

The Plymouth and South West Devon Joint Local Plan (JLP) (<https://www.plymouth.gov.uk/sites/default/files/PlymouthSouthWestDevonJointLocalPlanSubmission.pdf>) is a ground breaking **spatial strategy** for south west Devon. It sets the development framework for the city of Plymouth, England's 16th largest city, six thriving market towns (Okehampton, Tavistock, Ivybridge, Totnes, Kingsbridge and Dartmouth) and a wealth of sustainable villages many of which are located within West Devon, one of the most sparsely populated districts in England (323rd out of 326), for the next **20 years**. The JLP covers an area of 2, 126 sq km, spans three planning authorities, three highway authorities, two Areas of Outstanding Natural Beauty, a World Heritage Site and adjoins Dartmoor National Park. The JLP was submitted in July 2017, has passed successfully through the hearings stage of Examination, and we anticipate consulting on a limited set on Main Modifications in Autumn 2018.

All of the plan documents are available on the Examination webpages (www.plymouth.gov.uk/plymouthandsouthwestdevonjointlocalplan)

The Plymouth and South West Devon Joint Local Plan represents a significant step forward in plan making best practice:

- It is a Joint Local Plan covering the Local Planning Authority areas of Plymouth City Council, West Devon Borough Council and South Hams District Council, which means that it represents **successful collaboration** between two rural authorities and a major city authority. It is a **single local plan**, containing strategic policies setting out requirements for housing, employment land and retail, as well as local policies for determining applications and a full set of site allocations. When adopted it will be the **13th joint local plan in England**, and one of the only joint plans to be a 'single plan, including all of the strategic and local policies relevant to the plan area.

- The need for **26,700** new homes, **6,600** new affordable homes, and for employment floorspace providing for the creation of **13,200** new jobs is met in full by allocations in the plan (one of only 40% of Local Plans that fully meet their OAN according to MHCLG), so that the whole strategy for meeting needs and delivering sites can be clearly and easily understood.
- The Joint local Plan arose from the **Duty to Cooperate** discussions which took place in 2015 as part of the strategic planning processes undertaken by the three authorities. Planners led the discussions and championed the concept of a Joint Local Plan with senior officers and lead Members, eventually securing agreement to fully collaborate on the plan.
- The Joint Local Plan has its roots in the work on the award winning Plymouth Plan, and the similarly ambitious West Devon and South Hams Our Plans, and is therefore **based on innovative and ground breaking consultation methods** which sought to include all groups in society in the plan making process. Once adopted the Joint Local Plan will be integrated back into the Plymouth Plan using the interactive plan website.



PLANNING CONTENT AND SKILLS

There are many areas in which the JLP is notable. The assessment of housing need reflected acknowledged best practice alongside elements of the emerging standard methodology, to arrive at a need figure which did not shy away from affordability issues in South Hams and West Devon, and the economic growth agenda being pursued in Plymouth. The resulting housing need figure **exceeds** that derived by the standard methodology, and is met IN FULL in the JLP. The housing need did not come under significant challenge during the Examination, and we are very confident that it will be supported by the Inspectors.

The JLP proposed a spatial strategy which meets needs through a **sustainable distribution** of development which respects the sustainability characteristics of the plan area. It uses two Policy Areas which are based on our spatial understanding of the plan area, rather than local authority boundaries, and uses these policy areas to ensure that the spatial strategy delivers the needs of the growing city of Plymouth, and the complementary but different needs of the Thriving Towns and Villages of South Hams and West Devon – making sure that Plymouth’s needs are accommodated in the Plymouth Policy Area.

Through these and other policy innovations, the JLP demonstrates the real advantages of **planning jointly** across local authority boundaries to meet needs through the use of a spatial strategy not shackled to local authority boundaries. The complexities of attempting to solve **complicated cross boundary issues** have been resolved by the ability to plan in a strategic and comprehensive way which responds to the spatial and sustainable characteristics of the plan area rather than LPA boundaries, and we believe this has led to a more straightforward and consistent strategy which can be understood by developers and communities alike, and which reflects the aspirations of local communities.

Such an approach has been possible because of the way in which we approached the production of the JLP. A **Collaboration Agreement** set out a flexible, light touch set of structures to make joint working as easy as possible. **Effective leadership**, both by officers and elected members ensured the appropriate level of political involvement, steer, and support at each step of the process.

- The Joint Local Plan has been prepared on an extremely fast timetable, showing that it is possible to produce complex local plans in a **timely and rapid manner**. Moving from the initial decision to collaborate on the production of a joint local plan to the submission of that plan took slightly less than 18 months. On our current timeline, we expect to adopt the joint local plan around three years from the decision to prepare it.

- This timetable has been achieved through the effective collaboration between the three authorities, allowing resources to be pooled, innovative ways of working with key partners, such as the Transport Strategy Working Group, to be developed, and the creation of **strong governance structures** embedding key Members in the plan making process. It has also been achieved through the development of approaches to housing need assessments, and to the creation of housing trajectories and 5 year land supply calculations which met with little serious challenge at Examination.

- The Joint Local Plan is focused on delivery of the strategy and of the allocations it contains. It builds upon Plymouth’s award winning **Plan for Homes** which is successfully delivering **1,000** homes a year in the city. The JLP Authorities are committed to the ongoing delivery of the plan, and have set out detailed arrangements to ensure that the plan will be the driver for monitoring and managing delivery in the area up to first review and beyond. These arrangements include setting up a new Joint Local Planning team funded by the three authorities, and ongoing Member governance arrangements to ensure **consistent decision making**, guidance and democratic accountability.

We believe that the Plymouth and South West Devon Joint Local Plan sets a new benchmark for excellence in plan making, and that the techniques and skills we have developed are exemplary, setting examples that other LPAs will find useful in navigating the complex local plan process. The plan is delivering the Government’s agenda of **boosting the supply of housing**, and has done so through a proactive use of the Duty to Cooperate to ensure that the plan covers the most appropriate spatial area – again promoting the Government’s encouragement of joint planning. For these reasons, we think the Plymouth South West Devon Joint Local Plan should be considered for the RTPI SW Award for Excellence in Spatial Planning.

“10 stages of consultation over 6 years (Plymouth Plan Conversation began in 2013) (7 consultation phases before the JLP, 3 consultation phases on the JLP)”

A Joint Local Plan Steering Group was established which contained experienced, senior Councillors from each Council, with one chair and equal voting rights across all three authorities. This group was the **engine room of the JLP**, meeting regularly with senior officers to guide the process, and provide informal advice and feedback on issues as they arose. This group, whilst not having any delegated responsibility, has been a fundamental aspect of the plan's success. This Member group was matched to a core group of planning professionals from all three LPAs, and from a range of specialisms (including natural infrastructure, transport, housing and infrastructure) who drove and co-ordinated the preparation of the plan. This team have had to work **creatively and effectively** with a number of other colleagues, partners and stakeholders who have contributed to the plan. This partnership working has been key to the success of the plan. Without such flexible, collaborative and highly skilled governance structures the JLP could not have been produced with such a strong spatial strategy, or on such an ambitious timescale.

It is the belief of those who have prepared the plan that by incorporating in the plan both the overall spatial strategy and site allocations, we can clearly demonstrate an **ability to deliver** what we are setting out to achieve.

SUSTAINABLE DEVELOPMENT

The JLP continues to place the achievement of sustainable development at the heart of the plan making process. The Vision and Strategic Objectives of the JLP clearly set out a **sustainable vision** for the plan area, articulated in the very first policies of the plan. These policies set out a **golden thread** running through the JLP, guiding the location of development using sustainability indicators and the principles of sustainable linked communities, and of rural sustainable communities.

Delivery of sustainable development is then inherent in every policy, from the spatial strategy, to the identification of **two clear policy areas**, the Plymouth Policy Area and the Thriving Towns and Villages Policy Area. These provide the basis for the spatial strategy and recognise the different sustainability characteristics of the area. A suite of policies for **guiding development management decisions** is also predicated on sustainable development, with necessary and appropriate **mitigation measures** identified to ensure negative impacts are avoided.

The JLP strategy clearly locates over **70% of the housing** to be provided over the plan period in the Plymouth Policy Area – the most sustainable location in the plan area. Moreover, the **distribution strategy** then looks to reinforce the sustainability of the main towns in the Thriving Towns and Villages Policy Area, while protecting the sensitive and high quality environments which form the setting of the city of Plymouth. This distribution strategy was developed based on sustainability principles which were set out and tested in the Distribution Topic Paper (www.plymouth.gov.uk/sites/default/files/HousingDistributionTopicPaper.pdf) and it is notable that the spatial strategy of the JLP was **formulated and tested** before the distribution of housing across the plan area was finalised. This meant that the distribution of housing followed a strategy that arose from an understanding of the **sustainability characteristics** of the plan area, and which aimed to promote sustainable development across the plan area – rather than being informed simply by where housing sites were available or by the individual LPA assessment of needs.

One of the key processes that has helped balance the social, economic and environmental objectives of the plan was the positive use of the **SA/SEA**. The SA/SEA process also incorporated the **HIA** and **EqIA** as an integrated approach to considering the likely impacts of the plan. This resulted in equality being embedded within the assessment process and has allowed the LPAs to ensure that any potential risks to protected characteristics are identified and that policies can be adjusted to ensure that the policy promotes equality. Alongside this was the **HRA** assessment and combined, these 'appropriate assessments' have ensured that all aspects of the plan have been considered for their sustainability and equality characteristics.

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COMMUNITY ENGAGEMENT AND INCLUSIVE PLANNING

Effective engagement was at the heart of the preparation of the JLP and required an **in-depth** understanding of the distinct communities and hugely contrasting settlements and landscapes that are contained within the plan area. This diversity demanded an **engagement strategy** that melded innovation with tradition and relied upon skilled staff who recognised the benefits of using social media, knew the value of social skills and understood the essential role planning plays in **shaping local communities**.

“Over 8,300 comments to write the JLP... and an additional 2,482 comments received at Regulation 19”

Prior to the JLP process, seven stages of consultation had already been undertaken across the three LPAs on their own individual plans. Ensuring none of this work was lost, each comment received during these stages was taken forward and an additional three phases of engagement on the JLP itself were undertaken. Altogether over **8,300 comments** were used to write the JLP and an additional **2,482 comments** were received at Regulation 19 stage.

For each consultation phase on the JLP there was development in the **branding** showing a continued journey of integration. During the first consultation, individual consultation documents and promotional material was produced; during the second shared documents were consulted on but there was still variation in the branding across the authorities and in the final Regulation 19 consultation there was one document produced with one engagement strategy and **one set of promotional materials** across the authorities.

The need to identify and engage with new audiences influenced the types of engagement tools that were utilised throughout the production of the JLP. Engagement software was used to send targeted subject emails and newsletters to customers allowing material to be specific and relevant to the recipient. Across all consultations on the JLP, some **28,000 targeted electronic communications** were sent out to residents, businesses and key stakeholders. In addition, **over 11,000 letters, leaflets and maps** were sent to recipients who had expressed a preference for hard copies over digital information, or who had limited internet access.

The breadth of engagement tools used reflects the wide range of **community characteristics** that can be found in the plan area, from the bustle of central Plymouth to the tranquillity of the Tamar Valley.

The **richness of community networks** in Plymouth led to an innovation which saw the LPA working closely with Plymouth Octopus Project (POP), a representative group of the Voluntary and the Community Sector (VCSE). This **partnership** allowed engagement with traditionally hard-to-reach groups and saw community groups **trained and empowered** to run their own engagement events independent of the council. Tools and materials given to the groups included an **A0 map** showing all the sites proposed for development and protection in the Plymouth Policy Area with an **accompanying booklet** showing each sites' individual constraints.

A streamlined **site-assessment 'worksheet'** was also produced showing the process the planning officers went through to assess each site and allowing anyone in the community to "become a planner" and do the site assessment themselves.

In the more rural areas a more traditional approach formed the basis of engagement which utilised not only parish councils but also neighbourhood plan groups as **conduits for the core messages** of the JLP. These were accompanied by a series of public events that took in agricultural shows, farmers markets and community events across an expansive geographical area.

At each stage of consultation a summary report was written, ensuring **feedback was given at each stage** of the plan making process. The second phase of consultation on the JLP was also an additional phase and introduced as an opportunity to respond to previous comments received and to present the emerging housing distribution strategy. At Regulation 19 stage a Statement of Consultation was written which included **a response from officers** to each comment received.

The JLP has been prepared for the communities of the people who live, work and enjoy the area. Its primary purpose is as the statutory development plan for the three areas but it also establishes an **over-arching strategic framework** for sustainable growth and the management of change.

The extensive community engagement that has been undertaken by each Council has ensured that **all members of the community** have had a chance to engage in the process through a variety of different means. For each consultation, the traditional engagement tools were used in addition to new and innovative techniques to engage a wider audience. The LPAs worked more closely with our neighbourhood planning groups and the voluntary and community sector than ever before and there was continual development of the **Interactive JLP** (www.plymswdevonplan.co.uk) with an emphasis on user experience. Feedback at each stage of development on the use of the Interactive JLP ensured the website was intuitive, in plain-English and navigation to the area of the plan most relevant to an individual was easy. In the future the ambition is to further develop the use of the Interactive JLP with **increased mapping functionality** and incorporation of the JLP monitoring.

“28,000 targeted electronic communications were sent out to residents, businesses and key stakeholders (JLP)”

OUTCOMES

The JLP provides **certainty, clarity and direction** for those living, working and enjoying the area. It sets out proposals for growth, a suite of policies for development management decision making, and a **clear framework for communities** to take control of the growth of their areas through the preparation of Neighbourhood Plans.

- The policies within the Plan are balanced between the objectives and benefits of growth, whilst recognising the importance that access to green space provides for the **health and well-being** of our community. The JLP sets out a comprehensive set of greenspace policies for the city of Plymouth, ensuring that development is matched with the creation of high quality environments.
- The Councils are also continuing to develop and enhance the interactive plan, making it easier for people to access the parts of the plan that are **relevant to them**, ensuring it is usable and in plain English.
- As a result of extensive collaboration and engagement with stakeholders, Duty to Co-operate partners and the local community, there is a **strong sense of ownership** to the plan and its vision and aims. Many amendments through the plan making stages have been made as a result of consultation and engagement, including the removal of sites due to the special environmental qualities, or strengthening policies to **provide more protection** for the historic environment and heritage assets.

GOOD PRACTICE

In producing the JLP and justifying the strategy and policies through Examination, we have developed several techniques which we believe show best practice in plan making:

- Our approach to proving housing supply is based upon a **thorough understanding** of the housing trajectories for whole plan area, and the two policy areas. These trajectories are based upon a thorough, detailed and forensic understanding of the delivery profiles of every site making up the supply of housing over the plan period from 2014 to 2034.

From this core understanding we can **extract data** to demonstrate 5 year land supplies and show how we meet the new Housing Delivery Test with robust and consistent output. This approach led to a realistic assessment of housing delivery, which went **virtually unchallenged** at Examination and has left us confident that our evidence and approach will be supported by the inspectors.

- The JLP is **not a plan that will 'sit on a shelf'** once it has been adopted. It has been written to ensure that it will drive the delivery of new homes, jobs and quality places across the three LPAs. Monitoring and our proactive approach to delivery, building on the measures in the Plan for Homes, will be used to guide delivery through a governance process set out in detail in the Governance Topic Paper (www.plymouth.gov.uk/sites/default/files/RevisedGovernanceTopicPaper.pdf). This process strengthens the structures set up to guide the JLP through the plan making process, ensuring that the **drive and ambition** which led to the decision to embark on a joint plan continues throughout the delivery of the plan.
- The JLP has been prepared to a very **ambitious timetable**. The decision to produce a joint plan was taken by the three LPAs in February/March 2016. Exactly a year later, the JLP was approved by the Councils for Publication and subsequent submission, which took place in July 2017 slightly **less than 18 months** after the decision to produce a joint plan. If the JLP is adopted on the current timetable, the whole process from decision to produce a joint plan, through to adoption will have taken just 3 years, showing that it is possible to produce a plan following the broad timescales set out by LPEG.
- The JLP shows that it is possible to **positively and proactively** use the Duty to Cooperate to produce collaborative, innovative plans. The JLP Councils saw the requirements of the Duty to Cooperate as an opportunity to develop a joint plan which could address the needs of the HMA in a **clearer and simpler manner** than would have been the case if they had continued with separate local plans. We consider this to represent best practice in how to use the Duty to Cooperate – as set out in our **Duty to Cooperate Statement** (www.plymouth.gov.uk/sites/default/files/DutyToCooperateStatement.pdf).

“Over 11,000 letters, leaflets and maps were sent to recipients who had expressed a preference for hard copies over digital information, or who had limited internet access. (JLP)”

- A robust infrastructure planning and delivery process, which includes a comprehensive **Infrastructure Needs Assessment**, identified all the infrastructure measures required to deliver the JLP, including the following key features:
 - An evidence base demonstrating a thorough understanding of the infrastructure needed to support delivery,
 - Setting up an **Infrastructure and Investment Forum**, enabling all key stakeholders to work together to prioritise the delivery and funding of critical infrastructure projects,
 - A **proactive approach** to coordinated delivery of housing and infrastructure to ensure that Plan objectives can be achieved on time,
 - The establishment of **clear links** between the infrastructure planning process and the Councils capital programmes and S106 and CIL, to ensure that potential developer contributions can be identified at the earliest possible point in the development process and funding is available to **support priority projects** at the right time,
 - An **investment model** which identifies all the sources of funding that can be applied to each of the key infrastructure projects, particularly over the first five years of the Plan Period.
- Setting up a **Transport Strategy Working Group (TSWG)** - a multi-disciplinary group of planning professionals from across the three highway and planning authorities – and wider regional partners- which was formed in order to jointly **investigate, understand and resolve** the transport challenges posed by a Plan of this complexity. As a result of the work of the TSWG, there was no significant objection to the JLP transport strategy and policy measures, and all transport evidence was **agreed and supported** by all the highways authorities and Highways England.

SOCIAL BENEFIT

The JLP aims to provide **a better quality of life for all** communities within the Plan Area. The Plan sets out, through the Vision and Spatial Strategy a picture of a vibrant waterfront city, and thriving towns and villages which builds on extensive community engagement and partnership working.

Taken together, these two key principles paint a picture of a major city with an **ambitious programme** of growth and regeneration sitting within an extensive rural area, full of opportunity, high quality landscapes and history, with a wide diversity of communities and a broad range of urban and rural issues which need to be considered and addressed.

The Vision in the JLP aspires to enhance the **mutually supportive relationship** between urban and rural areas, building on the strengths and characteristics of the local area. The city is recognised as being the major service centre with a broad range of services, facilities and recreational opportunities and in complementary fashion the towns and villages in the rural hinterlands have a stronger focus on **self-containment, quality of life** and more limited services and facilities. When taken together and viewed as a whole, as the JLP sets out to do, it is clear that this represents a strategy that is for the benefit of all where a range of services, facilities, places to live, work and enjoy are available to meet the needs of our broad and diverse community, **without prejudice**.

The JLP demonstrates how the Vision will be turned into reality through **twelve key strategic objectives**, each of which is related to a series of policies set out within the plan. The objectives have identified the key issues which the JLP needs to address and this in turn will have significant benefits for all our communities including those who may be more disadvantaged than others.

Particularly in the TTV area but not exclusively, neighbourhood planning and the opportunity for **bottom-up planning** has received significant interest with a number of local communities wishing to take a lead role in shaping the future growth and development of their area. The Councils have recognised this by explicitly setting out the relationship between neighbourhood plans and the JLP and how they relate to the policies in the plan to set a **framework for the empowerment of our communities**.

