘the total economic impact of general aviation on the UK economy is around £3 billion of Gross Value Added and supports in excess of 38,000 jobs.’ The Government’s vision is for the UK to be ‘the best country in the world for general aviation as a flourishing, wealth generating and job producing sector of the UK economy.’ The Strategy identifies the difficulty in finding suitable sites as one of the main reasons for the lack of new general aviation accessible airfields nationally, but this is not an issue for Plymouth given that the site has been safeguarded for this very purpose. It also highlights how existing general aviation airfields find it difficult to gain planning consent to develop their existing facilities, yet the JLP takes a positive view of aviation development on the site. The Strategy goes on to recognise the challenges posed to these sites from other higher value land uses, which is what led to the specific policy being included in the NPPF.
- 8.10 Additionally, the site of Plymouth airport is very well located in relation to Derriford hospital (with its own emergency service needs), Plymouth Marjon University, and the cluster of high value businesses at Plymouth Science Park and Plymouth International Medical and Technology Park. It would play a key role in realising the potential of the Derriford and Northern Corridor Growth Area as a regionally significant growth hub (Strategic Objective SO4 of the JLP).
- 8.11 The City Council is aware of private sector interest in delivering a general aviation airport at the site, some business planning work has taken place, and a pre-application submission was also received for a mixed-use scheme comprising aviation uses. Through the Government’s Airfield Development Advisory Fund, the City Council gained reliable insight into the level of investment required to reopen the airport for a range of different aviation uses. As part of a market sounding exercise, the City Council proactively engaged with a number of airport and investor groups where officers were advised that on the right terms, a potential general aviation and business aviation opportunity could be delivered. Furthermore, the potential for electric aircraft and drones to use the airport site in the medium to longer term, especially with the hospital nearby was recognised by a commercial director operating within the UK’s aviation industry. However, the City Council was advised that financial pressures associated with the COVID-19 pandemic would need to be alleviated and core business would need to stabilise before further, more detailed, discussions could take place.

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https://assets.publishing.service.gov.uk/media/5a805326ed915d74e622dcd3/General_Aviation_Strategy.pdf

- 8.12 Notwithstanding this situation, the City Council has committed itself to take further proactive action to help overcome land ownership constraints for future aviation use of the site. It has continued to negotiate with the leaseholder with a view to buying the lease back, and is actively exploring all options to regain control of the site. However, the reality is that this will take more time to resolve.
- 8.13 Taking into account all of the above, the position of the JLP councils and of the City Council specifically can be summarised as follows:
- The JLP's objective to safeguard the opportunity for aviation use at the airport site remains valid, and this position is supported by national policy including specifically paragraph 110f of the NPPF.
 - Although Policies SPT8.1 and PLY42 reference the five-year review, and there is currently no private sector led solution and action to re-establish aviation use, the need to continue with the safeguarding position remains valid.
 - The JLP safeguarding period of five years has not proved sufficient to respond to significant unforeseeable circumstances and to fully resolve the complex issues relating to business planning and resolution of constraints to deliverability arising from land ownership. The economic and social benefits from general aviation are of such significance to justify extending the safeguarding period beyond the five-year review point.
 - These factors are material considerations for planning decisions relating to the airport site and opportunities for aviation use.
 - Therefore, the City Council as the relevant local planning authority will continue to seek to safeguard the opportunity for general aviation use of the airport site until the question of acquisition of the land has reached its conclusion.

9. Implications from any significant cross boundary issues

- 9.1 There are currently no significant cross boundary issues that require an urgent update to the JLP.

10. Conclusion

- 10.1 Five years after its adoption, the JLP councils consider that the adopted Plymouth and South West Devon Joint Local Plan continues to provide an effective strategy for the management of growth and development across the whole plan area. The JLP sets out a spatial strategy and vision that continues to be evidence based informed and appropriate for meeting the needs and potential of the area and to be an effective policy framework for the development of sites.

- 10.2 Given the revised planning system now being put in place through the Levelling-up and Regeneration Act, the councils are considering how best to move to the next iteration of the plan. However, having completed this Five Year Review report, the current JLP is considered to be substantially up-to-date, and the focus will remain on its delivery and monitoring.

Appendix A - PAS Route Mapper and Toolkit 2

The following table from the PAS Local Plan Route Mapper Toolkit sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government.

The toolkit has helped to inform the decision on whether the Plymouth and South West Devon Joint Local Plan still meets current NPPF requirements. As the JLP was adopted under the NPPF 2012 the following quick reference colour codes help to identify new or revised NPPF requirements since the adoption of the Plan.

Key:

New plan-making requirement of the NPPF 2023 not contained within the previous 2012 version
New plan-making requirement of the NPPF 2019 and/or NPPF 2021 not contained within the previous 2012 version
Revised plan-making requirement of the NPPF, containing some changes from the 2012 version
Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	There are no major infrastructure projects currently proposed in the local planning authority areas and as such the provisions associated to nationally significant infrastructure projects are not directly relevant.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>A Written Ministerial Statement (WMS) published on the 24 May 2021 introduced First Homes policies. Due to the Local Plan’s adoption prior to the publication of the WMS, it does not include policies in accordance with this WMS. However, the WMS and NPPG make it clear that local plans that were submitted for examination prior to the 28th June 2021 or had reached publication by the same date and went on to be submitted for examination by the 28th December 2021 were not required to take account of ‘First Homes’. This is a matter which is best addressed in the next iteration of the local plan.</p>
2.	<p>The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.</p>	NPPF Para 7	<p>The JLP fully contributes to the achievement of sustainable development. The strategy works across the wider JLP area to ensure that it provides homes , commercial development and supporting infrastructure in a sustainable manner.</p> <p>Chapter 3 the Spatial Strategy sets out how the JLP will fully meet the needs for new homes, jobs and services within the Plan Area in the most sustainable manner. The strategy places Plymouth as the primary focus for growth and enables the Towns and Villages of South Hams and West Devon to also meet the housing and economic needs of their communities. The approach in South Hams and West Devon focuses development within the main town as the most sustainable location for</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>growth The strategy sets out economic, social and environmental objectives which are then articulated into policy SPT1 and SPT2.</p> <p>The allocated sites have been chosen through a site selection process which ensures that they are in the right locations, and key infrastructure needed to support these developments has been identified</p>
3.	Contribute to the achievement of sustainable development and the UN Sustainable Development Goals.	NPPF Para 7, 8, 9, 16	<p>The JLP supports the achievement of sustainable development and the NPPF’s sustainable development objectives. It has been informed by Sustainability Appraisal (SA) throughout. The SA has supported the selection of options for the spatial strategy and site allocations and policies have been assessed against the SA objectives which have been developed in line with the strategic objectives of the Local Plan.</p> <p>Chapter 3 the Spatial Strategy sets out how the JLP will fully meet the needs for new homes, jobs and services within the Plan Area in the most sustainable manner. The strategy places Plymouth as the primary focus for growth and enables the Towns and Villages of South Hams and West Devon to also meet the housing and economic needs of their communities. The approach in South Hams and West Devon focuses development</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>within the main town as the most sustainable location for growth. The strategy sets out economic, social and environmental objectives which are then articulated into policy SPT1 and SPT2. Although the UN SDGs are not specifically mentioned in the text of the JLP, the policies in the JLP meet with the NPPF and ensure that the plan is contributing to the achievement of these goals.</p>
4.	<p>Apply the presumption in favour of sustainable development.</p> <p>For plan-making this means that:</p> <p>a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.</p> <p>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:</p> <p>i. the application of policies in this Framework that protect areas or assets of particular</p>	NPPF Para 11	<p>The JLP meets the paragraph 11 requirements for plan making through the policies and proposals set out in the Plan. Policy SPT1 sets out the key overarching sustainable development policy, the spatial strategy and other policies within the plan promote a sustainable pattern of development that meets the development needs of the area. Alongside development proposals, key infrastructure has been identified to ensure an alignment between growth and infrastructure delivery. The policies in the plan have identified BNG to help improve the environment. The Climate Emergency Planning Statement, which sits alongside the JLP, is supporting further climate change mitigation and adaptation.</p> <p>The strategic policies provide for the OAN for housing and other requirements such as employment land in full based on evidence</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<p>importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or</p> <p>ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole</p>		<p>produced during the plan production and also through continuing monitoring of the JLP.</p>
5.	<p>Provide a positive vision for the future; a framework for meeting housing needs and addressing other economic, social and environmental priorities.</p>	<p>NPPF Para 15</p>	<p>A vision for Plymouth and SW Devon is articulated at the front of the JLP (P11). The vision sets out how the JLP will meet the sustainable development needs of the Plymouth and the thriving towns and villages. It includes references to the JLP’s strategic role as well as creating healthy communities and the provision of homes and jobs. This is then further developed through 12 strategic objectives and articulated into Policy SPT1. The plan acknowledges the importance of taking a strategic and integrated approach to growth, which reduces the need to travel and places sustainable development at its heart</p> <p>In the Plymouth Policy Area the strategic outcomes, objectives and policies expand on the vision for the plan area and set the scene for growth in the city. This is articulated through the creation of three growth areas :</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The City Centre and Waterfront Area The Derriford and Northern Corridor Area The Eastern Corridor Growth Area Each of these areas has a key diagram and a series of allocations which link together to support the overall vision for Plymouth. This strategy is further supported by a strategic transport plan which ensures that targeted infrastructure investments along with behavioural change programmes work together to meet the growth aspirations of the plan in a sustainable way.</p> <p>In the Thriving Towns and Villages of South Hams and West Devon the strategic outcomes, objectives and policies set out how development in these locations will reinforce and protect the existing settlement pattern. This is articulated through a sustainable settlement hierarchy set out in TTV1. Growth is distributed in accordance with this settlement hierarchy (Fig 5.1):</p> <p>Main towns – Dartmouth, Ivybridge, Kingsbridge, Okehampton, Tavistock and Totnes Smaller towns and villages – Bere Alston, Chillington, Dartington, Hatherleigh, Lifton, Modbury, North Tawton, Salcombe, Stokenham and Yealmpton</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Sustainable Villages – Berry Pomeroy, Blackawton, Bratton Clovelly, Bridestowe, Broadwoodkelly, East Allington, Ermington, Exbourne, Folly Gate, Halwell, Harberton, Harbertonford, Highampton, Inwardleigh, Lamerton, Lee Mill, Lee Moor, Lewdown, Marldon, Milton Abbot, Monkokehampton, Morleigh, Northlew, Rattery, Sampford Courtenay, Sparkwell, Spreyton, Staverton, Stowford, Ugborough, Wolsten Green and Wotter.</p> <p>Policies TTV2 sets out how this growth will be delivered in a sustainable manner across the thriving towns and villages policy area.</p> <p>Each of the Main Towns has a vision diagram, spatial priority and a series of allocations which link together to support the overall vision for each of the Main Towns.</p>
6.	<p>Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication</p>	NPPF Para 16	<p>The JLP meets the requirements of paragraph 16. The JLP was adopted in March 2019 and the adoption of a detailed SPD for the development management policies in July 2020, it is considered that the policies are clearly written and unambiguous. The Interactive JLP website includes a news page that is updated regularly, allows various searches to be made and includes a more accessible map of the allocations and designations across the whole plan area and is available here</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>Plan Content</i>		
7.	<p>Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and design quality of places. (to ensure outcomes support beauty and placemaking)</p>	<p>NPPF Para 17, 20</p>	<p>Chapter 3 The Spatial Strategy sets out the overarching strategic objectives for the JLP Area, which are clearly set out in strategic policies. The Plan then goes on to sets out key objectives for the Plymouth and Thriving Towns and Villages Policy Areas (Chapter 4 and 5).</p> <p>SPT1 sets out key principles including ensuring that local distinctiveness and sense of place is respected, maintained and strengthened. There are a number of policies which ensure that beauty and placemaking are supported, including:</p> <ul style="list-style-type: none"> DEV20 Place shaping and quality of the built environment DEV21 Development affecting the historic environment DEV22 Cornwall and West Devon Mining Landscape World Heritage Site DEV23 Landscape Character DEV24 Developed Coast and Heritage Coast DEV26 Nationally protected areas
8.	<p>Outline which policies are ‘strategic’ policies</p>	<p>NPPF Para 21</p>	<p>The JLP sets out strategic policies. Chapter 3 sets out the Spatial Strategy and includes 14 key strategic overarching policies:</p> <p>SPT1 – Delivering Sustainable Development</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>SPT2 – Sustainable linked neighbourhoods and sustainable rural communities</p> <p>SPT3 – Provision of new homes</p> <p>SPT4 – Provision for employment floor space</p> <p>SPT5 – Provision for retail development</p> <p>SPT6 – Spatial provision of retail and main town centre uses</p> <p>SPT7- working with neighbouring areas</p> <p>SPT8 – Strategic connectivity</p> <p>SPT9 – Strategic principles for transport planning and strategy</p> <p>SPT10- Balanced transport strategy for growth and health and sustainable communities</p> <p>SPT11 – Strategic approach to the historic environment</p> <p>SPT12 – Strategic approach to the natural environment</p> <p>SPT13 Strategic infrastructure measures to deliver the spatial strategy</p> <p>SPT14 – European sites – mitigation of recreational impacts from development</p> <p>There are also key strategic policies for each of the Policy areas</p> <p>PLY1 Enhancing Plymouth’s Strategic role</p> <p>PLY2 Unlocking Plymouth’s Growth Potential</p> <p>PLY3 Utilising Plymouth’s economic Assets</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>PLY4 Protecting and Strengthening Devonport Base and Dockyard Strategic Role PLY5 Safeguarding Plymouth’s Mineral Resources PLY6 Improving Plymouth’s City Centre</p> <p>PLY19 Central Park – Strategic Green Space Site PLY20 Managing Plymouth’s Waterfront PLY21 Supporting the Visitor Economy PLY22 Cultural Quarters PLY37 Strategic infrastructure for the City Centre and Waterfront Growth Area PLY47 Strategic infrastructure for the Derriford and Northern Corridor Growth Area PLY49 Shefford Community Strategic Green Space PLY57 – Strategic infrastructure for the Eastern Corridor Growth Area PLY62 Strategic Infrastructure measures TTV1 Prioritising growth through a hierarchy of sustainable settlements TTV2 – Delivering sustainable development in the TTV Policy Area TTV3 Strategic infrastructure for the main towns TTV25 Development in the Sustainable Villages TTV26 Development in the Countryside</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			TTV27 Meeting Housing Need in Rural Areas DEL1 Approach to development delivery and viability, planning obligations and Community Infrastructure Levy
9.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> . Where larger scale developments are proposed that form part of the strategy for the area, policies should be set within a vision which looks further ahead (at least 30 years).	NPPF Para 22, having regard to the transitional provisions at NPPF para 221	<p>The strategic policies in the plan cover the period from adoption in 2019 to 2034 (a period of 15 years). As the plan was adopted prior to 20th July 2021 (see note below) a 30 year strategy for any significant extensions or new settlements is not required. Having said this, it is clear from the plan that some of its strategic allocations are set within a longer term vision which goes beyond 2034. For example, Policy PLY44 (Woolwell Sustainable Urban Extension and Community Park) explicitly recognises that only part of the 2,000 new homes proposed will happen within the plan period itself. Policy PLY48 (Sherford New Community) explicitly recognises that part of the 5,500 new homes proposed will happen within the plan period itself.</p> <p>NB: For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point the previous version of this framework was published on 20 July 2021 (for Spatial Development Strategies this would refer to consultation under section 335(2) of the Greater London Authority Act 1999)</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	<p>The spatial strategy and site allocations are articulated through key diagrams and allocations:</p> <p>Strategic Transport Diagram p52 PPA – Spatial Priorities Map p69 City Centre and waterfront growth area vision map p73 Derriford and northern corridor growth area vision map p126 Eastern Growth Area Vision Map p152</p> <p>TTV – Maps for key towns Dartmouth Vision Diagram p192 Ivybridge Vision Diagram p197 Kingsbridge Vision Diagram p204 Okehampton Vision Diagram p209 Tavistock Vision Diagram p215 Totnes Vision Diagram p222</p> <p>Policy Maps Map 1 Designated Sites Map 2 Biodiversity Policies Map Plymouth Policy Area Policies Map Thriving Towns and Villages South Hams Policies Map Thriving Towns and Villages West Devon</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	<p>Chapter 3 – The Spatial Strategy sets out the Objectively Assessed Need and sets a strategy to deliver this over the plan period.</p> <p>The Housing Market Area and the Functional Economic Market Area have both been clearly defined in line with the relevant guidance in the Planning Practice Guidance.</p> <p>The JLP Councils have a clear understanding of housing needs in their local area and relationship to the latest demographic data as well as the Standard Method figures. Delivery is annually monitored and updated through the Housing Position Statement and the Annual Monitoring Report. These show that the JLP is delivering at a sufficient rate to address objectively assessed needs over the plan period.</p>
12.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	PPA and TTV policies set out the specific allocations for each of the policy areas with specific policies for the different geographical issues and considerations.
13.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 58	Joint Local Plan Policies SPT13 and SPT14 set out the policy provisions for strategic infrastructure measures and how contributions will be made to mitigate for recreational impacts from development on European Sites within the Tamar Estuaries Complex SPA.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Policy DEL1 (Approach to development delivery and viability, planning obligations and Community Infrastructure levy). This policy sets out a positive and strategic approach to infrastructure delivery which seeks to accelerate the delivery of development and provide a flexible approach where appropriate</p> <p>Alongside this there are detailed requirements for individual sites and also more general requirements for growth areas and infrastructure provision (see below):</p> <p>PLY37 Strategic Infrastructure measures for the City Centre and Waterfront Growth Area PLY47 Strategic Infrastructure measures in the Derriford and Northern Corridor Growth Area PLY57 Strategic Infrastructure measures for the Eastern Corridor Growth Area PLY62 Strategic Infrastructure Measures TTV3 Strategic Infrastructure measures for the Main Towns</p>
14.	Local Plans and development strategies are examined to assess if they have been positively prepared, justified, effective and consistent with national policy.	NPPF Para 35	The JLP was examined and found sound and to fully meet the area’s OAN in line with paragraph 61 of the NPPF.
	<i>Housing</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
15.	The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.	NPPF Para 60	The JLP meets the area's identified housing need in full. Policy DEV7 Meeting local housing need in the Plymouth Policy Area, DEV8 Meeting local housing need in the Thriving Towns and Villages and Policy DEV9 Meeting Local Housing Need in the Plan Area set out how the plan will deliver an appropriate mix of housing types.
16.	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area ¹⁵ which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for	NPPF Para 61	Given that the JLP was adopted prior to the standard method being implemented, NPPF para 33 and NPPG (Paragraph: 062 Reference ID: 61-062-20190315, Revision date: 15 03 2019) mean that the standard method only becomes the default measure of local housing need if the JLP housing requirement is significantly below the figure derived from the standard method. See paras 3.14-3.39 of the main report, which sets out the JLP councils position that these figures are not significantly different and therefore that the JLP housing requirement remains valid.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
17.	The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework .	NPPF Para 62	Given that the JLP was adopted prior to the standard method being implemented, NPPF para 33 and NPPG (Paragraph: 062 Reference ID: 61-062-20190315, Revision date: 15 03 2019) mean that the standard method only becomes the default measure of local housing need if the JLP housing requirement is significantly below the figure derived from the standard method. See paras 3.14-3.39 of the main report, which sets out the JLP councils position that these figures are not significantly different and therefore that the JLP housing requirement remains valid.
18.	Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers ; people who rent their homes and people wishing to commission or build their own homes .	NPPF Para 63	Policies DEV7-DEV13 set out policies for type, size and mix, as well as quality of housing provided, including for specialist groups. DEV7 and DEV8 set out the need to ensure that a mix of housing sizes, types and tenure should be provided. DEV7 ensures a wide choice of high quality homes which widen opportunities for home ownership, meet needs for social and rented housing and create sustainable, inclusive, mixed communities in the PPA. DEV8 ensures a choice of homes is available within the TTV which meets the needs of the local community.
19.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 64	DEV7, 8 and 9 set out the different types of affordable housing to be sought in the Plymouth and Thriving Towns and Villages

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			Policy Areas. The tenure mix preference sought by the LPA's is set out clearly in SPD.
20.	Expect at least 10% of the total number of homes to be available for affordable home ownership, 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 specific groups.	NPPF Para 66	DEV7, 8 and 9 set out the requirements for affordable housing. The policies require a mix of housing sizes, types and tenure appropriate to the area. The tenure mix preference sought by the LPAs is set out clearly in the SPD which seeks a split between social rented homes (65%) and affordable home ownership tenures (35%). This is the equivalent of 10.5% of homes being available for affordable home ownership.
21.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 67	SPT2 Sustainable linked neighbourhoods and sustainable rural communities sets out the strategic approach for development in designated areas. SPT3 Provision of new homes sets out how this is to be distributed between the different policy areas PLY6- PLY61 sets out the specific sites allocations and approach to development within the PPA TTV1 Prioritising growth through a hierarchy of sustainable settlements. Fig 5.1 identifies how the site allocations have been distributed across the TTV settlement hierarchy and it is anticipated that Neighbourhood Plans will support the delivery of homes by identifying locations for development.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			TTV4 – TTV27 sets out the specific site allocations and approach to development within the TTV, including provision of 550 homes to be provided through Neighbourhood Plans in sustainable villages.
22.	<p>Planning policies should identify a supply of:</p> <p>a) specific, deliverable sites for five years following the intended date of adoption; and</p> <p>b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.</p>	NPPF Para 69	The JLP allocates land for development for the whole plan period to 2034 (covering a period of 10 years from 2024) and annual monitoring shows that there has been a consistent supply of sites in excess of 5 years worth, since adoption. We currently have a 5.84 year supply of deliverable sites across the plan area and also sites available within the trajectory for further years. The trajectory is updated every year within the Housing Position Statement.
23.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 70	<p>The requirement for identifying land to accommodate at least 10% of the housing requirement on sites no larger than one hectare was introduced through 2019-based amendments to national policy after the adoption of the Local Plan. The JLP does not therefore have a set policy position in relation to the percentage of development on small sites but it does proactively encourage small sites development.</p> <p>We had in excess of 10% of small sites in the supply at the time of adoption and are confident that this is still the case. The existing committed small development sites, plus windfall sites</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			of less than 1 ha combined with the smaller site allocations add up to more than 10% of the housing requirement.
24.	b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom build housing;	NPPF Para 70	Policy DEV9 sets out policy provisions for self and custom building housing supporting their development providing that they meet with sustainable development, general amenity and design policies within the Plan.
25.	<p>73. Local planning authorities should support the development of exception sites for community-led development (as defined in Annex 2) on sites that would not otherwise be suitable as rural exception sites. These sites should be on land which is not already allocated for housing and should:</p> <p>a) comprise community-led development that includes one or more types of affordable housing as defined in Annex 2 of this Framework. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding; and</p> <p>b) be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards.</p>	NPPF Para 73	<p>Policies DEV7- DEV9 provide a policy framework which seeks to widen home ownership as well as provide social and rented housing</p> <p>DEV7 Meeting local housing need in the PPA DEV8 Meeting local housing need in the TTV DEV9 Meeting local housing need in the Plan Area.</p> <p>In the rural areas Policy TTV26 sets out provisions for development in the countryside and TTV27 set out provisions for meeting local housing needs in rural areas including development on sites adjoining or very near an existing settlement which would not otherwise be released for housing (rural exceptions policy)</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
26.	Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments.	NPPF Para 74	<p>This new requirement was introduced to national planning policy through the 2019-based update to national planning policy and thus after the adoption of the Joint Local Plan. However the policies and proposals in the JLP collectively ensure that development is provided on a variety of sites including larger scale development. PLY48 Sherford new community provides for 5500 new homes and PLY44 Woolwell Sustainable Urban Extension provides for about 2000 homes.</p> <p>Strategic masterplans are in place for the different growth areas in the Plymouth Policy Area including City and Waterfront, Derriford and Northern Corridor and the Eastern Corridor. Many larger allocations require a masterplan to be submitted alongside a planning application for example PLY39 Glacis Park Derriford.</p> <p>There are also a range of sites which provide extensions to smaller settlements for example TTV6 East of Ivybridge, TTV14 East of Okehampton, and TTV16 Callington Road Tavistock. These all have design codes and masterplans that have informed their development.</p> <p>TTV23 Dartington Hall Estate specifically requires an endorsed estate framework to be prepared to ensure that the</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			development proposed (120 units) fully recognises the special characteristics of the Dartington Estate
27.	Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies..	NPPF Para 75	<p>Figure 3.4 of the JLP sets out the five year land requirements from the point of adoption of the JLP. Annex 5 sets out illustrative graphs of the housing trajectories including:</p> <ol style="list-style-type: none"> 1. Plymouth and South West Devon Joint Local Plan – Plan Area (annualised target) 2. Plymouth Policy Area (annualised target) 3. Thriving towns and Villages Policy Area (annualised target) <p>The housing trajectories are reported in the housing position statement and the 5YHLS updated on an annual basis.</p>
28.	<p>Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old for decision making purposes if the following criteria are met:</p> <p>a) their adopted plan is less than five years old; and</p>	NPPF Para 76	<p>The Councils have prepared Housing Position Statements which demonstrate a consistent five-year housing land supply every year since adoption of the Plan. The current position as at December 2023 is a net supply of 7,362 homes which represents a 5.84 year housing land supply.</p> <p>See also para 3.36-3.39 of the main report</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.		
29.	<p>In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).</p> <p>National planning guidance provides further information on calculating the housing land supply, including the circumstances in addition include a buffer (moved forward from later which past shortfalls or over-supply</p>	NPPF Para 77	The Councils have prepared a Housing Position Statement (HPS) which demonstrates a 5.84 year supply against the housing requirement set out in the adopted strategic policies. The HPS also sets out how the plan has been delivering housing since adoption and is presently in a surplus position against the Housing Requirement (annualised). This is further confirmed by the 2022 Housing Delivery Test (HDT) result of 121%. The HDT result confirms no policy consequences are applied and therefore no buffer is required to be applied to the 5YHLS.
30.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 81	Fig 3.4 sets out the requirements for the TTV and there are policies in the plan which enable the sustainable growth of settlements.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>TTV1 – Prioritising growth through a hierarchy of sustainable settlements TTV2 – Delivering sustainable development in the Thriving Towns and Villages Policy Area TTV27 - Meeting local housing need in rural areas provides opportunities to deliver rural exception sites in line with paragraph 78</p> <p>The existing policy framework supports the development of affordable housing across the whole plan area. However, despite this, housing affordability across the area has worsened. South Hams and West Devon have declared a Housing Crisis and are updating their Housing Strategies to address this. Plymouth has also updated its Plan for Homes. Considerable work is being undertaken by the Housing Teams to update the local needs survey and work with communities to bring forward sites through Community Land Trusts and other mechanisms. The policy framework in the JLP allows these additional needs to be considered and delivered.</p>
31.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 83	The JLP provides a range of strategies, policies and allocations that together provide a framework to enable rural places to grow and thrive, whilst having regard to local context, circumstances, and aspirations.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>TTV2 – Delivering sustainable development in the Thriving Towns and Villages Policy Area</p> <p>TTV25 Development in the Sustainable Villages makes provision for 550 homes in sustainable villages. This also allows Neighbourhood plans to bring forward additional site for development and growth</p> <p>Fig 5.8 sets out the indicative levels of new housing to be provided in the sustainable villages, which ranges from 10 dwellings to 30 dwellings.</p> <p>In the rural areas Policy TTV26 sets out provisions for development in the countryside and TTV27 set out provisions for meeting local housing needs in rural areas including development on sites adjoining or very near an existing settlement which would not otherwise be released for housing (rural exceptions policy).</p>
32.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 84	TTV26 Development in the Countryside sets out the provisions in lines with the NPPF. This policy is being supported and upheld by Inspectors at appeal. This works alongside the Development Management Policies of the plan the control development in specific circumstances and locations

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			TTV25 Development in the Sustainable Villages TTV27 Meeting local housing need in rural areas DEV13 Consideration of sites for Travellers and Travelling DEV20 Place shaping and quality of the built environment DEV21 Development affecting the historic environment DEV22 Cornwall and West Devon Mining Landscape World Heritage Site DEV23 Landscape character DEV24 Undeveloped coast and Heritage Coast DEV25 Nationally protected landscapes
	<i>Economy</i>		
33.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 85	SPT4 sets out the provision of employment floorspace within the JLP Area and policies within the plan allocate land to meet identified employment needs, with considerable flexibility to meet changing needs. Identified needs were justified through the evidence gathered to support the production of the JLP and latest forecasts continue to be consistent with population and job growth figures in the plan. The Plan sets out both quantitative and qualitative needs for all foreseeable types of economic activity over the plan period.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Floorspace requirements are split into B1, B2 and B8, however, it is important to note that B1 does not exist anymore, because it has moved to Class E</p>
34.	<p>Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.</p>	<p>NPPF Para 86</p>	<p>The Vision, Strategic Objectives and policies within the JLP set out an economic strategy for the JLP area. This strategy seeks to strengthen the role of Plymouth in the region, as well as supporting sustainable economic growth within the market towns and villages.</p> <p>SO1 (Delivering the spatial Strategy) sets out the overarching objectives of the Plan which then feed into the policies and proposals of the Plan.</p> <p>SPT4 (Provision for employment floor space) sets out the distribution of employment floorspace.</p> <p>The Plan also includes strategic objectives and policies which support economic growth including:</p> <p>S02 Strengthening Plymouth’s role in the region SO3 Delivering growth in Plymouth’s City Centre and Waterfront Growth area SO4 Delivering growth in the Derriford and Northern Corridor Growth Area</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>SO5 Delivering Growth in Plymouth’s Eastern Corridor Growth Area</p> <p>PLY51 Langage (Strategically important employment location)</p> <p>S06 Delivering a prosperous and sustainable South West Devon</p> <p>TTV1 Prioritising growth through a hierarchy of sustainable settlements</p> <p>TTV2 Delivering sustainable development in the thriving towns and villages</p> <p>SO7 Maintaining a strong network of Main Towns</p> <p>SP1 Spatial priorities for development in Dartmouth</p> <p>SP2 Spatial priorities for development in Ivybridge</p> <p>SP3 Spatial priorities for development in Kingsbridge</p> <p>SP4 Spatial priorities for development in Okehampton</p> <p>SP5 Spatial priorities for development in Tavistock</p> <p>SP6 Spatial priorities for development in Totnes</p> <p>SO8 Maintaining the vitality and viability of the smaller towns and villages</p> <p>SO9 Meeting the viability of the many sustainable villages in the rural area</p> <p>SO10 Maintaining a naturally beautiful and thriving countryside</p> <p>TTV26 Development in the countryside</p> <p>DEV14 Maintaining a flexible mix of employment sites</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			DEV15 Supporting the rural economy
35.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 86	The JLP provides a range of allocated sites to meet the economic needs of the plan area. SPT4 sets out the provision of employment floorspace within the plan area and land for various uses is allocated within various site allocations.
36.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 86	<p>The JLP sets out positive proactive policies to bring forward sites and support investment. In addition, Annex 3 of the JLP sets out the Plan Contingency Measures with various options to address identified issues which could be potential barriers to development coming forward. Some of these contingency measures are also set out in the reasoned justification of the JLP.</p> <p>The successful delivery of the spatial and growth strategy within the plan is reliant on significant improvements and investment to infrastructure. Numerous policies provide the policy framework for this including:</p> <p>SPT13 – Strategic Infrastructure measures to deliver the spatial strategy PLY37 - Strategic Infrastructure measures for the City Centre and Waterfront Growth Area PLY47 - Strategic Infrastructure measures for the Derriford and Northern Corridor Growth Area</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>PLY57 - Strategic Infrastructure measures for the Eastern Corridor Growth Area</p> <p>PLY62 – Strategic infrastructure measures</p> <p>TTV3 - Strategic Infrastructure measures for the main towns</p> <p>DEL1 – Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy.</p>
37.	<p>Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.</p>	<p>NPPF Para 86</p>	<p>The JLP provides a flexible policy framework to allow the plan area to respond to changes in economic circumstances.</p> <p>In order to offer choice and flexibility, SPT4 sets out the provision of employment floorspace across the plan area and DEV14 (Maintaining a flexible mix of employment sites) sets out the policy framework to ensure sufficient land is available for a range of uses.</p> <p>The reasoned justification sets out the uncertain nature of employment land delivery and how the JLP deals with this by providing allocated sites as well as flexible polices to support the delivery of jobs.</p> <p>To support economic growth in the city, policies PLY1, PLY2 and PLY3 work collectively to enhance Plymouth’s strategic role and to open up new areas for growth within the city centre, the</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Waterfront Growth Area, the Derriford and Northern Corridor Growth Area and the Eastern Corridor Growth Area.</p> <p>PLY4 recognises the importance of the Naval Base and Dockyard role in the city setting out in policy the importance of protecting and strengthening this important asset for the city.</p> <p>In the Thriving Towns and Villages, TTV1 sets out the overarching approach of prioritising growth through a hierarchy of settlements. Land is allocated within the main towns , smaller towns and key villages to support economic growth. TTV2 sets out how sustainable development will be delivered in the rural areas by supporting the growth and expansion of rural business and enterprise, the development and diversification of agriculture, the delivery of sustainable tourism with DEV15 providing specific policy guidance to support the rural economy.</p> <p>Policy TTV25 sets out provisions for development in sustainable villages.</p> <p>TTV26 sets out provisions for development within the countryside</p> <p>TTV28 sets out provisions for horse related development in the countryside</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The definition of traditional employment land will be affected by the Use Class changes but the JLP has always aimed to have flexibility within the supply of employment land. The policies and the SPD provide a flexible framework that enables us to respond positively to new development types that are emerging, and to respond to changing work patterns since Covid19.</p>
38.	<p>Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	<p>NPPF Para 87</p>	<p>The evidence to support the JLP included a sectoral analysis of existing and future business needs and this helped inform policy SPT4 (Provision of employment floorspace). This policy sets out the proposed distribution of employment land provision within the Plymouth and TTV policy areas. The range and mix of uses are included within the individual site allocations within the JLP. The JLP has a key strategic employment site at Langage (PLY52) that is now part of the Freeport.</p> <p>Policy PLY3 seeks to strengthen Plymouth’s regional economic assets including its marine, advanced manufacturing, medical and healthcare and knowledge based etc</p> <p>Policy PLY4 makes provisions to protect and strengthen the Devonport Naval Base and Dockyard’s strategic role</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Policy PLY33 Oceansgate provides policy provisions for the Oceansgate Enterprise Zone which supports marine related development</p> <p>TTV18 Pixon Lane Employment site protects land in Tavistock for employment uses because of the vital role it plays to support business investment and growth in the town.</p> <p>DEV14 Maintaining a flexible mix of employment sites DEV15 Supporting the rural economy</p> <p>Whilst the JLP does not make explicit provision in response to the specific sectors identified in national planning policy, these were introduced to national policy as requirements after the adoption of the JLP.</p>
39.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed (beautiful) new buildings.	NPPF Para 88	<p>DEV15 Supporting the rural economy provides a flexible policy framework to support economic growth and diversification within the rural part of the JLP area within suitable locations.</p> <p>TTV25 sets out provisions for development in sustainable villages.</p> <p>TTV26 sets out provisions for development within the countryside</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			DEV14 Maintaining a flexible mix of employment sites DEV15 Supporting the rural economy
40.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 88	<p>Policy TTV2 sets out how sustainable development will be delivered in the rural areas by supporting the growth and expansion of rural business and enterprise, the development and diversification of agriculture, the delivery of sustainable tourism.</p> <p>Collectively TTV2 and DEV15 provides a positive framework to enable the sustainable growth and expansion of all types of business in rural areas. It is responsive to a range of rural economic and social needs, and it supports the appropriate reuse of rural buildings. Support is provided for rural employment and farm and rural business diversification schemes. In particular , DEV15 Supporting the rural economy supports appropriate diversification proposals in suitable locations.</p>
41.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 88	Policy TTV2 sets out how sustainable development will be delivered in the rural areas by supporting the growth and expansion of rural business and enterprise, the development and diversification of agriculture, the delivery of sustainable tourism with DEV15 Supporting the rural economy providing a comprehensive policy framework to enable the sustainable

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>development of proposals which support the rural economy in suitable locations– this could include tourism and leisure where there is an identified local need.</p> <p>Policy DEV17 Promoting Competitive Town Centres Policy DEV18 Protecting local shops and services Policy DEV20 Place Shaping and the quality of the built environment Policy DEV21 Development affecting the historic environment Policy DEV22 Cornwall and West Devon Mining Landscape World Heritage Site Policy DEV 23 Landscape Character Policy DEV24 Undeveloped coast and Heritage Coast Policy DEV25 Nationally protected landscapes</p>
42.	<p>Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.</p>	<p>NPPF Para 88</p>	<p>The JLP seeks to safeguard important community services and facilities with SPT1 and SPT2 providing an overarching strategy to support the provision a sustainable society with a range of local services and community facilities.</p> <p>Within the city PLY1 sets out how the policies in the plan will enhance Plymouth’s strategic role with individual proposals working collectively to retain and develop local services and facilities.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>PLY38 Derriford Commercial Centre sets out provisions to enable the creation of a new heart for northern Plymouth by enabling the development of both food and non food retailing</p> <p>PLY43 University of St Mark and St John sets out policy provisions to enable the development of key facilities including a sports hub, small shops and other services to meet the day to day needs of its users.</p> <p>TTV2 sets out how sustainable development will be delivered in the TTV policy area DEV18 – Protecting local shops and services provides a policy framework for this.</p> <p>Other policies protect services and facilities including: DEV14 Maintaining a flexible mix of employment sites DEV15 Supporting the rural economy DEV16 Promoting retail and town centre uses in appropriate locations DEV17 Promoting competitive town centre DEV19 Provisions for local employment and skills</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The Plan also includes strategic objectives and policies which support the provision of services and facilities including:</p> <ul style="list-style-type: none"> S02 Strengthening Plymouth’s role in the region S03 Delivering growth in Plymouth’s City Centre and Waterfront Growth area S04 Delivering growth in the Derriford and Northern Corridor Growth Area S05 Delivering Growth in Plymouth’s Eastern Corridor Growth Area PLY51 Langage (Strategically important employment location) S06 Delivering a prosperous and sustainable South West Devon TTV1 Prioritising growth through a hierarchy of sustainable settlements TTV2 Delivering sustainable development in the thriving towns and villages S07 Maintaining a strong network of Main Towns SP1 Spatial priorities for development in Dartmouth SP2 Spatial priorities for development in Ivybridge SP3 Spatial priorities for development in Kingsbridge SP4 Spatial priorities for development in Okehampton SP5 Spatial priorities for development in Tavistock SP6 Spatial priorities for development in Totnes

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>SO8 Maintaining the vitality and viability of the smaller towns and villages</p> <p>SO9 Meeting the viability of the many sustainable villages in the rural area</p>
43.	<p>Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.</p>	<p>NPPF Para 89</p>	<p>The JLP enables a range of opportunities in the rural areas to meet the needs of local businesses and communities. TTV2 sets out how sustainable development will be delivered in the rural areas by supporting the growth and expansion of rural business and enterprise, the development and diversification of agriculture, the delivery of sustainable tourism with whilst DEV15 specifically supports the rural economy. The policy seeks to avoid a significant increase in the number of trips requiring the private car and encourages the use of sustainable transport but would still provide the opportunity for a development to demonstrate how traffic impacts could be mitigated for. In a rural area – the JLP consider this approach provides an appropriate balance and encourages the use of Sustainable Travel Plans.</p> <p>TTV25 sets out provisions for development in sustainable villages.</p> <p>TTV26 sets out provisions for development within the countryside</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			TTV28 sets out provisions for horse related development in the countryside
44.	<i>Town centres</i>		
45.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 90	<p>The JLP identifies a network of growth areas, city neighbourhoods as well as main towns and key villages which offer a range of services and facilities across the JLP Area. In particular, JLP Policy SPT2 sets out a strategic approach to linked neighbourhoods and sustainable rural communities, with TTV1 setting out a hierarchy of sustainable settlements for the thriving towns and villages policy area.</p> <p>Underneath this strategic approach , DEV16 sets out how proposals for retail and centre uses will be determined to ensure that development is in appropriate locations.</p> <p>DEV15 Supporting the rural economy DEV16 Promoting retail and town centre uses in appropriate locations DEV17 Promoting competitive town centre DEV19 Provisions for local employment and skills</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
46.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 90	The JLP and associated policy map defines the extent of town centres, primary shopping areas and primary frontages. Relevant policies include: PLY6 Improving Plymouth's City Centre DEV16 Promoting retail and town centre uses in appropriate locations DEV17 Promoting competitive town centres DEV19 Protecting local shops and services
47.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 90	The JLP contains one policy TTV24 Hatherleigh Market which seeks to retain the important market function which exists in the redevelopment of an allocated site. Elsewhere in the JLP Area the city and main towns do have covered or street markets eg Tavistock, Totnes. Wider policies in the plan such as DEV18 Protecting local shops and services would help retain existing markets.
48.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 90	The JLP provides and supports a range of regeneration and redevelopment opportunities particularly in the city centre and Waterfront growth area policies PLY6 – PLY37 but also opportunities have been identified within the thriving towns and villages to identify sites for a range of uses such as TTV6 Land

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>East of Ivybridge which sets out meeting needs for local convenience shopping if appropriate.</p> <p>In terms of meeting retail needs, SPT6 Provision for retail development has set out that limited objectively assessed 'quantitative' need for new retail floorspace exists within the Plan Area until after 2026. No sites are allocated in this plan to meet this limited need. Instead, applications for new retail floorspace will be considered as brought forward by the market in accordance with the provisions of policies SPT6, DEV15, 16, 17 and 18. The AMR demonstrates that we have met the need to 2026 but renewed evidence will be required to identify future needs otherwise we could be vulnerable to supermarket applications in inappropriate locations.</p>
49.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 90	As set out above SPT6 Provision for retail development has set out that limited objectively assessed 'quantitative' need for new retail floorspace exists within the Plan Area until after 2026. No sites are allocated in this plan to meet this limited need. Instead, applications for new retail floorspace will be considered as brought forward by the market in accordance with the provisions of policies SPT6, DEV15, 16, 17 and 18. The AMR demonstrates that we have met the need to 2026 but renewed evidence will be required to identify future needs otherwise we

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			<p>could be vulnerable to supermarket applications in inappropriate locations.</p> <p>If applications are made which cannot be accommodated within the city or town centres then DEV16 (Providing retail and town centre uses in appropriate locations) sets out the requirements / thresholds for impact assessments.</p> <p>These include</p> <ol style="list-style-type: none"> 1. Retail development creating new or additional floorspace greater than 500 square metres (gross) in the Plymouth Policy Area. 2. Retail development creating new or additional floorspace greater than 250 square metres (gross) in the Thriving Towns and Villages Policy Area. 3. Leisure and office development creating new or additional floor space greater than 2,500 sq.m.(gross).
50.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 90	Policy PLY2 (Improving the City Centre) recognises that through development and environmental changes the city centre can provide a high quality living environment. In the towns and villages, DEV17 sets out policy guidance to promote competitive town centre uses and encourages residential uses on second floors.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
51.	<i>Healthy and safe communities</i>		
52.	Achieve healthy, inclusive and safe places and beautiful buildings which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 96	<p>The JLP provides a number of policies which seek to achieve healthy, inclusive and safer places including:</p> <p>SPT1 Delivering sustainable development SPT2 Sustainable linked neighbourhoods and sustainable rural communities DEV1 Protecting health and amenity DEV3 Sport and recreation DEV4 Playing pitches DEV5 Community food and allotments DEV6 Hot Food Takeaways in Plymouth</p> <p>DEV3 and DEV4 supports opportunities for sport, physical activity and active leisure. DEV3 also includes provision for protecting, enhancing and creating new PROW and bridleways DEV5 aims to encourage and support local food growing and the creation of edible landscapes such as orchards and food forests DEV6 seeks to tackle a key health issue identified in the PPA in relation to the proximity of fast food premises to educational establishments.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
53.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 97	<p>This requirement is met in a number of policies including SPT1 Delivering sustainable development SPT2 Sustainable linked neighbourhoods and sustainable rural communities</p> <p>Policy DEV1 (Protecting health and amenity) criterion 2. Ensuring that developments and public spaces are designed to be accessible to all people, including people with disabilities or for those whose mobility is impaired by other circumstances.</p>
54.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 97	<p>The JLP had regard to wide number of plans and strategies during its preparation and is supported by a significant number of key stakeholders including health, where required some allocations include specific proposals for health, wellbeing, social and cultural uses.</p> <p>DEV1 (Protecting health and amenity) sets out a policy framework to safeguard the health and amenity of local communities</p>
55.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 97	The JLP has policies which seek to protect important facilities and services. In particular, DEV18 provides a policy framework which seeks to protect local shops and services.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
56.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 97	<p>The JLP has policies which provide opportunities for shops, services and facilities to develop in particular:</p> <p>PLY6 Improving Plymouth’s city centre DEV15 Supporting the rural economy supports the development of farm shops subject to a number of criteria DEV16 – Providing retail and town centre uses in appropriate locations DEV17 Promoting competitive town centres DEV18 Protecting local shops and services.</p> <p>NB It can be possible to develop farm shops under permitted development rights, such as Class R of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, which allows change of use of agricultural buildings to a flexible commercial use, when certain conditions are met.</p>
57.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 97	The spatial strategy sets out an integrated strategic approach to the location of houses, economic uses and community services. There are also numerous site allocations in the PPA and TTV that allocate land for a variety of appropriate mixed uses.
58.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 98	The JLP contains numerous site allocation policies which carefully consider a range of issues on the site and enable the

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>regeneration of existing buildings and previously developed land. The Housing Position Statement demonstrates the extent of estate regeneration that has occurred and is still occurring in Plymouth as unfit housing is demolished and replaced by new accommodation.</p>
59.	<p>Plan positively to meet school place requirements and to encourage development which will widen choice in education.</p>	<p>NPPF Para 99</p>	<p>The JLP has planned positively for school place requirements and the provision of adequate education infrastructure. Working with both Plymouth and Devon education authorities, the JLP ensures that policies in the JLP identify school provision where needed.</p> <p>PLY37 identifies the need for a new city centre primary school PLY44 identifies the need for a Woolwell Urban Extension Primary School PLY48 identifies 3 primary and 1 secondary schools for Sherford</p> <p>PLY50 Saltram Meadow Primary School PLY52 Plympton Primary School TTV3 sets out the expansion of early year places, primary school and secondary school provision where required TTV3 sets out expansion of special educational needs places SP4 sets out new primary school in the east of Okehampton and the relocation of post 16 provision at Okehampton College.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			SP5 sets out new primary school provision and secondary school improvements for Tavistock. Regular discussions are held with education colleagues in DCC and PCC to understand the population planning requirements, surplus and capacity issues across the area, which currently show there is only an additional need for SEN provision.
60.	Work proactively and positively with promoters, delivery partners and statutory bodies to plan for public service infrastructure.	NPPF Para 100	The Infrastructure Needs Assessment and schedule at Appendix 1 of the Joint Local Plan sets out the infrastructure provided, safeguarded or promoted and the relevant policy this relates to. Policy DEV30 sets out how community infrastructure needs will be met, and work will continue with utility providers and other infrastructure companies to ensure appropriate provision is made going forward.
61.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 101	Policy DEV20 Place shaping and the quality of the built environment includes provisions to ensure that the layout and details of the new development adequately contribute to towards high standards of community safety and reduce opportunities for crime. For locations which might generate large crowds (including transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>restaurants, visitor attractions and commercial centres) councils need to consider appropriate security measures.</p> <p>There are sources of guidance available including:</p> <ul style="list-style-type: none"> • Protecting Crowded Places: Design and Technical Issues • National Counter Terrorism Security Office (NaCTSO) crowded places guidance • Centre for the Protection of National Infrastructure (CPNI) – built environment guidance <p>The Plan also has Strategic Objective SO2 which seeks to Safeguard the defence role that Plymouth plays for the UK’s security. Policy PLY4 Protecting and strengthening Devonport Naval Base and Dockyard’s Strategic Role provides a policy framework to support defence requirements.</p>
62.	Provide open space, sports and recreational facilities which meets the needs of the local area. Consider how they can deliver wider benefits for nature and support efforts to address climate change.	NPPF Para 102	The provision of open space has been taken into account in the JLP. The JLP recognises that open space can provide health and recreational value to those that live and work nearby, have an ecological value, as well as being an important part of the landscape and setting of the built environment, all of which make it an important part of the achievement of sustainable development. The JLP assesses the need for open space and opportunities for new provision in the local area, but also

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>importantly protects existing open spaces, including but not restricted to designated open spaces. A number of policies support the provision of open space, sports and recreation facilities including:</p> <p>SPT1 Delivering sustainable development SPT2 Sustainable linked neighbourhoods and sustainable rural communities DEV1 Protecting health and amenity DEV3 Sport and recreation DEV4 Playing pitches DEV5 Community food and allotments DEV27 Green and play spaces</p> <p>Various site allocations provide specific sport and recreational requirements.</p> <p>DEL1 – Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy.</p>
63.	Protect and enhance public rights of way and access.	NPPF Para 104	<p>The JLP seeks to maintain and enhance the public rights of way, SPT9 Strategic Principles for transport planning and strategy and SPT10 Balanced transport strategy for growth and health and sustainable communities work collectively to support sustainable transport and to set out a hierarchy of modes which places walking at the top.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Individual allocations set out protection and enhancement of public rights of way and access where appropriate.</p> <p>JLP Policy DEV1 Protecting Health and Amenity sets out the need for developments and public spaces to be accessible to all people and also requires Health Impact Assessments to be submitted where appropriate.</p>
64.	<i>Transport</i>		
65.	<p>Should actively manage patterns of growth in support of objectives in Para 104. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.</p>	<p>NPPF Para 109</p>	<p>The spatial development policies of the JLP set out how the JLP will deliver the Spatial Strategy. Strategic Objective 1 – Delivering the Spatial Strategy maximises growth in Plymouth by giving priority to the identified growth areas of the City Centre/Waterfront, Derriford/Northern Corridor as well as the Eastern Corridor.</p> <p>In the Thriving Towns and Villages growth is focused in the six main towns of Dartmouth, Ivybridge, Kingsbridge, Tavistock, Totnes and Okehampton which reinforces the role of these towns supporting a wider rural hinterland. Outside of these key areas growth is supported in line with the hierarchy of settlements set out in TTV1 (Main towns, Smaller Towns and Villages, Sustainable Villages and Smaller Villages).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Key Strategic Policies for the Spatial Strategy include:</p> <ul style="list-style-type: none"> SPT1 – Delivering sustainable development SPT2 – sustainable linked neighbourhoods and sustainable rural communities SPT3 – Provision of new homes SPT4 – Provision of employment space SPT5 -Provision for retail development SPT8 - Strategic connectivity SPT9 - Strategic Principles for transport planning and strategy SPT10 - Balanced transport strategy for growth and health and sustainable communities
66.	<p>Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.</p>	<p>NPPF Para 110</p>	<p>The hierarchy of settlements set out in the JLP has been supported by the Strategic Housing Land Availability Assessment and an assessment of settlements in the TTV area which considered access of public transport, services, facilities and employment opportunities.</p> <p>Key policies in the JLP include:</p> <ul style="list-style-type: none"> SPT1 – Delivering sustainable development SPT2 – sustainable linked neighbourhoods and sustainable rural communities SPT9 Strategic Principles for transport planning and strategy

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>SPT10 Balanced transport strategy for growth and health and sustainable communities PLY1 Enhancing Plymouth’s Strategic role TTV1 Prioritising growth through a hierarchy of sustainable settlements TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area</p>
67.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 110	Policies SPT8 (Strategic connectivity), SPT9 (Strategic Principles for transport planning and strategy) and SPT10 (Balanced transport strategy for growth and health and sustainable communities) collectively set out the strategic framework for the identification of key transport infrastructure. Where necessary road improvements and other key infrastructure has been identified within specific allocations and on the policies map.
68.	Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 110	<p>The JLP recognises the importance of active travel with key strategic policies clearly articulating the importance of the hierarchy of modes and seeking to develop an integrated approach to planning and transport measures which are delivered according to a hierarchy of modes.</p> <p>Key policies include: SPT8 Strategic connectivity SPT9 Strategic Principles for transport planning and strategy</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>SPT10 Balanced transport strategy for growth and health and sustainable communities DEV29 Specific provision relating to transport – to provide high quality safe and convenient facilities for walking, cycling, public transport...</p> <p>Through the PropTech 2 Innovation Fund we have developed a sustainability and accessibility mapping tool that will assist in identifying opportunities for further networks and links with our LCWIPS and will input into our work on design codes. This will ensure that walking and cycling networks are better designed and actively encourage involvement of highways and transport infrastructure providers in their development.</p>
69.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 110	<p>Policy SPT8 sets out the JLP’s approach to strategic connectivity. Policy SPT13 sets out the JLP’s approach to strategic infrastructure provision. Specific policies of the plan provide for large-scale transport facilities including:</p> <ul style="list-style-type: none"> PLY16 Plymouth Railway Station PLY37 City Centre / Waterfront transport improvements, including Plymouth coach station and ferry port PLY42 Plymouth Airport PLY57 Northern Corridor transport improvements, including Forder Valley Link Road

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			PLY57 Eastern Corridor transport improvements PLY62 Other city strategic transport improvements TTV16 Tavistock railway station
70.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 110	Although Policies SPT8 (Strategic connectivity) and PLY42 (Plymouth Airport) include safeguarding provisions for the Plymouth airport site for general aviation, these were linked to the five year review of the plan. However, as presented in the main body of the report, there is a case for extending the safeguarding period and this is consistent with the wider objectives of the JLP and in particular SO4.
71.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 113	The JLP does not identify specific lorry parking facilities, however its wider policies could potentially allow the LPAs to enable provision of this if a proposal for this type of development was forthcoming. The current adopted Local Transport Plans did not identify any need for additional overnight lorry parking facilities.
72.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users, the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance including the National Design	NPPF Para 114	Strategic Objective 1 – Delivering the Spatial Strategy sets out the key principles which need to be considered for meeting and distributing growth throughout the JLP area. This fully acknowledges the need for an integrated approach to growth which reduces the need to travel and places sustainable development at the heart of the JLP.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<p>Guide and the National Model Design Code; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</p>		<p>In delivering the spatial strategy, the strategic policies SPT1 to SPT14 set out the overarching approach to achieving sustainable development which enable the promotion of sustainable transport modes and ensures development maximises opportunities to improves access whilst minimising any significant impacts from development on key transport networks.</p> <p>In relation to Design, DEV20 sets out various provisions including the need to ensure that development contributes positively to the townscape and landscape including the layout, demands for movement and the enhancement of key gateway locations and routes in and out of Plymouth.</p> <p>DEV29 sets out the specific provisions relating to transport ensuring that development contributes positively to the achievement of a high quality, effective and safe transport system in the Plan Area. Development needs to promote sustainable transport choices and facilitate sustainable growth that respects the natural and historic environment.</p>
73.	<p>Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>	NPPF Para 115	<p>Policy DEV29 sets out specific provisions relating to transport planning. In Plymouth, DEV29.7 sets out that development proposals should, where appropriate, incorporate travel</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>planning. The adopted SPD sets out how travel plans will be assessed and specifically references NPPF paragraph 111 and the relevant PPG.</p> <p>In South Hams and West Devon , the Highway Authority is Devon County Council, and they provide advice on when a travel plan is needed. This is judged on a case by case basis.</p>
74.	<i>Communications</i>		
75.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 118	The provision of digital communications infrastructure is supported by Policy SPT8 Strategic Connectivity which seeks to build upon Plymouth and South West Devon's digital connectivity ensuring that growth and change reflects the need to create high quality and technologically advanced methods of communication for businesses and residents as well as a network of shared and open data, which enables strategic decision making and unlocks barriers to strategic connectivity with the rest of the world.
76.	<i>Making effective use of land</i>		
77.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 123	The JLP has been developed having detailed regard to the effective use of land to meet development requirements . At the heart of the plan SPT1 (Delivering Sustainable Development) sets out provisions for the effective use of land is made for development through optimising reuse of previously developed

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>sites, therefore reducing the need for greenfield development, protecting natural assets and creating opportunities for viable low carbon energy schemes.</p> <p>Where possible the JLP has identified regeneration and redevelopment opportunities and has optimised the use of brownfield land.</p> <p>In terms of improving the environment and living conditions, DEV1 Protecting health and amenity, DEV2 Air, Water, Soil, Noise and Light and DEV10 Delivering High Quality Housing provide specific policies which seeks to carefully considered the impact of development , with DEV10 specifically ensures new dwellings are of a sufficient size and meet Nationally prescribed Space Standards with sufficient external amenity space.</p>
78.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 123	JLP Policy SPT1 Delivering Sustainable Development sets out that the effective use of land is made for development through optimising reuse of previously developed sites, therefore reducing the need for greenfield development, protecting natural assets and creating opportunities for viable low carbon energy schemes.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
79.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 124	<p>The JLP seeks to achieve multiple benefits from development with a number of policies setting out specific clauses to deliver this:</p> <p>SPT1 Delivering Sustainable Development A sustainable environment where:</p> <ul style="list-style-type: none"> i. The effective use of land is made for development through optimising reuse of previously developed sites, therefore reducing the need for greenfield development, protecting natural assets and creating opportunities for viable low carbon energy schemes. ii. Overall gains in biodiversity are achieved by protecting and enhancing species, habitats and geological sites. <p>SPT2 Sustainable linked neighbourhoods and sustainable rural communities.</p> <p>DEV26 Protecting and enhancing biodiversity and geological conservation makes provision for BNG ahead of the mandatory 10% BNG required through the Environment Act.</p>
80.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 124	Strategic policies SPT1 (Delivering Sustainable Development) and SPT2 (Sustainable linked communities and sustainable rural

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			<p>communities) provide policy provision in terms of the effective use of land</p> <p>Policy SPT12 sets out the strategic approach to the natural environment. Clause 8 sets out the need to conserve and enhance a functional network of greenspace and geodiversity sites that meet the needs of communities and wildlife this recognises the importance of land for a number of functions.</p> <p>DEV26 Protecting and enhancing biodiversity and geological conservation.</p> <p>Dev 27 Green and play spaces</p> <p>DEV35 Managing Flood Risk and Water Quality Impacts</p>
81.	<p>Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.</p>	<p>NPPF Para 124</p>	<p>Policy SPT1 Delivering Sustainable Development sets out the key overarching strategy of using land effectively, stating clearly that ‘The effective use of land is made for development through optimising reuse of previously developed sites, therefore reducing the need for greenfield development, protecting natural assets and creating opportunities for viable low carbon energy schemes.</p> <p>This is at the heart of the spatial strategy which prioritises and allocates considerable previously developed land within the</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			Plymouth policy area and the main towns (see list in 76 below). Bringing forward these sites is often challenging, and delivery is carefully monitored through the Housing Position Statement.
82.	Promote and support the development of under-utilised land and buildings.	NPPF Para 124	As well as the provision in SPT1 requiring the effective use of land, various allocations exist within the plan which seek to regenerate land and buildings including: PLY16 Plymouth Railway Station PLY20 Managing and enhancing Plymouth's Waterfront PLY21 Supporting the visitor economy PLY25 Sugar House , Sutton Harbour PLY28 Land north of Cliff Road , The Hoe PLY31 Bath Street East PLY33 Oceansgate PLY33 Drakes Island PLY38 Derriford Commercial Centre TTV10 The Quayside TTV21 Baltic Wharf TTV24 8 Hatherleigh Market
83.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 124	The JLP can be considered generally supportive of this kind of use, and has a number of specific proposals promoting residential use above commercial property. Although there is

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			not specific development management policy within the JLP in relation to this recent changes to the permitted development rights allow for different types of development above residential homes and commercial premises to be built without permission. Existing policies that seek to maximise the use of land and support the vitality and viability of centres provide a flexible approach to encourage this.
84.	They should also allow mansard roof extensions on suitable properties where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard. Where there was a tradition of mansard construction locally at the time of the building’s construction, the extension should emulate it with respect to external appearance. A condition of simultaneous development should not be imposed on an application for multiple mansard extensions unless there is an exceptional justification	NPPF Para 124	The JLP does not contain a specific policy reference to mansard roof extensions. Applications for Mansard roof development could be determined using existing policies in the Plan including: DEV1 Protecting health and amenity DEV10 Delivering High Quality Housing DEV20 Place shaping and the quality of the built environment
85.	Reflect changes in the demand for land.	NPPF Para 126	The JLP contains policies which allow for flexibility, for example Policy SPT4 provides an oversupply of employment land to provide opportunities to respond to changes in economic circumstances and the demands of the market. SPT3 provides for more land supply than the requirement to ensure there is a choice of sites and to respond to changes in the market.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
86.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 128	<p>A variety of policies cover this issue in the JLP. The key policies include:</p> <ul style="list-style-type: none"> SPT1 Sustainable Development SPT2 Sustainable linked neighbourhoods and sustainable rural communities DEV1 Protecting health and amenity <p>Together these policies ensure that the following characteristics are achieved</p> <ul style="list-style-type: none"> • Sufficient number and demographic mix of people to create a sense of belonging, vitality and safety • A mix of land uses that work well together • Good accessibility • Good digital connectivity • Character and a sense of place • Social inclusion <p>DEV7-10 set out the detail of housing need and delivering high quality housing. This is supported by the SPD that provides more detailed information on mix, type, needs and specialist accommodation.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
87.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards. Area-based character assessments, design guides, design codes and masterplans are appropriate tools to use to help to ensure land is used efficiently while also creating beautiful and sustainable places.	NPPF Para 129	The JLP allocates enough sites to meet its housing need in full. This is set out in policy SPT3 and is supported by DEV7-9 meeting local housing need. DEV10 Delivering high quality housing DEV20 Place shaping and design Site allocations set out in PLY and TTV policies identify housing numbers within them to secure appropriate levels of housing within developments. Having proper regard to the pattern of local development and the wider development context and surroundings in terms of style, local distinctiveness, siting, layout, orientation, visual impact, views, scale, massing, height, density, materials, detailing, historic value, landscaping and character, and the demands for movement to and from nearby locations.
88.	<i>Design</i>		
89.	Set out a clear design vision and provide maximum clarity about design expectations through the preparation of design codes or guides consistent with the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design codes and guides can either form part of a plan or be supplementary planning documents.	NPPF Para 132, 133 & 134	The JLP and in particular policies SPT1 and SPT2 embed high standards of design, local distinctiveness and sense of place as a key overarching strategic policy. Many other policies in the plan also ensure that design is inclusive, high quality and sustainable. Policy DEV20 Place shaping and the quality of the built environment sets out a clear set of principles which development should follow. Development proposals will be required to meet good standards of design, contributing

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>positively to both townscape and landscape, and protect and improve the quality of the built environment.</p> <p>The Councils have also adopted an SPD which includes considerable design detail and advice and is used to support the policies.</p>
90.	<p>Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.</p>	<p>NPPF Para 135</p>	<p>The JLP has policies which set out design outcomes and this is amplified within the SPD.</p> <p>In particular Policy DEV20 (Place shaping and the quality of the built environment) sets out that:</p> <p>Having proper regard to the pattern of local development and the wider development context and surroundings in terms of style, local distinctiveness, siting, layout, orientation, visual impact, views, scale, massing, height, density, materials, detailing, historic value, landscaping and character, and the demands for movement to and from nearby locations.</p> <p>Achieving a good quality sense of place and character through good utilisation of existing assets such as quality buildings, heritage assets, trees and landscape features and attention to the design details of the scheme.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			Masterplanning approaches will be strongly encouraged for major schemes and are included as requirements in several site allocation policies.
91.	Ensure new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.	NPPF Para 136	<p>Policy DEV28 protects trees, woodlands and hedgerows, require net gain and appropriate mitigation. Trees are crucial in delivering a wide range of adaptation benefits and for helping to maintain our health and wellbeing; for example, spending time around trees and looking at trees can reduce stress, lower blood pressure, and improve mood.</p> <p>Trees play a vital role in addressing the climate emergency through their storage of carbon, reducing run off, increasing drainage, shade and improving air quality, as well as addressing local climatic effects and reducing energy demand. Trees also support a huge amount of habitats and species. Tree planting is a key component of the government plans for net zero. Existing trees, especially mature trees that have significant value should be protected and development should provide enhanced tree cover with the right new trees in the right places.</p> <p>The Plymouth and South West Devon Climate Emergency Planning Statement was adopted in November 2022. This sets out requirements to protect and enhance tree cover as well as</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			other measures which seek to address the impacts of climate change.
92.	Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. The primary means of doing so should be through the preparation and use of local design codes, in line with the National Model Design Code. For assessing proposals there is a range of tools including workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments.	NPPF 138	The JLP and in particular policies SPT1 and SPT2 embed high standards of design, local distinctiveness and sense of place as a key overarching strategic policy. Many other policies in the plan also ensure that design is inclusive, high quality and sustainable. Policy DEV20 (Place shaping and the quality of the built environment) sets out a clear set of principles which development should follow. Development proposals will be required to meet good standards of design, contributing positively to both townscape and landscape, and protect and improve the quality of the built environment. The Councils have also adopted an SPD which includes considerable design detail and advice and is used to support the policies.
93.	<i>Green Belt</i>		
94.	Ensure proposals for new Green Belts demonstrate why development management policies would not be adequate, any major changes in circumstances to warrant the creation of a new Green Belt, the consequences for sustainable development, the need for Green Belt to support adjoining	NPPF Para 142	Not applicable

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	areas, and how new Green Belt would meet other objectives of the Framework.		
95.	Establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 145	Not applicable
96.	Give first consideration to land which has been previously developed and/or is well-served by public transport, including increasing density within town and cities centres. Set out the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 146 & 147	Not applicable
97.	Where Green Belt boundaries are being defined, they should be clearly outlined and be consistent with the plan's strategy for meeting identified requirements for sustainable development.	NPPF Para 148	Not applicable
98.	<i>Climate change, flooding and coastal change</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
99.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 158	<p>The JLP contains a carbon reduction target written into policy. Various JLP policies set out the proactive approach in SPT1 and then more specifically in the following: DEV32 Delivering low carbon development DEV35 Managing flood risk and water quality impacts DEV26 protecting and enhancing biodiversity and geological conservation DEV28 Trees, woodlands and hedgerows.</p> <p>The Plymouth and South West Devon Climate Emergency Planning Statement addresses these key adaptation issues relating to overheating, flooding and drainage, soil and greenspace, trees, biodiversity and habitat improvement.</p>
100.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 158	<p>The JLP contains policy which support appropriate measures to ensure future resilience to climate change impacts including: DEV32 Delivering low carbon development DEV35 Managing flood risk and water quality impacts</p> <p>The JLP was supported by a Strategic Flood Risk Assessment and other evidence including: Water Resource Management Plans, Groundwater Source Protection Zones, Catchment Management Plans and Shoreline Management Plans.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>This ensured that development proposals planned and mitigated for climate impacts where appropriate.</p> <p>The JLP contains many measures which collectively address some of the challenges of climate change.</p> <p>Examples of mitigating climate change by reducing emissions:</p> <ul style="list-style-type: none"> •Reducing the need to travel and providing for sustainable transport •Providing opportunities for renewable and low carbon energy technologies •Providing opportunities for decentralised energy and heating •Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design <p>Examples of adapting to a changing climate:</p> <ul style="list-style-type: none"> •Considering future climate risks when allocating development sites to ensure risks are understood over the development’s lifetime •Considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development •Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> •Promoting adaptation approaches in design policies for developments and the public realm <p>The Plymouth and South West Devon Climate Emergency Planning Statement adopted in November 2022 addresses important mitigation and adaptation issues and sets new requirements to embed future resilience.</p>
101.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 160	The JLP and in particular policies DEV33 Renewable and low carbon energy (including heat) and DEV34 Community Energy provide a positive policy approach to the delivery of renewable and low carbon energy.
102.	Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.	NPPF Para 165 & 166	<p>Policy DEV35 Managing Flood Risk and Water Quality Impacts sets out the need for sites not allocated within the JLP to follow a sequential approach where the proposal is located in areas which are at risk from flooding.</p> <p>The sites allocated in the JLP were put through a sequential test.</p>
103.	Steer new development to those areas with the lowest risk of flooding from any source. If this is not possible, the exception	NPPF Para 168, 169,	Policy DEV35 Managing Flood Risk and Water Quality Impacts sets out policy provisions in relation to the exceptions test.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	test may have to be applied, informed by the potential vulnerability of the site and of the development proposed. Where this is the case, sites need to demonstrate that the development would provide wider sustainability benefits outweighing the flood risk and that the development would be safe for its lifetime without increasing flood risk elsewhere (and where possible will reduce flood risk overall).	170 and NPPF Annex 3	The development sites within the JLP were subject to the sequential test and where required the exceptions test.
104.	Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 177	JLP Policies DEV35 Managing Flood Risk and Water Quality Impacts and DEV36 Coastal Change Management Areas collectively work to ensure that development avoid vulnerable areas and protect coastlines.
105.	<i>Natural environment</i>		
106.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 180	The JLP provides a comprehensive approach to the natural environment. At a strategic level Policy SPT12 sets out the strategic approach to the natural environment and various Development Management policies provide further detail including: DEV2 - Air, Water, Soil, Noise, Land and Light DEV23 Landscape Character DEV24 Undeveloped Coast and Heritage Coast DEV25 Nationally protected landscapes

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>DEV26 Protecting and enhancing biodiversity and geological conservation</p> <p>The policies in the JLP are based on up to date information about the natural environment and other characteristics of the areas including AONB, landscape character assessments and biodiversity.</p>
107.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 181	Policy SP12 (Strategic approach to the natural environment) sets out the hierarchy of sites. In support of this policy, DEV25 (Nationally protected landscapes) and DEV26 (Protecting and enhancing biodiversity and geological conservation) provide further detail about maintaining and enhancing networks of habitats and green infrastructure.
108.	Great weight should be given to National Parks, the Broads and the Areas of Outstanding Natural Beauty. The scale and extent of development within these designated areas should be limited. Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.	NPPF Para 182	<p>Policies SPT12 and DEV25 set out a policy approach for the AONBs and land adjacent to the Dartmoor National Park along with other important landscapes in the JLP Area.</p> <p>Other policies in the Plan also support the natural environment including :</p> <p>DEV23 Landscape Character DEV24 Undeveloped Coast and Heritage Coast</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			DEV26 Protecting and enhancing biodiversity and geological conservation DEV27 Green and Play Spaces DEV28 Trees, Woodlands and hedgerows
109.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 184	Policy DEV24 (Undeveloped Coast and Heritage Coast) sets out a policy for development proposals which could have a detrimental impact on the coast
110.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 185	Policies SP12 (Strategic approach to the natural environment) and DEV26 (Protecting and enhancing biodiversity and geological conservation) along with the policies map set out the key components of the environments.
111.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 189 & 191	Policy DEV2 (Air, Water, Soil, Noise, Land and Light) ensures that development proposals will not cause unacceptable on or off-site risk or harm to human health, the natural environment or living conditions.
112.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and	NPPF Para 192	Policy DEV2 (Air, Water, Soil, Noise, Land and Light) aims to minimise negative air quality impacts of development proposals. Development will be refused where it is going to have a significant impact on an AQMA, create a new AQMA or result in

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	Clean Air Zones, and the cumulative impacts from individual sites in local areas.		<p>an adverse effect on a European Site. There are AQMAs in Plymouth and South Hams and these are monitoring in the AMR. Air quality needs to be assessed through SA SEA and will therefore need baseline evidence. Drawing on the review of air quality carried out for the local air quality management regime, the Plan may need to consider:</p> <ul style="list-style-type: none"> • what are the observed trends shown by recent air quality monitoring data and what would happen to these trends in light of proposed development and / or allocations. • the impact of point sources of air pollution (pollution that originates from one place). • the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments, including their implications for vehicle emissions. • ways in which new development could be made appropriate in locations where air quality is or is likely to be a concern, and not give rise to unacceptable risks from pollution. This could, for example, entail identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable; and

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> opportunities to improve air quality or mitigate impacts, such as through traffic and travel management and green infrastructure provision and enhancement..
113.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 193	At a strategic level Policies SPT2 (Sustainable linked neighbourhoods and sustainable rural communities) sets out an approach to ensure that new development is integrated well with existing businesses and community facilities. This policy aims to achieve the creation of well connected neighbourhoods and communities. Further detail is provided in DEV20 (Place shaping and the quality of the built environment) and also DEV18 which seeks to protect local shops and services to ensure local community services are maintained.
114.	<i>Historic Environment</i>		
115.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 196	Policy SPT11 sets out the strategic approach to the historic environment with DEV21 (Development affecting the historic environment) providing further detail through a positive strategy which fully recognises the importance of the historic environment. It ensures that the significance, character, setting and local distinctiveness of heritage assets is carefully considered in development proposals.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			Alongside this DEV22 provides specific policy provisions for the Cornwall and West Devon Mining Landscape World Heritage Site.
116.	<i>Minerals</i>		
117.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 216	<p>Policy PLY5 Sustainable Use of Mineral Resources sets out the policy position within the city boundary.</p> <p>The adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon</p>
118.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 216	<p>Policy PLY5 Sustainable Use of Mineral Resources sets out the policy position within the city boundary. The starting principle is to prioritise the use of recycled and secondary aggregates.</p> <p>The adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon</p>
119.	Safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas.	NPPF Para 216	<p>Policy PLY5 Sustainable Use of Mineral Resources, sets out policy to enable the identification of mineral safeguarding areas.</p> <p>Policy PLY55 Hazeldene Quarry Minerals Safeguarding Area and buffer zone sets out an area to safeguard land for the extraction of limestone aggregate.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon
120.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 216	This is not fully relevant to the JLP. Policy PLY5 Sustainable Use of Mineral Resources provides policy guidance for minerals within the city boundary and the adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon.
121.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 216	This is not fully relevant to the JLP. Policy PLY5 Sustainable Use of Mineral Resources provides policy guidance for minerals within the city boundary and the adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon.
122.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 216	JLP Policy PLY5 Sustainable Use of Mineral Resources provides policy to ensure that proposed operations do not give rise to unacceptable loss of amenity or unacceptable impacts on the environment. Alongside this , the adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
123.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 216	Policy PLY5 Sustainable Use of Mineral Resources provides policy guidance for minerals within the city boundary and the adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon. Other policies in the plan such as DEV2 (Air, Water, Soil, Noise, Land and Light) would allow these circumstances to be assessed if required.
124.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 216	Policy PLY5 Sustainable Use of Mineral Resources sets out policy requirements to ensure high quality restoration and aftercare of mineral sites within the city boundary. Alongside this, the adopted Devon Minerals Plan 2011-2031 provides minerals policies covering South Hams and West Devon.