

Kirstie Aldridge  
Clerk to Brixton Parish Council

BY EMAIL ONLY

15/01/ 2017

Dear Kirstie

**South Hams District Council response to the draft  
Brixton Neighbourhood Plan**

Thank you for sending the pre-submission Brixton Neighbourhood Plan (Regulation 14)\* to the Local Planning Authority (LPA) for comments. This will be referred to as the Draft Brixton Neighbourhood Plan (the NP) in this document.

The LPA fully supports the initiative to produce a neighbourhood plan and recognises that much work has gone into the development of the NP with extensive community involvement. The LPA commends the Brixton Neighbourhood Plan Group for all the hard work already put into the NP.

These comments have been provided to assist the Neighbourhood Planning Group in producing a Draft Neighbourhood Plan for submission to the LPA at Regulation 15\*. The response is based on the information provided and available at the time of reviewing the NP, which includes the pre-submission draft Brixton Neighbourhood Plan (Nov 2017) and appendices available on the website.

A number of suggestions are made below for further consideration prior to submission at Regulation 15, to help ensure the NP is successful at examination and contributes to a strong planning policy framework for the Brixton Neighbourhood Area.

\*Neighbourhood Planning (General) Regulations 2012

Key comments on the overall NP are:

- 1) The NP is on the whole well considered and well drafted and, with some minor amendments, is likely to help meet the stated Vision and Objectives for the Neighbourhood Area.
- 2) **Conformity with the Development Plan and meeting the Basic Conditions.** As your Basic Conditions Statement makes clear, two of the 'basic conditions' neighbourhood plans must meet is to have regard to the National Planning Policy Framework (NPPF) and to be in conformity with the strategic policies of the Local Development Plan that is extant at the time of the examination of the NP. For South Hams, this is currently the 2006 Core Strategy except where this is out of date and the NPPF takes precedence. However, it is likely that emerging policy will be adopted by the time of the NP examination: The Plymouth and South West Devon Joint Local Plan (JLP) is currently being examined and is expected to be adopted in 2018. These comments therefore assume that the JLP is the relevant Local Development Plan for the Brixton NP. If this is the case, all references to the Core Strategy should be removed from the NP and from the Basic Conditions Statement. A list of strategic Development Plan policies is included as an appendix to this letter.
- 3) **Overall development strategy:** It is recognised that the parish of Brixton has seen major recent and ongoing development, and also that there limitations on development within the neighbourhood area due to the location on the edge of the AONB. However, the NPPF does strongly encourage local planning policy to have a positive attitude towards development wherever possible. In addition, JLP policy TTV30 identifies Brixton as a 'sustainable village' where development for 10 dwellings might be delivered through a neighbourhood plan over the JLP plan period, notwithstanding any development that has already taken place or that has already been granted permission.
- 4) **Affordable Housing.** It is not made clear within the NP what the assessed level of affordable housing is within the Neighbourhood Area, nor how this need or likely further need arising within the NP period is likely to be met. As such, the NP has not demonstrated how it will assist in meeting local needs and the requirements of Section 6 of the NPPF: Delivering a wide choice of high quality homes
- 5) For the above reasons, the LPA is concerned that the NP as currently drafted does not adequately demonstrate how it has had regard to the NPPF and is in conformity with the strategic elements of the Development Plan. The LPA would prefer to see a) more positive wording within the policies and supporting text of the NP to demonstrate that it is not anti-development, b) the allocation of one or more development sites to deliver in the region of 10 dwellings that would meet local and affordable housing need. This may be appropriately delivered through a Community Land Trust or other community-led housing, which is an opportunity for the local community to control development coming forward and to ensure that local needs are met.
- 6) The LPA has some other concerns about the NP's conformity with the strategic policies of the JLP and with the NPPF, particularly in regard to the Development policies. These concerns are picked up in the detailed comments below.
- 7) **The Evidence Base.** The appendices to the NP provide clearly presented evidence, although a) evidence for the proposed Local Green Space designations could usefully be expanded to provide a clearer demonstration that each one meets

the criteria set out in NPPF 77, and b) we were not able to access the Housing Needs Assessment from the link given in the appendices.

- 8) **SEA and HRA.** Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA): When the NP is submitted to the LPA at Regulation 15, it will need to be accompanied by either a screening report saying that SEA is not considered necessary, or a full SEA report. HRA screening will also be necessary in order to demonstrate compliance with European laws. Please request an SEA/HRA screening report from us by emailing SW-Neighbourhood Planning [NeighbourhoodPlan@swdevon.gov.uk](mailto:NeighbourhoodPlan@swdevon.gov.uk). The target for completing screening reports is 10 weeks, including consultation with statutory consultees. Should SEA be considered necessary, this can be undertaken at no cost to the NP group via the DCLG support package available at <https://mycommunity.org.uk/take-action/neighbourhood-planning/support-grants/>
- 9) **Other.** There is some repetition of JLP policy, which is understandable given that the NP has been progressed to a similar timescale as the JLP. However, this may cause confusion where NP policies differ in interpretation from JLP policy, and is unnecessary unless JLP policy does not adequately address local circumstances. In such cases, it will be appropriate for the NP policy to add emphasis or detail. Where this is the case it should be made clear in supporting text. Individual instances of where this occurs are picked up in the detailed comments below.

### Comments on specific parts of the Neighbourhood Plan

*Where a particular policy is not commented on, please assume that the LPA supports it*

Section, policy or text	Comment
Map, p.2	For clarity, we would prefer to see this map renamed 'Neighbourhood Plan Area', which should be shaded to clearly show the exclusion of the Sherford area.
Environment section	A map showing the location of the Neighbourhood Area in relation to the AONB would be useful in this section.
Env2. The land identified on Environment Policy Env Map 2: Policy Area Env2 will be protected from development to maintain the important public open views across the South Devon AONB that define the setting and character of Brixton village and its eastern and western approaches.	Are there any circumstances in which some types of development in this area would be acceptable? A blanket ban on any development at all may not be realistic.
Env3. (a) Priority Habitat throughout the parish, including deciduous woodland, wood pasture/parkland, ancient woodland and wildlife corridors as shown on Environment Habitat Policy Map, will be protected and enhanced. (b) Important woodlands are to be conserved and enhanced for their contribution to the character and bio-diversity of the parish. See Appendix 9: Env Map 4.	Does this add significantly to the environment policies in the JLP, especially DEV28 and DEV30?
Env4. A green corridor will be maintained for visual and ecological significance to protect against the further urban expansion east of Plymouth along the A379, and	What exactly is intended here? Is no development to be permitted in this area at all, or might certain types of

<p>to safeguard the individual identities of Chittleburn, Combe, and Brixton village, as defined on Env Map 2: Policy Area Env4.</p>	<p>development or design be considered appropriate?</p>
<p>Env5. (a) Local Green Spaces will be protected and enhanced. Only development directly associated with and necessary to improve the green spaces will be permitted within them (Environment Policy Map Env Map 2 and Appendix 7). (b) Measures to improve the appearance of the A379 route through Brixton, particularly through measures such as tree planting and green landscaping, will be supported. See Env Map 2.</p>	<p>Suggest wording is included which clearly designates the LGS e.g. 'The following green spaces as identified on Env Map 2, are designated as Local Green Spaces..' Then list all proposed LGS by name and map ref.</p>
<p>Env6. The area identified as the Brixton Strategic Green Space (Env Map 2) shall be safeguarded during the Plan period (2014-2034) except in the event that a future Housing Needs Survey identifies the need for essential, affordable local housing for Brixton community. In which case small numbers of well designed, sensitively located housing might be considered; in any event not before 2023 when the first review of this Plan is due. This review will also consider the development progress of Sherford and any impact on the Brixton Strategic Green Space. No development will be permitted that adds substantially to the cumulative impact of development in the village that will adversely impact on the social wellbeing and character of the village.</p>	<p>Suggest this policy is reworded in a more positive way, e.g. 'Within the area identified as the Brixton Strategic Green Space (Env Map 2), proposals for small scale housing development will be supported where a) they can be demonstrated to meet an essential local need b) they are sensitively located... etc</p> <p>Consideration should be given to how this policy relates to the policies in the development section below.</p>
<p>Env7. Designated historic and heritage assets and their settings, both above and below ground, shall be conserved and enhanced. Development proposals are required not to harm but to conserve, restore and enhance designated and non-designated historic and heritage assets and their settings.</p>	<p>The identification of local non-designated heritage assets is welcomed and adds detail to JLP Policy DEV2. The first paragraph of this policy is not considered necessary as designated assets are already well protected in policy.</p>
<p>Env8. Private or community renewable energy generation schemes will be supported provided they are designed to minimize harm to local heritage, biodiversity, landscape, views and skylines, through noise or other nuisance and be in keeping with its setting and surroundings.</p>	<p>Is any type of renewable energy generation of any size acceptable? Some clarification is needed.</p>
<p>Cof1. The following local facilities are designated as Assets of Community Value*: The Post Office / village shop The Foxhound pub The Scout hut St Mary's School Assets of Community Value shall be protected and retained. Development that would result in the loss of or harm to any such asset will not be permitted unless there is equivalent or improved alternative provision in the parish.</p>	<p>Have these facilities been formally listed as Assets of Community Value? See <a href="https://www.southhams.gov.uk/article/3851/Assets-of-Community-Value">https://www.southhams.gov.uk/article/3851/Assets-of-Community-Value</a> Suggest adding to this policy words to the effect 'unless it can be demonstrated that the facility is no longer needed'. Permitted development rights should be referred to in respect of the shop.</p>
<p>Cof2. New development will be required to contribute towards the provision or improvement of community facilities in Brixton in accordance with adopted standards and local priorities which could include but is not restricted to: • a parish hall, • off-street car parking and/or car park, • a visitor car park in Brixton Village • play spaces, • allotments, • Network improvements to</p>	<p>CIL regs should be referred to: planning obligations must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. See</p>

<p>footpaths, bridleways and cycle paths, • measures to mitigate traffic flow and speed through the village, • improvements to and “greening” of the A379 corridor, • public river access</p>	<p><a href="http://www.legislation.gov.uk/ukdsi/2010/9780111492390/part/11">http://www.legislation.gov.uk/ukdsi/2010/9780111492390/part/11</a></p>
<p>Cof3. Developments of more than 5 homes shall incorporate adequate public landscaped space and provision for safe children’s play within the development.</p>	<p>What is considered ‘adequate’ in this context? It would be useful to refer to JLP evidence <a href="https://www.plymouth.gov.uk/jointlocalplenevidencebase">https://www.plymouth.gov.uk/jointlocalplenevidencebase</a> and Fields in Trust guidelines <a href="http://www.fieldsintrust.org/">http://www.fieldsintrust.org/</a></p>
<p>Sar1. Public open space, private outdoor sports grounds, school playing fields and allotments shall be protected and retained in that use. Only development directly associated with and necessary for their improvement will be permitted unless: (a). an alternative and improved provision is provided that retains its original functional requirements for existing and future users; and (b). the proposal would not result in the loss of an area important for its amenity or contribution to the character of the area in general.</p>	<p>What does this policy add to JLP DEV3?</p> <p>As currently worded, the grammar of part b) of the policy is confusing: ‘Only development...will be permitted unless (b) the proposal would not result in the loss of...’</p> <p>It is not entirely clear what is intended here.</p>
<p>Dev Map 1</p>	<p>This is a useful map to help set the context for the NP</p>
<p>Policy Tpt2</p>	<p>This is not really a policy and should be moved to supporting text.</p>
<p>Employment policies</p>	<p>The employment policies are welcomed as adding appropriate local detail to JLP policy. However, clearer identification of the relevant sites on one single map is recommended.</p> <p>Have site assessments been carried out to assess the impact of development on these sites – particularly the ‘site of approximately 2.5 Ha in the vicinity of Dodovens Farm/Chittleburn Business Park’? No such assessments have been seen by the LPA, and are recommended in order to demonstrate deliverability of the NP.</p>
<p>Policy Dev1 Development shall not harm but maintain and enhance the South Devon AONB and its setting, paying full regard to national and local strategic policies for the AONB and to the South Devon AONB Planning Guidance.</p>	<p>This policy repeats the requirements of Policy Env1 and as such is not considered necessary.</p>
<p>Policy Dev2 Location, scale and character of development. (a) Within the settlement boundary the scale, density and character of development shall be in keeping with its site and surroundings and shall cause no adverse impacts on natural or historic assets, important views, outlooks or skylines, local amenity, traffic, parking or safety</p>	<p>The provisions of this part of the policy are already well provided for in existing planning policy. As such, this part of the policy is not considered necessary.</p>

<p>Policy Dev2 (b) Elsewhere in the parish development will be strictly controlled and only permitted where it is small scale (1 - 2 dwellings) and can be delivered sustainably and not in conflict with any other policy.</p>	<p>This part of the policy is contrary to JLP TTV31, which supports housing and employment development for local needs only adjacent or very close to existing settlements. Isolated development elsewhere is only supported in very specific circumstances, such as to meet the needs of a rural worker. As currently worded, the NP policy is more permissive than JLP TTV31. Unless this is the intention, we suggest removing this part of the policy.</p>
<p>Policy Dev2 (c) In the event that a future Housing Needs Survey identifies the need for essential, affordable local housing for Brixton community, small numbers of sensitively located, well designed housing, might be considered within the Parish outside the AONB.</p>	<p>As above. This is already provided for by JLP TTV31 where the proposed development is adjacent or very close to existing settlements. As currently worded, the NP policy is more permissive than JLP TTV31. Unless this is the intention, we suggest removing this part of the policy.</p>
<p>Policy Dev2 (d) Small scale development that secures a viable long-term future for a valued local asset which would otherwise be lost, or will meet an essential local need which could not otherwise be met may be permitted</p>	<p>As above. In addition the wording 'essential local need' potentially creates confusion. What is intended here? This could be interpreted as need for several affordable houses, or in several other ways. Again we suggest removing this part of the policy which is already covered by TTV31.</p>
<p>Dev3. All new development should be of high quality and appropriately designed for the context in which it is proposed with respect to its neighbours and the rural character of Brixton village and Parish. Development shall take into account topography, layout, building orientation, massing, landscaping, public green space and associated public realm, to minimise visual, ecological and social impact. Housing will comply with the Department of Communities &amp; Local Government "Technical housing standards – nationally described space standard."</p>	<p>What does this policy add to JLP DEV10 and Dev20? NPs should avoid repeating existing/emerging policy wherever possible.</p>
<p>Dev4. Design shall maximise, where possible, the orientation of new development to capitalise on solar energy and other natural sustainable resources to reduce energy consumption. Development comprising the use of renewable energy and low carbon materials will be encouraged where it does not harm the character and appearance of the Parish and the landscape.</p>	<p>As above – does this policy add significantly to JLP DEV34?</p>
<p>Dev5. All new developments shall include adequate off street parking and cycle storage for residents, users and visitors. Residential developments shall also provide at least one parking space per bedroom.</p>	<p>This policy is supported, although some clarification of 'adequate' is recommended. See NPPF 39, updated in 2015 with the following text: "Local planning authorities should only impose local parking standards for residential and non-residential development where</p>

	there is clear and compelling justification that it is necessary to manage their local road network.” (written statement: Planning Update March 2015)
Dev6. Existing Recreation and Tourism facilities shall be retained for that use. Only development directly associated with and necessary for their improvement will be permitted unless: (a) alternative and improved provision will be made in a location well related to the functional requirements of the use and its existing and future users; and (b) the proposal would not result in the loss of an area important for its contribution to the character of the area in	This policy is supported, but suggest adding wording to the effect ‘Unless it can be demonstrated to be no longer financially viable’.  There appears to be text missing at the end of part (b)?
Dev8. Future development of former Steer Point Brickworks hard standing (refer to Dev Map 2 and Dev Map 3). This large area of previously developed land lies within a highly sensitive area of the AONB. Only development proposals to enhance this site and provide significant overall community benefit in this special location will be considered.	More detail would be welcomed here as to what might be considered acceptable development for this site and what sort of community benefits are aspired to and might be realised from the site.

I hope you find these comments useful. Please do not hesitate to contact me if you would like further clarification on any of them.

Best wishes,

Mandy Goddard  
Neighbourhood Planning Specialist



## South Hams and West Devon

# Strategic Development Plan Policies December 2017

This document sets out the strategic development plan policies which neighbourhood plans in South Hams and West Devon should demonstrate conformity with, as at December 2017.

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#### Introduction

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### **Introduction**

Neighbourhood plans must be in conformity with the strategic elements of the Local Development Plan that is extant at the time of the examination of the neighbourhood plan. As at December 2017, the extant Local Development Plans for the two Districts are the South Hams Core Strategy 2006 and associated documents, and the West Devon Core Strategy 2011 and associated documents. Further detail on these documents and the relevant policies is given below in Sections 2 and 3. A new Joint Local Plan for the two Districts and Plymouth is currently being examined and is expected to be adopted in 2018.

## **1. The Emerging Plymouth and South West Devon Joint Local Plan (JLP)**

<https://www.plymouth.gov.uk/sites/default/files/PlymouthSouthWestDevonJointLocalPlanSubmission.pdf>

Emerging policy should not be referenced in Neighbourhood Plans if the NP is expected to be examined before it is adopted. However, it is important to ensure that NPs are in general conformity with the strategic elements of the emerging JLP and with evidence gathered for the JLP, so that the NP does not become out of date once the JLP is in place.

Relevant sections and policies of the JLP are as follows:

The Vision

The Strategic Objectives

Policy SPT1 Delivering sustainable development

Policy SPT2 Sustainable linked neighbourhoods and sustainable rural communities  
Policy SPT3 Provision for new homes  
Policy SPT4 Provision for employment floorspace  
Policy SPT5 Provision for retail development  
Policy SPT6 Spatial provision of retail and main town centre uses  
Policy SPT7 Working with neighbouring areas  
Policy SPT8 Strategic connectivity  
Policy SPT9 Strategic principles for transport planning and strategy  
Policy SPT10 Balanced transport strategy for growth and healthy and sustainable communities  
Policy SPT11 Strategic approach to the natural environment  
Policy SPT12 Strategic infrastructure measures to deliver the spatial strategy  
Policy SPT13 European Sites – mitigation of recreational impacts from development  
Policy TTV1 Prioritising growth through a hierarchy of sustainable settlements  
Policy TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area  
Policies TTV3 – TTV28 (Main Towns) where relevant  
Policy TTV29 Site allocations in the Smaller Towns and Key Villages where relevant  
Policy TTV30 Empowering local residents to create strong and sustainable communities where relevant  
Policy TTV31 Development in the countryside

Policy DEV1 Protecting health and amenity  
Policy DEV2 Air, water, soil, noise, land and light pollution  
Policy DEV3 Sport & Recreation  
Policy DEV8 Meeting local housing need in the Thriving Towns and Villages Policy Area  
Policy DEV9 Meeting local housing need in the Plan Area  
Policy DEV10 Delivering High Quality Housing  
Policy DEV13 Consideration of sites for Travellers and Travelling Showpeople  
Policy DEV14 Maintaining a flexible mix of employment sites  
Policy DEV15 Supporting the rural economy  
Policy DEV17 Promoting competitive town centres (where relevant)  
Policy DEV18 Protecting local shops and services  
Policy DEV20 Place shaping and the quality of the built environment  
Policy DEV21 Conserving the historic environment  
Policy DEV22 Development affecting the historic environment  
Policy DEV24 Landscape character  
Policy DEV25 Undeveloped Coast and Heritage Coast  
Policy DEV27 Nationally protected landscapes  
Policy DEV28 Protecting and enhancing biodiversity and geological conservation  
Policy DEV29 Green and play spaces  
Policy DEV30 Trees, woodlands and hedgerows  
Policy DEV31 Specific provisions relating to transport  
Policy DEV32 Meeting the community infrastructure needs of new homes  
Policy DEV34 Delivering low carbon development  
Policy DEV35 Renewable and low carbon energy (including heat)  
Policy DEV36 Community energy  
Policy DEV37 Managing flood risk and water quality impacts  
Policy DEV38 Coastal Change Management Areas

## 2. South Hams District Council

### Development Plan Strategic Policies December 2017

<https://www.southhams.gov.uk/article/3868/Local-Development-Framework>

The extant Development Plan for South Hams District as at December 2017 comprises the following documents:

- 2006 Core Strategy including saved policies from the 1996 Local Plan
- 2007 Sherford New Community Area Action Plan (AAP)
- 2008 Affordable Housing Development Plan Document (DPD)
- 2010 Development Policies Development Plan Document (DPD)
- 2011 Site Allocations Development Plan Document (DPD) for:
  - Dartmouth
  - Ivybridge
  - Kingsbridge
  - Totnes
  - Rural Areas

The Council considers the following policies relevant as strategic policies with which Neighbourhood Plans should be in conformity where they are still up to date and in conformity with the National Planning Policy Framework (NPPF). Where policies are not in conformity with the NPPF, the NPPF will take precedence and the relevant NPPF paragraph or section is given.

Policies that the Council considers Neighbourhood Plans should be in conformity with are shaded green in the following table.

Strategic Policy	Conformity required?	Notes
<b>Core Strategy 2006</b>		
CS1, Location of Development	Y	Not in full conformity with NPPF; however, NPs should have regard to CS1 as it gives an indication of which settlements are considered sustainable by the Council. NPPF Paras 14-15 are also relevant ('Presumption in favour of sustainable development').
CS2, Housing numbers	N	Out of date. Not in conformity with NPPF – relevant section: 6. Delivering a wide choice of high quality homes. JLP evidence is relevant.
CS3, Employment land provision	Y	Compliance required though NPs may add detail
CS4, Sherford New Community	N	Where relevant.
CS5, Previously developed land	Y	NPPF 111 permits local targets. No new evidence to suggest a different target, however, the Council suggests flexibility on the 50% figure.

CS6, Affordable Housing	N	Does not conform with NPPF in terms of evidence. NPPF Paras 50 and 54 are relevant. New JLP evidence suggests 30%
CS7, Design	Y	Sets out broad design parameters. NPs may add local detail. DPD1 is relevant.
CS8, Infrastructure provision	Y	NPs may add local detail.
CS9, Landscape and historic environment	Y	In broad conformity with NPPF. NPs may add local detail. DPD2 and DPD5 are relevant.
CS10, Nature conservation	Y	DPD5 is relevant.
CS11, Climate change	Y	In broad conformity with NPPF. NPs may add local detail.
CS12 Tourism	N	NPPF does not advocate a sequential approach for tourism related development. Relevant NPPF sections: 1. Building a strong, competitive economy 2. Ensuring the vitality of town centres 3. Supporting a prosperous rural economy
CS13, Rural diversification	N	Not in full conformity with NPPF. NPPF Para 28 takes precedence.
<b>Development Policies DPD</b>		
DPD7, Transport, access and parking	Y	
DPD8, Open space, sport and recreation	Y	
DP11, Housing mix and tenure	Y	
<b>Site Allocations DPD policies where appropriate</b>		

### 3. West Devon Borough Council

#### Development Plan Strategic Policies December 2017

<https://www.westdevon.gov.uk/article/3867/Local-Development-Framework>

The extant Development Plan for West Devon Borough Council as at December 2017 comprises the following documents:

- 2011 Core Strategy
- Proposals Map
- Settlement Maps
- Saved policies from the 2005 Local Plan Review (as amended 2011)

The Council considers the following policies relevant as strategic policies with which Neighbourhood Plans should be in conformity where they are still up to date and in conformity with the National Planning Policy Framework (NPPF). Where policies are not in conformity with the NPPF, the NPPF will take precedence and the relevant NPPF paragraph or section is given. Evidence produced to support the emerging Joint Local Plan should be taken into account: this is highlighted where relevant.

Policies that the Council considers Neighbourhood Plans should be in conformity with are shaded green in the following table.

Strategic Policy	Conformity Required?	Notes
<b>2011 Core Strategy</b>		
Strategic Policy 1 Sustainable Development	Yes	Sets out sustainable development principles and is in conformity with the NPPF
Strategic Policy 2 Decentralised Renewable and Low Carbon Energy to Supply New Developments	No	Whilst the aspirations of the policy are NPPF compliant, the delivery component of it is not – in that such requirements are likely to be considered so onerous now as to threaten viability and deliverability.  NPPF Section 10 takes precedence, particularly paragraphs 97 and 98.
Strategic Policy 3 Renewable Energy	No	Not fully NPPF compliant: pre-dates the Written Ministerial Statement that requires onshore wind to come forward only on allocated sites in Local or Neighbourhood Plans.  NPPF Section 10 and Written Statement (HCWS42) take precedence.  <a href="https://www.parliament.uk/documents/commons-vote-office/June%202015/18%20June/1-DCLG-Planning.pdf">https://www.parliament.uk/documents/commons-vote-office/June%202015/18%20June/1-DCLG-Planning.pdf</a>

		More up-to-date evidence and guidance is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 4 Infrastructure Provision	Yes	In general conformity with NPPF. See also West Devon Infrastructure Delivery Plan 2015 <a href="https://www.plymouth.gov.uk/sites/default/files/WestDevonBoroughCouncilInfrastructureDeliveryPlan.pdf">https://www.plymouth.gov.uk/sites/default/files/WestDevonBoroughCouncilInfrastructureDeliveryPlan.pdf</a>
Strategic Policy 5 Spatial Strategy	No	Partially in conformity with NPPF, but too inflexible on development in the countryside/outside village development boundaries. NPPF Presumption in Favour of Sustainable Development takes precedence, Paras 14-16.
Strategic Policy 6 Density of Housing Development	No	While the NPPF allows for density rates to be set locally, it emphasises local circumstances and appropriate design. NPPF Paras 47 and 59 take precedence.
Strategic Policy 7 Strategic Distribution of Housing	Yes	Broadly in conformity with NPPF, provided up-to-date evidence still supports these numbers. Evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 8 Inclusive Communities	Yes except final paragraph (Lifetime Homes Standard)	Largely in conformity with NPPF. Lifetime Homes Standard no longer in use. Housing mix should be based on up-to-date evidence of local needs. For district need see Strategic Housing Market Assessment 2017 <a href="https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf">https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf</a>
Strategic Policy 9 Meeting Housing Needs	No	Does not conform with NPPF in terms of evidence. NPPF Paras 50 and 54 are relevant. New JLP evidence suggests 30% - see JLP Dev8 for detail. See <a href="https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf">https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf</a>
Strategic Policy 10 Supporting the Growth of the Economy	Yes	The objective of this policy is in conformity with the NPPF, though the NPPF gives more detail on an expected strategy for plans. NPPF Paras 18-22 are relevant. Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 11 Rural Regeneration	Yes	In broad conformity with NPPF.
Strategic Policy 12 Retailing	Yes	In broad conformity with NPPF. See SPD 'Assessing the Impact of New Retail Development in West Devon' 2013 and evidence at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>

Strategic Policy 13 Community Services and Facilities	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 14 Accessibility Planning	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 15 Traffic Management	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 16 Safer Communities	Yes	In conformity with NPPF.
Strategic Policy 17 Landscape Character	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 18 The Heritage and Historical Character of West Devon	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 19 Biodiversity	Yes	In broad conformity with NPPF. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 20 Promoting High Quality Design	Yes	In broad conformity with NPPF, although NPPF also references distinctive and innovative design (para 63, 65) and community involvement. NPPF Paras 56-68 are relevant. Up-to-date evidence available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 21 Flooding	Yes	NPPF paras 102-104 are relevant
Strategic Policy 22 Okehampton	No	Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 23 Tavistock	No	Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>
Strategic Policy 24 Sustainable Rural Communities	No	Up-to-date evidence is available at <a href="https://www.plymouth.gov.uk/jointlocalplanevidencebase">https://www.plymouth.gov.uk/jointlocalplanevidencebase</a>