

COMMITTEE REPORT

Case Officer: Ian Lloyd

Parish: Bickleigh
Ward: Bickleigh and Cornwood

Application Numbers:

4185/19/OPA Application A (App A)

4181/19/OPA Application B (App B)

Applicant/ Agent:

Mr Keith Fenwick
Pegasus Group
39 Bennetts Hill
Birmingham B2 5SN

Applicant:

Rockspring Barwood Plymouth Ltd
C/O Agent

Site Addresses:

App A: Land at Woolwell Part of the Land at Woolwell JLP Allocation (Policy *PLY44*)

App B: Land off Towerfield Drive Woolwell Part of the Land at Woolwell JLP Allocation (Policy *PLY44*)

Developments:

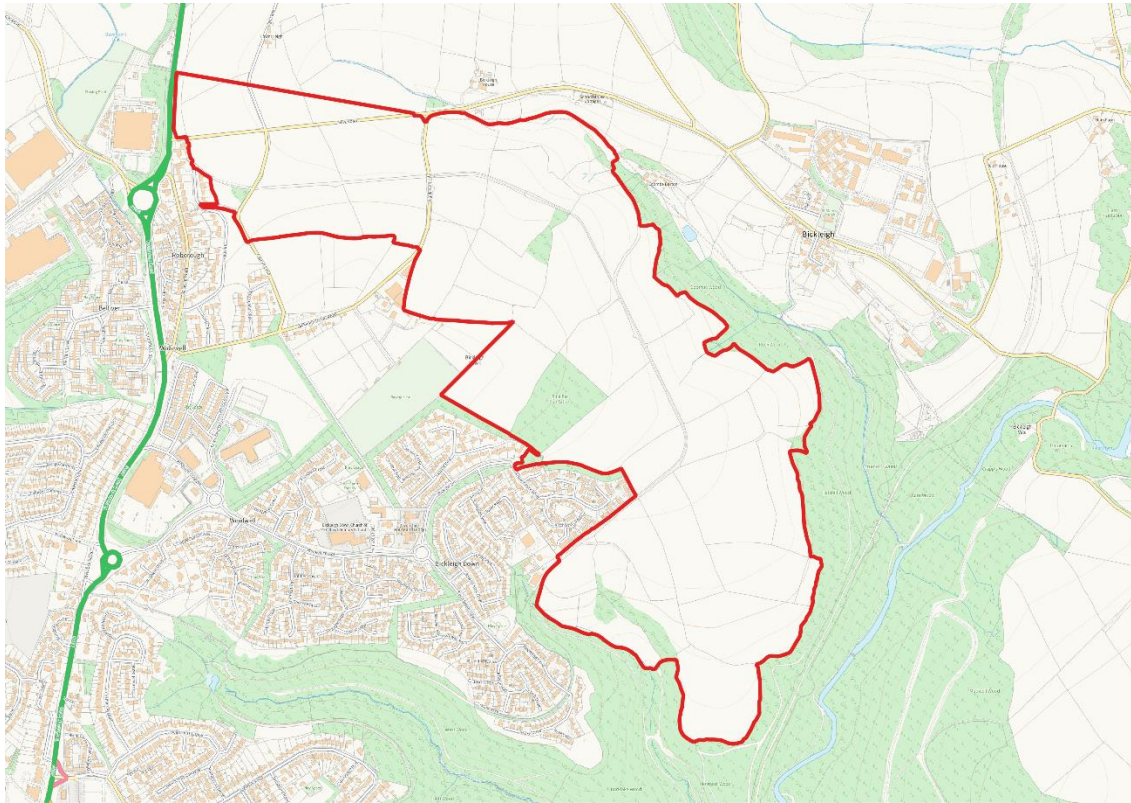
App A: READVERTISEMENT (revised plans) Outline application for provision of up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; new sport and playing facilities; new access points and vehicular, cycle and pedestrian links; strategic landscaping and attenuation basins; a primary substation and other associated site infrastructure. All matters reserved except for access.

App B: READVERTISEMENT (revised plans & description of development) Outline application for up to 360 dwellings, associated landscaping and site infrastructure. All matters reserved except for new access points from Towerfield Drive and Pick Pie Drive.

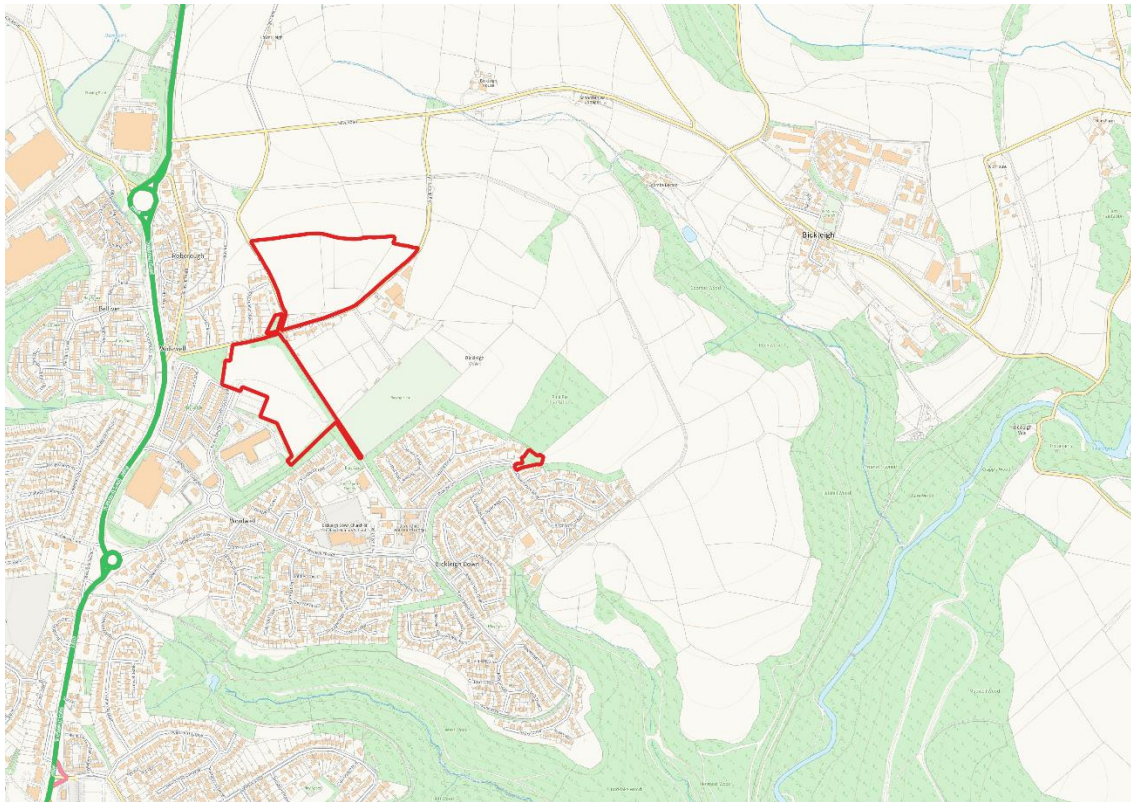
Reason item is being put before Committee:

These are major applications for development of considerable scale on a strategically important allocated site, but ones which have raised substantial local objection and have cross border implications. Whilst the site has been allocated for development, there are significant viability challenges, and debate is required around levels of policy compliance as well as the scale and breadth of mitigation that is appropriate to mitigate 2000 new homes. Therefore, given the complexity, balance of considerations and necessary prioritisation it is right for these matters to be debated by the Committee prior to making a decision.

App A Site Location:



App B Site Location:



For reasons which will be explained in detail in the report below, principally relating to most of the infrastructure being delivered on land within App A, App A should be determined first, and App B is not recommended for approval in circumstances where the App A is not first approved

Recommendations:

App A:

1. To adopt the Appropriate Assessment set out in an Appendix F;
2. To delegate approval of the application to the Head of Development Management in consultation with the Chairman and Vice Chairman to conditionally grant planning permission, subject to a s106 Agreement based on the heads of terms at Appendix D, provided that the Head of Development Management in consultation with the Chairman and Vice-Chairman shall have power to make minor alterations to the planning conditions set out in Appendix E to ensure consistency and appropriate cross referencing to the agreed S106 Agreement;
3. the event that the S106 agreement remains unsigned six months after this resolution, that the application is reviewed by the Head of Development Management, in consultation with the Chairman and Vice Chairman of the Development Management Committee, and if no progress is being made delegated authority is given to the Head of Development Management to refuse the application in the absence of an agreed S106 agreement.

App B:

Subject to the approval of App A,

1. To adopt the Appropriate Assessment set out in an Appendix G;
2. To delegate approval of the application to the Head of Development Management in consultation with the Chairman and Vice Chairman to conditionally grant planning permission, subject to a s106 Agreement based on the heads of terms at Appendix D, provided that the Head of Development Management in consultation with the Chairman and Vice-Chairman shall have power to make minor alterations to the planning conditions set out in Appendix E to ensure consistency and appropriate cross referencing to the agreed S106 Agreement;
3. the event that the S106 agreement remains unsigned six months after this resolution, that the application is reviewed by the Head of Development Management, in consultation with the Chairman and Vice Chairman of the Development Management Committee, and if no progress is being made delegated authority is given to the Head of Development Management to refuse the application in the absence of an agreed S106 agreement.

Contents

1	Executive Summary	5
2	Introduction, Background, and Community Engagement.....	7
3	Description of Site and Surroundings:	9
4	The Proposals	12
5	Consultations	13
6	Relevant Planning History	24
	ANALYSIS	25
7	Human Rights and Public Sector Equality Duty Considerations	25
8	The Principle of Development	29
9	Urban Design	30
10	Housing Main Policy Considerations including Affordable Housing, Housing Mix, Standards and Clawback	35
11	Sustainable Transport including Active Travel, Access, and Highway Considerations	39
12	Landscape, Dartmoor National Park, Tamar Valley National Landscape, Green Infrastructure, Community Park, and Arboriculture	49
13	Ecology and Wildlife	54
14	Health, Education, and Well-Being.....	59
15	Open Space, Sport, and Recreation Policy Considerations.....	67
16	Sustainable Development, Climate Change, Environmental Impact Assessment, Heritage and Historic Environment, Lighting Assessment, Drainage/ Flood Risk and Utility and Foul Drainage Appraisal	70
17	Phasing, Infrastructure and Delivery Including s106 HoTs, Viability and Equalisation	81
18	The Planning Balance and Conclusion.....	88
19	Resolutions	89
	Appendix A – Full Bickleigh Parish and Local Member Consultation Responses	91
	Appendix B – Summarised Consultation Responses	103
	Appendix C - Policy.....	110
	Appendix D - S106 Heads of Terms.....	132
	Appendix E - Planning Conditions	145
	Appendix F – Habitats Regulation Assessment for Land at Woolwell Ref 4184/19/OPA ...	181
	Appendix G – Habitats Regulation Assessment for Land at Towerfield Drive Ref 4181/19/OPA	195
	Appendix H - Glossary	209
	Appendix I - Application Documents.....	212

1 Executive Summary

The Executive Summary summarises the longer detailed report to enable readers to more easily and rapidly become acquainted with the large body of application material, considerations, and the subsequent conclusions drawn. The numbers/ headings correspond to the numbering and main headings in the report below.

1.1.1 The Woolwell Urban Extension is allocated under Joint Local Plan (JLP) Policy *PLY44*. It requires the delivery of comprehensive, residential led mixed use development creating a sustainable urban extension in the order of 2,000 new homes. As a strategic allocation, the Woolwell development plays an important part of the JLPs spatial strategy and will provide 7% of the new homes planned across the JLP area. As part of the development proposals, the site is expected to include a local centre, extensive Community Park, sports facilities and play spaces, a primary school and support sustainable lifestyles and promote health and wellbeing.

1.1.2 This report considers two planning applications which have been submitted pursuant to the allocation. Whilst they are two standalone applications, both are interlinked and relate to the delivery of a single Masterplan covering the allocation area. Both applications therefore have been assessed together, and the package of mitigation measures identified as being necessary to make these developments acceptable in planning terms have been based on the combined 2,000 dwellings. Given the dependencies of the two applications, they have been reported together. However, Members should note that these are still separate applications and should be tested on their merits, and that two decisions will be required.

1.1.3 The applications are:

- App A: for provision of up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; new sport and play facilities; new access points and vehicular, cycle and pedestrian links; strategic landscaping and attenuation basins; a primary substation and other associated site infrastructure.
- App B: up to 360 dwellings, associated landscaping and site infrastructure

1.1.4 Much of the community infrastructure that responds to the policy requirements is being provided for within the App A site. As such, App B is largely dependent upon App A in terms of the mitigation and ensuring App B is capable of being acceptable in planning terms.

1.1.5 The applications are Environmental Impact Assessment development, and as such, Environmental Statements have accompanied both applications. A Habitats Regulation Assessment has also been undertaken to assess the effects of the proposed developments on European Protected Site's. An Appropriate Assessment has been carried out and is included within this report to confirm that the development, following mitigation outlined will not detrimentally affect those Sites.

1.1.6 The applications have been made in outline form, so at this stage it is the principle of development and terms of the mitigation that is being considered. The specific details of how the developments will come forward will need to be determined through subsequent reserved matters applications and condition discharges. Construction is likely to take place over the next 15 to 20 years.

1.1.7 Applications of this scale and complexity give rise to many issues and matters for consideration. Since the applications were validated a considerable amount of work from the local authorities, statutory agencies and the applicant's team have gone into the assessment

and evolution of the submitted material. This has been to ensure the scale of impacts, as well as opportunities arising from these developments is properly understood. Following this review and evolution, the submitted material has now reached a stage that they provide a sound basis for decision making and outlining the extent of mitigation needed.

1.1.8 The schemes have also given rise to viability challenges. This is not unexpected given the scale of infrastructure required on a site of this size. Following the submission of a Viability Assessment, the applicants have confirmed that only 12.5% of the homes could be affordable. The Council has had the Viability Assessment independently appraised, the results of which confirm that a policy compliant level of affordable houses is not viable. Indeed, the advice is that even 12.5% is not viable. This has also necessitated a prioritisation of the specific s106 obligations being proposed, in order to ensure essential obligations have been secured within the tolerances that the site finances allow. Given the need to share equal costs across the two sites, and noting that App A includes a higher proportion of the infrastructure serving both on sites within its site, the affordable housing has been profiled to provide 8.7% (143) on App A and 30% (108) on App B.

1.1.9 Finally, it is noted that collectively some 1692 letters of representation have been received against both applications, 1681 against the initial submission (866 for App A, 815 for App B) of which 20 were in support, 1 was undecided, and 1660 were in objection. 11 letters of representation were received in response to the revised submission (5 for App A, 6 for App B) of which 2 were in support in principle, and 9 were in objection. Despite the allocation, the schemes as presented are not without significant objection.

1.1.10 Whilst the applications have been submitted to bring forward development on an allocated site, the form in which the development has been proposed must still nevertheless sufficiently accord with the principles of the development plan for planning permission to be granted. It is clear however following the determination process, that not all policy objectives have been capable of being achieved and that a balancing of priorities and the areas in which greater weight should be applied is required in which to reach a decision.

1.1.11 The main considerations that arise from these applications from a strategic level are considered to be the following:

- The status of the Woolwell Urban Extension within the Development Plan and its context in supporting the wider JLP spatial strategy, housing delivery targets and the Council's 5-year land supply;
- The proposed affordable housing levels and the weight to be given to both *DEV7* and *DEL1* with regards to the sub-policy provision of affordable housing;
- Whether the proposed mitigation and infrastructure provision to be included within the conditions and S106 is sufficient to ensure development complies with relevant policies and would make the schemes acceptable in planning terms, and indeed, that those obligations can be considered Community Infrastructure Levy compliant;
- The effect of the viability conclusions on site delivery, and the impact on what tolerable package of mitigation measures is possible;

1.1.12 Naturally, the scheme gives rise to other key considerations and policy objectives that need appropriate weight, and a balanced view applied in the round as part of the decision making process;

- The effects and appropriateness of equalisation and apportionment of obligations across the two sites;

- Suitability and acceptance of the proposed site-wide Masterplan as setting the strategic direction of travel for the entirety of the allocation, and role of the Allocation Wide Design Code and function of Neighbourhood Design Codes in which to create a framework for managing reserved matters and the future detailed design;
- The effect of the proposed development on the character and appearance of the area including on Dartmoor National Park, as well as recreational and ecological impacts;
- How the development can drive significant modal shift, reducing reliance on private car use and engender more sustainable means of travel, as a means of ensuring that both the Local Road Network and Major Road Network are not undermined. Most notably, considerations surround impacts of the development on the A386 and Woolwell to The George improvement scheme, and the effects of development in relation to the timing of the proposed highway improvement works;
- The scale and nature of opportunities of creating an extension to the existing Woolwell community, and how appropriate community infrastructure can be delivered to support the increase in population;
- The effects of a lengthy construction process on existing residents and communities including Woolwell itself, and the reasonable levels of mitigation and control that could be employed to reduce such effects;
- Whether appropriate regard been given within the proposals to secure carbon reduction and other climate change resilient measures, reduce impacts to protected and priority species and habitats deliver Biodiversity Net Gain.

1.1.13 Section 70(2) of the Town and Country Planning Act 1990 requires, in dealing with an application for planning permission that a decision taker shall have regard to the provisions of the development plan, so far as is material, and to any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission under the Planning Acts are to be determined in accordance with the development plan unless material considerations indicate otherwise. It is also established that a key part of the duty is to determine whether the development accords with the development plan when viewed as a whole. It has long been recognised that it is not unusual for development plan policies to pull in different directions and that the decision taker must therefore make a judgement as to whether a proposal is in accordance with the plan as a whole and bearing in mind the relative importance of the policies which are complied with or infringed and the extent of the compliance or breach.

1.1.14 A detailed review of the applications' merits are set out within the main sections of the report. However, Appendix C provides a consolidated precis of all of the relevant policies applicable to the applications and identifies whether the application is considered to accord with the policy, and how much weight is suggested should be applied into the decision making process.

1.1.15 Whilst the low provision of affordable housing in line with the expectation of *DEV7* is an important consideration, the provisions of *DEL1* also apply and is an important policy in this case. Furthermore, the package of recommended planning conditions and the proposed Heads of Terms ensure that the schemes are aligned with other policy requirements. Great weight is also placed on the importance of the spatial strategy, and the role the Urban Extension plays to the JLP's housing targets, and the annual supply of housing. As such, the schemes are considered to comply with the development plan as a whole, and accordingly both applications are hereby being recommended for approval.

2 Introduction, Background, and Community Engagement

2.1 The Application Submissions

2.1.1 There are two applications under consideration. The Applications were received in late December 2019 and registered as valid in early January 2020. Barwood are the applicants on both Applications. App A land is owned by Maristow Estates and App B land is owned by Plymouth City Council (PCC). They are stand-alone applications, but intrinsically linked. As such they are reported together, but with separate recommendations:

4185/19/OPA: hereafter referred to as App A – Outline application for provision of up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; new sport and playing facilities; new access points and vehicular, cycle and pedestrian links; strategic landscaping and attenuation basins; a primary substation; and other associated site infrastructure. All matters reserved except for access, was submitted along with application;

4181/19/OPA: hereafter referred to as App B - Outline application for up to 360 dwellings and associated landscaping, new access points from Towerfield and Pick Pie Drive, and site infrastructure. All matters reserved except for access;

2.1.2 Together, the two Applications cover the majority of the land within allocation *PLY44*, with the exception of a parcel of land of a similar size to App B, which is currently not the subject of an application. That land is owned by Summerfield Homes (Summerfield (SD3) Ltd), hereafter referred to as the Summerfield land.

2.1.3 The Applications have been made in Outline form. At this stage therefore, it is the principles of how the development should come forward that needs to be considered. The details and final arrangements for site delivery will be controlled through the subsequent reserved matters submissions.

2.2 Pre-Application Engagement

2.2.1 The proposals were the subject of detailed pre-application (pre-app) discussions over an extensive period.

2.2.2 Prior to the submission as part of the pre-app process, the Masterplan that accompanies the Applications was publicly consulted on during a two-day public event at The Woolwell Centre and an exhibition in Plymouth City Centre. During this formative period, there was also an independent Design Review Panel of the Masterplan, overarching design principles, and of the proposed Design Code. The outcome of the design review process was positive. An Environmental Impact Assessment (EIA) Scoping Exercise was also undertaken prior to submission of the applications (Ref: 1705/17/SCO – see planning history). The proposed Development has also been the subject of a public 'Developer Forum', held on 19th September 2019.

2.2.3 It can be seen therefore that public engagement took place on the Masterplan proposals prior to submission.

2.3 Stakeholder Engagement

2.3.1 In addition to the pre-app public engagement referred to above, statutory planning consultations were undertaken at the time of the initial submissions. Further consultation took place in November 2023 and January 2024 following receipt of further information relating to updated transport information and s106 proposals.

2.3.2 During the application process there has been considerable stakeholder involvement with post-submission workshops held with various agencies including the neighbouring authorities (as the highway, education, housing, lead local flood and waste authorities) and with interested parties including National Highways (NH) (formerly Highways England) and the National Health Service (NHS).

2.3.3 The Local Members have been engaged throughout the process. A site visit by South Hams District Council (SHDC) Executive Members was held in autumn 2022 and again in autumn 2023, and there will have been a Committee Members' site visit prior to consideration of the applications.

2.3.4 In this way the views of the local community and other interested parties have been taken properly into account during considerations of the applications proposals.

2.3.5 A summary of the consultation responses received throughout the process is set out in 5 and can be viewed in full on the Councils website.

3 Description of Site and Surroundings:

3.1 Allocated Land

3.1.1 The land at Woolwell is situated to the east of, and adjoining, the existing outer edge of the built-up area of Woolwell. The land lies to the east of Tavistock Road (A386) and extends north of Roborough. The site is within and towards the western edge of the administrative boundary of SHDC but is adjacent to the existing built edge of Plymouth where PCC are the Highway Authority for some of the roads close to the site, notably the A386.

3.1.2 The recent Roborough Park Eco Village accessed off Towerfield Drive (TD) adjacent to App B is also within Plymouth. Land locally is located within the Joint Local Plan (JLP) Plymouth Policy Area (PPA), also referred to as being part of the 'Urban Fringe' (UF). The total area of land within the *PLY44* allocation is 140.57 ha (347.36 acres), comprising:

- 117.44 ha (290.20 acres) within App A,
- 11.66 ha (28.21 acres) within App B,
- 11.74 ha (29.00 acres) currently owned by Summerfield Homes not currently part of any planning application,
- and land containing existing industrial units and Plymouth Argam Rugby Football Club (PARFC) clubhouse fronting Bickleigh Down Road.

3.1.3 The two separate stand-alone but linked and inter-related applications are not the entirety of land within the *PLY44* allocation. The Summerfield land, roughly equivalent in size to App B, comprising agricultural land and rugby pitches is not yet the subject of a planning application. The commercial premises and PARFC fronting Bickleigh Down Road, also within the allocation, are left 'greyed out' on the Masterplan as existing uses to be retained.

3.2 Surrounding Area

3.2.1 The allocation surrounds the outer eastern and northern edges of Woolwell and the older settlement of Roborough. Woolwell is a late twentieth century suburb dating from the early 1980's, located towards the north-eastern fringes of Plymouth, approximately 5.6 miles (9 km) north of Plymouth City Centre. There are currently approximately 1,300+ homes with a population of circa 3,000+ and an average household size of 2.3 (2021 census).

3.2.2 The site is also close to the village of Bickleigh (Woolwell is part of Bickleigh Parish), within which lies the Royal Marine Barracks. It is circa 585m as the crow flies between Bickleigh St Mary the Virgin Church and the Tramway within the site, separated by a valley. Bickleigh is

located c. 1.66 km east of Roborough and lies between the site and the boundary with Dartmoor National Park (DNP) which is further east beyond Bickleigh towards Shaugh Prior.

3.2.3 There is inter-visibility between parts of Woolwell, Bickleigh, Roborough and parts of the development site, and the site is visible from further afield, including from some vantage points within DNP. Close to the site are deciduous, semi-deciduous and coniferous woodlands, notably Coombe Wood, Rock Wood, Hatshill Wood, Darklake Wood (which is being re-naturalised), and Henroost Wood. The National Cycle Network (NCN) route 27 passes by Darklake Wood very close to the south-eastern edge of the site. The application land is higher than NCN27 and there is an incline down through the woodland to the level of the NCN cycle track at Riverford viaduct.

3.3 Services, Facilities, Amenities and Employment

3.3.1 There are a wide range of services and facilities within close proximity of the site including the Local Centre at Woolwell comprising shops (including a Post Office, hairdressers and take-aways), the Woolwell Community Centre, a GP health centre, and nursery premises. Bickleigh Down C of E primary school (406 pupil capacity) also serves as St Celia's church.

3.3.2 There are two large supermarkets, other shops, a veterinary practise, and a petrol filling station at Woolwell Road/ Woolwell Crescent, approximately 400m west of the site. The Woolwell Centre, close to both applications sites, is the much loved and well used local community centre and sits alongside a high-quality play space provision.

3.3.3 There are also amenities in Roborough including Roborough Village Hall on New Road and the Lopes Arms Public House. Services and amenities further afield include the church at Bickleigh and Plymouth University of St Mark and St John (Marjon University) which has a swimming pool and hockey pitches.

3.3.4 Other than employment within the retail or education sectors, there is the Child Support Agency offices on TD. There are employment uses in the industrial units within the allocation at Bickleigh Down Road, at Plessy, and at Roborough Industrial Estate approximately 300m west of the site, accessed off the roundabout between Tavistock Road (A386) and Tamerton Road. Further afield, there are significant employment opportunities at Derriford Hospital, Marjon University and Estover Industrial Estate as well as local out-of-town retail parks (Manadon, Marsh Mills etc.) and of course the City Centre, all within commuting distance. The nearest secondary schools are within Plymouth. The nearest secondary school for boys would be Tor Bridge High, over 3 miles from the majority of new homes at Woolwell. The nearest secondary school for girls would be Notre Dame School (comprehensive school for girls), less than 3 miles from the bulk of new homes at Woolwell.

3.4 Access and Accessibility

3.4.1 As a result of its original design, the existing Woolwell community has only one means of vehicular entry and two means of exit, all onto the same section of the A386. Woolwell is, in effect, a large series of cul-de-sacs. This means that the area is susceptible to traffic problems and can become isolated in the event of accidents or delays, affecting the Woolwell Road access as the only means of entry.

3.4.2 The urban extension will enable a substantial number of new homes to be constructed while providing additional amenities for new and existing residents. It will also address the inherent access problem by allowing traffic to and from Woolwell by alternative means other than Woolwell Road in the event of accident or emergency.

3.4.3 Currently access to the field parcels is mainly via a combination of New Road, Bickleigh Down Road and Blackeven Hill, but also via the smaller Carron Lane and Leigh Lane, with The Tramway (part of the historic 19th century former Plymouth and Dartmoor Tramway) also serving internally to access fields, including from Darklake Farm. Darklake Farm is located off Campion Way beyond the southern end of the part of The Tramway which lies within App A, just outside of the site. The Tramway continues through and beyond Darklake Farm, outside of the site, thereafter accessibility then becomes problematic due to topography. Pick Pie Drive (PPD) ends in a cul-de-sac at the southern border of the App A site with the existing Woolwell community.

3.4.4 The proposed new 'Northern Gateway' Roundabout (NGR) lies close to the edges of the jurisdictions of the SHDC, PCC, and DNP Authorities. As such, the northern gateway not only serves as the principal gateway entrance to the development, but as the entrance to and exit from both the City of Plymouth and DNP. Additionally, the Tamar Valley National Landscape (TVNL), previously referred to as an Area of Outstanding Natural Beauty, lies to the north west of Woolwell beyond the western side of the A386. There is no inter-visibility between the TVNL and Woolwell, however there is inter-visibility between parts of DNP to the east and the site.

3.4.5 The area is well served by existing bus services connecting to Plymouth City Centre, Derriford Hospital transport interchange, and other key local destinations throughout the day. Plymouth Railway Station is located on the edge of the City Centre and is accessible weekdays via direct bus services which include Plymouth Citybus' half-hourly 42C service and Stagecoach South West no.1 service operating every 20 minutes which stops on the A386 to the west of the site.

3.4.6 In terms of walking facilities, the existing Woolwell and Roborough area is reasonably well provided for in terms of footways, with reasonably good quality facilities connecting with those that extend along the A386 to the west of the site. Part of the area surrounding the site also has good cycling facilities through a combination of on and off- road cycle routes, notably NCN27. However, external links to existing and planned cycle/ footway networks could be substantially improved to allow access for commuting and leisure.

3.5 Topography and Site Characteristics

3.5.1 Site topography is varied and in parts sloping, with flatter, higher ground adjacent to the rugby pitches and Pick Pie Plantation, falling generally eastwards and south-eastwards towards the valley bottom, where the land generally becomes increasingly steep. Beyond the valley bottom and wooded areas outside the site, the land rises again towards Bickleigh Village and the far (eastern) side of the Plym Valley. To the north, beyond New Road, although levels are undulating, they are generally rising northwards beyond the site towards DNP and Roborough Common.

3.5.2 Levels vary considerably across the site. Levels on the 'inside' side of The Tramway, i.e. west and south of it towards Woolwell and Roborough are generally higher, and levels beyond towards the outer edge of the site are generally lower, falling away towards the valley bottoms. The highest part of the App A site is the proposed playing fields adjacent to the Plymouth Arguam rugby pitches.

3.5.3 The App B land is presently largely unmanaged grassland, together with associated hedges and trees and banking to the northern boundary with Darklake Lane.

3.5.4 Access to the southernmost App B field parcel is currently mainly via a combination of the turning head at the end of TD and pedestrian access from the Darklake Lane footpath.

Access to the northernmost field parcel is via the junction of Bickleigh Down Road and Carron Lane.

3.5.5 Topography on App B land is generally less varied, with the northern parcel falling gently and relatively evenly northwards and the southern parcel sloping downwards gently in a north westerly direction, though the southern parcel has some areas of raised vegetation, with a vegetation embankment parallel with Darklake Lane footpath and a treed ditch along the southern boundary.

3.5.6 App B levels (and the Summerfield Homes land) are by comparison to most of App A, generally slightly higher.

3.5.7 The majority of the agricultural land is Grade 3b, with some small pockets of Grade 4 and 5 towards the valley bottoms. As such the land is not the best or most versatile land.

3.5.8 Elsewhere within the *PLY44* allocation, the Summerfield Homes land is largely unused agricultural land, with part also in long-standing use as sports pitches, notably for rugby.

4 The Proposals

4.1.1 App A: Outline application for provision of up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; new sport and playing facilities; new access points and vehicular, cycle and pedestrian links; strategic landscaping and attenuation basins; a primary substation and other associated site infrastructure. All matters reserved except for access.

4.1.2 App B: Outline application for up to 360 dwellings and associated landscaping, new access points from TD and PPD and site infrastructure. All matters reserved except for access.

4.1.3 A full list of the application documents submitted for both App A and App B is set out in Appendix I. The submission documentation itself can be viewed online with the following links ([Application A](#), [Application B](#)).

4.1.4 The two planning applications are Environmental Impacts Assessment (EIA) development, and an Environment Statement was submitted, along with an associated Habitats Regulations Assessment (HRA). The report considers the planning applications together in parallel as both are part of allocation *PLY44*, but also as stand-alone applications as they require separate consideration on their merits, separate decisions and separate s106 Agreements.

4.1.5 As explained in greater detail in the report below, the majority of the infrastructure that is necessary for the Masterplan site to work comprehensively is on the larger of the two sites, App A, and therefore App B is dependent to a significant extent on the infrastructure that will be delivered on App A land. As such, App A should be determined first, and only if approved should App B be approved. If App A is refused, the infrastructure on which App B is dependent is not deliverable and App B should also be refused as being unable to deliver the required proportionate infrastructure within necessary timescales commensurate with the Development, and therefore contrary to policy. More is said about this in Section 17.

4.1.6 The applicants have also sought to ensure that the costs in delivering the two sites are proportionality the same, and as such, the cost burden to each site have been equalised across the two land ownership areas. This is because the delivery of the single Masterplan relies on mutually dependent infrastructure, that both sites benefit from and make the Masterplan area work as whole. This is necessary as for the most part, the infrastructure would be a cost on the

App A site, but for which App B would benefit from. App B residents would also rely on infrastructure within App A Whilst this equalisation of site costs is not necessarily a planning matter, it does impact upon how S106 costs have been apportioned.

4.1.7 During the determination of the application, and realisation around the levels of S106 contributions that would be required, issues surrounding the viability of the development have arisen as it became apparent to the applicant that the cost of delivering the scheme would be more than the two proposals could tolerate. Accordingly, a Viability Assessment (VA) was submitted in December 2022 outlining the level of affordable housing (AH) that was considered tolerable, as well as what could be absorbed for the wider S106. This has obviously become a significant consideration through the subsequent conclusion of the determination process and has been reflected within the package of measures included within this recommendation. Consequently, this reflects in much of the subsequent report analysis sections.

4.1.8 There has been criticism that there is other land within the allocation owned by another landowner in respect of which no application has been submitted, and that the proposals for the development of the allocated site should be submitted comprehensively. While one ownership and one application would make considerations far simpler, the reality on large sites is that is often not the case, and the LPA has a responsibility to determine the applications as submitted. The site wide Masterplan addresses issues surrounding comprehensive development and allows for the integration of the other land at a point in the future when that landowner is ready to come forward with an application.

5 Consultations

Insofar as the representations relate to material considerations these are summarised in the following tables and an indication given of in what Section of the report matters raised are addressed.

5.1 Parish and Local Member Comments

5.1.1 The views of Bickleigh Parish Council along with neighbouring Parish Councils, and the views of the Local Member for Woolwell are summarised below. Summaries of other consultee responses are available to view in Appendix B. Full copies of all consultation responses can be found online ([Application A](#), [Application B](#)).

Initial submission

Consultee	Summary of response	Where this is addressed
Bickleigh Parish Council	Objection, provides detailed comments and concerns on the following issues:	
	Access, traffic and transport	Section 11
	Climate change	Section 16
	Education,	Section 14
	Housing mix	Section 10
	Community provision	Section 17 & Appendix D

Consultee	Summary of response	Where this is addressed
	Public forum Transport Pylons Phasing Consultation Full comments can be found here and at Appendix A	Section 11 Section 16 Section 17 Section 5
Buckland Monachorum Parish Council	Requests further information and clarification. Full comments can be found here .	
Councillor Nicky Hopwood, Woolwell Ward	Objection, provides detailed comments and concerns on the following issues:	
	Transport, main access, infrastructure, and Pick Pie Drive	11
	Climate change	16
	Self-build plots	10
	Land ownership	4
	Consultation	5 and Appendix A and B
	Full comments can be found here and at Appendix A	
Dartmoor Forest Parish Council	Objection, notes the following; <i>'We are very concerned about this development and the traffic this will add to the already congested A386 road into Plymouth. This is a main route many of our residents use on their daily commute/to get to hospital appointments or just general travel. We notice that many of the traffic mitigating schemes within the planning application are being left to the developer to carry out. This is no guarantee that these schemes will be put into action once the houses are built.'</i> Full comments can be found here .	Section 11
Horrabridge Parish Council	Objection, notes the following; <i>'The JLP highlights the importance of dualling the A386 between The George Junction and Woolwell Roundabout before any more development is carried out along the A386 corridor. Congestion occurs on the George/Woolwell Roundabout bottleneck daily, which adversely affects the many Horrabridge residents who commute into Plymouth for work. It is considered to be vital that the JLP is adhered to.'</i> Full comments can be found here .	Section 11
Shaugh Prior Parish Council	Expresses concern regarding the absence of, and provides detailed recommendations and observations for, the required mitigation to make the development proposals acceptable. Provides detailed comments and concerns on the following issues:	Appendix D
	LVIA	Section 12

Consultee	Summary of response	Where this is addressed
	Traffic and transport	Section 11
	Biodiversity/HRA	Section 13
	Full comments can be found here .	
Tavistock Town Council	Objection, notes the following; <i>'...whilst Tavistock Town Council has no objection to the development of the Woolwell urban extension in itself, it cannot support these applications at the current time and will not do so until appropriate measures have been put in place to improve the A386 and other links between Tavistock and Plymouth... Any new developments along the Northern Corridor Growth Area that risk making the journeys of Tavistock residents more difficult are not acceptable unless and until appropriate mitigation has been put in place.'</i>	Section 11

Revised Submission

Consultee	Summary of response	Where this is addressed
	Objection, provides detailed comments and concerns on the following issues:	
	Affordable housing	Section 10
	Development phasing	Section 17
	Construction traffic, and Pick Pie Drive.	Section 11
	Full comments can be found here and at Appendix A	
	Requests further information and provides detailed observations and advice. Provides detailed comments and concerns on the following issues:	
	Recycling	Section 14
	Affordable Housing	Section 10
	Cycling	Section 11
	Journey Times	Section 11
	Full comments can be found here .	
West Devon Borough Council		
Bickleigh Parish Council		

5.2 Representations:

5.2.1 Collectively 1692 letters of representation have been received against both applications, 1681 against the initial submission (866 for App A, 815 for App B) of which 20 were in support, 1 was undecided, and 1660 were in objection. 11 letters of representation were received in response to the revised submission (5 for App A, 6 for App B) of which 2 were in support in principle, and 9 were in objection. All representations from both consultations are relevant. The letters of representation raised a number of issues, summarised as follows:

Initial Submission

Issue raised in LoRs	Where this is addressed
<i>Highways</i>	
<p>Access</p> <ul style="list-style-type: none"> - Layout <ul style="list-style-type: none"> o Pick Pie is too narrow to carry construction traffic, exacerbated by over-parking on road o Main access should be from New Road and not through existing estate o Single access to large estate is dangerous o Junction at Bickleigh down should be pedestrian access only to extra housing o Tesco access to be relocated away from entrance/exit to Woolwell - Other <ul style="list-style-type: none"> o Private property access off Carron Lane does not seem to have been taken into account – how will the property be accessed both during and after construction is completed o Queries why access to site A is included in site B when it has no relevance o Pick Pie must not be used as access point for construction - Rat run <ul style="list-style-type: none"> o By opening pick pie Woolwell will become a rat run o Will create a rat run past school, care home and two nurseries o Bollards should be put in to separate new development from existing Woolwell o Pick Pie should be restricted to pedestrians, cyclists, buses, and emergency vehicles 	9 Transport
<p>Construction impacts</p> <ul style="list-style-type: none"> - Construction will create air, noise, odour, and light pollution - Noise will impact neighbours' quality of life and construction traffic will be detrimental to area - Construction vehicles would be dangerous along pick pie – obstruct view of cars and pedestrians 	9 Transport
<p>Cycling</p> <ul style="list-style-type: none"> - 106 monies should be allocated to cycling infrastructure - An off-road cycling/walking path linking Roborough and Yelverton is needed with a recognised urgency - The proposal appears to be box ticking rather than credible attempt to improve cycling provision - Safe cycling/cycle lanes on the A386 must be included in planning/unsafe on roads currently 	9 Transport
<p>Parking</p> <ul style="list-style-type: none"> - Insufficient parking provision proposed – will overspill into existing Woolwell - Roads should be built with on street parking in mind/on street parking will narrow roads and create access issues for emergency services - Unrealistic to limit parking per house/density does not allow sufficient parking - Needs to take into account visitor parking needs/needs free parking - Existing parking pressure (Tavistock Road, eco village, PPD) which narrows roads and causes congestion 	9 Transport

Issue raised in LoRs	Where this is addressed
<p>Phasing/access</p> <ul style="list-style-type: none"> - Main access must be delivered first, proceeding from the new road end of the site - Works should not commence from PPD 	9 Transport
<p>Public transport (PT)</p> <ul style="list-style-type: none"> - Buses will be stuck in same traffic as cars, no bus lanes to Yelverton - Existing PT services are limited and congested at peak times/aren't services/inflexible - Investment should be made to encourage PT use/used to have bus service but didn't last 	9 Transport
<p>Traffic</p> <ul style="list-style-type: none"> - Capacity <ul style="list-style-type: none"> o Insufficient capacity on road network, roadworks brought grid to standstill, will choke north of Plymouth o A386 loaded beyond capacity routine and peak times, emergency vehicles struggle to pass o Roads cannot accommodate increase traffic/Development will significantly worsen/2-4000 more cars o Could impact access to and from Derriford hospital and emergency vehicles o Eco village made similar arguments but generated a high volume of traffic o Traffic from nearby developments must also be taken into consideration (Belliver, Yelverton, Horrbridge etc) - Construction <ul style="list-style-type: none"> o Construction traffic will push people to use alternative narrow routes to avoid gridlock o Construction traffic must be monitored by highways during construction - Infrastructure <ul style="list-style-type: none"> o Infrastructure insufficient o Woolwell is only accessed by one major road, no alternative access to Plymouth o Cycling and buses will not solve the situation o Need genuine car alternatives o Will push traffic onto country lanes that aren't suitable for increased traffic - Road upgrades <ul style="list-style-type: none"> o Proposed road north of Plymouth will not improve traffic, need a road to join south of the airport o Proposed reconstruction of A386 Woolwell roundabout insufficient to accommodate 2000 homes o Proposed dual carriageway unlikely to mitigate increase in traffic volume o Road improvements must precede development, SHDC, DCC & PCC must ensure upgrade delivered o No funding exists for upgrade/no commitment from PCC or SHDC, so development should be refused o Development cannot provide infrastructure needed to resolve northern corridor traffic issue 	9 Transport

Issue raised in LoRs	Where this is addressed
<ul style="list-style-type: none"> ○ Forder valley link scheme must be finished before Woolwell to the George (WtTG) scheme. ○ All junctions should be replaced with flyovers and traffic lights avoided ○ Upgrades need to take into account how recent roadworks halted traffic across the grid. - Safety <ul style="list-style-type: none"> ○ People will use alternative country lanes potentially causing accidents with horse riders, peds & cyclists ○ Traffic will make it unsafe for children and pets and difficult to access homes 	
<p>Transport Assessment (TA)</p> <ul style="list-style-type: none"> - Assessment data <ul style="list-style-type: none"> ○ Queries validity of traffic survey (2016) and if all country lanes leading to development were included ○ Nearby developments must also be taken into consideration (Belliver, Derriford, Tavistock, Eco homes) ○ Queries assertion development can be accommodated before the WtTG upgrade ○ SHDC need to robustly test transport figures/traffic assessment has been conducted at off peak times ○ Statistics on personal car use (2002-2014) out of date/ Car ownership should be based on Roborough and Woolwell and impact on network should be revised with this taken into account ○ Not clear if development has been assessed for indirect impact on traffic flow ○ Doesn't take into account commuters passing through - Modal shift <ul style="list-style-type: none"> ○ No convincing strategy to deliver modal shift relied upon in the TA ○ unrealistic reliance on bus services and changes in travel times/attitudes - trend amongst young to not drive does not apply to rural areas ○ Queries why if car usage is falling is the Forder valley road development necessary ○ Site is remote and gets more rainfall, so cycling is not credible choice, and using buses generally requires bus changes to get to destination, and doesn't consider buses for shift workers or Sundays 	9 Transport
<i>Environmental</i>	
<p>Air/noise pollution</p> <ul style="list-style-type: none"> - Queries the impact of additional vehicles creating noise and air pollution - Traffic pollution exacerbated by congestion will cause ecological impact - Noise impact during construction - Will cause air pollution outside care home, school, and homes 	9 Transport & 14 Health
<p>Biodiversity</p> <ul style="list-style-type: none"> - Destruction of environment and habitats when brownfield site could be used/no justification 	13 Ecology

Issue raised in LoRs	Where this is addressed
<ul style="list-style-type: none"> - Mature trees will be destroyed/loss of hedges/trees must be considered - Loss of habitat for deer, pheasants, foxes, squirrels, birds, rare bats, badgers, - Plym river is sensitive and important for brown trout, migrating salmon and sea trout - Environment policy is weak/Irreversible damage to the environment/will sanitise natural woods - Queries how nocturnal animals will be protected 	
<p>Climate change</p> <ul style="list-style-type: none"> - Application should refer to climate change - Consider carbon natural build, rain water harvesting, copper boar heating, solar power - Land should be put aside for solar array to power homes - Queries whether there will be solar panels and charging points for electric cars for each home 	17 Climate Change
<p>DNP</p> <ul style="list-style-type: none"> - Properties will tower over moors/will be very visible - should be sensitive and in keeping as per planning requirement of DNP/will spoil DNP/AONB - Increase traffic and unsympathetic housing will cause negative impacts - Will create light pollution 	12 Landscape
<p>Flooding/drainage</p> <ul style="list-style-type: none"> - Attenuation basins likely to be inadequate given number of homes - Increasing in tarmac/loss of trees and greenspace will lead to flooding and run off into watercourses - Could lead to flooding on properties which have never flooded, query if developer is liable - Houses on Leat Walk highlighted as area at risk of flooding - Will create flooding problems for Bickleigh village, also in lower fields of Plym and Bickleigh valley 	17 Flood Risk
<p>Green space</p> <ul style="list-style-type: none"> - Loss of access to existing open fields will not be compensated for/token green space - Greenspace is vital for wildlife and resident wellbeing 	12 Landscape
<p>Landscape</p> <ul style="list-style-type: none"> - Impact on beauty of countryside/loss of valued countryside - Hedgerows on Bickleigh down and Carron lane should be retained, and a green belt put in place on site A to maintain rural landscape - Leat walk will lose views - Countryside should be at forefront of decisions 	12 Landscape & 13 Ecology
<p>Open Space</p> <ul style="list-style-type: none"> - Lack of open space - existing or proposed - No provision for open space for existing residents, no open space near Roborough green - Queries if there's provision for separate dog/children play areas - Queries provision of allotments and fruit trees as opposed to ornamental trees 	12 Landscape & 15 OSSR

Issue raised in LoRs	Where this is addressed
Built Area	
<p>Affordable housing</p> <ul style="list-style-type: none"> - Queries whether scheme will generate AH/how many - Only 1500 houses should be built and all should be council houses to rent - Concerned AH residents will not respect properties and neighbours. 	10 Housing
<p>Density</p> <ul style="list-style-type: none"> - Trying to fit same number of houses into smaller areas/how will this deliver JLP requirement - Density in some areas is that of an inner city and does not match existing Woolwell/ is excessive and inappropriate - Number of dwellings should be reduced proportionally to amount of land being developed - Proposed density doesn't allow for sufficient parking 	9 Urban Design
<p>Design/Layout</p> <ul style="list-style-type: none"> - Houses proposed up to existing property boundary/lack of privacy - Community Park (CP) and pitches too far away from many houses, no open space near Roborough Green - Houses should be built closer to Woolwell centre/facilities centred around existing community hub - 3-4 storey not appropriate - Pitches should be moved back to placement in original plan - Site B should be developed to max 30 dw/ha as eco-village, and accessed off TD or site A 	9 Urban Design
<p>Landownership</p> <ul style="list-style-type: none"> - Development of only some of the allocated land is not what was ratified in the JLP - All three landowners should be working together/PCC land has been included without permission - By not including Hitchins land the existing pitches are not secured/land could be developed with further housing 	4 Proposals
<p>Phasing</p> <ul style="list-style-type: none"> - Phasing should be identified and trigger points for delivery of community/road infrastructure - Should start from New Road to prevent disruption by construction traffic to school, care home etc - Infrastructure should be in place prior to homes being occupied 	17 Phasing
<p>Pitches</p> <ul style="list-style-type: none"> - Proposed pitches cannot be guaranteed/access may be refused if the Hitchins land isn't included - If existing pitches are removed the existing community will have no sports provision - Need all weather pitches 	15 OSSR
<p>Quality</p> <ul style="list-style-type: none"> - Needs to be better quality than recent major developments in Plymouth - Should be held to post-war standards rather than current housing standards 	9 Urban Design

Issue raised in LoRs	Where this is addressed
<ul style="list-style-type: none"> - Light painted brickwork looks poor over time, developers should guarantee repair where necessary 	
<p>Self-build</p> <ul style="list-style-type: none"> - As per <i>PLY44</i> and <i>Bick15</i> self-build plots must be included in plan 	10 Self-Build
<i>Community Facilities</i>	
<p>Education</p> <ul style="list-style-type: none"> - Secondary education provision should be included existing secondary schools are overprescribed - Queries timeline for new primary school, existing primary school over prescribed - How will school be staffed given teacher shortages 	14 Education
<p>Employment</p> <ul style="list-style-type: none"> - Where will residents find work - Proposed jobs are only temporary construction - Tenant farmers will be removed causing loss of livelihood/will impact farming - Lack of jobs will make people use cars 	14 Health
<p>Facilities/services</p> <ul style="list-style-type: none"> - Insufficient facilities proposed/no improvement of existing facilities - cannot support more residents - Impact on police/fire/council services - Development in South Hams but residents will be using Plymouth's facilities - Long distance to nearest rubbish disposal centre 	Appendix D and 14 Waste
<p>Health/NHS</p> <ul style="list-style-type: none"> - Community Health <ul style="list-style-type: none"> o Impact on mental health in community o Construction traffic would pose significant danger to pedestrians and road users - Hospital <ul style="list-style-type: none"> o Derriford already beyond capacity – too few beds and doctors o A&E at breaking point with very long wait times - GPs <ul style="list-style-type: none"> o GP and dental services are already struggling, development will increase burden o Shortage of doctors - even if new surgery built there will be no one to staff it o 1600 dw would require 4 full time GPs not possible with existing service, and national wide staffing issues o Number of homes warrants GP, should be included with phase 1 with contract in place and clinical staff o Local GPs and Dentists aren't taking new patients, queries where new residents will go 	14 Health and Appendix D
<p>Infrastructure</p> <ul style="list-style-type: none"> - Infrastructure already stretched - Query if a park and ride should be considered adjacent Roborough community hall - Sewage, water, and electricity can't cope with additional housing 	Appendix D, 11 Transport

Issue raised in LoRs	Where this is addressed
<i>Overarching/general</i>	
<p>Consultation</p> <ul style="list-style-type: none"> - Surrounding areas and ward members weren't consulted/those using north corridor will be unaware - Developer hasn't kept public updated/ updated the website enough - Proposal was difficult to understand/ timescale unreasonable given volume of documents - Shouldn't go ahead unless residents' concerns answered/residents wishes will not be kept in mind - Times of consultation events limited the number of people able to attend 	2 Community Engagement
<p>General</p> <ul style="list-style-type: none"> - Application will not receive sufficient scrutiny - Plymouth and West Devon will be impacted by development to meet SHDC's needs/DCC will benefit from council tax, but PCC will have to deal with impacts - Queries developer's motives/only benefits developer not Woolwell - Query where the funding to maintain development will come from - Independent review of traffic, services; health/education/police, and environmental impact needed - What security is there to ensure delivery of roads, GPs, bungalows, self-build etc 	Some issues not material; Appendix D & 10 Housing
<p>Impact on existing Woolwell</p> <ul style="list-style-type: none"> - Will cause overpopulation/doubles size of Woolwell - Destroy community/village atmosphere/ruin character/'ruin Woolwell' - Diminish quality of life/area is over-utilised 	9 Urban Design
<p>Principle</p> <ul style="list-style-type: none"> - Need <ul style="list-style-type: none"> o Not needed/empty buildings not being used/ lack of demand for large developments e.g. Sherford o Locals don't want new homes/queries whether people on SHDC waiting list are local o No clear evidence this number of houses needed - Plan <ul style="list-style-type: none"> o Scale is too large/scheme cramped and could produce ghetto and impact residents o Consent should be conditional on adopting principles in neighbourhood plan o Estate should be separate from Woolwell not an extension/is more an extension of Roborough - Location <ul style="list-style-type: none"> o Unaccepted loading on northern fringe without providing necessary road infrastructure o Brownfield land should be developed before looking to encroach on greenfield areas facing DNP o Will spread urban sprawl/north of Plymouth already overpopulated o Houses should be built closer to where people want to be o Expand Sherford or build somewhere else off the A38 instead/build on airport land instead 	8 Principle, 10 Housing

Issue raised in LoRs	Where this is addressed
Property Impacts <ul style="list-style-type: none"> - Will reduce existing property prices - Difficult to sell homes - Service charge for CP may make new properties difficult to sell - Impact on views will reduce property value - Will devalue eco-homes and anger existing residents 	Some issues not material, Appendix D

Revised Submission

Issue raised in LoRs	Where this is addressed
Community Health <ul style="list-style-type: none"> - The increased noise and air pollution, along with increased traffic pollution will impact resident's quality of life, particularly children, and there are no plans to shield existing dwellings as with other developments. - Concerned that the site is being accessed via a quiet residential street which passes a school and nursing homes. 	14 Health & 11 Transport
Consultation <ul style="list-style-type: none"> - A Design Code has been imposed upon 3rd party landowners without consultation, this should have been drafted via a joint effort of the LPA and various landowners, rather than by the 'first party out of the block' and should not bind 3rd parties to its delivery. 	4 Proposals
Environmental <ul style="list-style-type: none"> - Loss of green spaces will impact biodiversity, recreational areas for residents, aesthetics of the community, and the health and wellbeing of the residents and ecosystem. - Long-term interests of the community and environment should be prioritised over short-term gains. - Proposal lacks consideration for the long-term sustainability of the community. - Replacing New Road extends journey times while causing more environmental destruction when there is already a usable road. 	13 Ecology, 16 Sustainability & 10 Transport
Highways <ul style="list-style-type: none"> - Access <ul style="list-style-type: none"> o The accesses to the new Woolwell site (the new roundabout, TD and PPD) will congest the A386. o Access to New Road should not be blocked from the A386 as it is the essential access to Bickleigh Village, Shaugh Prior, and Wotter, with the other roads being single track and unsafe. It is also the safest access for HGVs, military tanks, and ambulances as some helicopters for patients going to Derriford hospital use the 42-commando helipad. o The new three arm priority roundabout appears to be a similar size to Woolwell roundabout and as such is insufficient in size as, when used by HGVs, the roundabout becomes single lane due to their width. Due to lack of traffic lights on the Woolwell roundabout at peak times vehicles from Woolwell are not given way to and this will likely happen at the new roundabout. 	10 Transport

Issue raised in LoRs	Where this is addressed
<ul style="list-style-type: none"> - Rat run <ul style="list-style-type: none"> o Woolwell will become a rat-run for traffic. - Safety <ul style="list-style-type: none"> o Speed limits are not adhered to along the Roborough bypass, the increased traffic will increase the danger to pedestrians and drivers. - Traffic levels <ul style="list-style-type: none"> o The plans to widen the A386 doesn't consider the proportion of traffic accessing Derriford and Plymouth, and there is an existing bottle neck between the George P&R and Derriford roundabout. The 2000 new homes will create the same effect. o The walking, cycling, and PT enhancements aren't adequate to mitigate the increased traffic. o There is little employment in the site and residents will need to use the A386, increasing traffic levels. o 2000 homes will add an additional 4000 cars, increasing traffic noise levels particularly for those in Roborough Village and Believer. o The increase in vehicles at peaks times when traffic is at a standstill will create more carbon pollution and reduce air quality. 	
<p>Infrastructure</p> <ul style="list-style-type: none"> - The scale of the application will strain existing Infrastructure both locally and in Plymouth. - The increased population has implications on local services (particularly to health services which are not being proportionally increased – GPs, dentists, and Derriford Hospital), traffic congestion, and character of the neighbourhood. - Existing PT is not sufficient and unaffordable, and the remaining existing buses are overcrowded and unreliable. - SWW need to make another reservoir as there are already hose pipe bans during peak seasons due to insufficient water levels. - There are a lack of primary schools and police in the area. - Infrastructure to support the development needs to be put in place prior to construction. 	<p>Appendix D & 16 Utilities</p>
<p>Overarching/general</p> <ul style="list-style-type: none"> - Viability and equitability concerns due to disproportion balance of infrastructure and costs on App A. - It's not ethical for the developer to rescind the commitment for AH, which then may be amended retrospectively to be an even lower commitment. - Queries where the new Woolwell residents will be paying council tax to - Queries whether there will be a community charge, like with the eco-village. - Given that phasing is an allocation wide matter, the phasing should be made available now, as required by <i>PLY44</i>, rather than not being dealt with until after permission is granted. 	<p>17 Phasing & Appendix D</p>

6 Relevant Planning History

6.1.1 App A: 1705/17/SCO Request for EIA scoping opinion for up to 2000 dwellings; new primary school and other community uses as a new community hub; new access points and vehicular, cycle, and pedestrian links; areas of informal and public open space; strategic landscaping and associated site infrastructure. All matters reserved except for access. Reply 30.22.2017; Addendum Reply 05.09.2018.

6.1.2 App B: 1705/17/SCO Request for EIA scoping opinion for up to 2000 dwellings; new primary school and other community uses as a new community hub; new access points and vehicular, cycle, and pedestrian links; areas of informal and public open space; strategic landscaping and associated site infrastructure. All matters reserved except for access. Reply 30.22.2017; Addendum Reply 05.09.2018.

ANALYSIS

7 Human Rights and Public Sector Equality Duty Considerations

7.1 Considerations under *Human Rights Act 1998*, *Equalities Act 2010*, and under the Public Sector Equality Duty.

7.1.1 *The Human Rights Act 1998* places a duty on public authorities to respect the human rights of individuals and to act compatibly with sixteen fundamental rights and freedoms set out in the European Convention on Human Rights (“the Convention Rights”) wherever possible, unless primary legislation dictates otherwise.

7.1.2 In the planning context, the relevant Convention Rights are in respect for private and family life, home, and correspondence (Art 8) and right to peaceful enjoyment of property (Protocol 1 Art 1). The rights granted by Art 8 and Protocol 1 Art 1 are qualified rights meaning that interference with those rights might be permissible if it is done by the public authority to secure a legitimate aim, such as the regulation of land use through development control measures.

7.1.3 Both Art 8 and Protocol 1 Art 1 rights are therefore material planning considerations, so should be respected, but they are not guaranteed. Not every adverse effect on say residential amenity will therefore amount to an infringement of the right to respect for a person's home, nor the loss of value to landowners caused by neighbouring developments infringe Art 1 of the Protocol 1. It is a question of proportionality. Accordingly, the Convention Rights do not necessarily outweigh the importance of having coherent control over town and country planning, and whether in the planning balance the Convention Rights outweigh other material considerations, is a matter of planning judgment.

7.1.4 In the case of the two applications, the impact of construction traffic on the amenity of neighbouring residents, particularly using PPD potentially for a considerable period of many years, is an understandable concern. While construction impacts are an everyday occurrence, they can be mitigated through an appropriate Construction Environment Management Plan (CEMP) and a condition requiring a CEMP to be approved before the commencement of development is recommended. Consideration has also been given to whether a specific condition restricting use of PPD would be appropriate, lawful and policy compliant. The issue is addressed in detail in section 11.

7.1.5 The provision of a school promotes Art 3, the right to education. A primary school is proposed to be funded and school age children or any specific age group are not adversely impacted.

7.1.6 While granting planning permission would interfere with residents' Convention Rights to a limited degree, when compared with the wider public benefits of the proposed development

the interference would be in accordance with the law and in pursuance of a well-established legitimate aim.

7.1.7 The Public Sector Equality Duty (PSED) contained in section 149 of the *Equality Act 2010* provides that a public authority or person exercising a public function must, in the exercise of its functions, have due regard to the need to:

- “(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”*

7.1.8 The protected characteristics are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

7.1.9 PSED is a procedural duty. It requires a public authority to consciously consider with due rigor, the potential impacts of a proposed decision or policy on people with the relevant protected characteristics so there is a proper appreciation of the potential impact of the decision on the equality objectives and the desirability of promoting them. What is required by way of consideration depends on the context, but it does not require the impossible or indeed any particular outcome.

7.1.10 While as outline applications there is no agreed housing mix, the mix for each phase will be secured by condition, to ensure a range of accommodation to meet the needs of young and older people. The Parameter Plans (PPs) allow for the possibility of single- storey accommodation and a percentage is required to be wheelchair accessible homes, more suited to housing the disabled and elderly, being secured through condition. The development, including the Community Park (CP), will be publicly accessible, as will The Tramway.

7.1.11 Social isolation can have negative health impacts and by creating environments which naturally bring people into contact, opportunities to address isolation arise. As part of the Developments, formal crossing facilities will be upgraded on the A386 Tavistock Road to support the visually and mobility impaired, and the Woolwell to the George (WtTG) scheme to which the proposals contribute includes similar provision.

7.1.12 The community infrastructure proposed includes facilities and funding for all groups and ages, with education, community facilities, sports provision. Local centre and health provision with all ages and groups catered for.

7.1.13 There are opportunities through the section 106 agreements to fund expansions to local facilities including the local community centres, which are well used by the existing local community, are inclusive and care for all. By expanding existing facilities, the opportunities for new and existing residents to socialise and integrate is increased, and PPD will serve as an accessible link, a vital means to connect the communities.

7.1.14 Romany gypsies and Irish Travellers are protected as ‘races’ under the 2010 Act and as such are a group within the community who have equal rights to access good quality well located places to live. Policy *DEV13 - Consideration of sites for Travellers and Travelling Showpeople*, advises new sites for travellers and travelling showpeople will be permitted where they are part, or can demonstrate that they will contribute to the creation, of a sustainable linked neighbourhood or sustainable rural community. This application does not propose any Traveller

pitches, with no need having been identified. The site is more remote from the main trunk network where the demand for traveller pitches is higher and, while in such circumstances the development does not propose to cater directly for this group's needs, the development does not preclude provision and no inequality arises because of the development if approved.

7.1.15 Self-build housing, which could favour younger people, is not included for reasons explained in the housing section report linked to viability, but the absence of provision at the outline stage does not preclude the possibility of provision if a demand arises. Through the Allocation Wide Design Code (AWDC), Neighbourhood Design Code (NDC), Reserved Matters (RMs), conditions and section 106 framework it is possible to ensure homes are built to acceptable standards of accessibility to address the housing, mobility, and health needs of all in the community and no adverse impacts are anticipated.

7.1.16 In general, the Applications will deliver mix and affordability of housing, public buildings and spaces that contribute towards meeting the needs for young and older people, all race and faith groups, people with disabilities and of any gender within an environment designed to be safe and minimise crime and the fear of crime.

7.2 Relevant Policy Framework

7.2.1 *Section 70(2) of the Town and Country Planning Act 1990 requires, in dealing with an application for planning permission that a decision taker shall have regard to the provisions of the development plan, so far as is material, and to any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission under the Planning Acts are to be determined in accordance with the development plan unless material considerations indicate otherwise. R (Corbett) v Cornwall Council [2020] EWCA Civ 508 re-emphasised that a key part of the section 38(6) statutory duty is to determine whether the development accords with the development plan when viewed as a whole. It has long been recognised by the courts that it is not unusual for development plan policies to pull in different directions and that the decision taker must therefore make a judgement as to whether a proposal is in accordance with the plan as a whole and bearing in mind the relative importance of the policies which are complied with or infringed and the extent of the compliance or breach.*

7.3 The Development Plan Framework

7.3.1 The statutory development plan for the purposes of determining the Applications is the *Plymouth & South West Devon Joint Local Plan 2014 – 2034* ("JLP") adopted by SHDC on March 21st 2019 and the *Bickleigh Parish Neighbourhood Plan* ("BPNP") made 2019. Within the development plan, the most important policies for decision-taking purposes are:

- *SPT1 Delivering sustainable development*
- *SPT2 Sustainable linked neighbourhoods and sustainable rural communities*
- *SPT3 Provision for new homes*
- *PLY44 Woolwell Sustainable Urban Extension and Community Park*
- *DEV7 Meeting local housing needs in the Plymouth Policy Area*
- *DEV9 Meeting local housing needs in the plan area*
- *DEV23 Landscape character*
- *DEV25 Nationally protected landscapes*
- *DEV30 Meeting the community infrastructure needs of new homes*
- *DEV32 Delivering Low Carbon Development*
- *DEL1 Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy*
- *Bick01 Ecology, Geology and Diversity*

- *Bick 04 New Housing Development*
- *Bick05 Infrastructure*
- *Bick06 New Community Facilities*
- *Bick07 Local Character*
- *Bick09 Local Green Space*

7.3.2 *Devon Waste Plan 2011 – 2031* and *Devon Minerals Plan 2011 – 2031* also form part of the Development Plan. *The Devon Minerals Plan* provides the minerals policy framework for Devon over the period to 2033. Aggregate supply is a consideration in the construction phase. *The Waste Plan* emphasises the need to reduce waste generation and treat unavoidable waste as a potential resource, with an emphasis on sustainability. Waste issues are dealt with in Section 16.

7.3.3 The above policies are up to-date and consistent with national planning policy and should be given full weight in the assessment of the Applications. An assessment of the weight to be afforded to all relevant development plan policies is provided at Appendix C.

7.4 The National Planning Policy Framework

7.4.1 *The National Planning Policy Framework* (NPPF), last updated in December 2023, sets out the Government’s planning policies for England and how they should be applied. It is a material consideration for decision-taking purposes and can affect the weight attached to policies of the development plan. It cannot, however, alter whether there is a conflict with the development plan nor undermine the statutory primacy that a development plan holds.

7.4.2 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. At Paragraph 8, this is defined as meaning that there are three overarching objectives which are interdependent and need to be pursued in mutually supportive ways: economic, social, and environmental. The NPPF goes on to state, however, that they are not criteria against which every decision can or should be judged (paragraph 9).

7.4.3 Paragraph 11 of the NPPF directs that planning decisions should apply a ‘presumption in favour of sustainable development’. In respect of the operation of paragraph 11.c) for decision-taking purposes, where planning proposals accord with an up-to-date development plan, they should be granted planning permission without delay. The corollary, naturally, is that where a proposed development does not accord with an up-to-date development plan then planning permission should be refused unless there are prevailing material considerations to the contrary. In the case of the Applications, there are development plan policies that are relevant to the assessment of the Applications and those policies that are important to their determination are up to date.

7.4.4 The NPPF is supported and complemented by the national *Planning Practice Guidance* (PPG). The guidance provided by the PPG is advice on procedure and elaboration of NPPF policies and can provide statements of new planning policy. It is a material consideration alongside the NPPF.

7.4.5 In July 2024, the Government proposed changes to national planning policy. Those changes (and corresponding draft version of a new NPPF) were subject to a consultation that closed on 24th September. The matter of what weight, if any, to be afforded to a draft or emerging policy is a matter of planning judgment. However, it is unclear which, if any, of the proposed changes will ultimately be adopted (and which of course are liable to change depending on the review of that consultation). As such, not more than limited weight is given to

the new draft NPPF and in practice it should play no determinative role in the determination of these applications

7.5 Other Relevant Considerations

7.5.1 Other material considerations include:

- The *Joint Local Plan Five Year Review Report* (March 2024)
- JLP documents including *Plymouth and South West Devon Supplementary Planning Document* (SPD) July 2020 and *Plymouth and South West Devon Developer Contributions Evidence Base* June 2020
- The declared Climate and Housing Emergencies
- *Plymouth Sound and Estuaries European Marine Management Site, Recreation and Mitigation Management Scheme* (RMMS) November 2019.
- *Dartmoor AONB Management Plan 2020 – 2025* (Draft) and *Tamar Valley AONB Management Plan 2019 – 2024*.

8 The Principle of Development

8.1 Spatial Strategy and Reasons for an Urban Extension

8.1.1 The JLP at Policy *SPT3* identifies that as a minimum the number of new homes that will be delivered across the plan area to 2034 will be 26,700. This should be provided in line with the JLPs spatial strategy which apportions housing delivery appropriately between the Policy Areas. The spatial strategy operates at three different levels; the Plan Area; the PPA; and the Thriving Towns and Villages Policy Area (TTVPA). *SPT3* apportions at least 19,000 of the required homes within the PPA. The PPA incorporates the administrative area of Plymouth along with Plymouth's Urban Fringe (UF), and includes Sherford and Woolwell, is where major development is committed.

8.1.2 Strategic Objective *SO1 - Delivering the spatial strategy* makes it clear that the growth of Plymouth will be supported by a significant number of new homes. The northern corridor of the A386 has been identified as an integral part of that growth strategy. The contribution of the 2,000 new homes at Woolwell therefore forms a critical part of the overall JLP spatial strategy and has the potential to deliver at least 7% of the homes required within the Plan Area, and 11% of those provided for within PPA.

8.1.3 Plymouth and the UF are clearly identified as having the greatest potential to deliver a significant number of new homes during the plan period. In allocating development where there is existing infrastructure to support it, development in more sensitive locations can be minimised. The Spatial Strategy as such allows a more proportionate approach to managing growth in the TTVPA and in particular around the six main towns, where development expectations have been set within the capacity limits of the local infrastructure and services. The importance of the delivery of the Woolwell allocation in achieving the overall objectives of the JLP spatial strategy cannot therefore be overstated.

8.1.4 Having regard to housing delivery and the required 5-year supply of deliverable housing land, the combined JLP authorities can demonstrate a 5-year housing land supply of 5.35 years at end of March 2024. Although the housing numbers intended to be delivered through the Applications are not yet required to contribute towards maintain the 5-year supply, these sites will be important going forward to ensure this is maintained. Passing the test is going to be increasingly more difficult and highly unlikely without Woolwell contributing to the supply.

8.1.5 The risks are considerable if the allocation is not brought forward, including: increased risk of challenge to the 5-year housing land supply through appeals; increased risk of failing the housing delivery test; the loss of 2,000 homes from the land supply which will have to be replaced with other sites elsewhere; undermining the JLP strategy and policies meaning they cannot be considered up to date and have less weight going forward; and increased speculative applications in other less sustainable sites

8.1.6 All of this is within the context of significant uncertainty with planning reform, the JLP review, housing numbers and household projections as well as the more recent proposals outlined in the NPPF consultation.

8.1.7 Accordingly, there is a strong policy basis in which to support the delivery of these proposals.

8.2 JLP Policy *PLY44* and Bickleigh Parish Neighbourhood Plan Policy *Bick04*

8.2.1 Under Policy *PLY44 Woolwell sustainable urban extension and community park* the land at Woolwell, the development is expected to achieve a comprehensive residential led mixed use development to provide a sustainable urban extension and a defined edge to the north of the city, including a new community park, with provision for in the order of 2,000 new homes. The principle of development coming forward in this manner is therefore accepted.

8.2.2 Policy *Bick04 - New Housing Development* advises residential development within the proposed Woolwell Sustainable Urban Extension area should follow the principles set out in Policy *PLY44*. A more detailed analysis of how the proposals meet are aligned to what is expected by *PLY44* is set out in Appendix C.

9 Urban Design

9.1 Overarching Policy Context and Main Considerations

9.1.1 A key aim of the planning system is to ensure that new development plays a part in helping to create places and buildings that are beautiful, sustainable, healthy, safe, efficient and that function well. These and other themes carry through national policy, national guidance, best practice guidance, local plans, SPDs, and assessment tools and form the basis for and help to guide decision-making relating to the design of new development.

9.1.2 JLP Policy *PLY44* policy sets out the requirement for a Design Code and strategic Masterplan. *SO11 - Delivering high quality development* aims to deliver development which is sustainable, of the right type for its location, and of good quality, which achieves particular outcomes: it results in healthy communities that enjoy good quality and clean environments and where healthy lifestyles are positively encouraged. *DEV10 - Delivering high quality housing* requires housing development to be of a high quality in terms of its design and resilience and provide adequate space to achieve good living standards is achieved through the criteria under the policy. As an outline application, issues including the quality of the building design, materials and layout will all be addressed at RM stage. However, compliance will be required with the AWDC, which also introduces a further level of quality and scrutiny through the requirement for NDCs which must follow and build on the principles set within the AWDC. In this way, proposals are consistent with the Government's requirement for DCs, and the NDC and RM application process will provide a framework in which to ensure the policy criteria are considered and addressed.

9.2 Overview of the Design Approach

9.2.1 The approach to design for the allocation is chiefly set out within the submitted Design an Access Statement (DAS), the AWDC and demonstrated at the macro scale by the Masterplan. The site wide Masterplan was the subject of extensive pre-app discussions. This involved the applicant's specialist team of urban designers, transport planners, ecologists and drainage engineers, and the LPA's in-house specialists testing masterplan options and arriving at a consensus as to the preferred Masterplan. For example, the approach to landscape strategy, access and movement options, the location of housing parcels, alternative locations for the key infrastructure such as the school, local centre, playing pitches, and drainage options. There was also a subsequent independent Design Review Panel Process, which was made up of the panel's own specialists, to review the approach to the Masterplan, overarching design principles, and the Design Code work. The outcome of the design review process was positive and reinforced the position that the Masterplan principles were and remain sound. Urban design matters are directly linked to and overlap with issues addressed in other chapters including landscape and ecology.

9.3 Vision

9.3.1 The documents start by setting out a vision for the development in the future, laying down aspirations for a place that is sustainable, has its own identity, is a pleasant and healthy place to live in and to visit, that is well connected and easy to move around, attractive, and characterful. The vision underpins the proposals and helps to define the strategies and principles that provide the framework for the design of the development. This vision accords with the wider government aims for developing healthy and successful places and the aspirations for good place making of the JLP and stands as a good base point to return to for this and all future proposals that may flow from any related permission.

9.4 Design Framework

9.4.1 Policy *DEV20 - Place shaping and the quality of the built environment* advises larger scale development proposals will be required to meet good standards of design, contribute positively to both townscape and landscape, and improve the quality of the built environment through an appropriate design framework. While policy *PLY44* sets out the requirement for a Design Code and strategic masterplan, it sets no guidance or specification as to how a code would operate or what aspects should be coded. The initial submissions of the DAS and AWDC have been significantly amended in consultation with Local Authority officers since first submitted and officers are confident that this now provides a much more positive and helpful framework from which high quality urban design can emerge than was the case at the outset.

9.4.2 Through a series of strategies, parameters and principles that are chiefly contained within chapters 3 and 4 of the DAS and AWDC, there is now a logical hierarchy of information that sets a framework for the disposition and structure of the development of urban and green spaces within the allocation area. The strategies and principles primarily provide the structure of what is to go where, for instance; where the principle routes of movement will be and how other key routes will relate to those; where the key points of access are located; where the highest areas of density would be situated and where the tallest buildings are to be found; where the area of mixed use would be located along with a primary school; the approach to different aspects of Green Infrastructure (GI) including Sustainable Drainage Systems (SuDS), open spaces, structural tree planting; and where play and sports and leisure areas will be. Together, these high-level principles provide a blueprint for a successful place where future residents will have good access to local facilities and shops within the local centre, green space within easy reach, sustainable travel modes can be the mode of choice, safe and memorable townscape punctuated by urban squares and key buildings, and streets are lined with trees.

9.4.3 The strategies as set out accord with good standards in urban design as set out in best practice guidance and there can be confidence that the underlying structure of the way that the place is to be assembled has the capacity to lead to the development being successful in placemaking terms.

9.5 Allocation Wide Design Code (AWDC)

9.5.1 A revised AWDC has been submitted and sits alongside the higher-level principles and strategies and chiefly provides design instruction so that designers have a suite of design solutions and direction for different scenarios. These scenarios set expectations and design standards for different situations across the allocation area. In most cases these are either location specific providing a performance specification of the types of attributes specific spaces are to have, such as for Key Spaces, or where they are not specific to a location, they provide a list of valid options or standards that are applicable for given scenarios as they arise. This higher-level code will apply across the entire allocation area and will ensure that there is a consistent and high-quality approach to different aspects of design and that the prescribed acceptable standards are the expectation irrespective of location. The document is comprehensive covering topics that are both urban in character such as parking, street design and building character, to aspects that are related to SuDS, ecology, green amenity space and play.

9.5.2 The Code itself is subdivided into Chapters covering the different themes relating to the development as follows:

Overarching Framework

9.5.3 Sets out the overall approach to developing a coherent and legible place that is easy to move around and supports health and wellbeing.

Streets and Movement

9.5.4 Sets out the hierarchy of routes and defines key aspects of their design and character including tree planting, parking and movement, and connectivity for different modes of transport.

Urban Structures

9.5.5 Relates to the way in which the urban area should be designed and includes coding relating to block structures, boundaries, key spaces and servicing for waste and utilities. It sets out mandatory principles that are to be applied across the entire development as well as providing coding that can be applied to features in locations where specific site conditions are encountered.

Green and Blue Structures

9.5.6 Focusses on providing coding for aspects relating to the GI to ensure that amenity, open space, and biodiversity aims are met throughout the development.

Building Design and Character

9.5.7 Sets out the approach to be taken relating to the design of buildings in different locations with coding covering aspects such as building type, formality, character, and materiality. Three main Character Areas (CAs) are planned and are defined as the: Parkland Edge, Central Core, and Woodland Edge. Each CA will have a different architectural approach and feel relating to their position, density, scale, and surrounding context and from the area of local precedence they draw their character references from. The materials palette will be a simple range that includes slate, render, stone, and some timber cladding. Officers are satisfied

that this approach will help to give different areas of the development their own unique sense of place that will help with navigation whilst also relating appropriately to local identity.

9.5.8 Within each of the chapters the codes are set out in a number of ways depending on the nature of the design issue.

9.5.9 Specific codes set out requirements for how a particular element of the development is to be designed and provide specific or parametric dimensions and diagrams to illustrate these requirements. For instance, the main spine road is proposed to contain footways, a segregated cycle track, carriageway, and tree planting along its length. It's character and geometry are proposed to change slightly as it relates to different parts of the site along its route. These different arrangements are provided within the code.

9.5.10 Other codes provide a set of performance criteria for different aspects of design against which future proposals will be measured. These act as a benchmark for future designers and decision makers and generally define either qualitative or specific aspects of design. As an example, the code for parking provides acceptable solutions and critical aspects of design to be achieved across a range of different parking scenarios that might reasonably be expected to be encountered within different parts of the site to ensure that parking arrangements are convenient, safe, and do not have a negative impact on the street scene. Similarly, a range of block types define the characteristics that urban blocks are to have including the way in which parking and buildings are arranged within them. The coding for green spaces follows a similar format and provides both overarching principles and specific instructions for typical scenarios that will need to be addressed in the design of the development.

9.5.11 The comprehensive nature of the code will serve as a helpful tool for future designers as it sets standards for design approaches, but it will be equally helpful for decision makers who will be able to use it as a tool to test design proposals against.

9.6 NDCs

9.6.1 The AWDC importantly provides instruction within figure 3 (a comprehensive table) as to how these design options are to be assembled through a further tier of coding at a neighbourhood level. The Neighbourhood Codes would be agreed ahead of or alongside the submission of RM applications relating to a defined neighbourhood code area and provide a clear set of instructions about how a place is to be designed, whilst also retaining consistency with the overarching principles and compatibility with other NDC areas. The Neighbourhood Codes operate at the scale of streets, blocks, and urban and green spaces and effectively provide the context for designers to express themselves through the detail. The Neighbourhood Code would, for example, define the pattern and layout of the network of streets, show how wide particular streets should be, clarify the heights of the buildings to each side of a street, confirm if there should be street trees on both or one side of a street and what their spacing should be, and set out the character of the boundary treatments to the properties amongst other things. Once in place, the NDC serves as the blueprint for design within the coded area. Designers then use the composite information to detail the street, buildings, gardens, squares, and green spaces in the context of the prescribed coding information for the area.

9.6.2 The two-tier system of coding, with a high tier Allocation Wide Code defined at the Outline planning application stage and a lower tier Neighbourhood Code prepared ahead of the RM stage, has been well tested at Sherford and has been successful in co-ordinating different design teams as well as multiple developers to a common coherent and emerging plan. Officers are confident that the documents have the capacity to deliver the high quality expected from the *PLY44* policy.

9.6.3 Planning conditions attached to the outline application will be required to ensure that the number of neighbourhoods and their boundaries are first agreed, and a NDC is provided ahead of or in parallel with the first RM application within any agreed neighbourhood.

9.7 Main Access

9.7.1 The Northern Gateway is the main new access and is identified as one of a number of key spaces within the development. Located at the proposed new entrance on Tavistock Road (A386), it will become the primary access, form a clearly defined edge to the city, and form the first impression for those travelling south from the north. It is also the point at which people leaving Plymouth from the south travelling north out of the city will experience the start of the transition from the more urban environment towards DNP. The Northern Gateway key space is part of the Parkland Edge CA.

9.7.2 This space covers the area surrounding the existing Roborough Hall, including its entrance from Tavistock Road/ New Road. Entrance routes to this public/ civic building will be attractive, welcoming and of quality, including an uplift in public realm treatment and landscape treatment. This is not without its challenges due to changes in topography, the necessary realignment of the A386 for safety reasons, and the need to stop up New Road.

9.7.3 As mentioned above the AWDC sets out design principles, qualities, and components to feature in key space areas. For the Northern Gateway, this includes the gateway space having a planned and sensitive arrangement of built form and landscaped elements to define the key space, for the roundabout to be an integrated element that does not fully dominate the arrival experience and contain landscape components to include tree and hedge planting, mounds, walls, and public art. Density will be 40 d/ha and 2-3 storey development is considered appropriate as an entrance gateway to the development and city.

9.8 Second Road Access

9.8.1 A second road access, a requirement of *PLY44*, will be from an extension of PPD. The new primary street will link the Northern Gateway and PPD, passing through the local centre and past the school, opening up the existing cul-de-sac to provide an alternative means of access for the existing Woolwell community. In line with the existing treatment on PPD, one side will contain a grass verge with no street trees, and on-street parking on the other with lengths of tree planted verges dispersed between parking space groupings. A key building will be designed to terminate the view line on entry to the space from PPD, with a dual-fronted façade to ensure an active frontage overlooks all elements of the primary street. Boundary treatments and landscaping are to be subservient to and complement the key buildings, with existing tree planting retained, enhanced, and managed to create visual enclosure, wherever possible.

9.9 Transport and Movement, Walking and Cycling proposals to Re-use The Former Tramway

9.9.1 Transport, movement and active travel are key components of urban design and an important thread running through the proposals. Re-use of the former Tramway as a walking and cycling leisure route is a key component of the strategy, accommodating links between the sports pitches, primary school, CP and New Road/ Roborough Hall and frequent access points are planned to enable people to connect to it from adjacent development parcels.

9.9.2 The Primary Street will also provide a fully segregated cycle route along its length creating a safe and attractive option for cyclists wishing to access social, leisure, education needs and the local centre. The secondary and tertiary network is proposed to be

interconnected and permeable and have design speeds of 20mph or lower throughout. Such design speeds should encourage walking and cycling as modes of choice especially for less confident cyclists. Once completed the new main road link will provide the main Public Transport (PT) route .

9.9.3 Measures such as the new cycle link to NCN27 planned from the SE corner of the site offering a viable route for cycle commuting to eastern areas of the city and to the city centre via tracks running through Saltram Park, as well as ease of access to wider leisure routes and the wider package of transport measures are addressed under the transport section 11

9.10 A Clearly Defined edge to the city

9.10.1 The eastern edge of the development at the transition with the CP will form a well-defined edge to the city as required by the *PLY44* policy. Whilst obviously subject of future application, the masterplan and AWDC makes some key assumptions that provide intention of what could come forward. In this edge location, groups of buildings are planned to be fragmented by green wedges containing trees and other vegetation. These wedges have a multifunctional purpose that help set the development into the landscape as well having benefit for ecology and movement. Planned street trees will ultimately add to the sense of urban greening when viewed from a distance and will reinforce the existing retained tree and hedgerow structure. The CP forms a green break between the edge of the urban area and land beyond the site boundary to the north and east. Buildings are proposed to be constructed in materials that relate well to the local area and as such tones and textures will have a sense of visual continuity with existing areas. The development edge will be visible from viewpoints beyond the site and will be read as development set within the landscape in the context of the edge of the city.

9.11 Urban Design Summary

9.11.1 The submitted Masterplan was the subject of detailed pre-application assessment and evaluation through an independent urban design peer review. It has proved robust and is a sound strategic Masterplan, through consideration of the applications.

9.11.2 The Developments are comprehensively planned and meet the requirements of *PLY44* for a strategic Masterplanning approach. Through the framework established in the AWDC for future NDCs, the PP's, RMs, conditions and s106 measures, the requirements of Policies *SO11* and *DEV10* will be met. The applications pre-date the requirements of paragraph 114 of the NPPF to reflect the National Design Guide and the National Model Design Code, but the AWDC provisions match and exceed requirements.

9.11.3 Overall, the proposals provides a tried and tested framework for good design and for a successful and sustainable place to emerge. There can be confidence that the objectives set out in the vision can be realised through future stages of design and planning and meet the aims of policy.

10 Housing Main Policy Considerations including Affordable Housing, Housing Mix, Standards and Clawback

10.1 Affordable Housing

10.1.1 Through Policy *DEV7 - Meeting local housing need in the Plymouth Policy Area*, the LPA seeks to deliver a wide choice of high-quality homes which widen opportunities for home ownership, meet needs for social and rented housing, and create sustainable, inclusive and mixed communities. A key strand of Policy *DEV7* includes the requirement for major developments to provide at least 30% of the total number of dwellings as AH without public

subsidy. These homes should be provided on-site. Policy *SPT3 - Provision for new homes* aims to deliver at least 19,000 new homes in the PPA, of which 4,550 should be affordable. Woolwell would in theory therefore contribute 600 Affordable Homes towards this requirement.

10.1.2 Having declared a Housing Crisis AH provision is among the Council's priorities in promoting balanced and sustainable communities.

10.1.3 *The South Hams & West Devon Homelessness Strategy 2022-2027* aims to ensure that there is sufficient accommodation available for people who are, or may become, homeless. The Strategy advises in the years 2016- 2021, the number of affordable homes delivered in South Hams was 615. Average house prices in the South Hams when the Strategy was published in 2022 was £440,139, a 25% increase since 2016 (Sept 2016 - £331,625). Average salary in South Hams was £30,160 in 2020, an increase of 9% since 2016. AH targets are at the whole plan and policy area level within the JLP. Net additional AH delivery from development over the first 10 years of the plan period (2014-2024) was 1,177 dwellings at an average of 118 dwellings per annum (position Statement September 2024).

10.1.4 The rental picture is similarly downbeat. Office for National Statistics data revealed that in the 12 months leading up to December 2021 the south west experienced the highest rental increases of 3.1%. In the three months to August 2021, Royal Institute of Chartered Surveyors reported that tenant demand was accelerating while landlord instructions remained in decline. It can be seen it has become increasingly difficult to secure affordable accommodation in South Hams.

10.1.5 The Developments, for up to 2,000 homes, have the potential to go some considerable way towards addressing issues identified in the declaration of a housing crisis.

10.1.6 Following the submission of their viability assessments, the applicants have set out that only 12.5% (250) can be delivered. Indeed, the evidence suggests even this would be an unviable level. Due to the equalisation across both sites, it is proposed that these 250 would be split between App A at 8.7% (143) and App B at 30% (108). Whilst 30% has been proposed on App B, the required 30% across the whole site has not been achieved and at face value, the schemes do not comply with DEV7.

10.1.7 If the Developments do not come forward, no AH is provided. If permitted, 250 AH can be delivered without public subsidy and while not policy compliant, would still go some considerable way towards meeting local housing needs, while delivering the spatial strategy and meeting the 5-year supply of deliverable housing land.

10.1.8 Despite appearing low, the level of AH achievable without public subsidy is consistent with the levels of AH achieved recently on larger development schemes elsewhere. Schemes are not directly comparable as there will be different community infrastructure requirements for different developments, but larger schemes with a considerable infrastructure burden such as Woolwell will likely be able to deliver less AH.

10.1.9 The provisions of *DEL1* are also an important consideration in the context of affordable housing delivery and the interpretation of *DEV7*. *DEL1* allows for the relaxation of planning obligations where robust viability evidence has been submitted and assessed. Further discussion of the viability appraisal is set out in section 17, but whilst the delivery of Affordable Housing forms a significant expectation of *SPT3* and *DEV7*, *DEL1* is also an important consideration to be balanced when considering an application alignment to the development taken as a whole. So, whilst the provisions of *DEV7* do have weight, this must be weighed on balance alongside that of the *DEL1*.

10.2 AH Tenure and Allocation Policy

10.2.1 The proposed level of AH is based on a 50% rented accommodation and 50% intermediate accommodation tenure split. This differs from the advice set out in the SPD which aims to deliver a mix of 65% Social Rented Homes and 35% intermediate Home Ownership Dwellings (the latter usually being in the form of Shared Ownership). The SPD is not itself policy, and therefore does not hold the same weight as the JLP itself. Furthermore, this provision is generally aimed at more modest developments where the numbers involved are less significant. For Woolwell, the split will still approximately 125 Social Rented properties. These are still considerable numbers for without the development would not be achieved. Furthermore, with increased provision of Shared Ownership properties, a higher number of affordable units are available and supports wider aims of creating a sustainable mix of tenures. The Council's Affordable Housing team have supported this mix.

10.2.2 Typically, eligibility for affordable homes is linked to a local lettings policy. This means that those on the local waiting list will be given priority and ensures only local people are able to occupy these affordable homes. This will be secured through the s106 agreement.

10.3 Viability Clawback Review Mechanism

10.3.1 A clawback clause has been agreed as part of the S106 agreement in an attempt to increase the level of AH provision on App A in circumstances whereby the actual cost of infrastructure is less than what was initially assumed it would as part of the viability exercise. As the costs of infrastructure (typically site costs and not S106 agreement obligations) was an attributing factor in why higher levels of affordable homes could not be delivered, it is right therefore that any 'savings' are properly captured. This needs to be carried out on an open book basis with triggers within the s106, detailing when the review should take place. The housing market is volatile, and it is reported to be experiencing difficulties at present, therefore a clawback mechanism is considered normal practice and important to secure on App A to help maximise the potential for the delivery of additional affordable units over the life of the development. In this way, clawback provides an opportunity for the creation of a future fund which would be used to deliver an increased level of AH in the later phases of development.

10.3.2 To provide an overview of how the fund would be calculated, increases in house prices would be measured relative to any variation in actual infrastructure costs in the earlier phases. A proportion (60%) of any uplift would be provided to the clawback fund (the 40% profit remaining with the owner). This fund is then translated to additional AH provision. The performance of the clawback and the outturn level of AH is therefore dependant on the performance of the housing market relative to build costs and is not guaranteed.

10.3.3 It is difficult to forecast medium to long term trends, anticipated rates of inflation or speed of delivery – all being factors likely to affect profitability. As such, no predictions are made on the likelihood of clawback being able to deliver up to the desired 30% AH over the life of the development, but the clawback does provide an opportunity to increase levels if economic circumstances permit.

10.4 Housing Mix

10.4.1 The Applications have been submitted in outline and further details on the type and specific tenure of the individual homes will not be considered until such time as applications for RMs come forward. This is not therefore the stage in which to comment on the type, size, or layout of the accommodation. The most particular needs in the policy area presently are for smaller dwellings most suited to younger and older people and housing suitable for those with specific needs. Housing needs and demands though, vary over time. Therefore, when any RM

applications are submitted, the officers will use all available data to determine the optimum sizes of units sought based on needs. In the AH context, this will accord with *DEV7* where the LPA will seek to deliver a wide choice of high-quality homes which widen the opportunity for home ownership, meet the needs for social and rented housing, and create sustainable, inclusive, and mixed communities and BPNP Policy *Bick09 - Housing Mix* which has similar aims.

10.4.2 A mix of housing sizes, types, and tenure appropriate to the area as supported by local housing evidence will be sought by condition, to be assessed through RMs to ensure that there is a range of housing, broadening choice and meeting specialist needs for existing and future residents.

10.5 Accessible Homes and Standards

10.5.1 Policy *DEV9 - Meeting local housing need in the Plan Area* requires consideration be given to the delivery of a range and mix of housing to meet local housing needs. This means AH could include social and affordable rent, shared ownership, and innovative housing models that meet the local demand, such as rent-to-buy, starter homes and shared equity as appropriate.

10.5.2 The proposed conditions includes requirements to provide the following;

- at least 20 per cent of dwellings to meet national standards for accessibility and adaptability (Category M4(2) of Building Regulations);
- at least 2 per cent of dwellings to meet national standards for wheelchair user homes (Category M4(3) of Building Regulations). Category M4(3) dwellings will be counted as contributing towards the category M4(2) dwelling requirement.

This is consistent with the requirements of *DEV9*.

10.5.3 As outline applications, it is not possible to consider exacting how these will be provided on site. However, future applications will have to accord with the above requirements, and detailed proposals outlined through the future applications.

10.5.4 Compliance with the nationally prescribed space standards will also be determined at the reserved matters stage.

10.6 Self and Custom Build and Sites for Travellers and Travelling Showpeople

10.6.1 There is support for self-build and custom-build housing in Policies *PLY44* and *DEV9*, the latter requiring they meet the over-arching sustainable development, general amenity and design policies. BPNP Policy *Bick14 - Self-Builders* and paragraph 70 of the NPPF also support self and custom build.

10.6.2 The Council does not have significant evidence to support the needs for this type of dwelling. If provided, this would be at the detriment of the level of AH currently viably affordable. This tenure type will not remove anyone from the greatest need on housing registers. As such, while not providing plots is contrary to the aims of policy, self-build is not sought to be secured formally in circumstances whereby for viability reasons, it would further impact on the number of AH or other contributions and it will be for individuals to pursue directly with the house builders. The Developments are still considered policy compliant in the round.

10.6.3 Policy *DEV13 - Consideration of sites for Travellers and Travelling Showpeople* advises new sites will be permitted where they are part of or can demonstrated that they will contribute to the creation of a sustainable linked neighbourhood or sustainable rural community.

10.6.4 SHDC has met the need determined in the Gypsy and Traveller Accommodation Needs Assessment evidence for the JLP:

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

10.6.5 Issues were also considered under the *Equalities Act section 7*. Housing colleagues however advice that this site is not in the right location to meet the need that SHDC is aware exists within the Caravan Dwelling community. The Romani and Traveller community that the Council is aware of would prefer to have sites within closer proximity to the A38. As such, while not providing plots is contrary to the aims of policy, provision is not sought to be secured formally in circumstances whereby for viability reasons, it would further impact on the number of AH or other contributions and it will be for individuals to pursue directly with the developers.

10.7 Other S106 Non-Financial Housing Provisions

10.7.1 An AH Scheme/ Plan is to be approved as part of each RM for that phase of housing (such plan to include details of numbers of AH, specific locations, tenures, and sizes, avoiding clustering, ensuring homes are tenure blind etc.).

10.7.2 Within each RM site/ phase, a S106 clause will ensure 50% of the relevant AH be completed and made ready for occupation prior to 50% of the housing completions within that residential area; and 100% of AH to be completed and made ready for occupation prior to 80% of the housing completions in that residential area.

10.7.3 In addition to the requirement to ensure the 50% social rent/ 50% Shared ownership tenure split overall within each phase of development and local connection cascade referred to above, clauses for registered providers and the maximum level of management fees imposed upon tenants of AH units to ensure they remain affordable are also recommended.

11 Sustainable Transport including Active Travel, Access, and Highway Considerations

11.1 Transport, Highways and Access: Strategic Policy and Main Considerations and the Transport Assessment

11.1.1 The transport impacts of an additional 2,000 homes is a key consideration. The JLP aims to deliver an integrated approach to transport and planning, where infrastructure is planned and funding sought to deliver high quality, sustainable travel options. This is evidenced by the raft of JLP strategic objectives and policies, including *SO4 - Delivering growth in Plymouth's Derriford and Northern Corridor Growth* and *SO12 - Delivering infrastructure and investment* which aim to realise the potential of the Derriford and Northern Corridor Growth Area as a regionally significant growth hub, by delivering among other things the new sustainable urban extension at Woolwell, and the required infrastructure to support that growth. Policies *SPT9 - Strategic principles for transport planning and strategy*, *SPT10 - Balanced transport strategy for growth and healthy sustainable communities* and *SPT13 - Strategic infrastructure measures to deliver the spatial strategy* support these aims. Policy *DEV29 - Specific provisions relating to transport* requires developments to contribute positively to the achievement of a high quality, effective, and safe transport system and the promotion of sustainable transport choices.

11.1.2 The *PLY44* Woolwell allocation sees growth focussed on this accessible location but recognises the existing constraints of the A386, and in part, the allocation is dependent upon the delivery of the planned WtTG highway improvement scheme as implied at *PLY44(2)*.

11.1.3 Policy *PLY47 - Strategic infrastructure measures for the Derriford and Northern Corridor Growth Area* also includes the key WtTG strategic infrastructure improvement measures on the A386. This also sets out an expectation that new development that benefits from this infrastructure would contribute financially to its delivery.

11.1.4 BPBP policy *Bick05 - Infrastructure* requires that new housing development should contribute towards a range of community infrastructure and Woolwell should follow the approach to its contribution towards community infrastructure as identified in the (then) emerging JLP. Policy *Bick06 - New Community Facilities* also references appropriate and proportionate contributions to related off-site infrastructure.

11.1.5 DCC is the highway authority for the area subject of this application. However, PCC is responsible for the A386 in this location, and National Highways oversee the operation of the Trunk roads, notably the A38 at Manadon into which the A386 feeds. All three authorities have been closely involved in this development from its inception and been involved in modelling and assessment of the impacts.

11.1.6 Main highway considerations surround the current capacity constraints of the Local Road Network (LRN) and unless addressed, the planned expansion on the northern corridor cannot happen. The focus has been on the impacts on the LRN and the measures necessary to mitigate those impacts.

11.2 Transport Assessment

11.2.1 Through the allocation of the site, it is accepted as a matter of principle that the location for the new homes is one that can enable safe, secure walking, cycling and PT access to local services and amenities. Nevertheless, as would be expected with a major development of the scale of Woolwell, a significant amount of work has gone into the analysis of transport impacts and proposed measures consistent with the aims for a high quality, effective and safe transport system.

11.2.2 The scope and parameters for the Transport Assessment (TA) were agreed with the three highway authorities in advance. This included traffic analysis and junction modelling.

11.2.3 The TA forecasts the multi modal transport impacts generated by the overall development proposals comprising of 2,000 new dwellings, 1,200 sqm of commercial, retail, and community floorspace (A1-A5, D1 and D2 uses), and a new primary school.

11.2.4 The TA considers the impact on the transport network, both in terms of its local impact and its impact over a wider area. The applicant also produced further technical notes. The three highway authorities have reviewed and responded to the information presented.

11.2.5 Existing conditions were reviewed along with national and local policy and emerging evidence on future travel trends.

Predict and Provide Approach to Traffic Impact Assessment

11.2.6 A traditional 'predict and provide' assessment was undertaken for the purposes of a robust TA and at the request of highway officers. The assessment reflects demand-led supply: predict future demand for travel and provide appropriate transport capacity to meet that demand. It therefore assumes no societal or technological changes in travel behaviour, despite this contradicting the vast amount of evidence to the contrary.

11.2.7 Findings confirmed that the WtTG improvement scheme and the junctions to the north of it were forecast to work within capacity in future year scenarios, with the full *PLY44* allocation development at Woolwell. The initial modelling also confirmed that congested areas to the

south, with the addition of wider committed development only (i.e. excluding the Woolwell Developments) causes junctions along the A386, A38 and Novorossiysk Road to operate over capacity during the 1 hour peaks (0800 – 0900 and 1700 – 1800) with committed improvement schemes in place. It was therefore highlighted that the addition of development generated traffic from Woolwell only further increases congestion and associated queuing at these junctions during these 1-hour peaks, with these presenting unrealistic future scenarios.

11.2.8 Evidence suggests 'Predict and Provide' just induces further traffic which quickly takes up the additional capacity created, leading to undesirable outcomes including car dominated environments, poor quality of life, severance, and health and wellbeing impacts, as well as a return to congested conditions over time.

11.2.9 To address these concerns discussions with the highway authorities explored the emerging evidence base on travel trends and network performance whilst accommodating growth in congested areas, as well as ensuring that the strategy reflects the JLP vision for the northern corridor and the Woolwell development JLP Policy requirements to prioritise sustainable modes, and a 'Vision and Validate' approach agreed.

Vision and Validate Approach

11.2.10 The 'Vision and Validate' approach is simply to decide what we want to see - accessible, affordable, safe, climate-friendly, connected and socially just transport options – and design to achieve them.

11.2.11 With the baseline position that the existing network, in particular WtTG, is already heavily congested during AM and PM peaks, the emphasis is on how best to plan for the vision of the A386 corridor with capacity, but not one that only provides for the car at the expense of all others.

11.2.12 This Vision and Validate approach considers the potential future operational performance of the road network and measures necessary to achieve the vision. This culminated in an assessment of the residual capacity within the shoulders of the AM and PM weekday highway network peak hours (i.e. between 07:00-10:00 and 16:00-19:00). This approach differs from the first analysis as that focused on a single fixed hour peak thereby taking no account of the potential for drivers to adjust the time of their trip. The purpose was to identify the potential for peak spreading, which is a concept used to describe the broadening of traffic flow profiles in peak periods which occurs in congested networks as traffic demand increases. Aside from the use of residual capacity within the shoulders of the peak periods, congested networks can lead to shifts from the private car to more sustainable alternative modes of transport, and even prevent trips from taking place at all.

11.2.13 The work considered committed development traffic forecast for the 2021 and 2034 future year scenarios, with modal shift adjustments applied to base from positive intervention measures – PT improvements, travel plan measures etc. and the rationale for this.

11.2.14 Based on a combination of the trip banking exercise, residual capacity assessment and allowing for the adjustment to anticipated trip generation due to the on-site travel plan, the TA concludes that up to circa 416 dwellings (i.e. 379 + 38) could form an initial phase of development that can be accommodated prior to the construction of the WtTG scheme, with an immaterial impact on baseline traffic flows at the junction.

11.2.15 This demonstrates that there is potential for new dwellings to be built and occupied at the site in advance of the WtTG scheme being completed, even in the unlikely event that it was to slip a number of years.

11.2.16 Accounting for peak spreading, in the 2034 with 2,000 homes, the TA predicts all junctions do not exceed capacity apart from The George (Morgan Road / Southway Drive) and the A38 Forder Valley and Marsh Mills Interchanges.

DCC Review of the TA and Proposed HoTs Mitigation

11.2.17 DCC engaged with the applicant's transport specialists and undertook a robust review and assessment of the TA. 'Vision and validate' is endorsed, and ultimately DCC and PCC accept a move from 'predict and provide', and that further modelling is unnecessary.

11.2.18 DCC's review of the TA concludes the following:

- Trip Generation: Final adjusted TA trip rates are close to those developed by DCC for new communities around Exeter, allow for internal trips to schools and local centres and with Travel Plan implementation are considered appropriate for the proposed development at Woolwell;
- Off-Site Car Trip Reductions: The estimated reductions in existing off-site car trips are small and any over estimation of reductions are not significant;
- A386 George Junction - 80% of Woolwell traffic in the AM peak hour will use the A386 south of Woolwell and committed development and Woolwell traffic will result in high levels of over capacity at the George junction. However, the review identified potential over estimation of committed development traffic. With lower forecast committed development traffic there is potential for the junction to accommodate some increase in traffic and with a combination of reduced demand from existing and future committed and Woolwell development traffic it is considered that the junction will have more queuing than now but without severe congestion. The full Woolwell development would have a material increase with 400 homes in Phase 1. The material traffic increase with full Woolwell development cannot be accommodated and the Woolwell to the George highway improvement is needed to unlock the full 2,000 new homes at Woolwell.
- Vision & Validate Forecasts Conclusions - The TA results show overcapacity in 2034 at the George, Derriford roundabout and the A38 junctions even with peak spreading indicating that these junctions are likely to be over or near capacity throughout the three hour peak periods.
- JLP Modelling - JLP modelling which include the Woolwell development showed additional congestion but that with sustainable transport measures there would be fewer congested junctions in both the AM and PM peaks than the case without JLP development. This would achieve the objective of returning the performance of the highway network to, or as close as possible to, the situation without JLP development.

11.2.19 The TA Vision & Validate approach puts a lot of weight on the sustainable travel measures. There followed an exercised to secure an improved Travel Plan and additional sustainable transport measures to provide confidence that the outcomes will be achieved. This includes the package of transport measures set out in the HoTs at Appendix D and summarised below.

11.3 Access

11.3.1 A three access strategy is proposed with the new NGR as the principal new access, and extensions to PPD and TD. This supports the policy requirement at *PLY44* for a principal new access, so that the 2,000 new homes are not solely served off the existing local road network. The three-access strategy is a key element of the Masterplan and at the end operational phase or before, will provide circular routes for buses and improve general movement and accessibility for residents.

11.3.2 The NGR will afford access to the urban extension and beyond without traffic necessarily having to pass through the existing Woolwell community. However, as a major piece of infrastructure, it will take some time to construct, until which time, homes to be constructed in the north cannot be occupied. It is required to be delivered as part of any first phase of development, secured through the s106.

11.3.3 The existing community currently only has one means of access via Woolwell Road (and thereafter is a series of cul-de-sacs) and two means of exit (out via the same section of Woolwell Road) and via the A386 north from Woolwell Crescent. *PLY44* aims to resolve the existing access issue through sub-paragraph (6) which states that “*a second road access to Woolwell which is capable of accommodating traffic from the existing community and planned new development....which leads to improved traffic flow around the area and which reduces the impact of the development on the key transport corridor and routes*” should be provided.

11.3.4 The secondary access in an extension to PPD. While there is some local opposition to this, including that it should just be for buses and emergency access, opening up PPD and linking it through the development to the new NGR is a crucial element of the movement strategy and linked communities. So notwithstanding concerns the principle of serving the completed development through this strategy is sound and ensures the delivery of a connected, integrated and sustainable community.

11.3.5 There are also local concerns that Woolwell may be used as a ‘rat run’ by other traffic. Whilst increased traffic concerns are acknowledged, rat running is considered unlikely by the highway specialists given the NGR/ A386 is a more direct and faster route than through Woolwell. Circumstances may occur whereby some traffic may choose to use Woolwell roads rather than the NGR depending on the end destination, but a consequence of building and linking roads is that people, rightly, will use them as they wish at their convenience. Of importance is that highway engineers consider the main access and linking roads are safe and fit for purpose.

11.3.6 Of importance to local people will be how the LRN may change with the Developments including how existing access arrangements may be impacted. The new main street linking the NGR and PPD will cross New Road and Blackeven Hill in the process. The TD extension will also cross Bickleigh Down Road, combine in part with Carron Lane, and link into the new main street. Principles have been established to prevent traffic exiting west along Bickleigh Down Road, which does not have the capacity for such volumes. Issues will be finalised and resolved through RM applications, and the proposed conditions will address local traffic movements on the LRN whilst ensuring all existing properties remain fully accessible and will be the subject of further consultation so all interested parties have an opportunity for further input.

11.4 Woolwell to The George Improvement Scheme

11.4.1 The WtTG scheme is a strategically important scheme to alleviate existing congestion between Woolwell and The George Junction on the A386 Tavistock Road. Whilst this has long been a notorious pinch-point, the scheme seeks to resolve this whilst creating the capacity to support the planned growth and improve access to existing commercial and medical sites. Without it the allocation of homes at Woolwell cannot be delivered, nor the wider growth aims for the northern corridor.

11.4.2 PCC is delivering this strategically important scheme, which is part funded through Levelling Up Funds and Transforming Cities monies obtained from central government. Work started in the summer of 2024. Whilst the WtTG improvements seek to improve capacity generally, it will also include additional bus priority measures such as lane segregation, traffic management, traffic signal control, and bus stop improvements. These measures will support

wider public transport movement through the corridor improving bus journey times and performance where currently this would be affected by highway congestion. The WtTG scheme also prioritises provision for pedestrian and cycling space, and a new crossing on Woolwell Road, and will therefore improve safety through an otherwise heavily trafficked junction. The scheme, in 3 phases, will deliver:

- Dedicated walking and cycling facilities (Phase 1 and 2)
- A new signalised junction at Woolwell Crescent (Phase 1)
- Upgrade of Woolwell Roundabout to a signalised junction (Phase 2)
- Increased capacity on the A386 Tavistock Road by providing dual carriageway from Woolwell Roundabout to The George P&R (Phase 2)
- Increased parking capacity at The George P&R (Phase 3)

11.4.3 The phase 3 works are a recent addition to the project. It should be noted however, that its inclusion was not a requirement of the original *PLY44* allocation or the basis on which the applicant's TA modelled traffic patterns.

11.4.4 In recognition of the potential traffic movements generated by Woolwell, Policies *PLY44 (7)* and *PLY47* seek proportionate contributions towards the funding of the WtTG scheme. The applicant's TA recognises that about 16.3% of traffic that will pass through this section of the A386 will be by Woolwell residents. Officers consider that on this basis the site's contribution should reflect that percentage and a contribution of £6.8m is therefore considered necessary and fair. Without such contribution the scheme will not be sufficiently funded.

A386 Woolwell to The George/ Need for a Restrictive Condition

11.4.5 *PLY44(2)* states that no development should come forward until WtTG is delivered unless it can be demonstrated that the impacts upon the network would not be severe. DCC's assessment of the TA, shows however that 416 units could be accommodated before the vehicle trips would saturate the network. PCC has more recently contested this, expressing concerns around some of the modal shift assumptions that have been employed, and that saturation would likely be nearer 216 homes. Despite this suggestion, DCC remain comfortable that their TA conclusions remain sound as a basis for understanding the mitigation required and that 400 homes would be the effective tipping point. PCC have also requested a restrictive condition that ensures no further homes are occupied beyond the highway limit until the WtTG work has been completed. The rationale for such a request is sound given that without one, permission for the development of 2,000 homes could be given on a section of highway that cannot accommodate it.

11.4.6 A condition is directly supported by Policy *PLY44* of the JLP. The need for the condition is clearly evidenced, given the (undisputed) conclusion in the applicant's TA that there will be severe impacts on the operation of the A386 if more than 400 dwellings are occupied before the delivery of the WtTG improvement scheme. The condition is fairly and reasonably related to the Developments, specifically dealing with an identified issue arising directly from the proposals and serves the specific planning purpose of preventing unacceptable severe impacts. Such impacts relate to the character of use of the land and are clearly a planning purpose. The condition is not unreasonable, is precise and enforceable, meeting the tests of conditions.

11.4.7 In order to apply such a restrictive condition, and one that relies on action that is outside of the applicant's control, the Council will need to be satisfied that there is a realistic prospect of the works coming forward within that timeframe. Officers are satisfied that this is the case, as Phase 1 works are now underway and PCC are currently in the process of pre-contract tenders for the Phase 2 works. Phase 2 is likely to now start in early 2025 with an anticipated 19-month construction programme. The commitment to progress the project was re-affirmed by

the City Council's Cabinet in March 2024. In the event that planning permission is granted for these Applications, it will likely be a further 12 months before construction work starts (allowing for completion of the S106, and reserved matters approvals), so it would be unlikely that 400 homes will have been completed before the WtTG scheme has been completed.

11.4.8 The draft conditions that have been recommended include such a restriction. These would allow up to 400 homes being permitted on App A, but as suggested, no homes could be occupied on App B. The reason for this is the desire for other community infrastructure that App B relies on to have been delivered and as such, development on App A is needed.

The Case for the Applicant

11.4.9 The Applicant has said that it does not agree that the proposed condition limiting the number of dwellings that may be occupied until planned highway capacity improvements between Woolwell and The George have been implemented. The Applicant says that the condition is not necessary and that it fails the tests set out in the PPG. The Applicant has provided a legal opinion to support its view. The view is not one that is accepted.

11.4.10 The statutory framework says that a local planning authority may grant planning permission either unconditionally or subject to such conditions as it thinks fit. Conditions may be imposed on the grant of planning permission for regulating the development or use of any land under the control of the applicant (whether or not it is land in respect of which the application was made) or requiring the carrying out of works on any such land, so far as appears to the local planning authority to be expedient for the purposes of or in connection with the development authorised by the permission. This means that conditions must be imposed for a planning purpose, be fairly and reasonably related to the development to be permitted and not be unreasonable. The NPPF says further that as a matter of planning policy, conditions should be kept to a minimum and only imposed where they are:

- necessary,
- relevant to planning and to the development to be permitted,
- enforceable,
- precise, and
- reasonable in all other respects.

11.4.11 The Applicant appears to accept that there is a reasonable prospect of the highway capacity scheme coming forward, but nevertheless says that the condition would not serve a planning purpose and fails the tests of necessity and reasonableness. The thrust of the Applicant's argument appears to be that the highway capacity scheme is already funded and the prohibition on occupation would not protect against any shortfall in funding and/or not affect the delivery of the scheme, and so would prejudice the delivery of housing on an allocated site where there is acknowledged to be a pressing need for housing. The Applicant further adds that the implementation and delivery of the scheme is beyond the control of the Applicant.

11.4.12 Despite the applicant's reservations, JLP Policy *PLY44(2)* expressly refers to there being no occupation of new homes "*until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network.*" Also, the need for the condition is clearly evidenced by the Applicant's own TA. On this basis, the condition serves a planning purpose (even if it is not the one that the Applicant relies on) and is fairly and reasonably related to the development for which planning permission has been sought. There is also evidence that the highway capacity scheme is funded and is reasonably likely to be delivered. As the Applicant does not suggest that the draft condition lacks precision or is

unenforceable, the condition appears to meet both the legal and policy tests for a valid condition.

11.5 S106 HoTs

11.5.1 BPBP policies *Bick02 - Access to the countryside*, *Bick04 - New housing development*, *Bick05 - Infrastructure*, *Bick17 - Road safety*, *Bick19 - Walking and cycling*, and *Bick20 - Public transport* all reflect and are consistent with JLP policy aims for sustainable transport including DEV29.

11.5.2 Considerable work has been undertaken to inform the details of the required s106 mitigation package and conditions. This work, in close consultation with the three Highway Authorities, eventually resulted in NH removing their 'holding objection' which had been in place pending the outcome of assessments on the impacts of the development on trunk network road junctions, notably with the A38 trunk road at Mandon.

Public Transport Bus Service Improvements

11.5.3 The PT strategy for the development includes bus service improvements that seeks to provide a 20min weekday service and 30min evening and Sunday service through extensions to the 1A and 42C services. This is provider greater frequency and extending services later into the weekend evenings.

11.5.4 To support the delivery of this service, whilst potentially uneconomical to provide, DCC have sought a contribution of £2,310,000 (App A £1,894,200 and App B £415,800). This sum has been derived through consultation with bus operators who might ultimately tender to run such a service. The service is likely to commence from 400 homes when occupation rates are higher, and the contribution would support such a service for 8 years. After 8 years it is expected that patronage will make the service commercially viable, and whilst more money to secure the longevity would be preferable, the authorities accept that this is a reasonable amount of time to subsidise its provision.

11.5.5 PCC have expressed concerns that the service needs to be running from earlier in the development to start behavioural change from the earliest possible point. This also helps reduce reliance on cars in the early stages. Notwithstanding this, DCC support the suggested commencement point, as this offers the best chance for services to become independently financially viable for operators into the future once subsidies cease. The risk of implementing the service from commencement of development is that benefits are initially low with fewer new residents to use the service and the subsidy runs out before the service becomes well used. DCC advise that currently that the acceptable walking distance to a bus stop is 400m. There are services running along both the A386 and PPD, so any initial residents would nevertheless be close to stops. 400 homes would have more development out of the ground and justifies the need for a bus to enter into the development, and therefore this is considered to be an acceptable trigger point.

Active Travel and Other Measures

11.5.6 Much of the TA and focus in reducing demands of the highway network has been on active travel measures. Notwithstanding that Active Travel England (ATE) raised some concerns about App A, it is apparent from the application documentation, and the s106 package (details of which were not available at the time ATE's comments were made), that every effort has been made towards optimising active travel within the viability constraints and achieving a reasonable package of obligations to promote sustainable travel.

11.5.7 Outside the site the WtTG scheme includes walking and cycling improvements, and within the existing Woolwell community, improved walking and cycling measures are included on Woolwell Road, PPD, TD, at Darklake Lane and also at Roborough.

11.5.8 In addition to the requirements embedded in the AWDC for the standards of on-site footways and cycle lanes, the Tramway will be a dedicated walking and cycle leisure route and the CP will provide extensive opportunities.

11.5.9 To support the promotion of Walking and Cycling, the proposed HOTs include contributions towards: off-site cycle stands (£20,000 each) £200,000 (App A: £164,000 and App B: £36,000) to support the design and delivery of the Yelverton Cycle Improvement Scheme; and £100,000 (App A: £82,000 and App B: £18,000) towards an off-site cycle link from the edge of the site to the NCN-27.

11.5.10 The submitted Travel Plan also sets out a requirement for site wide travel coordination. To achieve the objectives set out in that Plan, £1,011,388 (App A £829,338.16 and App B £182,049) has also been proposed to be included in the S106, and this is necessary to ensure modal shift targets predicated within the TA are achieved. This contribution would support the work of the Coordinator, but also include a £250 voucher for every household which could be spent towards purchasing cycling equipment or on bus travel passes.

11.5.11 To further encourage and to make the take up of non-car travel more convenient, four mobility hubs will be provided within the site. To support their delivery, £240,000 has been requested to enable DCC deliver these. It is intended that they will be located near bus stops to make transition between modes more convenient.

11.5.12 The HOTs also identify £80,000 (App A £65,600 and App B £14,400) for the upgrade of existing bus stops outside of Woolwell to help promote the take of public transport use in the wider area.

11.5.13 The Travel Plan has been supported by DCC, and the measures identified above will help contribute towards significant reductions in car based journeys. On the basis that the obligations are secured, the development will be aligned to the objectives of the relevant transport policies set out earlier in this section.

11.6 Use of PPD by Construction Traffic

11.6.1 Since the formulation of the Masterplan, Bickleigh Down School has reached capacity. DCC as education authority, understandably, request that the first phase of the school be delivered early (before 300 occupations). The school site though centrally located within the development, is much closer to PPD than to the NGR. Full vehicular access to serve it is required upon school opening for legitimate safety reasons, including emergency vehicle access.

11.6.2 Despite the recognition of local concerns about PPD being used for construction traffic, the applicants are seeking to use PPD as a construction route which could deliver the school to the required timetable. This could be significantly less onerous than creating a construction route from the NGR. The applicants have also indicated a desire to develop a phase of dwellings parallel with the school construction. However, this does give rise to potential disruption for existing residents were this to become a route for construction vehicles. This route also passes the entrance of Bickleigh Down school.

11.6.3 As outlined elsewhere in the report, early delivery of the school within the site is essential given the capacity issues at the nearby schools.

11.6.4 Based on the findings outlined in the Transport Environmental Statement (ES) Chapter, it is anticipated that the site will generate around 225 construction vehicles movements per day. However, in the absence of details of phasing, construction trip rates are difficult to predict. Safety and amenity concerns have been expressed by existing residents, and given the length of time Woolwell will be built out over, could continue for several years.

11.6.5 DCC advise however that whilst it would be preferential to route all construction traffic in and out of the site via the NGR, that as Highway Authority would not be able to oppose construction traffic from using Woolwell Road and PPD. The reason for this is because Woolwell Road and PPD are designed geometrically to a commercial standard width and also up to commercial carriageway specification. Both these factors would mean therefore that these roads are capable of being used by construction vehicles safely. In addition to this, it is also recognised that no residential properties directly access nor front onto PPD itself.

11.6.6 To help minimise disruption, the applicants have agreed to restrict the use of larger vehicles from entering the site this way during school drop off times. This would ensure that there is no conflict during these busier times, and when young people are also present in the area. DCC support this and advise that this is normal practice where a school or nursery exists, on a construction traffic route. Such provisions would be secured through the CEMP which will help manage the routing of vehicles during the construction phases.

11.6.7 Whilst there are perceived concerns more widely around the principle of construction traffic using this route, the absence of being able to demonstrate empirically that amenity impacts will arise, means any further restrictions would be unadvisable. Such restrictions would fail the legal and policy tests. As a pre-commencement condition, it would also require the agreement of the applicant prior to it being imposed.

11.6.8 The applicant has also agreed a clause in the CEMPs so that when once the primary connection link between the NGR and PPD is made, all construction traffic will thereafter use the NGR, not PPD:

“Details for the routing of all Heavy Goods Vehicle construction traffic exceeding 7.5 tonnes. For the avoidance of doubt, this shall exclude construction traffic entering or leaving the site via the Pick Pie Drive site access once the primary street is completed to base course and open to traffic along the entirety of the route between Pick Pie Drive and the new northern Roundabout site accesses, other than in emergencies”;

11.6.9 The local member for Woolwell has also sought for additional traffic safety measures to be outside Bickleigh school in the event Woolwell Road is to be used by construction traffic. DCC have therefore investigated the capacity for measures outside the school. There is an existing zebra crossing, and wig wag lights operate during school peaks with an advisable reduction in traffic speed to 20mph. Measures have long been in place and work well.

11.6.10 Traffic speeds on Woolwell Road have been investigated from time to time and do not warrant further intervention by the highway authority on safety grounds. Parent parking near the school at peaks also acts to slow traffic.

11.6.11 Options that have been considered include speed tables and another zebra crossing or traffic lights. However, DCC do not support the provision of speed tables given issues raised generally where these have been used before. And an additional zebra crossing has also been considered unnecessary as there is an existing one nearby. The application and WtTG will also provide additional crossings on the LNR, so on balance further management measures would not be required.

11.7 Other Highways and Traffic Management Considerations

11.7.1 It was initially anticipated that the highway impacts of the Woolwell homes could impact on the trunk network at Manadon and even beyond. Pending confirmation, NH issued a '*holding objection*' preventing determination of the applications until matters were successfully concluded.

11.7.2 Extensive discussions and negotiations took place over a considerable period, with ultimately PCC conducting modelling on behalf of NH to establish impacts. Concerns that traffic queueing might arise on any of the A38 slip roads was ultimately deemed not to be likely and NH withdrew the holding objection. As such, it is considered that funding is best targeted on local impacts and focussed on the contribution to the WtTG scheme as having the greatest benefit and best mitigating impacts most directly attributable to Woolwell traffic.

11.7.3 There will need to be traffic management, temporarily during construction, and permanently post-development, to ensure the proper functioning of all local roads. New Road needs to be stopped up for safety reasons, to avoid another junction between the existing and new NGR and because of level changes arising from the realignment of the A386 to form the new junction. When the new main street and new TD extension cross Blackeven Hill and Bickleigh Down Road respectively, traffic management measures will be needed to avoid traffic using Bickleigh Down Road as a main means of access to the A386. This is necessary to protect the amenities of residents because these existing roads do not have the capacity to absorb the levels of traffic from the Development and existing community. Access will still need to be maintained to serve all properties, residential and commercial, off Bickleigh Down Road, Blackeven Hill, and Carron Lane, with the precise arrangements being subject to design at RM stage and through planning conditions. Illustrative information has been submitted to demonstrate that it is possible to direct traffic heading west along Blackeven Hill north via the TD extension, with Bickleigh Down Road being 'no entry/ exit' west of the new TD junction, remaining two-way thereafter to the A386. Properties east of this along Blackeven Hill will link into the new main street.

11.7.4 No Public Rights of Way are affected. Public access to the new community infrastructure will be secured through the s106 Agreement.

12 Landscape, Dartmoor National Park, Tamar Valley National Landscape, Green Infrastructure, Community Park, and Arboriculture

12.1 Background

12.1.1 On 26 December 2023, Section 245 of the *Levelling-Up and Regeneration Act* (LURA) amended the duty on relevant authorities in respect of their interactions with statutory purposes of AONBs, as set out in Section 85 of the Countryside and Rights of Way Act 2000 (as amended). In so far as it relates to this application, the amendment now requires relevant authorities "*in exercising or performing any functions in relation to or so as to affect land in an AONB...to seek to further the purpose of conserving and enhancing the natural beauty of the AONB.*"

12.1.2 There are currently no regulations or guidance to assist, but the explanatory note to the LURA states "*The clause strengthens the duty on certain public authorities when carrying out functions in relation to these landscapes to seek to further the statutory purposes and confers a power to make provision as to how they should do this.*"

12.1.3 As an allocated site, the principle of housing development in this location has already been accepted. Nevertheless, it is the role of the planning process to ensure that the form in

which development comes forward is acceptable and respectable within its context. The need for careful consideration is heightened given the sensitive landscape setting in which this site is sat. The submitted ES covering landscape, strategic character and visual amenity, and GI, has been fully considered. Additionally, a review of comments from other consultees (including, internal ecologists and urban designers, and externally DNP, TVNL, Forestry England etc.) has been carried out. The site has been walked with additional visits locally to consider views from further afield and particularly sensitive public visual receptors highlighted within the submitted Landscape and Visual Impact assessment (LVIA).

12.1.4 The multi-disciplinary nature of GI crosses over a number of key disciplines so officers have focused on specific elements considered pertinent to an overall, positive outcome for GI across the application sites. There has also been a focus on strategic landscape issues and elements, informed from a review of the submitted LVIA.

12.1.5 Having initially assessed the original submission and provided feedback, officers subsequently engaged in technical discussions with the applicant about several important documents that impact upon, and help deliver, quality GI.

12.1.6 In addition, time was spent ensuring the proposals will satisfactorily mitigate impacts arising from the allocated site on the wider, peri-urban landscape of the Plymouth fringe, and DNP and its setting. Important documents include the revised Design and Access Statement (DAS) (Resubmission September 2022), the AWDC (Resubmission November 2022), and the PPs. Officers carefully scrutinised these documents against JLP Policies, and in particular Policy *PLY44* and amended them through a number of reviews before final agreement was reached on the versions as submitted and under consideration now.

12.2 Strategic Landscape and Mitigation

12.2.1 Policy *DEV20 - Place shaping and the quality of the built environment* requires development proposals to contribute positively to both townscape and landscape and protect and improve the quality of the built environment through delivering landscape design that is appropriate to its location, in this case a sensitive location close to DNP. Policy *PLY44* requires a landscape strategy that responds to the sites location and relationship with DNP.

12.2.2 The LVIA (edp; edp3488_r008e; dated October 2019) has been assessed as providing a complete account of landscape and visual effects. Council officers are satisfied it is a thorough, carefully considered and sound document, generally adhering to current guidance and principles as set out in *3rd Edition Guidelines on Landscape and Visual Impact Assessment*. It is summarised in Chapter 9 of the ES and seen in full at Technical Appendix 9.1 to 9.4.

12.2.3 As would be expected with a development of this scale and location, which is currently an open, largely rural landscape close to Dartmoor, there will be some significant changes to the landscape character, visual amenity, and to local views because of implementing policy *PLY44* and as outlined in the application. The assessment has recognised the significance of these impacts and any potential harm, with the baseline position established through the professional standard methodology for assessing landscape character and visual amenity. This has subsequently helped to shape and inform the landscape approach and mitigation, with identified structural tree planting, and retained/enhanced wooded 'wedges' penetrating the proposed built edge along its boundary with the Tramway and extending into the CP.

12.2.4 It also identifies the need for a GI framework (including Public Open Space) and notes the development makes a positive contribution to the urban and rural context of the city by enhancing the site's eastern boundary. This is broadly achieved with the proposed planting of

new trees and woodland throughout the site, extending the visual context of Woolwell when seen from DNP within a fragmented built settlement with a strong sylvan structure. These overriding principles are adequately secured within the DAS and AWDC (Tier 1) and extended into subsequent NDCs (Tier 2). Advanced planting will be sought to assist with early establishment of screening and mitigation.

12.2.5 On this basis, officers are satisfied that there are no in principle reasons why the development as proposed should not come forward based upon a review of the LVIA and current framework Masterplan (submitted for illustrative purposes); this is provided that the key landscape characteristics of the local landscape are respected and retained as necessary, and the proportionate levels of mitigation are fully implemented as outlined, to be secured through the RM and by conditions and the s106

12.3 Dartmoor National Park Authority (DNPA)

12.3.1 Policy *DEV25 - Nationally protected landscapes* advises the highest degree of protection will be given to the protected landscapes of the South Devon AONB, Tamar Valley AONB – now referred to as National Landscapes – and DNP whose setting will be afforded protection from potentially damaging or inappropriate development.

12.3.2 DNPA have raised no objections to the development (as per policy *PLY44*) with awareness of the wider public benefits of the allocation site for housing, but on the premise that; mitigation is robust and exercised to the largest extent possible, with any residual effects compensated for.

12.3.3 Discussions with DNPA officers over the degree of mitigation required to minimise residual impacts of the development on the National Park have informed discussions over building height and GI PPs and AWDC requirements, to address *PLY44* requirements for a landscape-led approach. However, DNPA consider that due to uncertainty over phasing and the delivery of the CP, and future monitoring to ensure it serves its purpose in terms of relieving pressure on DNP, compensatory measures are necessary. The LPA and NE do not consider this to be required. In allocating the site with the requirement for a new CP, the intention was for recreational impacts to be managed on-site.

12.3.4 The mitigation will principally be delivered through the design and management of the CP and strategic GI planting within and adjacent to the built elements, the design of which is set out within a comprehensive Masterplan (*PLY44*) and secured within the AWDC and PPs. This also includes reassurance over the built form and heights of dwellings across the application sites, in particular App B where the land is highest. No further comments were made during the re-consultation. As outline applications, details will be agreed through RMs. However, the s106 will secure delivery of 50% of the CP prior to 400 occupations and 100% by 1400 occupations. DNP terrestrial impacts are managed through the larger than usual CP, which is considered sufficient to mitigate off-site impacts without requiring compensation. There are no marine impacts within DNP.

12.3.5 The cumulative assessments are noted and considered sound; officers accept the ES conclusion that the overall collective operational effects on landscape and visual amenity would be at limited, acceptable levels, and none are at a significant level. Should the development come forward as proposed, the design approach, materials, and mitigation will be fundamental to ensuring the effects are minimised. It is important that planting and tree establishment is at a sufficient scale to balance and enhance any adverse effects arising from the built elements. No financial contributions to DNPA are recommended as this is considered as being unnecessary.

12.4 TVNL

12.4.1 Similar policy considerations above apply. TVNL Partnership consider it seems illogical for the landscape buffer at the northern perimeter not to follow the current hedgerows. However, the red line follows the JLP allocated site and it is not for the applicant to amend it. It is though practically possible through planting to create an edge of more organic appearance. Comments are also provided on how future RMs should address the rural and urban transition.

12.4.2 TVNL Partnership sought assurance that recreational impacts will be considered and appropriately mitigated. As with DNPA's request, terrestrial recreational impacts on land outside the site from visitor trips made by new residents, are managed through the larger than usual CP. Mitigation of marine impacts, including within relevant parts of the TVNL, will be addressed through financial contributions towards the Plymouth Sound and Estuaries European Marine Management Site RMMS, secured through the s106 on a tariff basis. As part of TVNL lies within the RMMS boundary, the Partnership Team are eligible to seek funding for schemes within their boundary. No financial contributions to TVNL are recommended as this is considered as being unnecessary.

12.5 GI

12.5.1 The design and delivery of GI are governed by the AWDC, with the subsequent NDCs positively shaping the delivery of the Woolwell extension, if approved, through the RM stage. The codes provide officers with the necessary tools to seek high quality design outcomes across the development, including within the public realm and throughout the GI. GI is embedded throughout the AWDC, with chapters delivering important GI elements into the development at various scales i.e. *Chapter 3 – Streets & Movement* has a 'Street tree planting strategy' and *Chapter 5 – Green & Blue Structures* devoted to a focus on open space, ecology and biodiversity through sustainable drainage solutions, planting, and public art.

12.5.2 Specific points raised during the initial consultation, have informed revisions to the present GI documents, and can be confidently sought through RM applications as appropriate. Pertinent improvements include the strengthening of urban tree delivery within a developed strategy, more functional methods for embedding SUDs throughout the development, and securing existing landscape features when conducive to good design outcomes.

12.5.3 Whilst common with developments of this scale where the allocated land use is open farmland, landscape change is inevitable. What is most important is to ensure that as a result of the creation of level development platforms, associated earthworks, infrastructure, the loss of valued landscape features is avoided or minimised where unavoidable. However, for this site, through the iterative AWDC process, officers believe impacts can be minimised, and the requirements of Policy *PLY44* for a landscape-led approach, achieved at RM stage with comprehensive mitigation secured within the CP.

12.5.4 As reported, the LVIA has helped shape the current design approach to GI, and guides mitigation to address the identified impacts on the wider landscape, DNP, and its setting. Existing and proposed planting as part of the GI will deliver 'green wedges' that screen and divide the housing parcels, extending into the built form and linking back to the CP. Additionally, belts of tree planting will screen and filter views from the north and west as they follow the line of the existing tramway. The policy compliant 40m landscape buffer (*PLY44 (4ii)*) is secured within the CP, which is generally significantly wider along its length, and in combination with the strategic green spaces, will be connected within a network of pedestrian and cycle routes as detailed in proposed access plans.

12.5.5 Overall, a considered and strategic approach has been taken that will benefit residents of Woolwell and strengthen the GI in this peri-urban landscape with the provision of new recreational green space. The provision of the CP will create a clear and robust edge to

Woolwell, establishing a limit and defined northern edge to the city and urban extension in accordance with JLP policy. The submitted design documents will guide and secure this through the RM stage.

12.6 The Community Park

12.6.1 As established through *PLY44 (4)* and secured in the GI strategy, the CP forms an important element of the overall mitigation strategy for the development as a whole, acting as a multi-functional space for the new community, a landscape buffer, delivery of biodiversity and the location for elements of SUDs. It will act as a defined barrier around the outer edge and exposed periphery of built form, providing opportunities for planting, informal and formal open spaces, and as a haven for wildlife, balancing and supporting net gain for biodiversity effected by the urban extension. It will need to act as an open space for residents that mitigates potential impacts arising from recreational pressures on important ecological features such as the local and nationally important designations, and protected habitats and species.

12.6.2 It will be secured by conditions seeking the submission of Landscape and Ecological Management Plans (LEMPs) for each phase of the development and compliance with the HRA. As defined in the DAS, PPs, and AWDC, it is currently policy compliant.

12.6.3 Through several control measures set out within the s106 and conditions, the delivery of the CP will secure the necessary outcomes needed as outlined above, and across the relevant submitted reports.

12.6.4 The long-term stewardship of the CP is also of fundamental importance. With increased recognition and understanding of the way GI should be managed, against a backdrop of more recent research and modelling, communities and Councils are looking carefully at how the current default approaches can be challenged and potentially changed.

12.6.5 Whilst traditionally community facilities such as green open spaces were handed over to the local council for management, the approach now is for them to be kept in private ownership and managed by a private Management Organisation, funded by the developer and/or a service charge on residents. Whilst a relatively successful way for paying for management, residents often perceive this as 'double charging' because they pay both council tax and a service charge. Additionally, this has led in some cases to 'resentment over use' of these facilities by surrounding communities who do not contribute to the service charges.

12.6.6 However, challenging the status quo and recognising the benefits of historic models that evolved in Garden Cities and New Towns, there is increasing recognition for more holistic approaches to place management and, more recently, in combination with other funding opportunities such as green financing like habitat banking.

12.6.7 Recognising the value that managing the CP itself brings to the wider Community, the Council is looking at this opportunity itself. As such, the S106 includes obligations relating to the transfer of the CP to the Council alongside a significant commuted sum of £1.7m to ensure that it is in funds to carry out the maintenance over the required 30 year period. Whilst ultimately it results in less communal land being funded by residents through a management company, the wider benefits are significant. By owning the land, the Council can bring added value to this space to achieve wider JLP objectives around biodiversity, recreation and healthy lifestyles that would not otherwise have been achieved through standard estate management.

12.7 Arboriculture

12.7.1 Policy *DEV28 - Trees, woodlands and hedgerows* requires development should be designed so as to avoid the loss or deterioration of woodlands, trees, or hedgerows.

12.7.2 The submitted Arboricultural Impact Assessment (AIA) and Tree Survey (edp; AIA Oct 2019 – edp3488_r024a) has been reviewed in line with JLP and NPPF policies. The assessment and survey accord with BS 5837:2012 Trees in Relation to Design, Demolition and Construction (ES Appendix 9.5). The overall submissions are sound.

12.7.3 Six veteran items (T50, T103, G235, G244, T151 and G293) are present within the site and fully detailed in the submitted report. These are currently retained and encapsulated within the GI. They should also secure heightened tree protection measures prior to any works beginning.

12.7.4 Within the AIA, 8 category U items have been identified and recommended for removal; 13 items (category B or C) that will be directly impacted upon to facilitate the proposed development and 28 items requiring partial removal are also recorded. Up-to-date assessments will be sought through condition over the duration of the development, in particular where additional trees are cited for removal, either through detailed RM works or as a result of a decline in condition or the impacts of ash dieback; three category 'A' woodland belts have been identified.

12.7.5 Tree Preservation Order (TPO562) protects trees (W1) on the north-western boundary of Application B, adjacent to Bickleigh Down Lane and Carron Lane, Roborough, with an oak (T1) and group of trees (G1) on Carron Lane within Application A. Highways works have been reviewed to minimise impacts.

12.7.6 A number of woodlands are identified and retained within the Masterplan layout. They form an integral element to the mitigation strategy and provide valued enhancements to the layout and GI. Conditions should seek to secure woodland management plans to ensure appropriate access arrangements, long term improvements and a sound woodland structure is retained and developed in accordance with current best practice, in particular for Pick Pie Plantation. Additionally, conditions should seek to protect retained trees, woodland, and hedgerows in accordance with up-to-date Tree surveys, modified AIA, and Tree Protection Plans.

13 Ecology and Wildlife

13.1 Overview

13.1.1 Policy *DEV26 - Protecting and enhancing biodiversity and geological conservation* advises development should support the protection, conservation, enhancement and restoration of biodiversity and geodiversity across the Plan Area. Net gains will be sought from major developments along with long term managements.

13.1.2 Land at Woolwell is largely composed of species poor agricultural grassland with large arable fields. The main areas of wildlife value are the hedgerow network, some mature and Veteran trees, small areas of woodland (including Pick Pie Plantation) and a few areas on the margins of the site of wetland/scrub and more species rich grassland. This habitat supports species found in similar agricultural / urban edge habitat across Devon e.g. badgers, birds, bats, reptiles. No dormice were found. The eastern and southern borders of the site abut Ancient Woodland (Hatshill and Darklake Woods).

13.1.3 Through the consultation phase for this development the AWDC has been significantly strengthened in respect of ecological mitigation and enhancement. A new sub-section (5.2 Ecological Framework) has been added to Section 5 (Green and Blue Structures) clearly setting out the key ecological design principles (which were, for the most part, set out as commitments within the Ecology ES Chapter) to inform the detailed design stages. The AWDC sets out the

overarching principles which need to be followed at detailed design stage to ensure that wildlife requirements relating to habitats and species are met. Principles relate to the retention, protection, provision, and management of an ecological network throughout the site, particularly within the CP and the attenuation basins. Existing habitats will be protected (species rich grasslands, hedges where possible, Veteran trees) and enhanced, and new ones created, providing benefits for protected species such as bats, reptiles, and nesting birds. Features will include: a network of dark wildlife corridors and hop overs, hedgerows, woodland and scrub, mature trees, species rich and tussocky grassland, Sustainable Drainage Systems (SuDS), wildlife friendly planting in urban areas along with hedgehog holes in fences, and bat/bird boxes. The adjacent Ancient Woodland will be protected through creation of a 40m wide buffer. An indicative map of this network is shown on Fig 27 (Ecological Framework) and Fig 28 (Dark Wildlife Corridors and Zones) of the AWDC. Accessible wildlife habitat throughout the site will help to create a sense of place and ensure that residents have contact with nature with associated health and wellbeing benefits.

13.1.4 Principles and details in the AWDC, ES, and Appropriate Assessment will be secured via condition and s106, ensuring that details required are provided at detailed design stage through submission, agreement, and implementation of the LEMP, Lighting Plan etc.

13.2 Statutory Designated Sites

Special Protection Areas (SPAs) / Special Areas of Conservation (SAC)

13.2.1 Based on the Plymouth and South Hams JLP HRA it was agreed with Natural England (NE) that there could be potential recreational impacts (direct and indirect) on the following sites: Dartmoor SAC (a mix of heathland, wetlands and woodland), South Dartmoor Woods SAC (a mix of heathland and woodland), Plymouth Sound and Estuaries SAC (a mix of marine habitats), Tamar Estuaries Complex SPA (Internationally important populations of Avocet and Little Egret). The nearest component of the Dartmoor SACs is Shaugh Prior Woods Site of Special Scientific Interest (SSSI) which is approximately 2.4 kms from the site. The marine SAC/SPA is approximately 2.9kms distance. There may also be pollution impacts on the two marine sites.

13.2.2 The Council was therefore required to undertake an Appropriate Assessment for both applications. This sets out the mitigation requirements agreed with NE and the developer to ensure no adverse effect on the integrity of the SPA/SACs. Measures must be secured through legal agreement and conditions. They include:

- A s106 to secure the tariff required as per the *Plymouth Sound European Marine Sites Recreation Mitigation and Management Scheme* in accordance with the requisite Community Infrastructure Levy (CIL)122 tests set out in the *Community Infrastructure Levy Regulations 2021* (as amended).

Provision of additional strategic greenspace through:

- Planning condition or s106 obligation to secure the appropriate triggers for the phased delivery of the CP and other public open space in accordance with development phasing.
- s106 obligation to secure the mechanism for the future management of the CP and other public open space.
- Planning conditions requiring an Open Space Strategy and/or a Soft Landscape Scheme containing details of the design the public open space.
- Planning conditions requiring a LEMP containing details of the implementation and long-term management of the informal public open space.

- Requirement for monitoring of the success of the delivery/mitigation and measures for redress.

13.2.3 Given that the CP and public open space is required to ensure no recreational impacts on SPAs and SACS it is important that the wildlife value of these areas is maximised as far as practical as per the details and principles provided in the applications. In conclusion, there is an acceptable impact on these habitat/s receptor.

SSSI

13.2.4 The requirements of section 66 of *The Conservation of Habitats and Species Regulations 2017* for the LPA as Competent Authority to undertake an assessment of any implications for European sites and European offshore marine sites is addressed through the HRA's set out at Appendix F and G and the RMMS financial contributions to be secured through the s106. In consultation with NE, it is concluded following an Appropriate Assessment that the Developments are not likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and the conservation objectives of the sites are not compromised by the proposals. This is as a result of the CP addressing terrestrial impacts and the s106 securing RMMS payments addressing marine impacts.

Non Statutory Designated Sites

13.2.5 There will be no impacts on County Wildlife Sites.

Ancient Woodland

13.2.6 Hatshill and Darklake Woods Ancient Re-planted Woodland borders the site to the east and south. Hele Wood Ancient Re-planted Woodland is situated 700m from the site to the north. There is a potential pollution impact on the adjacent woodland, particularly during construction and potential recreational impacts on both. Mitigation to avoid or reduce urban impacts (lighting, noise, litter, disturbance, cats etc) includes a commitment to a minimum 40m buffer between the housing and the Ancient Woodland which will be in place through construction and operational phases. This will ensure compliance with NE's Standing Advice for Ancient Woodlands. Pollution control measures will be secured. It should be noted that Drake's Trail Sustrans route does already go through these woodlands and there is therefore already some public access. There is an acceptable impact on this habitat/ receptor.

Other Wildlife Habitats – Priority Habitats and Other

13.2.7 Roborough Down Common is located 700 m north of the site (at the nearest point) and within DNP. This supports a range of priority habitats (heath/acid grassland) and priority species. Potential recreational impacts are mitigated, as for the Dartmoor SACs, through securing the new CP. There is an acceptable impact on this habitat/ receptor.

Hedges (Priority habitat)

13.2.8 Precise impacts and therefore mitigation will be confirmed when the detailed cut/fill exercise is done at RM stage. Possible loss of 4km of existing hedges. Indicative design set out in the application is for 13.5kms to be retained and brought into ecologically beneficial management, 1km to be reinstated, 1km tree line to be created, 2.4km of linear woodland, and 6.4km of hedgerow. There is an acceptable impact on this habitat/ receptor.

Woodland/ Trees/ Scrub/ Grassland

13.2.9 Existing areas of wildlife habitat which will be protected from urban impacts (lighting, noise, disturbance, cats etc) / integrated into the CP are listed below. Long term management measures to enhance these areas for wildlife and control urban impacts will be provided in the LEMP and agreed with the Council.

- An area of wildlife habitat (scrub, semi-improved neutral grassland, springlines & open water) known as *Bickleigh Fields*, within the redline boundary to the NE.
- 5.87ha of woodland including Pick Pie Plantation situated in the centre of the site.
- 6 Veteran trees (with a commitment to protect mature trees as far as is possible)
- 2ha of unimproved grassland (with some wetland) found on a steep, south-facing slope in the south of the site.

There is an acceptable impact on this habitat/ receptor.

13.3 Biodiversity Net Gain

13.3.1 The applications were submitted long before requirements for mandatory Biodiversity Net Gain (BNG) came into force in January 2024. Policy *DEV26* nevertheless is still relevant and advises that net gains in biodiversity will be sought from all major development proposals through the promotion, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of legally protected and priority species populations. The level of biodiversity net gain required will be proportionate to the type, scale and impact of development. Enhancements for wildlife within the built environment will be sought where appropriate from all scales of development. Additionally, it is expected that Developments will provide for the long term management of biodiversity features retained and enhanced within the site or for those features created off site to compensate for development impacts. BPNP Policy *Bick01* similarly promotes the protection and enhancement of local biodiversity and wildlife.

13.3.2 Paragraph 174 of NPPF advised decisions should contribute to and enhance the natural and local environment, by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

13.3.3 The Biodiversity Impact Assessment Calculation used the Defra metric available at that time (version 2.0, 2019). Though there is an updated metric, it was appropriate to continue with the old metric. Mapping used to inform the calculations was illustrative and demonstrated what the likely loss and gains are at outline stage, noting that this could be subject to change at detailed design. A revised BNG calculation will therefore need to be undertaken at detailed design stage (version of the Metric to be agreed between the developer and LPA). However, given that the majority of proposed BNG is within the CP, which will not need to change, any significant deviations to this submitted Outline Metric, and the GI Plans on which it is based, would need to be fully justified and agreed by the LPA.

13.3.4 The calculation shows that the loss of agricultural land and small areas of grassland, orchard and scrub will be offset by grassland restoration throughout the CP, retained woodland and unimproved grassland, new woodland, wildflower margins along hedges, SUDS, wet grassland, wet woodland, and hedges. This results in a potential BNG of 50% across the two application sites. Note that this percentage is based on the LPA suggesting that hedges be included within the area Metric (which was possible at that time as BNG regulations had not been published). It is important to note that is the potential and as these applications pre-date the requirement for the nationally set BNG. And whilst the SPD implies that 10% BNG is required, the policy itself only seeks 'gain'. Nevertheless, the attached condition allows the Council to re-assess specific BNG proposals through the detailed delivery.

13.3.5 All details relating to the protection, creation, enhancement, and management of wildlife habitat are to be provided at RMs through LEMP and will be required to be agreed with LPA.

13.4 Protected Species

Bat roosts

13.4.1 All trees with high or moderate potential for bats have been inspected and no roosts found. Further survey will be undertaken before any surgery or felling is required and any mitigation requirements agreed with the Council. If a bat roost is discovered, then every effort will be taken to avoid impacts. However, in situations where it is impossible to avoid an offence under wildlife legislation, then the Council understand the three Habitat Regulations tests will be met and that NE will issue a licence. Further survey is not therefore required prior to determination of this application and a request for this would be unreasonable.

13.4.2 There are no direct impacts on any bat roosts in buildings and no known significant rare bat roosts near to the site (or indication of large roosts nearby from bat activity surveys). Enhancement of roosting potential includes at least 20 bat boxes within natural green spaces and bat features in at least 20% of buildings.

Bat Flight Lines/Foraging Habitat

13.4.3 Bat activity surveys (largely 2017) showed moderate levels of feeding and commuting activity across the site, concentrated along established hedges and woodland edges, especially in the south and east of the site. There are occasional records of nationally rare lesser and greater horseshoe and barbastelle bats as would be expected in any similar landscape in Devon. Potential impacts include direct loss or severance of hedges impacting on flight lines through the site, loss of foraging habitat, and indirect impacts through increased urban impacts (lighting, noise, cats etc).

13.4.4 Mitigation includes protecting and enhancing a network of dark corridors and hop overs through the site (minimum 12m width) during both construction and operational phases. The Lighting Strategy will be designed to ensure that light sensitive bats such as horseshoes can continue to move through the site. Creation of the CP with SuDS, woodland, hedges and species rich grassland, and bat boxes will provide enhanced foraging areas and maintain connectivity for bats through this landscape.

Dormice

13.4.5 Surveys were undertaken in 2016 and 2017 and no dormice were found. There is however suitable habitat on site for dormice and they have been recorded in adjacent land. Given this further surveying will be carried out prior to works commencing and any mitigation requirements agreed with the Council. If dormice are found, and if an offence under wildlife legislation cannot be avoided, then the Council understand the three Habitat Regulations tests will be met, and that NE will issue a licence. Further survey is not therefore required prior to determination of this application and a request for this would be unreasonable. Protection and enhancement of existing hedges and woodland and the creation and long- term management of new hedges and woodland could potentially increase the likelihood of dormice using this landscape, although this may be offset by increased urban impacts such as noise, lighting, and predations from cats.

Reptiles/Amphibians

13.4.6 Small populations of common lizard and grass snake, and a medium population of slow worm were recorded within the site. Further surveys will be undertaken prior to works commencing and detailed mitigation agreed with the Council. Creation of the CP and other green spaces, including the attenuation basins, and creation of 10 hibernacula will provide enhanced habitat for reptiles and amphibians compared to the current agricultural landscape.

Badgers

13.4.7 Badger walkover surveys were undertaken in 2017 and 2019. These confirmed the presence of a mix of active, partially used, and disused badger setts on site considered to be either outlier or subsidiary setts to a main sett off-site. Setts S1 (partially used), S2 (now disused), and S14 (partially used) are at most risk of direct or indirect impacts. Other impacts include potential loss of foraging habitat, disturbance from construction works and increased collisions. An updated survey was carried out in December 2022 with no overall significant change. Further checks will be undertaken prior to construction and detailed mitigation will be agreed with the Council e.g. badger underpasses. Protection measures will be included in the Ecological Construction Method Statement. Dark corridors, green spaces and the CP will all provide connected habitat through this landscape for badgers.

Nesting birds

13.4.8 The site supports a range of urban edge and farmland bird species of conservation concern, with the most notable being breeding populations of linnet, mistle thrush and song thrush associated with the hedgerow and tree network. Notable non-breeding birds recorded include skylark, spotted flycatcher and willow tit.

13.4.9 Mitigation includes removal of habitat to ensure no direct impact on nesting birds and enhancement of habitat opportunities through creation of a wildlife rich CP, SuDs, and green spaces with enhanced nesting and feeding habitat (woodland, scrub, species rich grassland, gardens, bushy hedges etc). At least 20 bird boxes will be erected in green spaces and at least 20% of buildings will have bird features.

13.5 Urban Design – Ecological Considerations

13.5.1 It is important to ensure that wildlife habitat is created and managed through the urban area and not just within the CP and green spaces. This benefits wildlife and people, by ensuring that everyone has access to nature. There is a commitment to ensure that the design of the urban form provides wildlife habitat and permeability including: creation and management of linear habitats along road verges, hedgehog holes in boundary fences, and bird and bat habitat features incorporated into at least 20% of buildings, including flower-rich species mixes to provide sources of nectar and pollen, and fruit and berry-bearing shrubs and trees.

13.5.2 SuDs will be designed to maximise their wildlife value through incorporating a range of wet and seasonally wet semi-natural habitats.

13.5.3 The design will recognise the importance of facilitating, accessible areas for community engagement and education opportunities, such as community orchards, allotment provision and areas which would support opportunities for education and learning.

14 Health, Education, and Well-Being

14.1 Health and Wellbeing within the Planning Context

14.1.1 The World Health Organization definition of health is: “health is a state of complete physical, social and mental wellbeing and not simply the absence of disease or infirmity”.

14.1.2 Health and well-being are multi-faceted. PPG considers how positive planning can contribute towards healthier communities, through good design in the built and natural environments, including GI by creating environments that support and encourage healthy lifestyles and providing facilities to meet the health needs of the population.

14.1.3 The *NPPF Section 8- Promoting healthy and safe communities* advises at para 96 that decisions should aim to achieve healthy, inclusive, and safe places and beautiful buildings which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, for example through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages. Developments should be designed to enable and support healthy lifestyles, for example through the provision of safe and accessible GI, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Key aims of the outline application assessment process

14.1.4 A key aim surrounding health and wellbeing is to create environments and vibrant neighbourhoods with appropriate amenities, facilities, and services that support, encourage, and promote opportunities for healthy lifestyles which is the desired outcome. The supporting plans and information, most notably the Masterplan and the framework established by the AWDC, NDCs and PPs, together with the conditions and s106 package of mitigation, aim to deliver a framework that will facilitate health and wellbeing. Future NDCs and RM submissions will be key to ensuring the health and wellbeing aims for the development are realised. This includes the quality and accessibility of the GI and links to wider infrastructure, to be secured through the s106. It also includes the quality of the residential environments and how inspiring a place to live this new urban extension to Woolwell will be.

14.2 Principles in Planning for Health

Mix of land uses

14.2.1 Para 97 of the NPPF advises decisions should consider and support the delivery of local strategies to improve health, and at para 102 it emphasises the importance of open space and recreation for the health and well-being of communities. Policy *DEV4 - Playing pitches* sets out how key elements of the health of a local community and facilities are to be secured through the s106. Policy *DEV27 - Green and play spaces* is an integral part of contributing to sustainable healthy communities. Open Space, Sport, and Recreation (OSSR) issues are considered in detail in chapter 15.

14.2.2 The site falls within the boundaries of the BPNP area which includes policies to support healthy communities, including Bick policies for *access to the countryside, infrastructure, new community facilities, local food growing, improving sports, recreation and play facilities*.

14.2.3 As a residential-led sustainable urban extension, the principal land use for the allocation is residential. However, in providing a new primary school, local centre, CP, sports pitches, and play spaces, opportunities for improved health within the community arise. Benefits extend to the existing community as well as new residents.

Creation of healthy and sustainable places and communities

14.2.4 Strategic Objective SO6 of the JLP promotes school, health, and recreation facilities of a high quality to reinforce strong communities. It is recognised that particularly with an ageing population reliant on PT, service provision will have serious implications for health and well-being. Many of the sustainable development policies relate directly or indirectly to health including *SPT1 - delivering sustainable development, SPT2 - sustainable linked*

neighbourhoods, SPT10 - healthy and sustainable communities, and SPT12 - the strategic approach to the natural environment.

14.2.5 The AWDC sets the framework for how future development will come forward through the NDCs and RMs. Additionally, the PPs set land use, density, building heights, movement, and GI parameters. The AWDC framework will ensure future development comes forward which addresses key principles and details surrounding street layouts, connectivity, and active travel. Ease of access to public and other services is addressed through the Masterplan. Safety and security will be addressed through the NDCs and RMs. Significantly more open space and green space is proposed than is standard for a development of this size, partly for a buffer, but also to manage recreational impacts within DNP. This will be achieved through the new CP and GI, but also by embedding sports and play spaces to complement the existing facilities at Woolwell.

14.2.6 Affordable and energy efficient housing is important to minimise health risks, particularly in winter, surrounding fuel poverty. The homes will be built to particularly good standards, secured by condition. Policy *DEV5 - Community food growing and allotments* aims to reduce health inequality by tackling food poverty. Food access is addressed through allotments and community food growing space, identified in the AWDC and to be secured through the design of the CP.

14.2.7 JLP Policy *DEV1 - Protecting health and amenity* requires development proposals to safeguard the health and the amenity of local communities, including through ensuring that developments and public spaces are designed to be accessible to all. A Health Impact Assessment forms part of the ESs submitted for each application. *DEV2 - Air, water, soil, noise, land and light* seeks to avoid the harmful impacts potentially arising from development proposals. Air quality is addressed through active travel measures and improved PT provision to limit car use. Noise and disturbance from construction will be addressed through specific CEMP condition for each phase.

14.2.8 Access to employment is important for health, through providing the means for residents to support better lifestyles. The allocation is residential, but opportunities arise for employment in the new local centre and the new school. The existing industrial estate is effectively ring fenced through the Masterplan to be retained for existing employment. The *PLY44* allocation is based on the location being close to significant employment, not only within the businesses already at Woolwell, but at the nearby hospital and many industrial and retail parks in the northern corridor, as well as the City Centre being accessible by PT.

14.2.9 Consideration of impacts on more vulnerable groups will be given at the RM stage and how future layouts address issues, including ease of access.

14.2.10 Clearly there are many external factors affecting the health of a community including the performance of the wider economy, food and fuel prices, and the existing health condition of the new population. By providing the required infrastructure in a timely manner (appreciating it is not viable to deliver everything at once upfront), positive behaviours can be established early and avoid embedded habits which can detract from aims surrounding establishing healthy lifestyles. Early delivery of the primary school, Tramway leisure route, and parts of the CP are examples where providing facilities can embed positive walking and cycling behaviours early and lead to better health outcomes, helping people to start well, live well, and age well.

14.2.11 The framework to be secured will assist in achieving vibrant neighbourhoods, access to adequate healthcare services and avoid healthcare inequalities. More detail is provided in the other sections of the report on the extent of the CP, sports and play provision and how the requirements of the above policies and guidance on health are to be secured.

14.3 Health Infrastructure

14.3.1 Policy DEV30 *meeting the community infrastructure needs of new homes* requires that the development of new homes should contribute to the delivery of sustainable communities with appropriate range of community infrastructure, such as primary health care infrastructure. This is amplified further within Policy PLY44 which requires provision for appropriate local facilities to support the new and existing residents and to enhance the sustainability of the area as well as Policies Bick05 *Infrastructure*, Bick 06 *New Community Facilities* and Bick22 *Health and welfare facilities*. Requirements are reinforced by NPPF Section 8 *Promoting healthy and safe communities* which advises decisions should take into account and support the delivery of local strategies to improve health, and at paragraph 34 for plans to set out the contributions expected from development including health infrastructure

14.3.2 Representations have been received from NHS Devon in relation to the provision of GP services, who have indicated that capacity in the nearby surgeries is currently inadequate to accommodate the health needs of the new community. The NHS team have engaged with local GPs to establish their willingness and capacity to extend their premises to meet the primary care needs of the development. The NHS have confirmed that they would not support the creation of a new GP facility within the development itself, as this would be costly to run and cause additional recruitment problems, and that their preferred method of ensuring capacity is created for local primary care provision would be through the expansion of existing premises. This is likely to be in the form of extensions to both the Roborough surgery, where a two wing expansion is feasible as well as a single storey expansion of the Woolwell surgery.

14.3.3 To facilitate this, contributions of £1,032,465 have been requested from App A and £226,639 from App B. These sums of money follow the standard formula set out within the “Devon Health Contributions Approach: GP Provision document” which was prepared by DCC and is evidenced within the JLP Developer Contributions Evidence Base that underpins the Councils’ approach to agreeing S106 obligations as outline within the SPD. Given the lack of capacity within the immediate local area, these contributions are considered necessary in making the development acceptable in planning terms by ensuring that residents have access to appropriate local services. The alternative would, in theory, mean residents travelling long distances for basic healthcare needs.

14.3.4 Representations have also been made on behalf of the University of Plymouth Hospitals (UHP) NHS Trust requesting contributions of £738,826 and £162,181 from the two sites respectively. This is to support services for acute and secondary health care, citing the increase in population will impact on the service provision at Derriford. Unlike most S106 obligations which are sought for physical infrastructure, the requests relates to supporting revenue services. NHS funding is typically provided centrally by the national government, and is population based. UHP argue that despite this, there is however a delay between the take-up of new homes and when funds are actually adjusted to account for this change. Whilst the NHS would still have a statutory duty treat patients irrespective of what funding that individual Trusts receive, the request effectively seeks to mitigate that delay.

14.3.5 The value of the contribution which has been requested follows a standard formula that the NHS themselves have developed. Whilst the mathematics have not been disputed, neither the contributions evidence nor the Councils’ SPD acknowledge or support this approach (unlike the evidence base for Primary Care). As such, it can be considered that there is no policy provision to support such financial requests regardless of the intentions of what it is seeking to address. Despite the concerns over how funding is received centrally, acute care patients would nevertheless continue to be treated. Consequently, such contributions should not be sought and mindful of other viability considerations, it is suggested that priority should be

directed towards the other obligations that secure more site specific development plan objectives.

14.4 Education Facilities

Primary

14.4.1 A requirement of *PLY44* is for a new primary school to meet the needs of the new population. While at the time of the allocation the existing primary school was not at full capacity, since the Applications were submitted Bickleigh Down School at Woolwell has reached capacity. As such, the need for the new school to be delivered earlier has arisen.

14.4.2 The scale and nature of the Applications was originally considered by both DCC and PCC as education authorities. The Councils identified the proposed App A development of 1640 homes will generate an additional 410 primary and 246 secondary pupils, and App B's 360 homes will generate 90 primary and 54 secondary pupils. Local education provision was considered to be at capacity, and in order to mitigate the impacts of the additional pupils and make development acceptable in planning terms, the following requests were made in accordance with *DCC's Education Infrastructure Plan 2016-2033* and *Section 106 Infrastructure Approach (February 2020)*.

14.4.3 In terms of providing for primary school need, the requirements are for the applicant to provide a 2.3ha site which would accommodate a 630 place school, plus early years provision. The basis for DCC's support is predicated on securing early access to a fully serviced school site within a reasonable time period early in the development. Behavioural change can be expected when facilities are available earlier within developments, impacting positively on modal shift. DCC sought the first phase of the new primary school to be delivered from the occupation of 200 homes when 50 pupils are expected to be resident.

14.4.4 Given the time in which it will take to get a levelled site with a haul route a fully serviced site accessed, and transferable, DCC have subsequently accepted a 300 dwelling trigger, meaning education provision will not be available until there is at least 75 pupils living on site. Beyond that, delayed delivery increasingly compromises the sustainability credentials of the development. The applicant considers that if construction traffic is not allowed through PPD, it may be 6 years until the school is delivered. There would be many more pupils from both the existing and new community whose primary education needs would not be met during this time, though precise numbers would depend on build rates and availability in Bickleigh Down school. Such a delay is not supported, being detrimental to community cohesion and sustainability aims, undermining modal shift predictions.

14.4.5 App A - As the existing school is at capacity and cannot be expanded to meet the needs of the development, DCC therefore seek a contribution towards new primary provision to serve the proposed development. The contribution requested towards primary provision is £7,841,555 (based upon the primary new build rate of £4,781 per dwelling or £19,417 per additional pupil based upon the *2018 Department for Education (DfE) primary new build rate* and has been applied to 403.85 primary pupils (as 6.15 of the 410 primary pupils generated will require SEN provision).

14.4.6 There is insufficient Early Years capacity locally to accommodate the increase in demand arising and a £410,000 contribution towards Early Years provision is also requested to ensure delivery of provision for 2, 3 and 4 year olds is requested at the Early Years rate of £250 per dwelling.

14.4.7 App B - The contribution requested towards primary provision is £1,721,317 on the same basis as calculated for App A.

14.4.8 The Early Years contribution sought is £90,000.

Special Education Needs and Disabilities (SEND) provision/ School Land

14.4.9 Contributions are also sought for SEND provision as approximately 2% of the new school population require a specialist school place. The proposed development of 1640 dwellings equates to 9.84 pupils (6.15 primary and 3.69 secondary) who will have an education need. The contribution rate is £77,890 per pupil (2018 DfE SEND extension rate). The nearest special school provision to the development will be within the PCC boundary. DCC will use the funding to support additional SEND provision within Plymouth.

14.4.10 App A - The SEND contribution sought is £766,437. App B - The SEND contribution sought is £168,242.

14.4.11 The 2.3 ha. of land required land is over and above that directly related to App A. 0.5ha of expansion land is sought, to be purchased by DCC at education land value development. Alternatively, should the Applicant seek to increase school capacity to a 630 place school, when numbers require in the future, future development will be expected to contribute to those costs.

Secondary

14.4.12 Initially PCC requested a financial contribution towards secondary school provision, based on an adopted formula. With policy support for education, such a request is potentially CIL-compliant. Unlike for primary places, here it is accepted there is no capacity locally. The applicants challenged the request on the basis that there is and will likely continue to be, capacity in secondary school provision in Plymouth. Officers engaged with PCC colleagues, resulting in a response to the re-consultation in which PCC advise the main area of pressure arising from the development is currently SEND provision and that this impact should be appropriately mitigated by the developments. As such, it is not considered that a secondary school contribution would meet the CIL-test as necessary, and none is sought in circumstances where capacity exists.

Secondary Transport

14.4.13 Given that a proportion of the development site falls beyond the statutory walking distance (the nearest school for secondary-age boys would be Tor Bridge High over 3 miles for the majority of Woolwell development for male pupils), DCC seek a contribution towards the cost of transporting male secondary age students to secondary provision.

14.4.14 As there will be no transport entitlement for secondary-age girls given that the distance to Notre Dame School (comprehensive school for girls) is within the 3 miles distance for the majority of the Woolwell development, no contribution is sought.

14.4.15 App A - Secondary transport cost is £379,762 calculated using the following formula: 1640 dwellings/ 50% = £3.25 per day per pupil x 123 pupils x 190 academic days x 5 school years. The cost is calculated based on the DCC contract cost of transporting a pupil from the area of development to the named school.

14.4.16 App B - Secondary transport cost is £83,363.

Education Summary

14.4.17 The contributions sought relate directly to construction of new education facilities for those living in the development, have policy support and are considered CIL-compliant, having regard to viability, local education is considered a high priority for the reasons explained above, as local provision is integral to the sustainability of the proposed urban extension.

14.5 Community Facility Expansion

14.5.1 The importance of community facilities to a sustainable community to support new homes is recognised in Policy *DEV30 - Meeting the community infrastructure needs of new homes*.

14.5.2 The pre-app public consultation made it clear that the local community supported the Masterplan which did not identify a site for a new community centre. Instead, the clear preference was for funding for the expansion of the capacity of existing much valued local community facilities. In this way the communities would be more united and integrated.

14.5.3 A Community building contribution of £841,804 is sought, split into £690,279.28 from App A and £151,524.72 from App B. The infrastructure is necessary to accommodate the community needs of the new population, and by expanding valued local facilities, and shared use with the existing community, aims of community integration are furthered. The Woolwell Centre have put forward possible ideas for expansion which, if any of the schemes were to be approved, would be pursued and funded through the s106. The funding sought is considered necessary, fair, and proportionate. In circumstances whereby through the s106 the money will be spent in infrastructure projects which have gained planning permission and have the support of the LPA, the contribution is considered to be CIL-compliant.

14.6 Public Art

14.6.1 It is recognised that public art can be an element of place making that can positively impact on health. The aims of Policy *DEV20 - Place shaping and the quality of the built environment* include integrating public art into major proposals in Plymouth. As the new NGR will create a gateway to the city and transition to the DNP, along with the adjacent land, the AWDC includes a public art strategy which identifies the Northern Gateway as one of four public art opportunity areas and one of the 'Key Spaces' where particular attention is required to be paid to townscape issues. The other opportunity areas are the CP, the Tramway, and the sports park/ local centre.

14.7 Designing Out Crime and The Police

14.7.1 Crime and the fear of crime can affect community health and well-being. Policies *DEV10 - Delivering high quality housing* and *DEV20 - Place shaping and the quality of the built environment* advise development proposals should look for opportunities to design out crime and the fear of crime in the layout of the development. The Police have provided comments on the approach to designing out crime. As outline applications, issues will be addressed at RM stage.

14.7.2 The Police have also made a request for funding for £749,435.32. The request lists the costs of recruiting and accommodating additional personnel and cites emergency services as falling within the definition of infrastructure within the recent *Levelling-up and Regeneration Act 2023*. The approach to calculating funding is based on a Police formula.

14.7.3 Unlike for primary care above, Policy *DEV30 - Meeting the community infrastructure needs of new homes* does not reference Police infrastructure. General funding for meeting the cost of dealing with the additional population, and not for specific measures directly attributable to mitigation the impacts of the development in this location, is more difficult to justify as CIL-

compliant. Police services are funded through a Council Tax precept and funding for Police services locally will still arise once homes are occupied.

14.7.4 In view of the fact that as with acute care there is no development plan policy support for the Police request, the area will still be policed. Furthermore, there are other higher priorities with policy support that are necessary to mitigate the direct local impacts of the homes that need to be funded through the viable S106 pot. As such, the Police's request is not supported on the balance of considerations and the merits of the case.

14.8 Neighbour Considerations, including Future Amenity

14.8.1 As advised above, policies *DEV1* and *DEV2* require development proposals to safeguard the health and the amenity of local communities from the harmful impacts potentially arising from development proposals. This does not include construction impacts which are addressed elsewhere at section 11.

14.8.2 As outline applications, some matters will only be able to be considered and addressed in detail through RMs. However, the Masterplan and PPs have taken neighbouring amenity and neighbour impacts into account as far as possible and provide an adequate framework to control future detailed design.

14.8.3 The PPs seek to ensure that where development parcels for new homes are proposed near existing homes, building heights and densities are appropriate so that amenity can be safeguarded through RM submissions.

14.8.4 Neighbouring communities and individual property owners will be affected by access arrangements, temporarily during construction, and during the post-development operational phase. While the precise arrangements are not yet known as to how properties served by Carron Lane and Leigh Lane may be affected, all access rights will be respected and conserved through RMs and conditions.

14.8.5 The existing roads serving the Woolwell Community, notably the key access and egress routes of Woolwell Road, PPD, TD, and Woolwell Crescent will also be used by new residents. The existing community will benefit from being able to use the new Main Street, new NGR and link into Bickleigh Down Road, Blackeven Hill, New Road and beyond to Bickleigh. RMs and conditions will ensure impacts are fully considered and consulted upon.

14.8.6 Further afield, residents of Bickleigh (and the Ministry of Defence), Shaugh Prior, and beyond will continue to have access to the A386 via the new NGR, though some temporary disruption during construction is likely to arise, to be managed by the highway authorities.

14.8.7 It is not anticipated that undue amenity impacts will arise in these communities or the local communities in Woolwell and Roborough from any changes in the way traffic is expected to use local roads.

14.8.8 Construction impacts are addressed under the transport Section 11.

14.9 Waste

14.9.1 Policy *DEV31 - Waste management* affords support to a waste management hierarchy of Prevention; Preparing for reuse; Recycling; Other recovery; Disposal.

14.9.2 As an outline application, issues will be addressed through RM and the hierarchy followed. DCC did seek a financial contribution towards the programmed upgrade to the waste recycling centre at Tavistock. However, having regard to viability, and that waste recycling facilities will still be available to residents, no contribution is sought as viably unaffordable.

14.9.3 WDBC understand residents of the new development entirely within SHDC use the Crowndale recycling centre at Tavistock rather than the centre at Ivybridge. It is also understood that residents of WDBC are prohibited from using Ivybridge's centre 'as it lies outside West Devon'. DCC, as the responsible Authority for the management of Crowndale are requested to confirm whether the new centre at Tavistock will come on stream before the development at Woolwell is occupied and whether this seemingly inequitable situation, which will again add to Northern Corridor traffic, has been properly considered. In posing the question, WDBC acknowledge some of this is not strictly a material planning consideration for this planning application. Provided there is a waste disposal solution the location of it is a wider strategic consideration between the two Councils and Devon.

14.9.4 As WDBC advise DCC are the waste authority. Woolwell residents will use Tavistock, as the nearest DCC recycling centre. There is a nearer centre within PCC's boundary, but there is no agreement between DCC and PCC for respective residents to use their nearest centre and future residents have no option but to use Tavistock, with the associated impacts on the LRN being a consequence of the allocation.

15 Open Space, Sport, and Recreation Policy Considerations

15.1.1 Policy *DEV27 - Green and play spaces* advises the LPA will protect and support a diverse and multi-functional network of green space. OSSR JLP requirements are set out in the *Developer Contributions Evidence Base 2022* and revised in *Playing Pitches/Sports Facilities February 2022*.

15.1.2 Application of the relevant OSSR quantity standards to the proposed development is shown and is based on an average occupancy of 2.25 people per dwelling as agreed through the application process. The various open space types are considered in turn below.

15.2 Accessible Natural Greenspace and Urban Local Nature Reserve

15.2.1 The DAS shows the proposed GI provision, comprising:

- existing woodland (Pick Pie Plantation) - 3.32ha,
- existing disused tramway - 3.39ha,
- formal proposed sports provision - 4.58ha, and
- useable GI/ community CP - 36.39ha,

coming to 47.68ha, which with the addition of the proposed structure planting totals 64.08ha.

15.2.2 The overall combined area of accessible natural greenspace and urban local nature reserve required by policy is 27.41ha. This is substantially exceeded even taking into account that the topography of some areas means that they will not be fully accessible.

15.3 Allotments

15.3.1 There is a requirement for 6,750 sqm of allotments across the two applications.

15.3.2 Within the red line boundaries for the two applications, two potential indicative locations for allotments are shown in the AWDC, to be confirmed through RMs.

15.3.3 Natural surveillance, security, and vehicular access will all need to be considered in determining the exact location of the allotments. It is likely that vehicular access and a limited amount of car parking will be required to allow for drop off of larger items such as bags of compost etc.

15.3.4 Details will need to be secured through the s106 or conditions, to include the required land for allotments comprising cultivable soil, free of rubble or contamination, and supported by soil test results, to meet the SPD *DEV5* standards with 10% of plots suitable for disabled users, and details of on-going management and maintenance arrangements for community use in perpetuity, including details of charging schedules.

15.4 Play Space

15.4.1 There is a requirement for 3,600 sqm of play space across the two applications.

15.4.2 Based on only providing the minimum sizes (1000 sqm for a NEAP and 400 sqm for a LEAP), the proposed play space provision in the AWDC is App A: 1 x NEAP and 3 x LEAPs = 2,200 sqm and App B 1 x LEAP = 400 sqm, totalling 2,600 sqm across both applications. This falls short of the quantum requirement for play (3,600sqm) by 1000 sqm.

15.4.3 The proposed potential locations for play areas are shown in the AWDC. Whilst most of the development site meets the accessibility requirements for play, the area to the north-west does not fully meet the accessibility standards, as it is further than 800m to walk from some dwelling parcels.

15.4.4 However, quantity is only one measure and the quality of play areas and their associated play value through careful design is equally, if not more, important. It is also the case that the proposed CP, and other open spaces within the proposed development site will provide further opportunities for informal play, with a substantial overprovision of accessible natural greenspace in comparison to policy standards.

15.4.5 Overall, it is considered that the proposed play provision is acceptable. The provision of high-quality play areas with high play value will be secured through subsequent RM applications along with further opportunities for informal play as part of the detailed design of the CP.

15.4.6 Triggers for the suggested delivery of facilities through the s106 are set out in Appendix D.

15.5 Playing Pitches

15.5.1 The Council's position regarding playing pitch provision has been updated since the original submission of the applications in *'Open Space, Sport, and Recreation (OSSR) – Additional Comments on Playing Pitches/Sports Facilities' February 2022*. This concluded that although the PPA standard of 0.79ha/1000 people for playing pitches could be met on site, the requirements of the *Playing Pitch Strategy* could not. Officers therefore suggested part of the playing pitch provision be made on-site, and part be made via off-site contributions to improve existing facilities to increase their capacity and enable them to meet the increased pressure placed on them by new residents.

15.5.2 However, as the area within the site is of sufficient capacity to meet the policy, the applicant is unwilling to make any off-site contributions for playing pitches as they are of the opinion that the proposed on-site provision is policy compliant.

15.5.3 Officers are seeking delivery of the following for pitches, and ancillary facilities (clubhouse/ changing/ parking provision) to be provided on site in Application A:

- One adult football pitch, size = 106m x 70m
- Two youth 11 v 11 pitches, size (for one) = 97m x 61m
- Two mini 7 v 7 pitches, size (for one) = 61m x 43m

- One adult rugby pitch, size = 154m x 80m – to be located as close to as possible to the existing rugby pitches on adjacent land
- If possible, with the levels, one 8-strip cricket square, size = 24.4m x 20.12m – to be located in between football pitches so that it can be protected from football use. The surrounding outfield requires a minimum area of 45.72m from the middle stump of the pitch in use, plus a 2.74m safety margin but this land can be occupied by football pitches.
- One pavilion building, size = 245 sqm gross floor area (GFA)
- Car parking area adjacent to the pavilion, to accommodate 50-60 cars.

15.5.4 While an outline application, it is considered there is potential to accommodate a significant part of the Council's requirements for sports provision on site, with the exception of partial contributions towards an adult rugby pitch and all-weather football or hockey provision, with details to be provided at the RM stage.

15.5.5 The updated Playing Pitch Strategy off-site contributions towards rugby and all-weather football and hockey provision, based on the proportion of a pitch required would amount to £342,867. However, given viability, the applicants consider the policy requirement is met on-site, that there is an opportunity in future to upgrade existing rugby pitches on the Summerfield land, an opportunity for 3G at the new primary school, and that there is no scheme for off-site contributions identified. As such off-site contributions are not being pursued.

15.5.6 While not directly related to the Applications, concerns have been expressed regarding the future of the rugby pitches. The Masterplan shows their retention and would be a consideration as part of any future application.

15.5.7 It is also requested that any sports facilities at the proposed primary school be secured for community use outside of school hours through a Community Use Agreement via the s106 agreement. DCC have indicated a willingness to use best endeavours to secure this.

15.6 Outdoor Sports Facilities

15.6.1 There is a requirement for 428 sqm of outdoor sports facilities across the two applications, However, no outdoor sports provision is proposed.

15.6.2 Since the application does not meet the policy requirement for outdoor sports, Officers requested an off-site contribution towards the improvement of existing local outdoor sports facilities (such as the existing Multi-Use Games Area (MUGA) adjacent to the Woolwell Centre). Based on the figures set out in the JLP Developer Contributions Evidence Base the off-site contribution would amount to £74,880. However, given viability considerations and the nearby existence of a MUGA and other play facilities in Woolwell, no off-site financial contribution is being sought. In the absence of a planned scheme or prospect in the near future, notwithstanding contributions sought in the Developer Contributions Evidence Base document, a requests is not considered CIL-complaint and prioritisation is afforded to on-site sport and play provision in circumstances surrounding viability issues.

Wet and Dry Sports Facilities

15.6.3 There is a requirement for 0.005ha of wet sports facilities and 0.022ha of dry sports facilities for 2000 homes. This provision is not proposed to be provided on-site and thus normally an off-site contribution would be sought equating to £844,741 for wet sports and £760,114 for dry sports.

15.6.4 For dry sports, the *Plymouth and South West Devon Sports and Leisure Facilities Plan 2016 – 2034* finds that although no shortfall of provision of sports halls is anticipated, there is

need to invest in improving the quality of some halls. For gymnastics, the need for an additional facility is noted.

15.6.5 For wet sports there is some deficit of supply of swimming pools, especially in the west of the city, but not enough to justify a new 25m pool. There is a need to invest in improving the quality of some facilities. The two major outdoor pools in Plymouth are noted as being in reasonable quality although there may be opportunities to enhance them following the facility audit.

15.6.6 In the absence of a planned scheme or prospect in the near future, notwithstanding contributions sought in the *Developer Contributions Evidence Base* document. a requests is not considered CIL-complaint and prioritisation is afforded to on-site sport and play provision in circumstances surrounding viability issues. For the avoidance of doubt this means no contribution to wet facilities. The nearest swimming pool is at Marjons.

15.7 Access (as it relates to OSSR)

15.7.1 Access linkages for pedestrians and cyclists (both on and off-site) are considered of paramount importance to this application. The use of the existing disused Tramway as a strategic cycle and footway is welcomed, as are the potential pedestrian and cycle links shown. The NDC details the on-site routes which will be *Disability Discrimination Act* compliant.

15.7.2 The following off-site linkages are considered particularly relevant, and should be secured through the s106:

- Linkage to existing OSSR and community facilities at the Woolwell Community Centre (formalise, maintain, and enhance existing off-road link from end of PPD to Darklake Lane);
- Linkage to NCN27 and West Devon Way to the east (secure new linkages through negotiation with adjacent landowners to provide direct linkages to this important route for recreation).

15.8 OSSR Summary

15.8.1 The proposed OSSR on-site provision is supported.

15.8.2 Off-site contributions were requested but were either not CIL-compliant or unaffordable having regard to viability and priorities and the Developments are considered acceptable in relation to OSSR on the basis set out above and on the HoTs in Appendix D.

16 Sustainable Development, Climate Change, Environmental Impact Assessment, Heritage and Historic Environment, Lighting Assessment, Drainage/ Flood Risk and Utility and Foul Drainage Appraisal

16.1 Sustainable Development

16.1.1 *STP1 Delivering sustainable development* states that the Council will support growth that will deliver a more sustainable future, and that the planned growth will be managed in accordance with the principles of sustainable development. This includes providing for a sustainable economy, society and environment whereby neighbourhoods and communities have a mix of local services, community assets, accessible greenspace, transport options to meet local needs, and development which addresses climate change, gains in biodiversity, where local distinctiveness and sense of place is respected, and maintained and strengthened through high standards of design. BPNP policy *Bick04 - New Housing Development* reinforces this and requires that new housing development should demonstrate how they contribute

towards delivering sustainable development and growth. Sustainability is also a thread that runs throughout the NPPF.

16.1.2 What constitutes sustainable development is multi-layered and cuts across many of the principles and desired outcomes being sought from the Woolwell developments. This includes for example, the approach to climate change, drainage, flood risk, building standards, energy, lighting, promoting wellbeing, social cohesion and maintaining cultural heritage. Whilst many of the attributes contributing towards the creation of a sustainable development are addressed elsewhere within the report, the submitted Sustainability Assessment seeks to summarise how the applications are generally contributing towards the three main strands. These can be summarised as follows;

Economic

16.1.3 Socio-economic benefits will be maintained and increase. The Masterplan approach is to retain the existing employment and for new employment opportunities in the local centre and school. Existing businesses will benefit through increased use of local services. Through the sustainable transport, energy, and waste strategies, paired with design principles that adhere to the energy hierarchy and building-integrated low carbon technologies, the proposed development aims to encourage low carbon growth.

Social

16.1.4 Existing footways, cycle facilities, and bus route provision will be improved and supplemented. The Travel Plan and improved range of sustainable modes of transport will benefit the existing and proposed community. A range of key facilities and services will be created as part of the proposed development to complement existing provision in the area including the new school, CP, new sports and play areas, small-scale retail/ commercial uses, and funding for the expansion of GP and community facilities.

Environmental

16.1.5 Design principles address potential impacts from within DNP and more locally to ensure that local landscape character is respected. These principles include sensitive building heights and densities, a landscape strategy to filter views through 'green wedges' and the creation of a substantial CP with a minimum 40m landscape buffer that includes GI and woodland. The majority of the hedgerow, tree network, and woodlands will be fully protected during construction activities and operational phases. Locally sensitive surrounding areas will also be protected during construction through management, mitigation and monitoring, and through a multi-disciplinary approach to the creation of SuDS.

16.1.6 These key principles are fundamental to achieving the desired outcomes from these schemes. At a higher level, community facilities such as the local centre, primary school, CP, recreational facilities, public transport and active travel measures are all embedded into the Masterplan and secured through the proposed S106. Other elements such as SUDS, wildlife enhancements, water protection, and mitigating light pollution will form part of the detailed designs which can only be considered through the subsequent planning processes. The applications are considered therefore, to deliver sustainable development.

16.2 Climate Change

16.2.1 *DEV32 - Delivering low carbon development* sets out the need for a low carbon future through the design and implementation of all developments in support of a Plan Area target to halve 2005 levels of carbon emissions by 2034, as well as seeking to increase the use and production of decentralised energy. It states that development should identify opportunities to

minimise the use of natural resources such as water, take account of projected climate change in its design with the aim of mitigating and remaining resilient to the effects of the changing climate, and will be considered in relation to the 'energy hierarchy' by i) reducing the energy load of the development; ii) maximising the energy efficiency of fabric; and iii) delivering on-site low carbon or renewable energy systems.

16.2.2 As the applications have been submitted in outline form, it is not appropriate to set out at this stage the precise details of how the individual buildings and form of development can address this. An outline Energy Statement has been submitted that outlines the likely suite of measures that would be employed to reduce energy needs and carbon emissions, principally through fabric first measures and on-site renewable energy generation. Alongside the specified building efficiency measures, on-site renewable generation measures will include Photovoltaics, Solar water heating, Air source heat pumps, water source heat pumps and Combined Heat and Power. How these will be delivered on the site will need to be managed through the subsequent design stages. For example, NDCs will establish the principles around EV charging points, solar orientation, rainwater harvesting and tree planting. A planning condition will also require details of how the Energy Statement has been applied to that part of the site on a phase by phase basis, meaning that the Council has the ability to further scrutinise the proposals at that stage.

16.2.3 In addition, the Council declared a Climate and Biodiversity Emergency on 25 July 2019. To strengthen the ambition of *DEV32* by ensuring that development proposals respond more rigorously to the heightening challenges of climate change, the Council produced the *Climate Emergency Statement (CEPS)* in November 2022 as direct response to the Emergency declaration. The CEPS has the status of an interim policy statement to bring forward the aspirations of the Future Homes Standards and should be taken into account when determining planning applications. The Statement however only takes effect on applications submitted after 1 November 2022, so would as such, not apply to the Woolwell applications. That said, the developments will be delivered over many years, and several reserved matters applications will cross the Council's desk for determination. This would mean that over the life of the development, technologies and standards will continue to improve, and the detailed designs will be capable of being considered in line with those at the appropriate stages. Other measures to ensure that Woolwell is resilient to the challenges of climate change, as included within Strategic Objective *CES01*, such as improvements to walking and cycling, public transport improvements, BNG, managing flood risk and SuDS, are detailed elsewhere in this report.

16.2.4 Providing that the framework set out above is followed, and conditions relating to reserved matters and NDCs are complied with, the applications are as such considered to be capable of according with *DEV32*.

16.3 Environmental Impact Assessment

16.3.1 Regulation 3 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017* prohibits a planning authority from granting planning permission for EIA development "unless an EIA has been carried out in respect of that development." The size and nature of the proposed developments is such that they come within the definition of "EIA Development" for the purposes of the 2017 Regulations. As a consequence, an ES was required to be submitted. As mentioned above, an ES was submitted.

16.3.2 Regulation 26 of the 2017 Regulations requires the Council to examine the environmental information in the ES and "to reach a reasoned conclusion on the significant effects of the proposed development on the environment" in the ES as supplemented by its own information. The reasoned conclusion must be up-to-date and is deemed to be up to date if it addresses the likely significant effects of the proposed development on the environment that

are likely to arise as a result of the proposed development. The Council's conclusions are then to be integrated into any decision to grant planning permission. The ES identifies the following likely significant effects, which have been considered in more detail in the relevant chapters of the report. The table also sets out the residual effects (taking into account in-combination and cumulative effects and mitigation):

Topic Area	Receptor	Residual Effect
Socio-Economic	Population, Housing, Education, Healthcare, Emergency Services, Recreation / Community Facilities and Economy	Low – Moderate Beneficial (temporary minor adverse construction impacts; beneficial for housing supply, and community infrastructure)
Health	Existing Residents, Existing Community Service Users, New residents, New Community Service Workers, Construction Workers.	Not Significant – Minor Beneficial (temporary minor adverse construction impacts; beneficial for provision of homes and community infrastructure)
Landscape and Visual	Landscape fabric of the application site, key landscape characteristics of the local context, 'host' landscape character area, 'non-host' landscape character areas, landscape designations. Landscape designations	Moderate/Major Adverse – Neutral (major/moderate, adverse, temporary, local and significant effects arise in local and views further afield including within DNP managed through RMs)
Ecology and Nature Conservation	Ecology Zone of Influence including designated sites, biodiversity and habitats.	Not Significant – Significant Positive (species and habitats not significantly adversely affected with conditions)
Cultural Heritage	Designated and non-designated historic environment assets and any identified archaeological remains.	Negligible Negative – Minor Positive (neutral, minor negative construction phase heritage setting impacts and range of impacts up to minor negative on archaeology. Negligible negative operational heritage setting impacts)
Transport and Access	Road networks, pedestrian networks, residential dwellings, community services, shopping areas, open spaces	Minor Adverse – Neutral (minor adverse construction and operational impacts)
Air Quality	People and property, Ecological.	Negligible (no significant construction or operational impacts).
Noise and Vibration	Residential properties, community uses including schools and hospitals and commercial uses.	Negligible (construction phase with CEMP and operational phase with conditions)
Hydrology, Flood Risk and Drainage	Watercourses, surface water, ground water, estuaries	Negligible (construction phase with CEMP and operational phase with conditions)

Topic Area	Receptor	Residual Effect
Ground Conditions	Human health, property, ground water, surface water.	Minor Negative (construction phase with CEMP and operational phase with conditions)
Waste	Human health, ecology, ground water, surface water, soils, air quality.	Minor Adverse – Neutral (construction phase with CEMP and operational phase with conditions)

16.4 Lighting Assessment

16.4.1 The submitted Lighting Assessment provides a review of the relevant national and local legislation, policy, and guidance relevant to the assessment of obtrusive light in relation to the proposed development.

Tamar National Landscape

16.4.2 The night-time experience from viewpoint 18 results in some change in ambient lighting conditions to the east. While views of the site from this receptor are screened by vegetation and landform glare and sky glow is visible over Plymouth to the south and may be similarly visible from the development resulting in a minor adverse effect on night-time views.

DNP

16.4.3 The land is visible from a number of viewpoints within DNP, including VP 2 (Roborough Down), VP 8 (Dewerstone Rock), VP 13 (Shaugh Prior) and VP 15 (Sheep's Tor), being particularly visible from areas which are elevated such as Sheep's Tor. Distant sources of lighting from urban areas to the south of DNP including Woolwell and Plymouth are visible from the majority of viewpoints. Glare from lighting at the royal marine barracks in Bickleigh was also visible at several viewpoints and sky glow was visible towards the urban area of Plymouth from all.

Analysis

16.4.4 Due to the distance between the Site boundary and DNP, and the intervening areas of agricultural land, hedgerows and woodland which act as a buffer, there is unlikely to be any light intrusion from the proposed Development into the National Park.

16.4.5 Users of DNP may be impacted by glare from lighting, where this is not screened by the existing vegetation and proposed GI. Sky glow is currently visible from these viewpoints to the south towards Plymouth. Though there is potential for the Proposals to add to this, it will be seen in the context of glow from the existing urban areas. It is anticipated that there may be a minor-moderate adverse effect on night-time views within the National Park.

Mitigation Measures

16.4.6 These measures will be required for the construction and operational phases. Through construction this will be addressed through a phase by phase CEMP condition addressing potential effects from artificial lighting during construction. This can be through a range of design and control measures, including the number, siting and use of shields and hoods on luminaires, appropriate timing of working hours, and operation of security lighting. General principles to mitigate the adverse effects of construction lighting are set out in Section 8 of the Lighting Assessment.

16.4.7 Similarly, operational lighting principles are set out which address how the potential effects on sensitive receptors during operation of the completed scheme can be addressed through appropriate lighting design. Measures to mitigate potential effects such as sky glow, glare or light intrusion include the type of luminaire, as well as the design and positioning of lights (e.g. power, orientation, and height of the luminaire), the use of shields and dimming or part night lighting. The principles which should be considered during the detailed lighting design should be followed in the preparation of the operational phase lighting design, to be secured by condition.

16.4.8 It is recognised that there is likely to be some residual sky glow from the proposed Development as light reflects from the ground into the sky. However, in allocating the site, this was understood and DNP consulted on the JLP and at the pre-app stage.

16.4.9 As outline Applications, most details are not currently available and will be secured through the NDCs, RMs, and conditions of consent requiring details of the lighting on a phase-by-phase basis. Future detailed lighting designs will be informed by a modelled lux contour plan of external lighting to allow suitable lighting levels to be provided near sensitive receptors.

16.5 Heritage and the Historic Environment

16.5.1 When considering whether or not to grant planning permission for development that affects a listed building or its setting, section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires a local planning authority to have special regard to the desirability of preserving any of the following:

- The building itself.
- The building's setting.
- Any special architectural or historic features.

16.5.2 The duty to have "special regard" means that a decision-maker should give considerable importance and weight to the "*desirability of preserving... the setting*" of listed buildings when weighing this factor in the balance with other "material considerations" which have not been given this special statutory status. So, a finding of harm to the setting of a listed building is a consideration to which the decision-maker must give considerable importance and weight.

16.5.3 Policy *DEV21 - Development affecting the historic environment* requires development proposals to sustain the local character and distinctiveness of the area by conserving and where appropriate enhancing its historic environment, both designated and non-designated heritage assets and their settings.

16.5.4 Section 16 of the NPPF *Conserving and enhancing the historic environment* provides guidance on the great weight to be afforded heritage impact considerations.

16.5.5 Cultural heritage is addressed in chapter 11 of the ES. While there are no designated heritage assets on site, sensitive receptors within a 2km radius include The Grade I listed Church of St. Mary, Bickleigh, Grade II listed Bickleigh House and associated gate piers, the Grade II listed village cross and Grade II listed Hatshill House. No heritage impact concerns arise. While the context of the wider relationship these heritage assets have with the site as agricultural land will change, in relation to their setting, no harm has been identified.

16.5.6 In relation to archaeology, the Historic Environment Team welcome the preservation within the scheme of the alignment of the historic 19th century Plymouth and Dartmoor Tramway and its re-use as a cycle and pedestrian path.

16.5.7 With regard to archaeological assets a programme of archaeological investigation, consisting of geophysical survey and field evaluation, has been undertaken and has demonstrated the presence of prehistoric and Roman activity, largely but not exclusively, concentrated in the northern part of the site. Archaeological deposits include a putative Roman road, Romano-British Ditches, medieval pits, and a ditched enclosure. The proposed development area also lies just to the north of a bivalent ditched enclosure, dated to the 2nd century AD, so additional Roman archaeological deposits may be expected in its vicinity. Groundworks for the construction of development of the site will expose and destroy archaeological and artefactual deposits associated with these heritage assets. The impact of development upon the archaeological resource can be mitigated by a programme of archaeological work to investigate, record, and analyse archaeological evidence that would otherwise be destroyed.

16.5.8 A condition requiring a Written Scheme of Investigation (WSI) is recommended, as advised by DCC heritage specialists. The conditions recommended by DCC have been amalgamated into one condition, accepted by DCC's Historic Environment Team. The LPA can ensure the compliance with the agreed timetable(s) for the archaeological work as set out in the WSI.

16.5.9 As such, there is no harm to any designated heritage asset. Subject to the condition recommended on archaeology, no conflicts with Policy *DEV21* arise.

16.6 Drainage/ Flood Risk

16.6.1 The planning applications form the majority of the Woolwell *PLY44* allocation. The submitted Flood Risk Assessments (FRAs) consider the flood risk for the sites and surface water drainage. Policy *DEV35 - Managing flood risk and water quality impacts* advises the LPA will assist the Lead Local Flood Authority (LLFA) in the management of flood risk and water pollution within the Plan Area by directing development away from areas at highest risk, but where development is necessary, ensuring that it is safe without increasing flood risk and pollution elsewhere. There has been close liaison with DCC as LLFA throughout, and also with PCC as LLFA for a small part of APP B. Section 1 of the *Meeting the challenge of climate change, flooding and coastal change* is relevant to considerations.

Flood Risk

16.6.2 The Environment Agency's (EA) Flood Map for Planning demonstrates that the sites lie wholly within Flood Zone 1, outside the fluvial flood risk area. The land is therefore at the lowest risk of flooding. The Sequential Test is passed and there is therefore no requirement for the Exception Test to be considered.

16.6.3 The vast majority of the land drains east within DCC's catchment. A small part of APP B has the potential to rain west into PCC's catchment, but the strategy is to drain all land to the east. DCC are the LLFA in such circumstances.

16.6.4 PCC as LLFA made reference to a required discharge rate of 1 in 10 years, having a standard policy on this given that most of Plymouth is in a Critical Drainage Area (CDA). DCC accept the 1 in 30 rate is appropriate. In discussion with DCC on PCC concerns surrounding risk of downstream flooding, DCC advise PCC's concerns are addressed given the requirement for compliance with the drainage strategy, that there will still be reference to the requirement for Ground Water Monitoring on App B (APP A already having conducted monitoring), and that any RM departure from that strategy involving water directly westwards into PCC's CDA would not be consistent with conditions, would require further evidence to demonstrate acceptability/ could

be refused/ could require a separate full application – and need to comply with whatever discharge rates were identified as necessary.

16.6.5 In summary, the LLFA are satisfied with the drainage strategy and issues can be addressed through RMs.

Surface Water Drainage

16.6.6 The preferred method of discharge for the site is via infiltration. The infiltration potential of the ground has been established for App A by targeted in-situ soakage testing, with the results included in the submitted FRA for App A.

16.6.7 The proposed surface water drainage strategy for the sites consist of a network of SuDS features conveying surface water run-off towards strategic infiltration basins set within the CP. The surface water discharge from the basins is by means of infiltration.

16.6.8 The land has been split into four sub-catchments located at the periphery of the site within the CP. An area of storage is located within each to manage the surface water within that catchment. The storage assessment has been undertaken for the *PLY44* allocation area comprising the applications.

16.6.9 Since the applications were submitted, a great deal of work has gone into refining the DAS and AWDC, in particular on the AWDC in also embedding SuDS within the development parcels themselves, rather than sole reliance on the drainage basins.

DCC Consultation

16.6.10 As part of the FRA consultation, DCC as LLFA requested that an assessment of the proposed strategy with the infiltration potential of the ground removed to determine a 'worst case' scenario be undertaken. This assessment demonstrated that should the infiltration potential of the ground be lower than reported by the ground investigation, the Masterplan includes sufficient space provision to manage surface water effectively.

16.6.11 During consideration of the applications two important matters arose. Firstly, the LPA undertook to amend the original proposal from piping surface water direct to the infiltration basins, to embedding SuDs through, for example, on-plot swales and rain gardens within the development parcels. This is not only consistent with aims to discharge surface water run-off as high up the drainage hierarchy as reasonably practicable (into the ground (infiltration); to a surface water body; to a surface water sewer, highway drain, or another drainage system) but will result in other environmental benefits for the character and appearance of the development as well as for ecology. Secondly, there were changes to Climate Change Allowances (CCAs). CCAs are predictions of anticipated change for peak river flow, peak rainfall intensity, sea level rise, offshore wind speed and extreme wave height. To increase resilience to flooding and coastal change, developments must make allowances for climate change in FRAs.

16.6.12 The EA uses CCAs when they provide advice on FRAs and strategic FRAs. The CCA for rainfall intensity for the area increased from 40% to 50% for the attenuation calculations. Consequently, the amount of volume required within the proposed surface water drainage strategy would increase and more land take and/ or greater depth be required for the basins.

16.6.13 However, the increase does not apply retrospectively and therefore is not applicable to applications already in the system i.e. not to these applications.

16.6.14 Groundwater monitoring was undertaken on App A, including at the location of the strategic infiltration basins. Additional groundwater monitoring is still required for App B.

16.6.15 The infiltration basins initially planned were estimated to have a capacity to meet the 40% CCA. By embedding SuDS, and slowing the rate of surface water run-off, the basins will have greater capacity than predicted and no undue concerns therefore arise around flood risk. Detailed surface water drainage schemes will be required to be submitted and approved, and the LPA will ensure that there is capacity in the system and no increased risk of flooding arises elsewhere.

16.6.16 The proposal complies with policy and guidance with respect to flood risk and provides the drainage to manage surface water run-off within appropriate locations within the development land.

16.7 Utility and Foul Drainage Appraisal

16.7.1 The submitted Utility and Foul Drainage Appraisal outlines and assesses the utility issues and identifies the need for new utility infrastructure, potential upgrade/ reinforcement works, or the need for further investigation/ modelling.

16.7.2 The report addresses electricity, gas, telecommunications (telecoms), potable water, and foul water drainage.

Electricity

16.7.3 National Grid Electricity Distribution (NGED) (formerly Western Power Distribution) confirm on-site infrastructure diversion works are required.

16.7.4 NGED records identifies 11kV and low voltage (LV) infrastructure within the proposed development boundary. An existing electricity substation (33/0248 Bickleigh Down Road) is located south of Bickleigh Down Road. Connecting to this substation are two 11kV underground cables. Two 11kV overhead lines also cross the application land. An LV underground cable supplies an existing telecommunications mast (Bickleigh Down CellNet Site 25 3c c\c). The surrounding existing developments are served by NGED 11kV and LV cable networks.

16.7.5 A strategy for the diversionary works which would be required for the existing 11kV overhead lines crossing the proposed site and would be subject to the detailed design of the Development, to be considered at RM stage.

16.7.6 National Grid on-site infrastructure diversion works are not required.

16.7.7 Running outside the site along the northern boundary of the App A land are 400kV pylons/ overhead lines owned and operated by National Grid which are to remain. The Scientific Advisory Group for Emergencies (SAGE) advise on extremely low frequency (ELF) and electromagnetic fields (EMFs). Precautionary approaches to ELF and EMFs suggest that 60m from the centreline of the pylon overhead line to any residential dwelling should be accommodated within any masterplan to reduce the level of ELF and EMFs to below the threshold of 0.4uT (microtesla). This is guidance and therefore is not mandatory. All of the dwellings indicated on the Masterplan would be more than 60m from the pylons (only a very few would be anywhere approaching this distance), and issues would be considered in detail and addressed at RM stage.

16.7.8 Bickleigh Parish Council refer to the pylons bordering the site, with concerns to them that the pylon should not be within the CP. The Pylons are effectively at the boundary of the allocation, so are outside the CP but define the allocation boundary.

16.7.9 Electricity Infrastructure - From the applicant's discussions with NGED, the required electrical infrastructure would involve a new 33kV – 11kV primary substation site (an indicative location has been identified within the Masterplan). This would be remote from dwellings to

avoid noise issues. EVCPs are among the Government's aims, supported by local guidance, to be secured as part of the AWDC requirement for a Climate Change Resilience Plan and through RMs.

16.7.10 The Utility Report advises that given a new primary substation is to be established on the site, there should be no issues in fulfilling the additional supply demand if EV charging points were to be installed across the development on a per plot basis or an 'EV filling station' was to be established. It is likely that additional 11kV cable circuits would need to be extended into the site along with additional 11kV pocket substations within the site to supply the additional demand. A Utilities and Services Code to show how necessary infrastructure will be well integrated is a requirement of the AWDC.

Gas

16.7.11 Wales & West Utilities (WWU) advise on-site infrastructure diversion works are not required.

16.7.12 Existing Gas Infrastructure - A 125mm diameter medium pressure (MP) gas main crosses the land. The main runs parallel to the northern side of New Road. A high pressure (HP) gas main known as the Lyneham/ Liskeard gas main is located close to the northern boundary of the site in an approximate east to west alignment.

16.7.13 Constraints include a 3m no build zone either side of the MP gas main crossing the site. If needed, the MP gas main could be diverted in consultation with WWU at the detailed design stage to agree an appropriate diversion route. However, based on the current Masterplan, diversion of the MP gas main will not be required. The report concludes the HP gas main does not pose a constraint on development.

16.7.14 Proposed Infrastructure - WWU have undertaken a capacity check to evaluate the available capacity in their existing network to support the development proposals. The nearest main with sufficient capacity to supply the proposed development is the 125mm diameter polyethylene MP gas main that crosses the northern section of the site. The availability of capacity is based on estimated gas consumption and is not guaranteed, as network capacity is on a first come first served basis and cannot be reserved.

Telecoms

16.7.15 Openreach advise on-site infrastructure diversion works are required.

16.7.16 Existing Openreach infrastructure is recorded within the site, with an overhead line and an underground cable duct running within and along New Road. An additional overhead line spurs off and continues along Leigh Lane to the north.

16.7.17 Telecoms Vodafone advise on-site infrastructure diversion works are not required.

16.7.18 A Vodafone cable duct enters the site just north of New Road on the western side of the site.

16.7.19 Constraints – Dependant on the detailed design of the development access junctions, Openreach infrastructure within the existing highways may need to be diverted. Existing Openreach infrastructure within the site may need to be diverted or undergrounded for the site to be developed without constraint, with details to be resolved through RMs. A condition is included to require undergrounding of new services.

16.7.20 Proposed Infrastructure – A new connection to the telecommunications infrastructure within the surrounding area will be required. The supply strategy will be confirmed by Openreach New Sites following their detailed design works at the post outline stage.

16.7.21 BT Broadband availability and quality of BT Broadband within the area at the time the applications were submitted, estimated download speeds for fibre broadband of 35Mb-51Mb with a minimum guaranteed speed of 32Mb. Actual speeds being made available will need to be discussed in detail with BT at the design or delivery stage. There are requirements under Building Regulations for all new homes to have good standard of communications and no condition is necessary.

16.7.22 TV and Digital Audio Broadcasting Services - The proposed development site is predicted to receive a good terrestrial TV signal from the Cardon Hill transmitter in the West Country TV region. The standard reception forecast for the area has 112 channels classed as good reception. The HD forecast for the area has 17 channels classed as good reception.

16.7.23 *The Building etc. (Amendment) (England) (No. 2) Regulations 2022* came into force introduce gigabit broadband infrastructure and connectivity requirements for the construction of new homes in England, amending *The Building Regulations* and will ensure new homes have good communications, important in modal shift aims around supporting working from home.

Potable Water

16.7.24 South West Water (SWW) advise onsite infrastructure diversion works are not required.

16.7.25 Existing Potable Water Infrastructure - A 24-inch diameter spun iron raw water main crosses the north-western area of the proposed App A development in a north to south alignment. A 250mm diameter ductile iron distribution main and a 9-inch diameter asbestos cement (AC) distribution main enter the north-west boundary of the site. Both mains continue in an east direction and then south parallel to the raw water main. An additional 6-inch AC water main enters the site from the North East and continues across the proposed development within New Road. An additional 6-inch diameter uPVC water main crosses the western area of the site in an approximate north to south alignment.

16.7.26 Constraints - No build zones are associated with the SWW infrastructure present within the site boundary. If the infrastructure is to remain in situ, no buildings or structures will be permitted within 4.5m of the 24-inch raw water main, 3.5m of the 9-inch distribution main and 3m of the 250mm distribution main. A strategy to divert the existing water supply may be required to facilitate the development proposals, whilst maintaining existing SWW supply agreements. The need for diversion will be dependent on the detailed design at the RM stage in consultation with SWW.

16.7.27 Proposed Infrastructure - SWW has undertaken a pre-planning investigation to determine points of connection (POC) to the existing water mains network. Multiple preliminary potential POCs have been identified to serve both the northern and southern areas of the site, with details to be confirmed at the detailed design stage. SWW are responsible for ensuring that capacity and pressure exists in the existing mains network to support development. As such, new mains infrastructure to serve the development will be requisitioned from SWW via Section 41 of the Water Industry Act from SWW.

16.7.28 Water Quality - The site is within a supply area with water hardness classed as moderately “soft”.

Foul Water Drainage

16.7.29 SWW confirm near-site infrastructure diversion works are not required.

16.7.30 Existing Foul Water Infrastructure - No SWW foul drainage infrastructure is present within the Development boundary. The existing developments in proximity of the proposed site are served by SWW foul drainage infrastructure. No diversions to existing foul water infrastructure are envisaged at this stage.

16.7.31 Proposed Infrastructure - Topography generally slopes down to the north, east and south toward the stream and the River Plym that form the base of the valleys along these sides of the Site. Generally, the gradient of the land steepens along the valley sides of the stream and the River Plym. Maximum elevations are located in the west at approximately 170m Above Ordnance Datum (AOD) falling to approximately 55m AOD along the stream alignment in the south. Foul water drainage will require a phased approach and internal pumping. SWW has undertaken a pre-planning investigation and provided multiple potential preliminary foul drainage POCs. The northern and central area of the site could drain by gravity to an existing 225mm diameter foul sewer. The southern area of the site will require a foul drainage pumping station. The flows from the southern area will be pumped north and connect to a 225mm foul sewer to be installed to serve the north and central areas of the site. The preliminary POCs will need to be confirmed at the detailed design stage.

16.7.32 In summary, there are no utility constraints that could not be addressed through RMs.

16.7.33 Capacity issues surrounding electricity and water supply nationally are beyond the capacity of any one application to resolve and need to be addressed regionally and nationally by the Government and responsible bodies. As the LPA, such issues regarding the capacity of the system do not present material grounds to oppose the approval of an allocated site on the balance of considerations.

17 Phasing, Infrastructure and Delivery Including s106 HoTs, Viability and Equalisation

17.1 Phasing and Policy Considerations

17.1.1 Policy *PLY44* includes the following requirements:

- *Delivery in accordance with a strategic masterplan and design code that should be prepared for the site and consulted upon in advance of the consideration of any planning application. This masterplan will:*
- *Identify the design philosophy and phasing of the development.*

17.1.2 As discussed elsewhere in the report, the Masterplan and AWDC are considered sound and provide a good framework to guide the detailed design process. However, no details of phasing have been provided with the applications. The applicant's position is that phasing can be determined through a pre-commencement condition.

17.1.3 Whilst knowing how the site is to be delivered would be extremely useful, it is not however essential, and it is accepted that phasing can legitimately be dealt with by condition. It is also accepted that as a large site, detailed arrangements are not always known until developers are on board and consequently phasing plans often need to be amended. The proposed condition requires such phasing plans to be agreed prior to the commencement of development, and as such, the LPA still retains sufficient control over how the site will come forward. The draft condition also makes it clear that the NGR will be delivered as part of the first phase of development. The policy intention is to ensure that the development is delivered in a coordinated and structured manner, and the absence of a phasing plan at this stage does not itself amount to a departure of the policy.

17.2 Infrastructure and Delivery Including s106 HoTs

17.2.1 When looking to secure S106 obligations as part of the mitigation package for that development proposal, the planning authority must be satisfied that the obligations are CIL compliant (as set out in Reg 122 of CIL regulations). For a proposal to be CIL compliant it must comply with the following three tests;

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

As such, it is the direct mitigation of impacts arising from a particular development that makes an obligation CIL compliant and this can include provision for AH, education, health and other requests providing they relate directly to mitigating the impacts of a specific development.

17.2.2 Paragraph 55 of the NPPF also states that:

“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition”.

17.2.3 The NPPF at para 97 provides advice surrounding how planning policies and decisions should provide for the social, recreational, and cultural facilities and services the community needs. Part of this is by;

- *planning positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments,*
- *taking account of and supporting the delivery of local strategies to improve health, social, and cultural well-being for all sections of the community; and*
- *ensuring an integrated approach to considering the location of housing, economic uses, and community facilities and services.*

17.2.4 The mitigation required by the development, and the policy justification for why the specific mitigation is required is addressed in the relevant sections of the report. A summary of the proposed S106 HOTS is set out below and at Appendix D. The package of planning obligations negotiated and recommended seeks to mitigate the impacts of the Developments and best meet the needs for a sustainable community as required by policy and guidance.

17.2.5 The value that has been suggested for each of the s106 contributions has been discussed elsewhere in this report. It has also been noted that a number of obligation requests made by consultees have not made the proposed heads of terms that has been recommended, because to include them all would render the applications unviable. Circa £50m worth of requests were initially sought, and whilst in the first instance it is necessary to consider these in the context of the CIL regulations and whether said requests are necessary, a degree of prioritisation has been required to focus on those requirements that are absolutely essential in order to create a sustainable community. How the S106 requests had been prioritised has identified below, and in order to inform those considerations the weight applied to development plan policies above has been attributable:

	Obligation	Initial value	Revised value	Comment
	Affordable Housing	12.5%	12.5%	

	Obligation	Initial value	Revised value	Comment
1	Ecology RMMS payments	SPD formula	SPD formula (approx. £846,000)	European Protected Site. Requirement of policy SPT14 and the HRA
2	WtTG	£6.8m	£6.8m	<i>PLY44</i> predicated on scheme delivery. Without planned improvements this number of homes could not be accommodated in this location, undermining JLP. Contribution essential to support funding needed
3	Primary school, inc. early years and SEND provision	£10,997,551	£10,997,551	<i>PLY44</i> predicated on delivery of school. Essential as no capacity at existing schools, and without, LEA will need to accommodate a predicted 12 pupils elsewhere. On-site provision supports modal shift/reduction in travel
4	Public Transport	£3,820,000	£2,310,000	Without intervention, TA predicts 26% of flows through WtTG from Woolwell Urban Extension. Without contribution, services would be unviable during early phases. Supporting public transport forms part of <i>PLY44</i> Reduced contributions follows re-evaluation around cost of extending 1A only and not having extended service from commencement
5	Travel Plan Implementation	£1,186,210	£1,011,388	Travel Plan measures are critical to achieving desired modal shift and reducing reliance on car. TA assumptions on LRN undermined without achieving this shift, and ensuring no severe impacts as required by <i>PLY44</i> . Reduction in value comes is a result of fine tuning the responsibilities of the coordinator
6	Health (primary)	£1,126,400	£1,259,104	Existing local GP facilities are at capacity, meaning residents would not have access to a local service. Supporting local facilities is required by <i>PLY44</i>
7	Community building	£2m	£821,804	Additional population increase, but with no community space

	Obligation	Initial value	Revised value	Comment
				would put pressure on existing Woolwell/Roborough Centres. Funding would enable expansion of existing centres. There is no proposed scheme identified justifying the £2m original ask, so reduced contribution reflects costs of expansion of the Woolwell Centre by 25%. Supporting community infrastructure to meet needs of the new residents is a requirement of <i>PLY44</i>
8	Walking and cycling infrastructure	£320,000	£320,000	Without contribution, removes supporting infrastructure which encourages sustainable/active travel options as required by <i>PLY44</i>
9	Upgrade of existing bus stops	£80,000	£80,000	As above
10	Mobility Hubs	£240,000	£240,000	As above
11	Community Park Commuted Sum	£1,792,005	£1,704,426	Without contribution the management of the CP would be borne by local authority, or by residents through a ManCo. The CP and ongoing provision to reduce recreational impacts on statutory sites is a requirement of <i>PLY44</i> Reduced contribution reflects reduction in size of Park being transferred
12	Secondary School Transport	£1,092,975	£463,125	Allocation is located with no nearby secondary schools, without contribution DCC would be required to fund transportation costs. Contribution has been reduced as a Secondary School for girls is situated within the 3m catchment, and therefore it is not necessary to secure monies for those students that have to travel less than 3 miles.
13	Sports Pavilion	£470,000	£470,000	Development includes sports pitches, inc. Cricket. Pitches could not function to league standards without adequate

	Obligation	Initial value	Revised value	Comment
				changing/social space. On-site sports provision is a requirement of <i>PLY44</i>
14	Monitoring Costs		£76,500	Required by Council policy

Whilst discussed elsewhere in the report, numerous requests were discounted due to additional viability burdens this would create. As an overview, these have been assimilated below to outline how the final package of proposed S106 obligations were prioritised:

	Obligation	Value	Comment
16	Manadon	£5,790,000	Development is likely to impact upon flows through Manadon, and initial contribution was proportionate to proposed upgrades in this area to create additional capacity. No confirmation of wider funding for scheme exists and timeframes are uncertain. Therefore, contribution not sought in favour of other priorities. NH concluded that Woolwell Urban Extension would not have a severe impact on the trunk road
17	Marsh Mills	-	As above
18	Education (secondary)	£5,000,000	Contribution follows existing Education formula and is required by <i>PLY44</i> . However, there is no identified scheme earmarked for the funding in which to directly mitigate Woolwell Urban Extension, and no immediate LEA schools within PCC. Furthermore, there has been a reduction in school aged children enrolling at schools suggesting that capacity exists within the existing system to accommodate.
19	Off-site sport & rec	£1,666,447	Contribution based on 0.005ha of wet sports facilities and 0.022ha of dry sports facilities for 2000 homes. No immediate scheme identified which would directly be attributed to mitigation, therefore contribution not necessary
20	Health (acute/secondary)	£900,007	Contribution is based on an NHS formula, whose methodology has not been sanctioned by the LPA nor does this evidence base feature within SPD nor JLP contributions evidence base. Consequently, other JLP objectives have been prioritised and, in any event, NHS still have duty to deliver service
21	NCN upgrade	£1,748,000	Infrastructure already exists and proposed scheme is largely trail improvements planned by PCC. Scheme is not identified as a mitigation requirement in TA and situated over 3km from site.

	Obligation	Value	Comment
22	Waste Recycling	£256,000	Contribution sought to support expansion of the Crowndale recycling facility. Expansion works are taking place irrespective of the development, and Woolwell Urban Extension not undermined without this contribution
23	Skills Training	£117,132	Contribution level based on what was agreed at Sherford in absence over specific policy guidance. However, there is no specific scheme in place which justifies this specific sum. Skills Training is requirement of Dev19, but not essential to delivery of this site. A condition requiring a scheme has been recommended
24	Public Art	£937,059	Contribution level based on what was agreed at Sherford in absence of specific policy guidance. Whilst public art important aspect of place making, development can still come forward in acceptable manner without this money given requirements of the design code.
24	Police	£749,435.32	Contribution is based on an NHS formula, whose methodology has not been sanctioned by the LPA nor does this evidence base feature within SPD nor JLP contributions evidence base. Consequently, other JLP objectives have been prioritised and in any event The Police still have duty to deliver service

17.2.6 Having regard to the list of asks made above it is recommended that the Council do not seek to secure the additional financial contributions that have been requested on the basis they are not viably affordable. Instead, it is recommended that the Council optimise the level of AH and support those higher priority measures as set out.

17.3 Viability, Sensitivity Testing and Equalisation

17.3.1 Viability has been discussed throughout the report. Paragraph 58 of the NPPF advises that it is up to the applicant to demonstrate whether circumstances justify the need for a viability assessment. It also states that the weight to be given to a viability assessment is a matter for the decision maker, but regard should be given to the circumstances in the case, whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.

17.3.2 The provisions of both *DEV7* and *DEL1* are also of relevance in these circumstances. Policy *DEV7* requires at least 30 per cent of the total number of dwellings, unless it is robustly justified. In such circumstances, *DEL1* requires robust viability evidence to be submitted where a developer contends that planning obligations sought, including for AH, would make a proposal economically unviable. *DEL1* goes on to advise that when determining whether or not to grant planning permission, that the LPA will have regard to the overall economic, social and environmental benefits of the Developments and whether then on balance, some relaxation of planning obligations is justified.

17.3.3 The applicants submitted a Viability Assessment (found [here](#) and [here](#)) which identified a large scheme deficit across the 2,000 homes, when taking into consideration house values

and total site costs. These assumptions were reviewed independently on behalf of the Council by viability experts, BNP Paribas. This process took approximately 6 months to conclude.

17.3.4 The Council's independent advisors have confirmed as such, that the developments are unable to support any additional costs, or higher levels of Affordable Housing over those assumed within the Assessment.

Final BNP Appraisal (combined site):

GDV	Costs	S106	Fees	Developers Profit	RLV	Benchmark LV	Surplus/ Deficit
£579,655,198	£368,143,062	£27,264,473	£77,847,024	£97,232,737	c.8,584,178	c.£31.9m	c.-£23.32m

17.3.5 Having modelled the appraisal themselves, BNPs advice is that the scheme returns a RLV of circa £8.6m. This would equate to approximately £27,000 per acre which is significantly less than the £100,000 per acre that they advise would be a reasonable return for the land in similar circumstances. The appraisal was also undertaken on the basis of a developers profit of 17.5%.

17.3.6 The outcome of this independent review of the appraisal demonstrates that the site could not deliver any more than 12.5% affordable housing (250 units) with the s106 package of obligations being sought. To help understand how adjustments to both the AH level and S106 costs would affect affordability, Officers further undertook a sensitivity test to understand how adjustments would affect levels. Adjustments to either the AH, or the S106 pot, would result in the following potential scenarios;

Scenario	% Affordable	Total Units	Market Units	Affordable Units	s106
Whole Scheme Viability Position	0%	2,000	2,000	0	£48,570,190
Whole Scheme Viability Position	10%	2,000	1,800	200	£31,630,984
Whole Scheme Viability Position	12.5%	2,000	1,750	250	£27,547,473
Whole Scheme Viability Position	30.0%	2,000	1,400	600	£4,547,690

17.3.7 The sensitivity testing does therefore demonstrate that it is possible to achieve 30% AH on the site, but that would mean only £4.5m would be available for S106 obligations. The required mitigation as outlined throughout the report would cost approximately £27m.

17.3.8 One further consideration that is also applicable to the viability consideration, is the evidence base that underpinned *DEV7* in the first place. This is set out in the *Plymouth and South West Devon Joint Local Plan Viability Study*, and at paragraph 5.4.2 outlines that S106 costs are generally in the region of £2,000 per dwelling. To deliver the mitigation and infrastructure required at Woolwell (as explained within this report), the S106 costs are approximately £13,500 per dwelling, some £11,500 per house more than the evidence base indicated. In the case of Woolwell, the costs of the community infrastructure has generated an additional £23m over what had been assumed within the policies initial evidence base. Consequently, it is acknowledged that for Woolwell to be policy compliant in all other respects,

that 30% affordable housing is not possible. As stated elsewhere in this report, it is not uncommon for strategic sites to have lower affordable housing levels as a result of the significant infrastructure burden, and this evident here.

17.3.9 The balance between the achievable AH level and that of the S106 value is therefore considered to be appropriate. Whilst disappointing that higher levels of affordable housing cannot be achieved, this is however considered to be the most appropriate balance and as such, ensures that the development is sustainable as a whole.

17.4 Equalisation

17.4.1 Given that the cost of delivering the majority of strategically important site-wide infrastructure falls within App A, it would mean that App A would cost significantly more to deliver than App B. To ensure that both sites are effectively sharing the same cost/profit profile, a process of equalisation is required. In this instance, the applicant has suggested that these costs can be equalised through the AH provision. This would mean that App B would provide a higher proportion of the AH on its site, as a means of 'paying' its equivalent share of the infrastructure costs that it relies on, but which is coming forward on App A. In similar circumstances where other large sites come forward and there are multiple landowners, it is often necessary to have S106 agreements where contributions must be passed from one site to the other. This mechanism avoids that process, and also ensures the infrastructure can be provided regardless of the App B construction status.

17.4.2 In terms of S106 contributions, these were initially calculated on the basis of mitigating the 2,000 homes. However, in terms of the specific contributions owed on App A and App B, these have been proportionally split so that App A contributes 82% and App B contributes 18%.

18 The Planning Balance and Conclusion

18.1.1 The Woolwell Urban Extension is an allocated site and forms a critical element of the Joint Local Plan's spatial strategy. Without its delivery, the homes planned for within the Plymouth Policy Area cannot be achieved, and the JLP authorities will be unable to demonstrate a 5-year land supply.

18.1.2 Unsurprisingly however, a development proposal of this scale will give rise to various issues and concerns and create tensions and conflict with other policy interests. As such, a considerable amount of time has gone into reviewing, assessing, and evolving the submission documents to understand and shape the mitigation that is required to ensure 2,000 new homes are capable of being sustainable development. Following lengthy discussions with partners and other stakeholders around the content of obligations that are necessary to achieve this, the applications have reached a stage where they can be determined.

18.1.3 Providing the development delivers the obligations and complies with the proposed conditions set out within this report, the applications are generally acceptable in planning terms and comply with the majority of the policies set out within the Development Plan. This is outlined in detail within the analysis section, and within the concise HoTs summary at Appendix D.

18.1.4 The most noticeable departure however is the level of affordable housing being delivered, and whilst viability assessments suggest that a compliant level is not deliverable, the weight given to securing the outcomes of *DEV7* should not be understated. *DEL1* is however material and allows for a relaxation of this policy where a scheme is shown to be unviable. Furthermore, the infrastructure costs associated with large scale sites are often greater than on smaller scale projects. In the case of these Developments, the obligations required are some

£23m more than the viability report supporting the JLP assumed. The obligations are essential to ensure the development accords with other aspirations of the plan.

18.1.5 The Planning Acts require applications to be determined in accordance with the development plan unless material considerations indicate otherwise. It is also a requirement to consider proposals against the development plan when viewed as a whole. Despite not aligning with *DEV7*, for which mitigating circumstances have been outlined, great weight has been given the JLPs spatial strategy and the requirements of *SPT3* and ensuring that the wider objectives of the JLP are achieved. Accordingly, these applications are being recommended for approval.

19 Resolutions

19.1 App A Decision Before App B

19.1.1 As advised under 'Recommendations' at the start of the report, the reasons why App A should be determined before App B, and why App B should not be approved if App A is not approved relate principally to the policy requirements of *PLY44* to deliver significant infrastructure to support the new housing development. In these circumstances whereby the majority of that infrastructure; the new school, CP, local centre, and sports facilities is all on App A land, and App B is dependent on the delivery of that infrastructure, App B should not commence until a material start has been made on App A and there are triggers in the s106 and a condition which establish the timing for delivery of App B, commensurate with infrastructure delivery.

19.1.2 The recommendations are as set out at the start of the report for Apps A and B:

App A:

1. To adopt the Appropriate Assessment set out in an Appendix F;
2. To delegate approval of the application to the Head of Development Management in consultation with the Chairman and Vice Chairman to conditionally grant planning permission, subject to a s106 Agreement based on the heads of terms at Appendix D, provided that the Head of Development Management in consultation with the Chairman and Vice-Chairman shall have power to make minor alterations to the planning conditions set out in Appendix E to ensure consistency and appropriate cross referencing to the agreed S106 Agreement;
3. the event that the S106 agreement remains unsigned six months after this resolution, that the application is reviewed by the Head of Development Management, in consultation with the Chairman and Vice Chairman of the Development Management Committee, and if no progress is being made delegated authority is given to the Head of Development Management to refuse the application in the absence of an agreed S106 agreement.

App B:

Subject to the approval of App A,

1. To adopt the Appropriate Assessment set out in an Appendix G;
2. To delegate approval of the application to the Head of Development Management in consultation with the Chairman and Vice Chairman to conditionally grant planning permission, subject to a s106 Agreement based on the heads of terms at Appendix D, provided that the Head of Development Management in consultation with the Chairman and Vice-Chairman shall have power to make minor alterations to the planning conditions set out in Appendix E to ensure consistency and appropriate cross referencing to the agreed S106 Agreement;

3. the event that the S106 agreement remains unsigned six months after this resolution, that the application is reviewed by the Head of Development Management, in consultation with the Chairman and Vice Chairman of the Development Management Committee, and if no progress is being made delegated authority is given to the Head of Development Management to refuse the application in the absence of an agreed S106 agreement.

Appendix A – Full Bickleigh Parish and Local Member Consultation Responses

Initial Submission

Bickleigh Parish: Objection

'Our response focusses on key areas that we consider are of considerable importance and explain in detail why we object to the planning application. These are:

- Access
- Traffic and Transport
- Climate Change
- Education
- The Housing Mix
- Community provision, including medical care
- Public Forum

ACCESS

There are three main access points to the land included in the proposed development:

1. *Main Access – a new roundabout on the A386 between the Roborough Recreation Hall and the Dartmoor Diner.*
2. *Pick Pie Drive Access – opening up the end of the existing road for access to the new housing development from the middle of current residential area.*
3. *Towerfield Drive Access – opening up the end of Towerfield Drive to provide access to a satellite new development of houses which will eventually join the rest of the proposed development.*

1. Main access

This main access to the new development will need to be completed prior to the start of any building. We would like the developer to guarantee this.

The construction of the roundabout will cause severe delays to current traffic flow during peak periods. We would like the developer to detail how this will be managed and over what period.

The current masterplan doesn't specify how the transition from rural moorland, which is the edge of the national park, to urban fringe will be visually managed. More detail is needed on this as the presentation of the main access to the new development will be crucial in preserving the rural aspect of the area. The transition point should avoid hard boundaries. (source Tamar Valley AONB). What plans are there to sympathetically manage the new access, so it is in keeping with the current surroundings?

We would also like to understand what plans are there to preserve or replant natural hedgerows around the area of the new main access?

2. Pick Pie Drive Access

We do not support the Pick Pie Drive access being opened for cars to use. It will result in an unacceptable increase of commuter and heavy building traffic and its associated noise and pollution for the residents whose properties back onto this road.

There is also the very real possibility it will be used as a short cut alternative to the A386 which will result in a 'rat run' effect. This would be very detrimental for the area as increased traffic will be encouraged onto a road which already suffers congestion at peak times. Most

notably the main road which runs past the existing primary school which struggles to cope with current traffic volumes during peak periods.

We would, however, be open to the idea of the proposed access at the end of Pick Pie Drive being a designated cycle and bus route with car usage only up to the new access point for existing residents.

3. Towerfield Drive Access

With Towerfield Drive being used by the DWP offices for parking on both sides of the road, how will the developers guarantee the safety of those cars with heavy plant machinery and building supplies being delivered on a constant basis?

How will the developers minimise the effect of the increased traffic/noise on the new Eco Village residents during the building process?

What thought has been given to the timing of when this satellite development of Towerfield Drive will join up with the main development given that when the houses become occupied the increased traffic flow along this narrow road will become unsustainable?

TRAFFIC AND TRANSPORT

PLY44 says that ...'additionally there should be no occupation of new homes until the A386 WTTG Junction Transport scheme has been implemented, with the exception of where it can be accommodated without resulting in a severe impact on the operation of the road network'.

The road network (not just the A386 itself) is already saturated especially during peak times and during times like we have experienced when SWW were in 'residence'.

The Traffic Assessment (TA) is lacking. Highways England (not Highways Devon) have indicated a required deferment of 6 months so that the TA can be fleshed out. We welcome this request so a full analysis can be undertaken.

The TA is 212 pages long – it is impossible to read; and in our opinion a barrier to public understanding. It is dated September and October 2019.

We wish to critique the following points within the TA:

- 1.1.7 – single TA applies to whole project not just the one application
- 1.1.11 – evidence of shift in transport behaviour in particular with the younger ages. These figures are based on National Evidence – not specific to the Woolwell / Bickleigh Parish area. Young people, particularly those living in Bickleigh, will need their own transport for travelling to work. The buses to Bickleigh and beyond were reduced because they were not being used. Have Barwood spoken to the public transport Companies.
- 1.1.12 – External documents are referenced using (dated) information at various points 2012, 2014, 2017 etc. We would like to understand what the trend is now. Documents refer to need to do more research, yet the TA formed on the basis of the outdated research is being used to justify development.
- 1.1.13 – the evidence presented in the TA is dated and may not be indicative of future trends
- 1.1.14 – Many of the points in this section are possibility rather than probabilities
- 1.1.17 – DfT uses the traditional approaches to prediction. Why would this development be a test case?

- 1.1.20 – TA is a package of strategies that all need to integrate and work. We would like to understand what the contingencies are if they don't.
- 1.2.3 – All of the documents referenced are more than 2 years old
- 1.2.5 statement regarding the future capacity of road with full development. The development will only increase traffic congestion during peak hours
- 2.3.7 – Quote Darklake Lane is a private road – this is incorrect
- 2.4.1 - Advises buses service the area but they only extend to the Woolwell roundabout not Woolwell itself. References keep on being made to good connections.
- 2.4.13 Talks about commitments that are long talked about but never actioned
- 2.6.3 – referring the A38/A386 Manadon Interchange the phrase 'well trafficked' used.
- 2.6.9 – Refer to Darklake Lane as a private road again
- 2.7 is about other schemes all stated as contributing to improvements for the development traffic. There is doubt over funding for the WTTG scheme (dismissed as poorly reported press)
- 2.8.4 – reference to reduction in collisions due to road improvement plans
- 2.9.1 – data collection exercise undertaken in July 2016
- 2.9.4 – the traffic surveys undertaken include Manual classified counts (MCC) and the Automatic traffic counts (ATC). As they have been previously provided to Plymouth City Council and Devon County Council these surveys have not been provided. These surveys should be included in the application.
- 2.10.1 – states that Woolwell well served by buses. We do not feel this is correct. Woolwell and Roborough have excellent bus links to a number of key local locations – We would like this explained in more detail. Numerous traffic schemes that will enhance local road network
- 3.3.4 (5) - local facilities to support new and existing residents. Where is the evidence that existing residents want the new facilities?
- Policy 5 and 18 of the Neighbourhood Plan regarding parking is not being adhered to
- Section 4 - traffic trends. Where is all the evidence of the trends which were documented years ago?
- 4.1.11 – there is lots of information regarding younger drivers but Devon population on the more mature side and people will retain their ownership rights to cars despite the trends anyway?
- 4.2.2 – where is the evidence of Devon trends?
- 5.3.3 – more statements about excellent facilities Statement re Travel Demand Management but people will do what they want to do regardless
- 5.4.122 - BICK04 policy regarding parking has been dismissed despite ratification through inspectorate. Goes on to state that Bick04 will be overridden by what DCC and SHDC say
- 5.4.14 – apparently parking needs will be determined by relevant policies and not by residents needs
- 5.4.34 – talks about push scooters, electric skateboard, hoverboard and Segway as alternatives for transport as opposed to the car – we do not feel this is realistic
- 5.4.49 – the masterplan has been developed with bus travel in mind, but no consultation has taken place on this subject with the relevant bus companies
- 5.4.57 – proposal for bus lanes in Woolwell Road during construction
- 5.5.8 – generally considered that high speed broadband, mobile services and WIFI public access will be improved to enhance home working opportunities – tell that to Devon and Cornwall Broadband customers!!

- 5.5.21 – car sharing – we do not feel this is realistic in such a rural area.

BPC Neighbourhood Plan BICK04 - requires larger housing development proposals to include a clear statement that demonstrates how the new housing areas will contribute positively to our sustainability by relating to existing areas and the community assets (the facilities we currently enjoy), ensuring new infrastructure and facilities will be encouraged to avail themselves of the local networks, services and facilities.

BPC Neighbourhood Plan policy BICK18 – new housing development will be required to provide a minimum of two-off-road parking space for units with 1 or 2 bedrooms and a minimum of three-off-road parking spaces for units with 3 or more bedrooms. Have Barwood taking this into consideration?

Barwood Traffic Assessment - Emerging Evidence on Future Travel Trends

Recurring themes reported in key evidence documents include but are not limited to the decline in car use and trip rates (especially amongst younger generations), the potential for home working and the digitisation of services to reduce car use, and influence of the built environment (i.e. the provision of sustainable infrastructure and proximity of facilities) on the likelihood of people to walk and cycle. Although, the Council supports green issues because of the location of the development, with some of the parish being in a rural area, the practicalities of home working thereby reducing the use of the car, are not so feasible.

The TA refers to young people, but the development does not take into account the older generation.

The building work could start at the same time. Different building contractors could be working on the development at the same time.

Barwood's Traffic Assessment is dated 2019 however some of the data is from 2012 (before the Eco Village at Roborough was built).

As traffic assessment is based on historic data, Bickleigh Parish Council strongly recommends South Hams District Council conducts an independent, up to date, traffic assessment.

Page 157 of Barwood's Transport Assessment

10.5.1 Based on a combination of the trip banking exercise, residual capacity assessment and allowing for the adjustment to anticipated trip generation due to the on-site travel plan, it is concluded that up to circa 416 dwellings (i.e. 379 + 38) could form an initial phase of development that can be accommodated prior to the construction of the Woolwell to the George scheme, with an immaterial impact on baseline traffic flows at the junction.

10.5.2 This therefore demonstrates that there is potential for new dwellings to be built and occupied at the site in advance of the Woolwell to The George scheme being completed, even in the unlikely event that it was to slip a number of years.

Justification is required demonstrating evidence supporting that the traffic can cope with a development of 416 'occupied' dwellings.

CLIMATE CHANGE

With reference to the following policies:

- *Bickleigh Parish Neighbourhood Plan Policy 2.6 Built Environment: We should promote the code for sustainable homes. We should encourage the wider use of renewable energy.*
- *Bickleigh Parish Neighbourhood Plan Policy BICK04 New housing development section 8.5 refers to a sustainable Urban Extension*
- *National Planning Policy Framework (NPPF) 3.2: The NPPF includes, at its heart is a presumption in favour of sustainable development.*

Following the withdrawal of the “code for sustainable homes (CFSH)” in 2015 we would like the developer to explain what plans are in hand to ensure sustainability is achieved in the development. We also seek to understand how the developer will demonstrate commitment and investment to providing sustainable, low carbon design and construction.

With reference to Policy BICK09 housing: Has the developer considered been given to full ‘Passive Housing’? If so, how do they plan to meet the 5 criteria of a true passive home? This approach will undoubtedly increase build costs, how, therefore, will the housing stock offered meet the affordability / low cost housing requirement.

We also wish for the developer to describe their vision for new homes that will have a positive, progressive influence on the environment and will enhance the lives of the people who move into them.

This development is of considerable size, yet we see no mention of working with and to “BREEAM” - why is this?

Policy BICK12 Space Requirements: There is much mention of woodland buffers and edgings however there is no mention of green corridors within the housing area. Can the developer quantify where all materials will be purchased and delivered from, hopefully locally sourced, to ensure un-necessary emissions due to long haul transportation are mitigated?

The developer’s report gives many “statements” with no substance or information to substance or information to substantiate how the “statements” will be delivered / achieved; please could this be provided

What is the climate change strategy? There is no mention in the developers report to a climate change strategy to promote and deliver green buildings. There is a Government initiative set a target for all new homes to have zero carbon emissions by 2016.

There is no mention of any protection of public rights of way or bridleways as per the joint local plan strategic policy SPT11.

EDUCATION

Item 5 of PLY44 included in the Plymouth and South West Devon Joint Local Plan quotes:

“Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the area, including a new primary school and appropriate contributions to mitigate the development on secondary schools in Plymouth”.

The planning application includes the provision of a new primary school, however there is no information on how many dwellings are required to be built before this will be opened.

A secondary school is not included as it is believed that there is sufficient space at nearby schools, namely Tavistock, Ivybridge, Tor Bridge.

The National Planning Policy Framework states that “the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities” (para. 72).

Policy BICK23 of the Bickleigh Neighbourhood Plan states “...that all local scholars have the opportunity to go to a local school”.

With the further developments in Tavistock, Derriford, Belliver, Pinewood, and the Eco Homes at Roborough, we have concerns by the time the development is habitable, these secondary school places will no longer be available.

Plymouth Live recently reported: The number of children applying for a place in the city has increased this year, the council says, to 3,033 children who applied on time (by October 31, 2019) for a secondary school place. The council website also advises that “The number of secondary school aged children has been in decline but after this academic year 2017/2018 the pupil roll will begin to increase.”

(<https://www.plymouth.gov.uk/childrenandfamilies/schoolseducationskillsandemployability/pupilnumbersandforecasts>)

The planning application also does not mention any provision for children of pre-school age. The current nurseries within Woolwell and Roborough are already at capacity.

HOUSING MIX

The 2017 Strategic Housing Market Assessment for the Plymouth area 21 has shown that over 50% of all new housing provided in South Hams up until 2034, should be either one or two bedroomed dwellings.

Policy BICK10 - Housing for the Elderly states: “It was made clear at the Community Consultation Event in March 2016 that new housing should offer more options for local people who want to move/downsize but stay in the area. Many attendees told us that they wished to remain living in the Parish but anticipate needing something smaller and more manageable as they get older”.

Although we accept that the size and type of dwellings will be agreed at the reserved matters stage, we would like for this to be addressed.

A policy requirement of PLY44 is for self-build plots. There is also reference to this within Bick 15 of the Neighbourhood Plan but there is little reference to self-build plots within the planning application. Barwood, when questioned about this in the developer forum responded:

‘We know from our public consultation that some people would like self-build plots to be provided and this will be discussed further with Officers during the determination of the planning applications. We are very happy to look at opportunities to deliver these if we can see a demonstrable demand for people to purchase and deliver self-build and custom-build homes.’

However, as it is a policy requirement that these must be provided for. We wish for these to be included within the plan, and removed if there is lack of demand, not the other way.

COMMUNITIES – provision for communities, including medical care

Medical provision

Consultation from NHS Devon Clinical Commissioning Group (CCG) states 'based upon the Devon County Council agreed planning guidance document and formula <https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance> the local GP practices that would be likely to receive new patients from the development are already oversubscribed. It would be expected that the new development would create approximately a further 792 patients based upon the 2.2 occupancy rate and without any mitigation this could lead the current patient list becoming closed to new patients.'

The response from NHS CCG highlights the increasing demand in the following services:

- *Accident and Emergency*
- *Non Elective Hospital Admissions*
- *Elective Hospital Admissions*
- *Day-Case Procedures*
- *Outpatient Appointments*
- *Diagnostic Imaging*
- *Community Nursing*

The Woolwell Medical Centre have confirmed to the Council they have concerns.

Additionally, surgeries are struggling to recruit GPs.

BPC require further consultation with NHS CCG. As stated in NH CCG consultee response, this is articulated in the Government's National Planning Policy Framework.

- *What discussions have taken place between Barwood & CCB (Clinical Commission Group)? Not enough information has been provided.*
- *Wider Devon Sustainability & Transformation Plan (STP) October 2016 states 'People are living longer and will require more support from the health and care system.' - It is important that the community is informed what discussions the developers have had with CCB.*
- *The CCG Plan states over the next five years they will: - Ensure that plans reflect the needs of local communities - Engage fully with our stakeholders on future direction of travel and proposed changes to services particularly where this impacts on the number of beds available, community hospital closures, and changes to specific acute services.'*
- *Neighbourhood Plan – BICK22, Health & Welfare Facilities The current situation with the local health and welfare service is of growing concern to the Parish Council. It is felt that the current service within the Parish is running close to capacity and will not be able to cope with the demands of a growing or ageing population.*
- *The 3 overarching objectives of the National Planning Policy framework are:*
 - o *an economic objective*
 - o *a social objective - accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.*
 - o *an environmental objective*
- *Although the NPPF states these objectives are not criteria which the application should be judged there is strong concern that this planning application does not address these objectives.*

The development will incur additional pressure on the existing medical services in Bickleigh Parish.

Recreation

The Council requires information on all the local groups and services who have been consulted

Although the proposal includes play provision for young children there is nothing for the youths.

PUBLIC FORUM

Traffic congestion on the A386

It was highlighted in the Parish Council meeting by several members of the public that the A386 simply cannot cope with additional traffic.

The Council notes that PLY44 Policy 2 states 'There should be no occupation of new homes until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network. The Council has absolutely no doubt, that any building works for residential homes (whether the homes are occupied or not), will result in a severe impact on the operation of the local road network.

Traffic flow in Woolwell Road

When the houses were built in Wood End Road it was supposed to be a 'rural' road. During the mornings the school run traffic is extremely busy. The Council's radar data has recorded 3600 cars have passed through Woolwell Road (over a 7 day period).

Traffic data

Strong concern has been raised to the Council that the traffic data Barwood have used is over 20 years hold. The data refers to young people not using own cars, which is simply not the case. Barwood have promised the community that this would be looked at.

Pylons

A resident queried where on the development the existing pylons are situated. If they are positioned within the 'recreational area' this is not acceptable as it will not create an area of open space or welcome natural play. There are reported health risks associated with living near pylons.

Phasing

A resident queried where the development would start on the site plan. We would like the developer to explain the phasing approach as this is not included within the planning application.

Consultation

The feeling is that Barwood have not completed comprehensive consultation. The community should be regularly updated with information such as how often Barwood have consulted, who they have consulted and when. During the weeks leading up to the Parish Council meeting Barwood were knocking on peoples' doors. How did Barwood randomly select the homes they would visit? What was the response rate? Has this data been published?

Although, in terms of planning consideration, this is not a material consideration, it is vital the parish (and wider community) are consulted and kept fully involved up to date with the developers plans.

CONCLUSION

The developer has failed to address a vast number of key points within the applications and ignored several Neighbourhood Plan policies and requirements within PLY44 of the Joint Local Plan.

For these reasons, Bickleigh Parish Council object to the planning applications.'

Councillor Nicky Hopwood, Woolwell Ward

'I write to object to planning application numbers 4185/19/OPA and 4181/19/OPA and shall lodge my comments to both.

Whilst some of my comments do not relate to policy in terms of objections to a planning application they are important issues that need to be taken in to consideration when you as a planning authority consider this application. When such a large plan is submitted on the back of the Joint Local Plan which already lays foundation for this development in principal, to define policy is even harder when an outline application has been submitted, coupled with the fact that there are 3 land owners within this policy area, Maristow who Barwood are working for, Plymouth City Council who Barwood have included in their application without their permission and Mr Hitchins who Barwood have completely excluded.

TRANSPORT - Within PLY44 of the JLP there is reference at point 2 that no homes should be occupied until the A386 Woolwell to the George Junction Transport scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network. The Transport assessment makes reference to the network being able to accommodate 378 + 38 houses which could form an initial phase of development that can be occupied prior to the construction of the Woolwell to the George Scheme and according to Barwood in the Transport Assessment 'will have an immaterial impact on the baseline traffic flows at the junction'. Traffic flow predictions conclude that while the proposed development will increase queuing times in peak periods this will be mitigated by better bus services, peak period spreading as some will choose to travel 'off-peak' to avoid peak time queues. The Transport Assessment states there is a trend amongst the young not to drive and notes that older people drive more. There is clearly no understanding of the area, many homes have 2-4 cars and whilst I accept this may be mainly due to poor bus connectivity there are no cast iron guarantees of how a better bus service will be sustained. The Transport Assessment relies heavily in a trend shift in travel and therefore less car journeys but there is no convincing strategy in place to deliver this objective.

A housing scheme has just been put before Plymouth City Council for 30 new homes at Belliver and there are additional homes being built north of Plymouth towards Tavistock. Does the Transport Assessment prove that these homes have been taken in to account and if not I question the accuracy of the Transport Assessment. Coupled with that we have heard no firm commitment from Plymouth City Council to deliver this road upgrade.

Before any homes are built the funding must be agreed for delivery of the project and the Woolwell to the George scheme would need to have been started and on site. In the TA trip banking is mentioned, in other words not generating any additional car trips. This again comes back to mind set changes for people who use cars and when a housing scheme is going to be delivered on the edge of the boundary of Plymouth in a semi rural location with poor bus service mind sets will not be changed until the scheme is complete with a proper connected bus service that is guaranteed and paid for by the developer for several years thus propping up bus services that will be running at a loss.

Until this is signed and sealed no homes could be considered to be even built let alone lived in. South Hams need to check the transport figures for accuracy and robustly test them. Residents in this area do not have to be transport experts to confirm what I believe South Hams will confirm and that is the A386 can take NO further traffic until the A386 upgrade takes place.

MAIN ACCESS – PLY44 also requires the main access to the site to be built before building commences. The main access point at a new New Road is in this planning application and needs to be completely finished before the building starts. Construction traffic will need to access the site via this road. The developments needs to start at the New Road end and sweep across to Woolwell. The CSA field which is the second planning application will need to be part of this sweeping process and not started until the phasing reaches that points. This part of the application cannot be started before the A386 road improvement is finished as the Woolwell junction cannot take anymore traffic. Also, the houses here would be an isolated development as no connectivity between the two sites would be built until the development reached this point.

INFRASTRUCTURE – in the Joint Local Plan at 4.181 under PLY44 it states that the development will need to provide for a range of facilities for both existing and new residents. Barwood are trying to prove that they can fit 2000 homes on less land and have shown new sports pitches for the new community but have not shown how they will meet the needs of the existing community. By Barwood excluding the Hitchins land there is nothing to stop Mr Hitchins putting a plough through the sports pitches on his land and the existing community would have no sports provision, this is after all private land over which no one can dictate to him what he does with land that belongs to him unless it is included in the overall scheme. That is why it is a red line to the community of Woolwell and unless all 3 land owners work together to deliver the policies within the Joint Local Plan the existing community may lose the play pitches that they enjoy at the moment.

PICKPIE DRIVE - I strongly oppose to the proposed opening up of Pickpie Drive to provide connectivity to the new development for cars. I think that if this happened it would be a rat run for cars coming in to Plymouth in the rush hour. They would go down New Road, through the site and come out at the Woolwell exit on to the roundabout as it is at the moment. The same thing happened in Roborough Village when that was reconfigured and led to the North exit from the Village being made an exit only and no through road and that was to go a further 200 yards. I would however support a bus, cycle and pedestrian link at that point as I recognise the need for good bus connectivity through the site which would also benefit the community as it is now. Also, this could be a pedestrian and cycle link from the existing Woolwell in to the Community Park and Cann Wood beyond. Ply44 states that the existing and new community need to be connected but it does not specify cars, connectivity via bus, walking and cycling is far more sustainable.

CLIMATE CHANGE – taking in to consideration comments re Pickpie Drive there is little reference to Climate Change within the documentation although South Hams District Council and Bickleigh Parish Council have declared a Climate Change Emergency. To encourage the use of public transport and walking and cycling Pickpie Drive could be used for this to encourage better public transport connectivity and less use of cars.

SELF BUILD PLOTS – a policy requirement of PLY44 is for self build plots. There is also reference to this within Bick 15 of the Neighbourhood Plan but again there is little reference to self build plots

When questioned about this in the developer forum the Barwood answer was

“We know from our public consultation that some people would like self-build plots to be provided and this will be discussed further with Officers during the determination of the planning applications. We are very happy to look at opportunities to deliver these if we can see a demonstrable demand for people to purchase and deliver self-build and custom-build homes.”

However, as it is a policy requirement that these must be provided for within the plan and if the demand is not there they can be taken out, not the other way.

LAND OWNERSHIP – there are 3 land owners within the JLP area. The application has been submitted excluding the Hitchins land which is completely unacceptable as this land plays a key part within the existing Woolwell community. The topography of that land is such that it is the flattest of the policy area and has the furthest reaching view over Dartmoor National Park. By excluding this land the risk is that Mr Hitchins could come forward and put in for planning to build so we end up having more houses on top of the 2000. You have said you can deliver 2000 on less land. Barwood are not working with Hitchins and have included the Plymouth City Council land albeit without their permission so could not deliver houses on the PCC land anyway. Barwood should have included the Hitchins land with or without permissions and treated this land the same as the PCC land.

How are you going to deliver all of the policy requirements within the Joint Local Plan with only the land in your control which is the Maristow land. No discussions have taken place and you do not know the infrastructure costs that could be in the S106 agreement. This would all be based on trust which is not acceptable.

CONSULTATION – PLY44 of the joint local plan makes it clear that delivery of the site will be in accordance with a strategic masterplan and design code that should be prepared for the site and consulted upon in advance of the consideration of any planning application.

Barwood have made great emphasis within the transport assessment of looking at the wider Plymouth road connections but they have not consulted widely as per the PLY44 policy requirement. I have met with Barwood on several occasions but after having made enquiries it would appear that they have not treated ward councillors in other areas that will be affected in the same way. Therefore Barwood have done selective consultation with elected representatives who's areas will be affected. One of the best mechanisms to truly consult is through Ward councillors who then feed down to their electorate. I have done this for Woolwell ward but I am unaware of any other councillor doing this which would lead me to believe that I am correct in my findings that they have not spoken to other wards that will be affected.

The applicant held a public consultation event in Woolwell and did send out postal invites for this event to Belliver and Glenholt and surrounding areas. The take up was not good, they did not however go out in to the wider community and for instance go to the local shopping centre in Southway, they chose to stand in the middle of Plymouth City Centre which makes no sense.

Barwood pledged to keep residents updated on their website www.landatWoolwell.com One newsletter was put on there with the findings of the public event and nothing else has been posted until the end of January 2020. In other words you have not kept residents updated all the way along the process that led to the planning application being submitted.

Lastly, residents want to know basics like trigger points for infrastructure, where will construction traffic come in to the site, where will building start, when will it start and all the other questions that come with a large scale housing development. I understand that these

will be determined in the reserved matters but I have continually pressed for some indication and this has not been forthcoming in great detail. I would ask that Barwood at least give details of where the site will start and I have and will continue to make my views known on this point. The phasing needs to start at the new New Road and sweep across to Woolwell.

Barwood have a duty to inform residents on what are important matters to those that live within the area and I would ask the District Council to press for these answers and make sure that residents can have an input in to reserved matters. Barwood surely have a duty to answer the most basic of questions out of courtesy to the residents I represent.'

Revised Submission

Bickleigh Parish Council

'Bickleigh Parish Council comments to revised planning applications numbers 4185/19/OPA and 4181/19/OPA.

- 1. Affordable Housing quota - An affordable housing quota of 30% of houses built was in the Joint Local Plan (policy number DEV7 point 2). Bickleigh Parish Council would like the developer to assure the community this that will, indeed, be the percentage of affordable homes built across the two planning applications. Affordable housing is a critical need within the area and it is a particular worry that this figure will be 'watered down' by the developer to maximise profits.*
- 2. Phasing of development - A development on such a large scale will undoubtedly severely disrupt the local communities of Woolwell, Bickleigh Village and Roborough Village. To minimise the impact on the residents of these areas the Parish Council would like assurances that the development access and first phasing will start in the north of the project – on the A386, north of Roborough Village. Such a course of action will have the least impact on the residents of all three areas affected by these plans. This is especially important as the building works will go on for many years. The quality of life of existing residents in all three areas should be of paramount importance to both the developers and the planning committee when applications of this size are approved.*
- 3. Construction Traffic – Supplementary to point 2, again, the quality of life of the existing residents of Woolwell will be severely impaired by the constant flow of construction traffic over a long period along Woolwell Road, which is the current only access road into the Woolwell residential area. If point 2 is not guaranteed, large construction vehicles will have to pass along Woolwell Road - past Bickleigh Down Primary School - on a regular basis over a long period of time. This road is already very busy and has no double yellow lines, except adjacent to some turnings. Traffic is constant and parking along the road is frequent. We would ask that consideration is given to those residents who live along Woolwell Road and Pick Pie Drive, whose peace would be shattered if the path of any construction traffic was through the Woolwell residential area.*
- 4. Pick Pie Drive - The prospect of Pick Pie Drive being eventually made into a 'rat run' by its adjoining to the new development in the adjacent fields was mentioned in Bickleigh Parish Councils original objections to the planning application 4185/19/OPA. However, in addition, we would like to draw attention to the successful precedent, to avoid such a scenario, which has been adopted in a recent Plymouth housing development. Specifically, the Manadon Park development. Residents along and adjacent to Pick Pie Drive in Woolwell are extremely worried about the opening up of the Pick Pie Drive entrance to the new development. Bickleigh Parish Council request that when this eventually happens that this road is for a BUS and CYCLE route only.'*

Appendix B – Summarised Consultation Responses

Insofar as the representations relate to material considerations these are summarised in the following Tables and an indication given of in what Section of the report matters raised are addressed.

Statutory Consultees:

Initial Submission

Consultee	Summary of response	Where this is addressed
Budshead Ward	Undecided, notes the following; <i>'I am not opposed to development per se and I am supportive of attempts to deliver housing to meet the needs of our growing city, however infrastructure needs to be in place to support housing in this area.'</i>	Appendix D
Church Of England, Diocese of Exeter	Undecided and notes the following; <i>'It is essential that PLY44 is not read or responded to in isolation; all developers of sites throughout the area of the JLP need to demonstrate their commitment to deliver all relevant plan policies.'</i>	Section 8
Dartmoor National Planning Authority	No objection subject to conditions and S106 parameters securing mitigation and compensation. Additionally requests further discussion around several points.	Sections 13,17 & Appendix D
Dartmoor National Planning Authority further response	No in principle objection subject to mitigation or S106 contribution	Section 17 & Appendix D
Devon County Council and Plymouth County Councils' Combined Response	Education: No objection subject to conditions and S106 parameters and contributions.	Section 14 and Appendix D
	Flood Risk: No in principal objection, requests additional information and provides guidance for conditions. Additionally provides the following observation; <i>'The LLFA is supportive of the use of infiltration at this site, in conjunction with the concept of the surface water management hierarchy however a greater factor of safety would be required for each basin, based on the large contribution areas and the presence of existing infrastructure such as New Road.'</i>	Section 16
	Flood Risk further response: No in principle objection subject to conditions. Additionally provides detailed observations and guidance.	
	Gypsy And Traveller Sites: No comment, requests consideration of <i>'one or two pitches for the travelling community within the development site.'</i>	Section 10
	Highways: Requests further information and discussion.	Section 11

Consultee	Summary of response	Where this is addressed
	Historic Environment: Provides detailed recommendations and guidance for conditions.	Section 16
	Minerals Planning: No objection.	
	Public Health: Support, provides detailed comments and guidance.	Section 14
	Public Rights of Way: Requests further information and discussion.	Section 11 & Appendix D
	Waste Planning: No objections subject to conditions and the following S106 contributions; App A - £262,400 App B - £57,600 Additional Waste planning guidance and clarification also provided.	Section 14 & 17
Environment Agency	No comment.	
Forestry Commission	Undecided, notes the following; <i>'Section 182 of the National Planning Policy Framework 2019 imposes a duty on applicants to provide suitable mitigation against anticipated adverse impacts on established neighbouring commercial businesses. We would therefore expect to see measures imposed on the applicant, within the planning conditions, that may include the erection of robust fencing, designated paths, and signage.'</i>	Section 11
Historic England	App A: No objection. App B: No comment.	Section 16
Ministry of Housing Communities and Local Government	No Comment.	
National Highways	Recommends a 6-month hold to allow for additional information to be gathered (this recommendation was re-issued until lifted following re-consultation).	Section 11
Natural England	Requests further information which is required to determine impacts on Designated Sites Habitats Regulations Assessment.	Section 13, 17 Appendix D
Natural England further response	No objection subject to appropriate mitigation being secured; - 'S106 obligation to provide the appropriate Recreation Mitigation and Management Scheme mitigation, in accordance with the requisite CIL122 tests set out in the Community Infrastructure Levy Regulations 2021 (as amended). Additional strategic greenspace will be provided through: - Planning condition or S106 obligation to secure the appropriate triggers for the phased delivery of	Section 13, 17 & Appendix D & E

Consultee	Summary of response	Where this is addressed
	<p>Community Park and other public open space in accordance with development phasing;</p> <ul style="list-style-type: none"> - S106 obligation to secure the mechanism for the future management of Community Park and other public open space. - Planning conditions requiring an Open Space Strategy and/or a Soft Landscape Scheme containing details of the design the public open space. - Planning conditions requiring a Landscape and Ecological Management Plan (LEMP) containing details of the implementation and long-term management of the informal public open space. <p>Requirement for monitoring of the success of the delivery/mitigation and measures for redress.</p>	
Network Rail	No comment.	
NHS Devon Acute Care	<p>Support subject to the following S106 contribution;</p> <p>App A - £738,826</p> <p>App B - £162,181</p>	Section 14
NHS Devon Primary Care	Requests further discussion.	Section 14
NHS Devon Primary Care further response	<p>Requests the following S106 Contributions;</p> <p>App A - £923, 648</p> <p>App B - £202, 752</p> <p>And Notes;</p> <p><i>'The ICB's concern is that the combined surgeries of Woolwell Medical Centre and Roborough Surgery Already over capacity within their existing footprint therefore it follows that to have a sustainable development in human health terms the whole local healthcare provisions will require review. The combined surgeries already have 16, 655 patients registered between them and this new development will increase the local population by a further 792 persons.'</i></p>	Section 14 , 17 & Appendix D
Plymouth Argam Rugby Football Club	<p>Objection, notes the following;</p> <p><i>'The rugby club lies within land allocated for development under Policy PLY44. Whilst the policy stipulates that a strategic masterplan and design code should be prepared for the site this does not seem to have been properly addressed. We are also disappointed that the applicant did not properly engage with the club before submitting the planning applications. As currently submitted, it is difficult to see how the proposals will achieve a comprehensive form of development which will protect the club's future.'</i></p>	Section 15
Plymouth Cycling Campaign	<p>Objection, notes the following;</p> <p><i>'An off road cycling and walking path linking Roborough with Yelverton - across Roborough Down has been the subject of proposals for more than 20 years...This would be</i></p>	Section 11

Consultee	Summary of response	Where this is addressed
	<i>dependent on section 106 money after further housing development. DCC states that it will continue to try and secure funding through developer contributions where appropriate. However, there is no mention of this route in the Transport Assessment Scoping Note...</i>	
Police Designing Out Crime	Provides detailed advice and guidance for designing out crime through the detailed design.	
South West Water	No Objection.	
Sport England	Holding objection, requests further information and notes the following; <i>'Sport England could offer its general support for a community sport proposals within the Woolwell development. But the detail is light and we have questions, advice and concern on the future provision that needs to be considered to ensure a fit for purpose development for community sport.'</i>	Section 15, 17 & Appendix D
Sport England further response on behalf of the Rugby Football Union	Notes the following; <i>'...significant concern over this proposal as further consideration and investigation is required into the implications to the rugby provision, which is currently located on the fringe of this development.'</i>	Section 15, 17 & Appendix D
Tamar Valley National Landscape (previously AONB)	No in principle objection, provides guidance and observations and requests additional discussions.	Section 12
National Grid Electricity Distribution (formerly Western Power Distribution)	No objection, notes the following; <i>'There is minimal existing capacity on the electricity distribution network and as such a new Primary substation will be required to be constructed which has an approximate lead in time of 2 years at a significant cost to the developer. Also suitable land would need to be identified and made available for the location of this Primary substation, approximately 30m2.'</i>	

Revised Submission

Consultee	Summary of response	Where this is addressed
Active Travel England	App A: Defer, and requests further assessment, evidence, revisions, and/or dialogue on the following areas: <ul style="list-style-type: none"> - Revision of Mode Share Targets as set out in the Travel Plan Details; - Details of Active Travel Infrastructure; 	Section 11, 17 & Appendix D

Consultee	Summary of response	Where this is addressed
	<ul style="list-style-type: none"> - Details of cycle parking App B: No comment. The Statutory Consultee remit only applies to consultations made valid by the LPA from the 1st of June 2023.	
Devon County Council	Education: No objection subject to S106 parameters and contributions.	Section 14, 17 and Appendix D
	Flood Risk: No in principle objections subject to condition.	Section 16
	Gypsy And Traveller Sites: No objection, requests consideration of <i>'one or two pitches for the travelling community within the development site.'</i>	Section 10
	Highways: No objection subject to the satisfactory resolution to the discussions about the trigger and conditions necessary to secure the required mitigation, which include a comprehensive set of conditions and S106 parameters and contributions.	Section 11
	Historic Environment: No objections subject to conditions.	Section 16
	Minerals Planning: No objection.	
	Public Health: No objection, provides detailed recommendations and guidance.	Section 14
	Public Rights of Way: No objections subject to S106 contributions to support a link via the Forestry Commission land in the southeast corner of the Site, and towards the proposed Clearbrook to Roborough Multi Use Trail.	
	Waste Management: No objection subject to the following S106 contributions; <ul style="list-style-type: none"> App A - £209,920 App B - £46,080 Waste Planning: No objection subject to conditions. Additionally provides waste planning guidance and clarification.	Section 14 & 17
Environment Agency	No objections subject to a condition. Additionally provides advice.	
Historic England	App A: No comment App B: No comment	
Marine Management Organisation	No comment. Detailed standard guidance and advice provided.	
Ministry of Defence	No Objection.	
National Highways	No objection, subject to the advice that a S106 contribution should be made towards transport improvements.	
Natural England	No further comments.	
NHS Devon Acute Care	Provides further evidence to support the request for acute care S106 contributions.	Section 13, 17 & Appendix D

Consultee	Summary of response	Where this is addressed
NHS Devon Primary Care	Support subject to the following S106 contributions; App A - £1,032,465 App B - £226,639 And notes; <i>'The increase in the contribution requested from the previous NHS comment is due to higher build costs. The development directly affects the ability to provide the health service required to those who live in the development and the community at large. Without securing such contributions, the ICB would be unable to support the proposals and would object to the application because the direct and adverse impact that the development will have on the delivery of primary health care.'</i>	Section 13, 17 & Appendix D
Plymouth City Council	Provides detailed guidance on cross-boundary matters which include:	
	affordable housing	Section 10
	education	Section 14
	transport	Section 11
	drainage matters	Section 16
	and provides recommendations for conditions and S106 parameters and contributions.	1 Section 7 & Appendix D
Police Buildings and Estates	No objection subject to the following S106 contribution of £749,435.32	Section 17
Police Designing Out Crime	Provides detailed advice and guidance for designing out crime through the detailed design.	Section 14
South West Water	No comment, provides guidance and requirements for compliance.	
Sport England	Objection, provides detailed comments and guidance, and notes the following; <i>'Sport England offers general support for a community sport proposals within the Woolwell development. But the detail is light and we have questions, advice and concern on the future provision that needs to be considered to ensure a fit for purpose development for community sport. We would be happy to review amended plans / specifications and clarification but at this time submit an objection to both applications.'</i>	Section 15, 17 & Appendix D
Tamar Valley National Landscape (previously AONB)	No further comments.	

Internal Consultees

Initial Submission

Consultee	Summary of response	Where this is addressed
Open Space, Sport, and Recreation	Provides detailed guidance and advice and requests conditions and S106 parameters.	Section 15, 17 & Appendix D
Waste	No objection.	

Revised Submission

Consultee	Summary of response	Where this is addressed
Affordable Housing	Provides detailed guidance along with recommendations for conditions and S106 parameters.	Section 10, 17 & Appendix D
Joint Local Plan Team	Provides detailed guidance along with recommendations for conditions and S106 parameters.	Section 8 , 7 & Appendix D
Open Space, Sport, and Recreation	No objection subject to conditions and S106 parameters and contributions. Provides detailed guidance and advice.	Section 15,17 & Appendix D
Waste	No further comments.	

Appendix C - Policy

JLP objectives, strategies, and policies

The Tables below provide an overview of the suggested weight to be afforded to the development plan policies when considering the merits of the Applications, to be considered in the planning balance on the whole. As the allocation policy is a detailed site-specific policy, this is considered in a separate Table further below. The weight afforded refers to the following hierarchy, derived from terms used in the NPPF: 1. Great; 2. Significant; 3. Substantial; 4. Due.

Policy	How the application meets policy	Weight to be afforded
<p><i>SO1 - Delivering the spatial strategy</i></p>	<p>The JLP identifies a minimum number of homes (27,600) that will be delivered across the plan area to 2034. Strategic Objective SO1 details how the different spatial elements of the plan area will combine to deliver the required housing and explains the different roles that each spatial element will play. Plymouth and the Urban Fringe (UF) are clearly identified as having the greatest potential to deliver a significant number of new homes during the plan period.</p> <p>There is a clear expectation that growth in the Plymouth Policy Area (PPA)/ UF will be supported by a significant number of new homes, and the northern corridor is identified as having an integral part in that growth strategy. The contribution of the planned 2000 new homes and additional economic and social land uses at Woolwell forms a critical part of the overall spatial strategy of the adopted JLP. The role of the UF is not only a critical element of supporting the growth aspirations, it also allows the plan to take a more proportionate approach to managing growth in the Thriving Towns and Villages Policy Area (TTVPA), and in particular around the six main towns, with development expectations set within the capacity limits of local infrastructure and services. As such, the importance of the delivery of the Woolwell allocation to the overall success of the JLP spatial strategy cannot be overstated.</p> <p>Conversely, if not delivered, it puts pressure on the delivery of housing land elsewhere to meet the requirements under Section 5 of the National Planning Policy Framework (NPPF) 'Delivering a sufficient supply of homes', in particular paragraph 67 for a housing requirement figure for the whole plan area which shows the extent to which identified housing need can be met over the plan period. Failure to deliver at Woolwell will put pressure on the strategy with very real implications through increased development pressures on other sites within the three JLP Authorities' boundaries.</p>	<p>Great</p>
<p><i>SO2 - Strengthening Plymouth's role in the region</i></p>	<p>Woolwell will help fund the delivery of the WtTG scheme and PT improvements, which helps improve capacity as part of the wider growth strategy for the northern corridor.</p>	<p>Great</p>

Policy	How the application meets policy	Weight to be afforded
<i>SO4 - Delivering growth in Plymouth's Derriford and Northern Corridor Growth Areas</i>	The WtTG, PT, local off-site walking and cycling improvements and cycle link contributions will help deliver on aims to realise the potential of the Derriford and Northern Corridor Growth Area	Great
<i>SO6 - Delivering a prosperous and sustainable South West Devon</i>	The facilities and infrastructure to be delivered at Woolwell help reduce the need to travel and provide more sustainable transport options, which the WtTG, walking, cycling, PT and travel plan measures at Woolwell will secure. This will be achieved within a landscape strategy which protects and respects the natural beauty of the surrounding countryside and takes advantage of maximising environmental assets though securing BNG and adopting the CP to achieve greater benefits in the future which can only be delivered through ownership.	Great
<i>SO10 - Maintaining a naturally beautiful and thriving countryside</i>	The policy aims to protect, conserve and enhance the natural beauty of South West Devon's countryside, and to avoid the creation of new homes development in unsustainable or inappropriate locations. As an allocated site the principle of allowing homes is established, though with the potential to have incidental wider impacts, issues are addressed through a substantial new CP, to provide a physical and visual buffer between the countryside and DNP beyond.	Great
<i>SO11 - Delivering high quality development</i>	The aim of the policy is to deliver development which is sustainable, of the right type for its location, and of good quality, which achieves particular outcomes: it results in healthy communities that enjoy good quality and clean environments and where healthy lifestyles are positively encouraged, to be achieved through the delivery of the CP, active travel, transport and other services, secured through the s106; Through a housing mix condition, the Woolwell development will provides a wide choice of homes; through the AWDC, a high quality living environment and as a sustainable urban extension will leave a positive legacy for future generations; through the CP, environment to be created, and BNG multiple benefits arise both to people and wildlife; proposals will respond positively to the challenges of climate change, with sustainable homes and transport reducing carbon emissions, reducing flood risk and contributing to more resilient communities; proposals provide for and meets the transport, health, community, education and other infrastructure needs generated through s106 obligations.	Significant

Policy	How the application meets policy	Weight to be afforded
<i>SO12 - Delivering infrastructure and investment</i>	The delivery of infrastructure and investment is a key, complex but crucial element of the overarching approach to delivery and monitoring of the JLP aims to meet the need for new homes in a sustainable way. As an allocated site, an initial assessment of the infrastructure required to deliver the strategic objectives of the JLP identified the infrastructure improvements required to make Woolwell a sustainable urban extension. including contributions towards the strategic WtTG highway improvements and for appropriate local facilities to support the new and existing residents including a new primary school and mitigating SEN impacts in secondary schools in Plymouth. Consistent with the aims for this strategic objective, developer contributions at Woolwell to help deliver the vision and mitigate the negative impacts of growth through the s106 package of sustainable measures set out in detail in the report and appendices. Notably this includes off-site improved cycle and pedestrian links, improved PT, travel planning, four mobility hubs with electric cars and bikes. New play, sports pitches and a pavilion, in addition to a large CP are to be secured. Health and community provision will be expanded. The package will benefit new and existing residents. AH will be provided, though 12.5% is below the target aim of 30%. The proposed package will deliver a sustainable development consistent with strategic aims and is considered to be the optimum sustainable package affordable within the constraints of viability.	Great
<i>SPT1 - Delivering sustainable development</i>	The allocation at Woolwell enables the objective for the LPAs to support growth and change that delivers a more sustainable future by being planned for and managed in accordance with the principles of sustainable development. This includes a sustainable society where neighbourhoods and communities have a mix of local services, community assets, accessible greenspace, transport options to meet local needs and addresses climate change (including by avoiding increasing flood risk). Overall gains in biodiversity are achieved and local distinctiveness and sense of place is respected, maintained and strengthened through high standards of design. Through the s106 obligations, conditions, and the Allocation Wide Design Code (AWDC), this report sets out how the Woolwell developments will fulfil these requirements for delivering planned sustainable development.	Great
<i>SPT2 - Sustainable linked neighbourhoods and sustainable rural communities</i>	The report sets out how the Woolwell development will support the overall spatial strategy through the creation of neighbourhoods and communities which have access to vibrant local services and community facilities, opportunities for home working including digital connectivity, have a good balance of housing types and tenures, well served by PT, walking and cycling opportunities and reducing the need to travel. The housing parcels,	Significant

Policy	How the application meets policy	Weight to be afforded
	CP, play and sports facilities will provide a safe, accessible, healthy, and wildlife-rich local environment, with well-designed public and natural spaces that are family friendly and welcoming to all. A new primary school will provide access to primary and early years education and a new local centre will complement the existing local centres. the AWDC framework will ensure focus on the sense of place.	
<i>SPT3 - Provision for new homes</i>	The overall housing distribution as set out in Policy STP3 has been derived having regard to the supply of sites and the principles of the spatial strategy. As a consequence, circa 71 per cent of growth is directed to the PPA and 29 per cent to the TTVPA, consistent with the sustainability appraisal of strategic alternatives for the plan. Under the policy, the JLP LPAs monitor and manage the delivery of housing from 2014 to 2034 in accordance with the apportionment between Policy Areas, the spatial strategy and the site allocations set out in the JLP, of which the land at Woolwell is a major part. Housing provision will be made for at least 26,700 dwellings (net) in the Plan Area during the plan period 2014 to 2034, with at least 19,000 new homes, of which 4,550 should be affordable in the PPA. Woolwell is therefore critical to the LPAs objective to plan, monitor and manage the delivery of housing in the plan period. By delivering 2,000 new homes, housing delivery targets may be met. Viability is considered elsewhere, but at 12.5%, proposed affordable homes fall considerably short of the 30% aim for Woolwell which would equate to 250, not the 600 homes and also impacts on the potential to deliver the 23.9% sought within the wider PPA. The acceptability or otherwise is addressed in detail in the report. Provision for the 2,000 homes is supported and encouraged in accordance with the aims of the spatial strategy. The lower level of AH is the optimum achievable as part of an affordable, viable sustainable package of obligations, and is supported as complying with policy taken as a whole and in the round.	Great
<i>SPT4 - Provision for employment floorspace</i>	As the allocation is for residential-led sustainable development, the approach taken is to secure additional employment provision within the new local centre and new school, not specifically allocate further employment land, but the masterplan excludes the existing industrial estate effectively ringfencing it and retaining its status as employment land.	Substantial
<i>SPT5 - Provision for retail development</i>	The small scale new local centre meets the requirement local retail development in support of the principle of sustainable linked neighbourhoods and sustainable rural communities, allowing for a small-scale local convenience shop in locations within reasonable walking distance of all homes.	Substantial

Policy	How the application meets policy	Weight to be afforded
<i>SPT6 - Spatial provision of retail and main town centre uses</i>	As with <i>SPT5</i> , <i>SPT6</i> is supportive of proposed local centres primarily for top-up food shopping and local services to meet local needs within the PPA.	Substantial
<i>SPT7 - Working with neighbouring areas</i>	A strategic allocation such as Woolwell requires close co-operation, which has been forthcoming during the pre-application process and through stakeholder engagement during the applications. Co-operation has been important with the other JLP Authorities over housing, and with DCC and PCC to ensure strategic cross boundary issues in relation to the transport and education infrastructure requirements of South West Devon are met. The Woolwell development also address recreational impacts potentially affecting DNP and the Tamar Valley.	Substantial
<i>SPT8 - Strategic connectivity</i>	The Woolwell development will make fair and proportionate contributions to the planned improvements from Woolwell to The George (WtTG) and good standards of digital communication are ensured through <i>Building Regulations</i> .	Great
<i>SPT9 - Strategic principles for transport planning and strategy</i>	The LPAs and the local highway authorities of PCC and DCC work together with key transport stakeholders to deliver an integrated approach to transport and planning. The Woolwell allocation sees growth focussed on this accessible location, and infrastructure planned and funded to deliver high quality, sustainable travel options.	Great
<i>SPT10 - Balanced transport strategy for growth and healthy sustainable communities</i>	Woolwell proposals include measures consistent with policy aims through contributions to WtTG, PT improvements, travel planning proposals and on and off-site walking and cycling improvements to encourage and facilitate greater modal shift toward sustainable modes of transport, providing the fair and proportionate infrastructure investment needed to support the improvement of sustainable transport choices for local people.	Great
<i>SPT11 - Strategic approach to the historic environment</i>	The retention and restoration of the historic Tramway as a walking and cycling leisure route is consistent with policy aims for development to make a positive contribution to local character and the enhancement of local distinctiveness. The setting o heritage assets will not be adversely impacted and archaeology heritage safeguarded by condition.	Great
<i>SPT12 - Strategic approach to the natural environment</i>	As an allocated site, it is recognised that the Woolwell development will have impacts and it is important within the limitations of providing 2,000 homes, that the distinctive characteristics, special qualities, and important features of the natural environment are protected, conserved, and enhanced. BNG will be secured by condition, and though loss of	Great

Policy	How the application meets policy	Weight to be afforded
	some hedgerows are inevitable, the aim is to secure no net loss through appropriate replacement. BNG will be delivered in a large part through the CP, but also embedded within the development parcels, secured by the AWDC and planning conditions. Impacts on the South Dartmoor Woods European Site within Dartmoor National Park (DNP) are safeguarded through the HRA by ensuring the CP will meet the recreational needs of the new community, which may also help limit impacts through use of the CP by the existing community. Financial contributions are secured to address marine recreational impacts through the s106.	
<i>SPT13 - Strategic infrastructure measures to deliver the spatial strategy</i>	The policy advises the LPAs will work in partnership, including with other stakeholders, to secure the infrastructure needed to deliver the spatial strategy. Plymouth's strategic transport improvements for WtTG fall under this umbrella and the Woolwell proposals make a significant, fair, and proportionate contribution towards delivery.	Great
<i>SPT14 - European Sites – mitigation of recreational impacts from development</i>	The policy requires mitigation measures where development is proposed within the identified zones of influence around European Sites that are vulnerable to adverse recreational impacts. For Woolwell this means a financial contribution towards marine off-site recreational impacts in the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA. For terrestrial impacts, this means avoiding undue recreational impacts on South Dartmoor Woods SAC European site within DNP through the provision of a much larger, high quality multi-functional green space at Woolwell than would ordinarily be required for this scale of development, in the form of the new CP.	Great
<i>PLY2 - Unlocking Plymouth's regional growth potential</i>	New homes at Woolwell are part of the planned regionally significant scale of growth to be delivered in the Northern Corridor Growth Area, through a co-ordinated and planned approach to economic development, spatial planning, and infrastructure planning. The homes and infrastructure to be secured at Woolwell will contribute towards the aims, notably improved capacity in the transport network through the WtTG scheme.	Great
<i>PLY44 - Woolwell Sustainable Urban Extension and Community Park</i>	See Table Below for Detailed Assessment	Great – see separate Table below for more detailed comments
<i>PLY45 - Plym Valley strategic greenspace</i>	Through s106 funding for a planned link between the site and NCN27, development at Woolwell will contribute towards the aims to providing new connections between the Plym	Significant

Policy	How the application meets policy	Weight to be afforded
	Valley greenspace and adjacent communities, particularly enhanced walking and cycling links to encourage visits by sustainable means.	
<i>PLY47 - Strategic infrastructure measures for the Derriford and Northern Corridor Growth Area</i>	In order to support the delivery of the strategy for the Derriford and Northern Corridor Growth Area, the Woolwell s106 includes a substantial financial contribution towards the WtTG scheme to increase capacity on the A386. S106 funding for PT improvements will support the policy aims of increased walking, cycling and PT use in the Derriford area, by benefitting everyone along the route of the planned weekday service frequency improvements to 20 minutes and improved weekend and evening services.	Great
<i>DEV1 - Protecting health and amenity</i>	The Woolwell development proposals will safeguard the health and amenities of the local community by ensuring satisfactory standards of daylight, sunlight, outlook, privacy, and the protection from noise disturbance for both new and existing residents, workers, and visitor through the AWDC, future NDCs and Reserved Matters applications and through conditions including control of construction impacts. The CP and all other public spaces will be designed to be accessible to all people, including people with disabilities or for whose mobility is impaired by other circumstances. This will include a DDA-compliant route through the CP. A Health Impact Assessment was submitted as part of the submitted Environmental Statement (ES) to address health impacts. Through the CP, play and sports provision, on and off-site walking and cycling improvements and mobility hub provision, active travel measures are optimised, contributing positively towards opportunities to improve physical health and well-being in the new and existing community.	Great
<i>DEV2 - Air, water, soil, noise, land and light</i>	The development at Woolwell will address the requirements of policy DEV 2 in a number of ways. Through the masterplan distribution of development, drainage strategy, a sensitive approach to cut and fill, the AWDC framework, and drainage strategy, harmful environmental impacts, and health risks for both new and residents will be avoided and water quality safeguarded. Through future RMs and a condition requiring a phased lighting strategy, the potential impacts of light pollution on local amenity can be limited, to assist with the conservation of dark landscapes and nature conservation. As a green field site, there will be loss of agricultural land, but this is an allocates site and is not the best quality or most versatile land.	Great
<i>DEV3 - Sport and recreation</i>	Through the application of this policy, the LPA will support the creation of new or enhanced sports facilities, and new public rights of access. New sports pitches and facilities are proposed which will be secured through the s106. The existing rugby pitches used by	Significant

Policy	How the application meets policy	Weight to be afforded
	PARUFC within <i>PLY44</i> are not part of this application, so Sports England's concerns at potential loss are unfounded. Funding for a new link created to the NCN27 route will improve access for walkers, joggers and cyclists.	
<i>DEV4 - Playing pitches</i>	Under the policy the LPA will ensure that development and growth is matched by an appropriate level of provision for playing pitch facilities. There are no current pitches within the red line applications (see reference above to the rugby pitches within <i>PLY44</i> but outside the application boundaries). The policy advises for new residential development on larger sites, where practicable, delivery will be expected on site as part of an integrated scheme. The space allocated for sports provision for pitches and a pavilion more than meets the policy requirement. A larger than minimum space is needed to allow for levels changes to accommodate flat pitches. Following detailed discussions with leisure specialist colleagues, all sports provision will be on-site. The level of sports provision sought is below the latest Playing Pitch Standard which has emerged during the latter stage of these applications, but nevertheless meet the policy requirements. The s106 will include the Council's preferred choice to best meet the local demand. Details of the adult and youth pitches sought/ to be provided are set out under the relevant sections of the report, including the planning obligations at Appendix 1.	Significant
<i>DEV5 - Community food growing and allotments</i>	The provision of allotments and food growing land is an important component of a healthy and sustainable community. Allotments are indicated within the CP in the AWDC and through RM for the design of the CP the Woolwell development will ensure that the community has access to food growing as part of this sustainable urban extension.	Substantial
<i>DEV7 - Meeting local housing need in the Plymouth Policy Area</i>	Housing mix will be reserved by condition, to provide an opportunity to ensure housing best meets local needs at the time of the phased delivery. Through viability testing, it has been established that achieving at least 30 per cent of the total number of dwellings as AH viably affordable as part of the sustainable development package recommended to Members. More AH is possible, but only at the expense of the delivery of other measures currently recommended within the s106 package of obligations. On the basis officers consider the recommended package offers the optimum balance between requirements currently affordable, the level of affordable homes at 12.5% (split App A 8%/ App B 30%) would deliver 250 affordable units, well below the aim for 600 units on this site. The level of affordable homes conflicts with the aims of the policy. Nevertheless, a decision must be taken on the balance of all considerations and overall, taken in the round, the Woolwell	Great

Policy	How the application meets policy	Weight to be afforded
	proposals accord with policy and guidance as a whole and best meet local housing needs within the constraints of viability.	
<i>DEV10 - Delivering high quality housing</i>	The policy requirement for housing development to be of a high quality in terms of its design and resilience and provide adequate space to achieve good living standards is achieved as outline applications through RMs and conditions. Issues including the quality of the building design, materials and layout, good pedestrian, cycling and PT connectivity to existing developed areas, open spaces, and local services such as schools and shops, as well as visually relating well to adjacent greenspaces to prevent hard urban edges. Compliance will be required with the AWDC, which also introduces a further level of quality and scrutiny through the requirement for NDCs which must follow and build on the principles set within the AWDC. In this way, proposals are consistent with the Government's requirement for design codes and the NDC/ RMs process will ensure the policy criteria including designing out crime, AH being indistinguishable from other homes, space standards etc. are considered and addressed.	Great
<i>DEV13 - Consideration of sites for Travellers and Travelling Showpeople</i>	Housing colleagues advise SHDC Council has met the need determined in the Gypsy and Traveller Accommodation Needs Assessment evidence for the Joint Local Plan (JLP). This site is not in the right location to meet the need the Council is aware exists within the Caravan Dwelling community. The Gypsy and Traveller community that the District is aware of would prefer to have sites within closer proximity to the A38. As such, no provision is proposed within the Applications.	Significant
<i>DEV14 - Maintaining a flexible mix of employment sites</i>	The Masterplan specifically excludes the existing industrial units, and as such their retention is consistent with Masterplan aims and policy. Under the policy employment sites will be protected from inappropriate neighbouring development, and through RMs, layouts will need to take account of the proximity of the employment premises.	Significant
<i>DEV18 - Protecting local shops and services</i>	In the PPA the LPA will support proposals which provide a mix of principally A1, A2 and A3 uses and other uses which contribute to vitality of the area and do not lead to inactive frontage. The proposals for the local centre include former use classes A1-A5 (now class E), D1 and D2, consistent with the policy.	Significant
<i>DEV19 - Provisions for local employment and skills</i>	The requirement can be addressed by condition.	Significant

Policy	How the application meets policy	Weight to be afforded
<i>DEV20 - Place shaping and the quality of the built environment</i>	<p>As with policy <i>DEV10</i> above, the requirements of <i>DEV20</i> regarding place shaping and the quality of the built environment design are addressed through the applications in a number of ways. Through a LVIA and Masterplan, a landscape strategy emerged based on 5 'green wedges' to filter views from outside the development, including from within DNP. The aim is to ensure that the new development visible from afar will not be seen as one mass of development but interspersed by greenery. This is achieved through retaining and supplementing existing groups of trees within the landscape to strengthen and define the wedges. Through a three-tier system of AWDC/ NDC/ RMs, full attention will be paid to place making from the design stage, so that no NDC can be approved that is not consistent with the AWDC, and no RM can be approved that is not consistent with both the AWDC and NDC for that area. The AWDC establishes three 'character areas' (about which more is said in the relevant section of the report) and layouts/ designs within neighbourhoods and RMs will need to reflect the aims for the relevant local character area. The AWDC identifies key spaces such as the Northern Gateway, where particular attention to townscape will be required to reflect the status of these key spaces. A public art strategy is part of the requirements of the AWDC.</p>	Great
<i>DEV21 - Development affecting the historic environment</i>	<p>At Woolwell, the setting of listed heritage assets is concerned and will be addressed further through RMs. Archaeological investigations comprising a geophysical survey and field evaluation has demonstrated the presence of prehistoric and Roman activity, largely concentrated in the northern part of the site. The archaeological deposits on the site include a putative Roman road, Romano-British Ditches, medieval pits, and a ditched enclosure that may be of prehistoric date, and a possible a post-medieval or 19th century tree enclosure ring or alternatively a prehistoric enclosure. There is also evidence of a substantial bivallate (earthwork with two banks, each with a ditch) defensive farmstead with pottery finds suggestive of a 2nd century AD settlement date. In addition, outside the areas that have previously been subject to archaeological investigation, the proposed development area contains the site of a putative WWII tower structure. The development of the area as proposed will expose and destroy known Romano-British and WWII archaeological and artefactual deposits as described above. The Historic Environment Team welcome the preservation within the scheme of the alignment of the historic 19th century Plymouth and Dartmoor Tramway and its re-use as a cycle and pedestrian path. A written scheme of archaeological investigation and reporting is to be secured by condition.</p>	Great

Policy	How the application meets policy	Weight to be afforded
<i>DEV23 - Landscape character</i>	As an allocated site, it is accepted that the Woolwell developments, while being visible, including from some viewpoints within DNP, will aim through the landscape strategy described under policy <i>DEV20</i> above (and in more detail in the relevant part of the report), to do the utmost to conserve landscape character and avoid significant adverse landscape visual impacts. DNP were involved in discussions before the JLP allocation and subsequently at pre-application stage, and accepted impacts would occur, but could be managed through an appropriate landscape strategy. As is explained in the report it is not considered necessary to compensate for visual impacts within DNP. There is no intervisibility with the TVNL.	Great
<i>DEV25 - Nationally protected landscapes</i>	As referred to under policy <i>DEV23</i> and <i>DEV10</i> above, the highest degree of protection will be given to the protection of the National landscapes of DNP and the TVNL, including potentially damaging or inappropriate development located within their settings, in particular to conserve their natural beauty. The landscape strategy addresses impacts and the detailed RMs and condition will address the detail of what, how and when the practical measures are implemented. Also, as explained under policies <i>SPT12</i> , <i>SPT13</i> , <i>PLY44</i> and elsewhere within the report, the CP will address potential recreational impacts in the National Landscape of DNP and through the RMMS payments secured in the s106, address marine impacts in the Tamar Estuary SAC within TVNL. There is no intervisibility with the TVNL, no terrestrial impacts not addressed through the CP and no undue marine impacts are anticipated that could not be addressed through the RMMS payments.	Great
<i>DEV26 - Protecting and enhancing biodiversity and geological conservation</i>	The policy requires development should support the protection, conservation, enhancement and restoration of biodiversity and geodiversity with specific provisions for the protection of European Sites. As an allocated site, consideration was given at the plan stage surrounding mitigating the recreational impacts of new residents on the European Site in DNP. The requirement for a CP meets this aim. As advised under policies <i>SPT1</i> , <i>DEV26</i> and <i>SO10</i> , consideration has been given to avoiding impacts on the South Dartmoor Woods Special Area of Conservation. The quantum of community and other open space far exceeds what would normally be required for housing development of this scale to mitigate impacts. It will be through the s106 and conditions to ensure that the quality of and timescale for delivery of the CP provision means that recreational impacts are appropriately managed to safeguard the European site. The Habitats Regulation Assessment (HRA) confirms impacts will be managed through conditions, a position supported by NE. The Woolwell ES demonstrates the BNG potentially deliverable. As an	Great

Policy	How the application meets policy	Weight to be afforded
	outline application, the details will be secured through conditions. While the AWDC requires measures to be embedded within the development parcels, the main opportunities for BNG are within the CP. The Council are seeking to own the CP and manage it in perpetuity through a commuted sum sought as part of the s106. If not adopted by the Council, management will be through a Management Company (ManCo).	
<i>DEV27 - Green and play spaces</i>	The requirement for the quality and quantity of accessible green space and play space to be improved will be met through on-site provision. While the policy quantum is more than met, for GI, recreation officer specialists have identified that local targets and standards for the provision of play space have not quite been met. However, substantial opportunities for more formal and informal play, leisure and recreation exist within the substantially greater than usual greenspace provided within the CP. All provision will be on-site.	Great
<i>DEV28 - Trees, woodlands and hedgerows</i>	The requirement for development to be designed so as to avoid the loss or deterioration of woodlands, trees or hedgerows, and where unavoidable, new native and locally appropriate trees and hedgerows will be secured as mitigation to ensure they contribute towards preservation, landscape character and BNG. Hedgerow loss for a major development of 2,000 homes on a greenfield site is inevitable. However, the biodiversity metric demonstrates there can be no net loss of linear hedgerow, to be secured through RMs and conditions. Veteran trees will be retained within the green wedges and Pick Pie Plantation is retained within the SWMP as part of the allocation.	Great
<i>DEV29 - Specific provisions relating to transport</i>	In allocating the site, it is accepted as a matter of principle that the location for the new homes is one that can enable safe, secure walking, cycling and PT access to local services and amenities. Nevertheless, as would be expected with a major development of the scale of Woolwell, a significant amount of work has gone into to the transport measures consistent with the aims for a high quality, effective and safe transport system. The promotion of sustainable transport choices will be achieved through improved active travel measures including high quality, safe and convenient facilities for walking and cycling on and off-site and links and will facilitate sustainable growth in the Northern Corridor by contributing significantly to the WtTG improvements, contribute to aims for cycling links to Yelverton and NCN27, and through PT, travel plan and other measures such as mobility hubs with electric cycle hire.	Great
<i>DEV30 - Meeting the community</i>	The requirement to meeting the community infrastructure needs of new homes is addressed through the s106 provisions/ contribution, including for a new primary school,	Great

Policy	How the application meets policy	Weight to be afforded
<i>infrastructure needs of new homes</i>	primary health care, sports / recreation and community facilities including new CP. In this way, the development can be a sustainable urban extension, as required by policy <i>PLY44</i> . The infrastructure secured is considered to be the optimum sustainable package of measures affordable having regard to viability considerations. Nevertheless, Members may consider a different balance of obligations is more sustainable that would meet the requirements of policy <i>DEV30</i> .	
<i>DEV31 - Waste management</i>	The policy supports a waste management hierarchy of prevention; preparing for reuse; recycling; other recovery; disposal. New developments are required to regard to the operational needs of the relevant waste collection authorities in their design and access arrangements. As an outline application, issues, including the reuse and recycling of construction and demolition waste will be addressed through a waste strategy in parallel with the submission of NDCs/ RMs. Similarly, how the developments will provide integrated facilities for the storage of recyclable and non-recyclable waste is a RM consideration. The provisions of Policy W4 Waste Prevention of the Devon Waste Plan will apply. DCC's request for a financial contribution towards the planned upgrade of the waste facility at Tavistock is not supported as a priority having regard to viability considerations and the priority of other infrastructure projects and delivery of the facility is understood not to be reliant on contributions.	Significant
<i>DEV32 - Delivering low carbon development and Climate Emergency Planning Statement (CEPS)</i>	Policy <i>DEV32</i> is used to ensure all development makes an appropriate contribution to the adopted carbon reduction target, and also ensures alignment with the net zero trajectory written into UK law under the 5th and 6th carbon budgets and the 2008 Climate Change Act. The Councils have all adopted the Climate Emergency Planning Statement (CEPS) as a material consideration in decision making to provide a clear framework for how the carbon reduction target in policy <i>DEV32</i> should be met. The CEPS document has the status of an interim policy statement and guidance and therefore to be taken into account when determining a planning application. As such, it is a material consideration in the development management process but applies to all new applications submitted after December 31st 2022 and as such the specific requirements will not apply directly to Woolwell. However, the principles of the CEPS will continue to be reflected in incremental improvements to <i>building regulations</i> , and future RMs are required to show provision of renewable energy generation. The 'energy hierarchy' aims to reduce the energy load of the development, maximising the energy efficiency of fabric, deliver on-site low carbon or renewable energy systems and carbon reductions through off-site measures. As an outline	Great

Policy	How the application meets policy	Weight to be afforded
	<p>application, measures will come through the RM process, but there will be a fabric first approach and a requirement for an energy and climate change statement and carbon reduction plan for each phase of development. Provision has been made within the viability appraisal to ensure the development will meet provisions surrounding Part L and Part F Building Regulation standards, meet Future Homes Standards, provide car charging points for all homes and include dwelling enhancements relating to solar, ground source heating, levels of insulation etc. equating to c. £9,000 per dwelling.</p>	
<p><i>DEV35 - Managing flood risk and water quality</i></p>	<p>While an allocated site within flood zone 1, it is still necessary to ensure that the development is safe without increasing flood risk and pollution elsewhere, and a flood risk assessment (FRA) has been submitted. A sustainable urban drainage system (SuDs) strategy is proposed around drainage infiltration basins, with additional SuDs to be embedded within the development parcels where infiltration is possible. 12 months ground water monitoring has taken place on App A to inform future designs, with a detailed drainage scheme to accord with the strategy in the FRA to be secured through conditions linked to phased RMs. 12 months ground water monitoring will be required as part of the condition on App B. While the majority of land within <i>PLY44</i> is not within a Critical Drainage Area (CDA) and the drainage strategy directs water eastwards outside of the CDA, a small part of App B is located within the Plymouth CDA. The Drainage Strategy sets out and justifies the options and chosen option proposed. Issues are explained in in the report. Regarding water quality, no objections have been received from SWW and there is a new pumping station within sight of the land.</p>	<p>Significant</p>
<p><i>DEL1 - Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy</i></p>	<p>A positive and strategic approach is advocated to accelerate the delivery of development and secure developer contributions to meet infrastructure needs. The s106 heads of terms (HoTs) considered necessary and affordable/ viable in order to mitigate the impacts of the development proposals are explained in detail in the report, along with their prioritisation, and set out in Appendix D. Additionally, the report explains why some funding requests are not being met, either because they are not compliant requests, or because they have a lower priority than other infrastructure demands and are unaffordable based on current viability. That 12.5% AH does not comply with Policy <i>DEV7</i> but is consistent with policy in the round as acceptable through the application of Policy <i>DEL1</i>.</p>	<p>Great</p>

Policy PLY44 - Woolwell sustainable urban extension and community park
Part of Policy
<i>Land at Woolwell is allocated for comprehensive residential led mixed use development to provide a sustainable urban extension and a defined edge to the north of the city, including a new community park. Provision is made for in the order of 2,000 new homes (about 1,560 of which are anticipated to come forward within the plan period). Development should provide for the following:</i>
How the application meets policy
<p>The allocation policy contains specific requirements that apply to both the site itself and how the proposals will impact on and integrate with the surrounding areas. The proposals have been subject to revisions over time following input from key stakeholders, including the collaborative creation of the Allocation Wide Design Code (AWDC), transport review and on the overall package of s106 obligations.</p> <p>The proposals include the land within the allocation that will define the edge to the north of the city, is residential led in that the majority of the built development are homes, is mixed use with the incorporation of a local centre, primary school and sports provision, includes the substantial new CP and make provision for up to 2,000 homes. The proposals are consistent with the fundamental requirements of the policy.</p>
Weight to be afforded Great
Part of Policy
<p>1. <i>Delivery in accordance with a strategic masterplan and design code that should be prepared for the site and consulted upon in advance of the consideration of any planning application. This masterplan will:</i></p> <ul style="list-style-type: none"> <i>i. Identify the design philosophy and phasing of the development.</i> <i>ii. Include a detailed transport and access strategy which establishes key road, walking and cycling routes and public transport, maximising the permeability of the site by all forms of sustainable transport, both within the development and to connecting routes in the vicinity.</i> <p><i>Set out a landscape strategy that responds to the sites location and relationship with Dartmoor National Park.</i></p>
How the application meets policy
<p>Masterplan and Design Code: The Masterplan emerged through a pre-app collaborative process involving specialists across a range of fields including masterplanning, transport, landscape, urban design, ecology, and hydrology. The Masterplan philosophy centres on the principles of good access, active travel and walkable neighbourhoods, seeking to make the community infrastructure as easily accessible on foot and by bicycle to all as possible. It achieves that by locating the majority of the key community infrastructure – new primary school, sports pitches/pavilion, and local centre – centrally between the northern and southern extremities of the site. The design philosophy is set out in the revised AWDC. This is a much-improved document from the one originally submitted, and now sets a framework for the delivery of quality homes, key spaces, and blue and green infrastructure, embedding SuDS and ecology not only within the CP but throughout the residential parcels. This will be achieved from the blueprint in the AWDC through a series of Neighbourhood Design Codes (NDCs), the Reserved Matters (RMs), conditions and the s106. More is said about this in the urban design section 9. The policy requires a landscape strategy that responds to the sites' location and relationship with DNP and a form of development which utilises natural features with appropriate strategic landscaping that is sensitive to its location and relationship with DNP resulting in a clearly defined edge of the city. The strategy is to use and supplement existing stands of trees</p>

<p>and hedges to create 'green wedges' which will screen and filter views from distance within DNP. Lighting is an important element of those considerations, and a lighting strategy addresses sensitive receptors. The landscape strategy is important, and issues are explained further in the landscape section 12. The PPs control density, height and the distribution of land uses such that the quantum of development can be delivered in an appropriate form through RMs.</p>
<p>Weight to be afforded Great</p>
<p>Part of Policy</p>
<p><i>The main access arrangements are to be agreed prior to the commencement of development and delivered commensurately with the associated phase of the development. Additionally, there should be no occupation of new homes until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network.</i></p>
<p>How the application meets policy</p>
<p>While in outline, the Applications include details of the three proposed main accesses and the Masterplan is predicated on the delivery of a three access strategy. All three access will be required as part of any first phase, secured through the s106. The point at which the main link road is completed between the NGR and PPD will be determined through the phasing condition. A condition is recommending limiting the occupation of no more than 400 homes, after which highway impacts are indicated to become severe.</p>
<p>Weight to be afforded Great</p>
<p>Part of Policy</p>
<p><i>A form of development which utilises natural features with appropriate strategic landscaping that is sensitive to its location and relationship with the Dartmoor National Park resulting in a clearly defined edge of the city.</i></p>
<p>How the application meets policy</p>
<p>The requirement for a form of development which utilises natural features with appropriate strategic landscaping that is sensitive to its location and relationship with DNP is addressed through the LVIA, the agreed landscape strategy, and will be delivered through RMs. A clearly defined edge of the city is addressed through the AWDC with that part of the site defined as a 'Key Space' to be considered as part of the NDC for that area and designed to address the transition between the edge of the city and DNP.</p>
<p>Weight to be afforded Great</p>
<p>Part of Policy</p>
<p><i>Delivery of a new Community Park that will form part of the network of Strategic Greenspace sites. It will therefore need to be of a sufficient scale, design and quality and must be multi-functional in nature. The park must:</i></p> <p><i>i. Meet the recreational needs of the new community to prevent an unacceptable impact on South Dartmoor Woods European Protected Site.</i></p>

- ii. Provide a minimum of a 40m landscape buffer between the edge of development and the Plym Valley Strategic Green Space and setting of Dartmoor National Park.*
- iii. Provide a high quality network of walking, cycling and horse riding routes through the Park that link into the adjacent Plym Valley Strategic Green Space.*
- iv. Incorporate elements of the Sustainable Urban Drainage system that must be designed to fit within the landscape setting of the Park and provide wildlife and amenity benefits.*
- v. Incorporate new playing pitches in line with local standards and associated infrastructure, such as changing rooms, required to support the new community. Facilities will be located in an appropriate area that does not conflict with the other functions of the park.*
- vi. Mitigate the impacts of the development on biodiversity and incorporate biodiversity enhancement measures.*
- vii. Utilise the old tramway for pedestrian and cycle connections through the development and providing the opportunity for onward links to the Plym Valley Strategic Green Space.*

How the application meets policy

The substantial new CP is part of GI totalling 56 hectares. A link is intended through the Forestry Commission managed land to the south east of App A, funded by the Applications to link into nCN27 and the strategic greenspaces beyond. The CP will:

- i) Meet the recreational needs of the new community to prevent an unacceptable impact on South Dartmoor Woods European Protected Site as agreed by NE through the Appropriate Assessment;
- ii) Provide a minimum of a 40m landscape buffer, but the vast majority of the CP is very much more substantial than that, coming near to 40m only in a few limited spaces, and, along with the landscape strategy of 'green wedges' address the impact issues this part of the policy seeks to safeguard.
- iii) Deliver high quality accessible greenspace that compliments the agreed package of sports provision – pitches and pavilion and play elsewhere. There is as yet no design for the CP, but the AWDC includes allotments and the policy requirement for a high quality network of walking, cycling and horse riding routes through the Park will be addressed through the detailed design of the CP at RM stage. Funding for the link to adjacent Strategic Green Space is agreed as advised above;
- iv) Sustainable urban drainage principles are agreed, embedded in the AWDC not just within the CP but throughout the development and will be secured through RM on a phase d basis.;
- v) Through the Masterplan it has been determined that the sports pitches are best located on the flatter land next to Pick Pie Plantation, and are secured through the s016;
- vi) That the proposals have the capacity and will mitigate the impacts of the development on biodiversity and incorporate biodiversity enhancement measures has been established through the HRA process, and measure will be secured through conditions and management through the s106, as agreed with NE.
- vii) The old Tramway will be used as a leisure route for pedestrians and cyclists, with a section to be opened by school opening. The Tramway doesn't extend to the boundary with the Plym Valley Strategic Green Space, but as advised elsewhere nearby but not directly from the Tramway.

Weight to be afforded Great

<i>Part of Policy</i>
Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the area, including a new primary school and appropriate contributions to mitigate the development on secondary schools in Plymouth.
How the application meets policy
The Masterplan shows the distribution of community infrastructure across the site and, together with the funding for and delivery of other community infrastructure secured through the s106 HoTs, demonstrates how the development will create the sustainable urban extension required by the policy. This includes a new primary school on site. It is not necessary to mitigate impacts on secondary schools in Plymouth where there is capacity, with the exception of SEN contributions secured and funding for secondary school transport.
<i>Weight to be afforded Great</i>
<i>Part of Policy</i>
<i>Contributions to strategic highway improvements and programmes.</i>
How the application meets policy
As set out in under transport matters at Section 11 the significant financial contributions toward the WtTG improvement scheme are secured through the s106. No contributions are necessary to support improvements to the trunk network. The raft of strategic and other transport measures secured through the s106 are set out in the Hots Appendix D.
<i>Weight to be afforded Great</i>
<i>Part of Policy</i>
Provision of opportunities and plots for self or custom build homes.
How the application meets policy
As explained under the housing Section10, there is not a significant demand identified for self and custom build and provision would impact on viability. Given the level of financial contributions is required to deliver the necessary mitigation for a sustainable urban extension, notwithstanding the development plan policy support, the inclusion of this form of housing would reduce the number of AH units deliverable. It considered preferable to instead prioritise the number of AH units to best meet identified local needs.
<i>Weight to be afforded Due</i>
<i>Part of Policy</i>
Maximise opportunities for on-site energy generation.
How the application meets policy

It is not economically practical to provide community heating. An Energy Strategy has been submitted and, as outline application no details are currently available, on-site energy generation will be secured on as phase by phase basis through the RMs and a condition for a phase by phase Energy Strategy.

Weight to be afforded Great

BNP Policies

Policy	How the application meets policy	Weight to be afforded
<i>Bick01 - Ecology, Geology and Diversity</i>	Measures are in place through the proposed LEMP condition, a two-tier condition for strategic site wide and detailed phased LEMPs to protect and enhance local biodiversity and wildlife The CP itself is a buffer and through the detailed design of the CP at RM stage, important features within and bordering the site can be safeguarded. Through the Appropriate Assessment potential recreational impacts can be managed to ensure there is no adverse effect on the integrity of European Sites. to the west.	Great
<i>Bick02 - Access to the countryside</i>	The Woolwell development proposes a number of on and off-site cycle and pedestrian improvements including within the existing Woolwell community, as part of the new development and funding for a link to NCN27, for improvements to the Yelverton cycle scheme and funding for a range of active travel measures, detailed elsewhere in the report.	Great
<i>Bick04 - New housing development</i>	The requirements of the policy to follow the principles set out in Policy <i>PLY44</i> and demonstrate how they contribute towards delivering sustainable development are explained throughout the report and the framework for delivery secured through the approved documents, future RMs, proposed conditions and s106 HoTs.	Great
<i>Bick05 - Infrastructure</i>	As above, new infrastructure on and off-site is secured through the approved documents, future RMs, proposed conditions and s106 HoTs.	Great
<i>Bick06 - New community facilities</i>	As above, new infrastructure on and off-site is secured through the approved documents, future RMs, proposed conditions and s106 HoTs.	Great
<i>Bick07 - Local character</i>	As outline applications with most matters reserved, the AWDC, parameter plans and conditions set the framework for achieving these aims, to be delivered through the NDCs and RMs.	Great
<i>Bick08 - Local green space</i>	The policy identifies sites including Pick Pie Plantation .The plantation is included and retained within the development and will be managed as part of the management requirements for the public spaces on the developments.	Significant
<i>Bick09 - Housing mix</i>	As referred to in the report, housing mix will be conditioned and needs addressed on a phased basis at the time of submission. This means that with a large site like this with	Great

Policy	How the application meets policy	Weight to be afforded
	delivery over many years, local needs can continue to be reflected and met as they evolve over a long period.	
<i>Bick10 - Housing for the elderly</i>	As outline applications issues will be addressed at RM stage. There is considerable scope to meet all needs with 2,000 homes planned and the PPs allow for single storey development most appropriate to meeting the needs of this group.	Significant
<i>Bick11 - Design and layout</i>	The criteria in JLP Policy <i>DEV10</i> for a proportion to be accessible homes are to be met through condition. The layout of roads, visitor parking, temporary parking spaces, emergency and mobility access are among matters addressed in the AWDC with principles for on-street parking arrangements and details to be secured through the NDCs and through RMs and conditions.	Great
<i>Bick12 - Space requirements</i>	As the housing parcels are outline, details will be secured through the NDCs and RMs.	Substantial
<i>Bick13 - Local food growing</i>	Garden sizes are a matter for RMs. Delivery of allotments and community food growing is a requirement of JLP Policy <i>DEV 5</i> with guidance in an SPD, and details will be secured within the CP as part of the RM for its detailed design.	Significant
<i>Bick14 - Self-Builders</i>	In circumstances whereby viability is limiting the number of AH, housing specialist colleagues support the delivery of AH for rent or sale over self-build.	Due
<i>Bick16 - Connectivity</i>	The requirements for new homes to meet good standards of communication is addressed through <i>Building Regulation</i> .	Great
<i>Bick17 - Road safety</i>	A number of measures are proposed as part of the WtTG scheme, including a pedestrian crossing on Woolwell Road. The internal estate roads will be designed safely, in accordance with the aims set out in the AWDC and meet highway standards.	Great
<i>Bick18 - Residential parking</i>	The AWDC sets a parking strategy, typologies that are applicable across the Allocation area and requires SuDS drainage principles be applied, including to parking areas. A balance will need to be struck between parking provision and townscape to avoid parking becoming a dominant element of the street scene.	Substantial
<i>Bick19 - Walking and cycling</i>	Active travel has been a significant part of the evolution of the scheme, with provision for walking and cycling within and beyond the development secured and will be further addressed as a matter of detail through the NDCs and RMs.	Great
<i>Bick20 - Public transport</i>	Funding for improved PT services is secured through the s106, which will benefit the new and existing community alike, by extending services into the evenings and at weekends for up to 8 years.	Great
<i>Bick21 - Existing Community Facilities</i>	Funding is sought through the s106 for the expansion of local community facilities instead of providing a new community centre, as supported by the local community through the	Great

Policy	How the application meets policy	Weight to be afforded
	pre-application process, enabling potential projects for the expansion of the Woolwell Centre and Roborough Hall.	
<i>Bick22 - Health and welfare facilities</i>	Funding is sought through the s106 for the expansion of local health facilities instead of providing a new health centre, as supported by the NHS/ local GPs.	Great
<i>Bick23 - School provision</i>	A new primary school, with early years and SEN provision is to be funded through the development, on a site capable of further expansion in the future.	Great
<i>Bick24 - Existing Sports and Recreation Facilities</i>	The rugby pitches are not part of either current application but are shown to be retained as part of the Masterplan.	Significant
<i>Bick25 - Improving sports facilities</i>	As above, the existing rugby pitches are not part of either current application but are shown to be retained as part of the masterplan, and issues surrounding improvement will be considered when that land comes forward for development. The PARUFC clubhouse is part of the industrial estate and shown to be retained as part of the masterplan strategy.	Significant
<i>Bick26 - New recreation and play facilities</i>	The new sports and play facilities to be secured are commensurate with the and will meet the needs of the new development and will also benefit the existing community.	Great

Appendix D - S106 Heads of Terms

Final Draft Heads of Terms (Without Prejudice)

1st November 2024

Introduction

These draft Heads of Terms set out the principles for the Section 106 obligations for both applications. Unless stated otherwise, the obligations will be covered in s106 agreements for both Application A and Application B.

1. Affordable Housing

- Provide at least: 8.7% (App A) and 30% (App B) affordable houses (equates to a total 12.5% across both sites and based on all 2,000 homes, equates to at least 143 affordable homes on App A and 108 affordable homes on App B)
- Affordable housing to be delivered providing at least 8.7% (App A) and 30% (App B) within each Phase (rounded up/down to the nearest whole number), unless otherwise agreed., recognising that there may be over or under provision in a Residential Phase
- App A and App B: Affordable Housing Scheme/plan to be approved as part of each Reserved Matters for that phase of housing. (Such plan to include details of No's of affordable homes, specific locations, tenures, and sizes, avoiding clustering, ensuring homes are tenure blind etc)
- App A and App B: Within each Reserved matters site/phase, to ensure 50% of the relevant Affordable housing shall be completed and made ready for occupation prior to 50% of the housing completions within that residential area; and 100% of Affordable housing to be completed and made ready for occupation prior to 80% of the housing completions in that residential area.
- App A and App B: Clause to ensure 50% social rent/50% Shared ownership tenure split overall and within each phase of development.

Viability Review (App A only)

- Clauses associated with the Viability Clawback Review Mechanism (refer to template)

Local Lettings (App A and App B)

- To include standard Registered Provider clauses
- To include clauses to ensure local connection cascade (Local Parish/ JLP Area/ wider)

Management fees (App A and App B)

- Clause that affordable housing service charges and other estate management charges not exceed the following per annum sums: House £208.00; Flat without a lift £681.72; Flat with a lift: £1,040 + RPI and additional +0.5% from July 2020.

2. Education

Primary Contribution (App A and App B)

- £9,562,872 in total (£7,841,555 (App A) and £1,721,317 (App B)) at the following triggers:

	50% of contribution by 10% occupation	50% payment by 50% occupation
--	--	--------------------------------------

App A	£3,920,777.50 by 164th occupation	£3,920,777.20 by 820th occupation
App B	£860,658.50 by 36th occupation	£860,658.50 by 180th occupation

Primary School Land and Primary School Expansion Land (App A only)

- Total 2.3ha land for a 630 place / 3FE primary school, incl. early years, site, comprising:
 - o 1.8ha of land suitable of accommodating a 420 place (2FE) school facility and the early years provision [‘Primary School Land’]; and
 - o 0.5ha of land to be safeguarded for potential future expansion of school to 3FE/630 place school and early years) [‘Primary School Expansion Land’]
- From commencement of development:
 - o DCC to be provided with reasonable access to the primary school land and primary school expansion land to carry out due diligence/feasibility work associated with delivery of the primary school
- Owners to submit a plan for approval showing precise boundaries of both the school land and expansion land; and access points & haul road route to provide a suitable construction access. Thereafter, owner shall not cause or permit any use that may prejudice its delivery for the school.
- No later than 150th occupation:
 - o Owners to transfer of school site for £1, with reasonable endeavours to ensure the site is levelled, free from contamination and served by the identified haul route and “temporary services connections” and in so far as it affects the primary school land all archaeological investigations required by the programme of archaeological work approved pursuant to the planning permission have been completed.
- From first occupation of 200th home:
- DCC can serve notice on the Owners giving a minimum 6-month notice period confirming the date when the school will be opened and therefore when permanent services connections and road built to adoptable standards required. From the date of notice served by DCC, owners to provide permanent services connection and public access (incl. vehicular) with road built to adoptable standards no later than the date provided in the notice unless an alternative date is subsequently agreed between DCC and the owners and provided that this is not prior to 300th home occupation.
- LEA to have ‘step-in rights’ to provide access and service connections to the site if the triggers are not being met.
- **App B Obligation:** No homes shall be occupied until the transfer of the school site at 150 occupations on App A.

School Expansion Land (App A only)

- DCC to confirm whether or not it wishes to accept transfer of the expansion land at the same time as the primary school land by occupation of 100th home occupation:
- If DCC confirms it will take transfer at 150th occupation, transferred at price equivalent to open market price of land for use as a primary school.
- If DCC confirms that it does not wish to accept transfer at that point, the expansion land to continue to be safeguarded for that purpose for a period of 10 years. During that period, DCC can provide 6 months written notice that it wishes to take transfer OR to confirm that it will not take transfer.

- If DCC has not taken transfer within the 10-year period or from the date it confirms it will not take transfer, then owners will retain ownership, including the right to make alternative planning applications for the use of that land.

Early years contribution (App A and App B)

- Total contribution £500,000 (£410,000 (App A) and £90,000 (App B)) for early years education, as follows:

	50% of contribution by 10% occupation	50% payment by 50% occupation
App A	£205,000 by 164th occupation	£205,000 by 820th occupation
App B	£45,000 by 36th occupation	£45,000 by 180th occupation

SEN contribution (App A and App B)

- Total contribution of £934,679.00 (£766,437.00 (App A) and £168,242.00 (App B) Special Educational Needs Contributions as follows:

	50% of contribution by 10% occupation	50% payment by 50% occupation
App A	£383,218.50 by 164th occupation	£383,218.50 by 820th occupation
App B	£84,121.00 by 36th occupation	£84,121.00 by 180th occupation

Secondary School Transport contribution (App A and App B)

- Total contribution £463,125 (£379,762 (App A) and £83,363 (App B)) for Secondary School Transport as follows:

	50% of contribution by 10% occupation	50% payment by 50% occupation
App A	£189,881.00 by 164th occupation	£189,881.00 by 820th occupation
App B	£41,681.50 by 36th occupation	£41,681.50 by 180th occupation

3. Health

Medical Facility contributions (App A and App B)

- Total contribution £1,259,104 (£1,032,465.28 (App A) and £226,638.72 (App B)) for expansion of local GP facilities in line with the following triggers:

	5% by 1st occupation	45% within 3 months of confirmation of build contract for a scheme that has been approved by the Council and that scheme has been granted planning permission (but not prior to 12.5% homes occupation)	50% payable in line with a timetable linked to defined stages of the build contract [to be agreed during detailed drafting of s106]
App A	£51,623.26	£464,609.38	£516,232.64
App B	£11,331.94	£101,987.42	£113,319.36

4. Ecology

Off-site recreational impacts (RMMS) (App A and App B)

- To pay contributions for each phase of development in full towards the Plymouth Sound Recreation Mitigation and Management Scheme prior to occupation of the first dwelling for that specific phase of development approved under Reserved Matters (standard schedule clauses).
- Payments to be made in line with the following charging schedule:
 - 1 bedroom £236.62
 - 2 bedroom flat £330.92
 - 2 bedroom house £435.89
 - 3 bedroom dwelling £467.91
 - 4+ bedroom dwelling £507.05

5. Management and Maintenance Scheme of Open Spaces and GI (including the Community Park), play areas, sports pitches/pavilion and surface water drainage system ('the Open Spaces') (App A and App B)

- Upon the Commencement of Development, Owners to submit Management and Maintenance Scheme for Open Spaces, with no Dwelling occupied until the Management and Maintenance Scheme for the Open Spaces has been submitted to and approved by the Council.
- The Management and Maintenance Scheme will provide a detailed specification for the upkeep and future maintenance and management of the Open Spaces and GI (including the 'Community Park'), Children's Play Areas and Surface Water Drainage System once completed.
- The Approved Scheme will be complied with, unless an amended / revised scheme is submitted and approved in writing
- On occupation of the first Dwelling the Owners shall secure the management and maintenance of the Open Spaces in perpetuity in accordance with the approved Management and Maintenance Scheme
- For the avoidance of doubt the Owners shall remain responsible for carrying out the Management and Maintenance scheme of any Open Space (or any part thereof) unless and until such time as a legal transfer to the Management Entity has been completed.
- The open spaces (etc) shall not be used for revenue or commercial purposes other than for the purposes that relate to the running of the Open Spaces or community benefit whereby revenue can only be used to reinvest in the Open Spaces facility.

Management Company/Adopting body Requirements (App A and App B)

- If the Owners decide to transfer the open spaces (etc) or any part thereof to a ManCo:
- Upon commencement of development, and prior to the establishment of a ManCo/Adopting body the owners must submit a Management Scheme to the Council for approval.
- The Approved Scheme will be complied with, unless an amended / revised scheme is approved in writing
- Where a ManCo, Purchasers of any homes or businesses or facilities (and any successors in title) at Woolwell to be members of the ManCo/ Adopting Body and pay service charges in perpetuity.
 - o Procure the Management Company/ Adopting Body in perpetuity.
- Transfer of Open Spaces etc. to ManCo will happen as soon as is reasonably possible following completion of the Open Spaces etc within each phase/sub-phase and thereafter managed and maintained in accordance with approved M&M Scheme in perpetuity.

Public Rights of Access

- For avoidance of doubt, there is to be unfettered rights of access for the general public at all times, save for maintenance/H&S reasons, to any space defined as 'community infrastructure' or 'accessible public open space'.

Community Park (CP): App A Obligations

- Prior to commencement of development, Owners to offer the community park area shown on plan (Stantec drwg. ref. 26734-RG-M-122 rev A) to SHDC for the Council to maintain and manage in perpetuity
- SHDC shall within (no later than) 6 months of the date it was offered confirm whether it wishes to accept transfer and will enter into a legally binding contract to accept a transfer of the community park area
- If the Council accepts the offer, it must enter into a legally binding contract for the transfer within (no later than) 6 months from the date it confirmed it accepts the offer
- Community Park to be practically completed in accordance with the previously agreed details and accessible to the public by: 50% by 400 occupations ('Transfer Tranche 1'); and 100% by 1400 occupations ('Transfer Tranche 2')
- The owner shall transfer each phase of the community park to the Council on completion of each 'Transfer Tranche'. In the event that a legally binding contract that guarantees transfer to SHDC is completed within the allowed period, the following triggers for payment of financial contributions will apply to the two applications:
- The CP area shall be retained in perpetuity and only used as public open space, landscape and ecological areas.
- The CP must not be used for revenue or commercial purposes other than for the purposes that relate to the running of the park (relating to those areas mentioned above) or community benefit whereby revenue can only be used to reinvest within the park. [NOTE: This will need to be covered also in the Schedule/obligations relating to management/maintenance of open spaces etc, including CP]
- If SHDC does not accept the offer or confirm it wishes to do so within the 6 month period and /or it does not then enter into the legally binding contract for transfer within the 6 month period outlined above, the management and maintenance for the community park area on plan ref 26734-RG-M-122 rev A will remain the responsibility of the Owners (see main HOTs re management & maintenance and ManCo arrangements).
- **Community Park App B:** No more than 90 dwellings on App B before 50% of the community park has been practically completed and is open to the public.
- **Both App A and App B:** Commuted sum payable in event community park area transferred: £1,704,426.00 (App A: £1,397,629.32 and App B: £306,796.68) payable at the following triggers:

TOTAL CONTRIBUTION / COMMUTED SUM (subject to change and only payable if the community park area is transferred to SHDC)	50% by 25% occupation	50% by 85% occupation
App A	£698,814.66 by 400 th occupation	£698,814.66 by 1,400 th occupation
App B	£153,398.34 by 90 th occupation	£153,398.34 by 306 th occupation

6. Sport and Recreation

Play Areas

- App A to provide 3 LEAPs with an activity zone of 400sqm minimum. Each LEAP should have a minimum of 6 play experiences focusing on 0–8-year-olds and a 20m minimum buffer between the activity zone and any habitable room façade of dwellings
- App A to provide 1 NEAP with an activity zone of 1000sqm minimum comprising an area for play equipment and structures and a hard surfaced area of at least 465sqm. The NEAP should have a minimum of 9 play experiences focusing on 8–14-year-olds and a 30m minimum buffer between the activity zone and the boundary of the nearest residential building
- App B to provide 1 LEAP with an activity zone of 400sqm minimum with a minimum of 6 play experiences focusing on 0–8-year-olds and a 20m min buffer between the activity zone and any habitable room façade of dwellings
- A detailed scheme for the play areas to be submitted as a part of any reserved matters in which they are located. The scheme will include:
 - o Nos., types, sizes, buffers to dwellings and exact locations to be delivered in that phase;
- For LAPs, LEAPs and NEAPS - Details of proposed play equipment, fencing, surfacing, lighting, line markings, and furniture (benches/picnic benches/bins);
 - o A timetable for laying-out and equipping;
 - o Details of provisions to ensure suitability for disabled users
- Play areas within any specific phase of development to be completed by 75% occupation of dwellings within that phase.

Sports Pitches and facilities

- The sports pitches to be practically completed prior to the occupation of 1,000 dwellings and to be delivered in accordance with the details approved by reserved matters for those facilities. As part of the relevant NDC and reserved matters application, consideration shall be given to the feasibility and appropriateness of the following specification:
 - o One adult football pitch, size 106m x 70m (which includes safety run-off area)
 - o Two youth 11 v 11 football pitches, size (for one) 97m x 61m (which includes safety run-off area)
 - o Two mini 7 v 7 football pitches, size (for one) 61m x 43m (which includes safety run-off area)
- With the sizes for football pitches taken from 'Sport England comparative sizes of sports pitches and courts (outdoor) September 2015 update' or any updated version Where pitches adjoin each other an additional 2m Respect spectator area should be included, meaning 8 meters should be left between pitches
- One 8-strip cricket square, size 24.4m x 20.12m – to include one non-turf wicket, to be located in between football pitches so that it can be protected from football use. The surrounding outfield requires a minimum area of 45.72m from the middle stump of the pitch in use, plus a 2.74m safety margin but this land can be occupied by football pitches – to accord with the design guidance in Sport England's Design Guidance Note: Natural Turf for Sport, 2011 May Revision 002 or any updated version

A ball strike assessment must be carried out where there is any risk of damage/harm to buildings/general public within 70 yards (64m) of the middle stump measurement. Alternative specifications are not precluded but in the event that this specification cannot be delivered, a Statement shall be included with that relevant NDC / RMA to explain the reasons why an

alternative specification is proposed to assist the Council's consideration of the proposed details.

- A Pavilion/sports hub to be to be practically completed prior to the occupation of 1,000 dwellings. Unless otherwise agreed in writing between the Owners and the Council), at the reserved matters stage the pavilion/sports hub shall be designed having regard to the principles set out in Sport England Clubhouse Design Guidance Notes (dated May 2016) and shall provide:
 - 245 m2 minimum GIFA for the pavilion
 - 4 team changing rooms with officials changing
 - kitchen and club room
 - o 40-50 parking spaces to serve the pitches (estimate 0.5ha total)
 - The build cost of the pavilion shall not exceed a maximum £470,000.00
- A detailed scheme for the sports pitches and pavilion/sports hub to be submitted as a part of any reserved matters for that area. The schemes will include detailed layout/ specification levels of pitches, including types and sizes.

7. Community Infrastructure

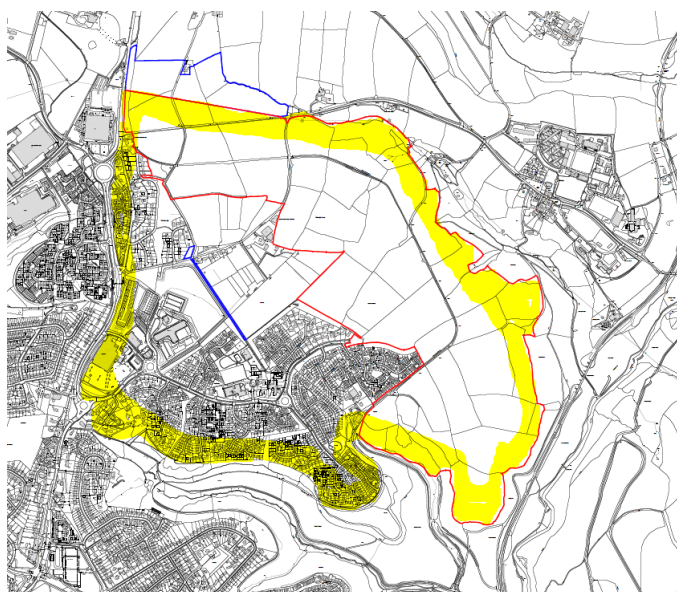
Community building (App A and App B)

- To pay £821,804 (App A: £696,279.28 / App B: £125,524.72), at the triggers set out below, towards new/improved local facilities:

	Total	10% at 20% home occupations	45% within 3 months of confirmation of build contract for a scheme that has been approved by the Council and that approved scheme has planning permission (but no earlier than 40% occupation)	45% payable in line with a timetable linked to defined stages of the build contract [to be agreed during detailed drafting of s106]
A	£690,279.28	£69,627.93 by 328 th occupation	£313,325.68 not prior to 656 th occupation	£313,325.68
B	£151,524.72	£12,552.47 by 72 nd occupation	£56,486.12 not prior to 144 th occupation	£56,486.12

- Clause for extent of geographical area for spend within the boundary as shown approximately on the following plan:

Sketch Plan for 7 Community Infrastructure - Community Building Geographical Area of Spend Clause



- Clause for LPA to approve community infrastructure funding bid requests prior to releasing contributions (see contributions table above).

Local Centre Marketing (App A only obligation)

- Marketing Strategy to be submitted and approved in writing by LPA prior to 1st occupation. The Marketing Strategy to include details of how the Council will be updated on progress and the process for reviewing and where needed amending the marketing strategy during the marketing period.
- From approval of the Marketing Strategy, owners to use reasonable endeavours to market and identify occupiers for the local centre until the local centre is fully occupied or until the 1,200th occupation (whichever is sooner) unless an alternative marketing period is agreed in writing by the Council.

8 Transport

Public Transport Core Infrastructure Package

- Owners to pay the Public Transport Improvement Contribution of £2,310,000 (App A: £1,894,200.00 total contribution and App B £415,800 total contribution) in total. Triggers for payment as follows:

	App A	App B
First Payment	£170,000 at 400th occupation	£170,000 at 100th occupation
Second Payment	£170,000 year following anniversary of First Payment Trigger	£170,000 year following anniversary of First Payment Trigger
Third Payment	£170,000 year following anniversary of Second Payment Trigger	£75,800 year following anniversary of Second Payment Trigger
Fourth Payment	£360,000 year following anniversary of Third Payment Trigger	
Fifth Payment	£360,000 year following anniversary of Fourth Payment Trigger	
Sixth Payment	£360,000 year following anniversary of Fifth Payment Trigger	

Seventh Payment	£304,200 year following anniversary of Sixth Payment Trigger	
------------------------	--	--

- DCC obligation to use reasonable endeavours to provide a minimum 20min weekday service (service 1) and 30min evening and Sunday service (service 2) for a period of 8 years. At 700 houses or one year following the anniversary of the requirement for the payment of Third Payment below (whichever comes first) DCC obligation to use reasonable endeavours to enhance the Improvement of the evening and Sunday services to half-hourly kicks in for five years alongside the daytime enhancement.
- The responsible authority shall use reasonable endeavours to secure the relevant services from the 400th (service 1) and 700th (service 2) occupations respectively

Bus Stops

- App A to deliver 3 pairs of bus stops and App B 1 pair of bus stops on the respective App A and B sites in indicative locations shown on Travel Plan Ref 7-5, in accordance with details approved as part of reserved matters / S38 Agreement.
- Delivery of those stops commensurate with phasing and delivery of the site (as controlled by conditions) subject to a requirement that:
 - o by 400th home occupation App A to deliver the northern pair of bus stops on Travel Plan Fig7-5 and provide for the ability for buses to turn within the site until the completion of the main street loop. Until the main street loop has been completed, alternative arrangements including temporary stop/turning facilities and details/locations/triggers can be agreed in writing between the Owner and DCC; and
 - o prior to the primary school opening on site, App A to deliver the pair of bus stops closest to school on Travel Plan Fig 7-5 and provide for the ability for buses to turn within the site until the completion of the main street loop, as well as 1 coach parking space (unless provided within the school site). Until the main street loop has been completed, alternative arrangements, including temporary stop/turning facilities and details/locations/triggers can be agreed in writing between the Owner and DCC.
- To pay £80,000 (App A: £60,000/ App B: £20,000) for the upgrade of existing / provision of new bus stops in locations shown on plan (to be prepared – see Travel Plan fig. 7-5) to be paid by 5% occupations (82nd occupation on App A and 18th occupation on App B).
- Responsible authority shall use reasonable endeavours to secure the bus stop upgrades within 6 months following receipt of payment.
- The contribution for upgrading/new stops above shall include a new pair of bus stop and shelters on the A386 at the northern roundabout prior to the 1st occupation, plans to be submitted to the responsible authority for approval. (location plan to be included)

Mobility Hubs

- To pay £240,000 (App A: £180,000/App B: £60,000) towards the provision of 4 Mobility Hubs, in accordance with the following payment triggers:

	App A: £180,000	App B: £60,000
First Payment	£60,000 at 82nd occupation	£60,000,0 at 18th occupation
Second Payment	£60,000at 492nd occupation	
Third Payment	£60,000at 902nd occupation	

- Mobility hubs to be provided by DCC in proximity to new bus stops identified on Travel Plan fig 7-5.
- The Site Wide Travel Plan Coordinator to ensure that the Mobility Hubs are procured and made available in line with the Travel Plan.
- Mobility Hub to include E Car and infrastructure for hire, E bikes for hire, Covered and Secure Cycle Parking with Sheffield Loops, and dedicated parking spaces.
- DCC to use reasonable endeavours to deliver each mobility hub within 12 months following notice served by owner confirming date when the corresponding bus stop will be delivered and when the land will be made available for the delivery of the mobility hub.

Modal Shift/ Travel Plan

- To pay £1,011,388 (App A: £829,338.16 / App B: £182,049.84) towards the provision of Site Wide Travel Plan Co-ordination, through the provision of ten instalments of £82,933.82 for App A and £18,204.98 for App B to be paid annually from the commencement of development of the first dwelling. Notwithstanding this, all payments (i.e. the full total contribution) shall be made not later than the occupation of 75% of homes (1,230 occupations for APP A and 270 homes occupation for APP B).
- DCC obligations:
 - Highway Authority to appoint a Site Wide Travel Plan Co-ordinator (SWTPC) within 6 months prior to first occupation to undertake the work and mitigation as set out within the Travel Plan, which *inter alia*, includes the following specific actions:
 - A Travel Plan Steering Group/ TOR shall be established prior to occupation of 5% of dwellings (82) on App A. For Application B, a Travel Plan Steering Group/TOR shall be established prior to occupation of 5% (18) dwellings
 - o On-site Personalised Travel Planning for residents (include travel information packs) undertaken within one month of the occupation of each dwelling
 - o Off-site Personalised Travel Planning for existing Woolwell residents and employees in study area assumed within Transport Assessment analysis to be undertaken in line with the delivery of bus / walk / cycle improvements
 - o Green Travel Voucher (value £250) provided to residents upon occupation redeemable against walking / cycling equipment, bus tickets, or Mobility as a Service subscription
 - o Measures and incentives to promote Car Club

Walking and Cycling Core infrastructure Package

- To pay £20,000 (App A: £16,400 / App B: £3,600) prior to 50% occupation (820 homes for App A and 180 homes for App B) occupation for the provision of 10 Sheffield cycle parking stands. Prior to the first occupation, DCC to confirm the locations of the cycle stands – 7 to be delivered within 6 months of payment by App A and 3 to be delivered within 6 months of payment from App B.
- To pay £200,000 (App A: £164,000 / App B: £36,000) towards the design and delivery of the Yelverton Cycle Improvement Scheme prior to the occupation of the 20% homes occupation (328 occupations App A and 72 occupations App B)
- To pay £100,000 (App A: £82,000 / App B: £18,000) towards an off-site cycle link from the edge of the site to the NCN-27 upon 50% occupation (820 for App A and 180 for App B).

Off-site highways, temporary highways, and other works

- To pay £6,800,000 (App A: £5,576,000 / App B: £1,224,000) towards the Woolwell to The George Improvement Scheme in line with the following instalments

	25% by 15% occupation	25% by 30% occupation	25% by 45% occupation	25% by 60% occupation
App A	£1,394,000 by 246th occupation	£1,394,000 by 492nd occupation	£1,394,000 by 738th occupation	£1,394,000 by 984th occupation
App B	£306,000 by 54th occupation	£306,000 by 108th occupation	£306,000 by 162nd occupation	£306,000 by 216th occupation

- App A: To deliver the Northern Gateway Junction and connected section of Main Street to New Road as per XXX plan prior to the stopping up of the New Road A386 Junction
- App A: Prior to occupation of the 1,300th home, at least one road shall be built to adoptable standard and taken to both:
 - the Towerfield Drive boundary of App B, provided that App B has delivered the primary street to its boundary (as per the App B s106 obligation for boundary connections) by that time, unless otherwise agreed by the LPA; and
 - o the northern boundary of the wider JLP Policy PLY44 allocation area, provided that a road has been delivered as part of development within that site to its northern boundary with App A, unless otherwise agreed by the LPA.
 - o Precise location of boundary connection and details/specifications agreed prior to delivery.
- App B: Prior to the occupation of the 285th home, at least one road shall be built to adoptable standard, taken to both:
 - o the Towerfield Drive boundary of App A unless otherwise agreed by the LPA; and
 - o the western boundary of the wider JLP Policy PLY44 allocation area unless otherwise agreed by the LPA.
 - o Precise location of boundary connection and details agreed prior to delivery.
- App A and App B: To establish a permanent pedestrian/ cycle link along Darklake Lane between Bickleigh Down Road and Pick Pie Drive to a suitable standard prior to occupation of 150 houses for App A and 1st occupation for App B (note: App A and App B will upgrade different sections of the route and extent of route each application responsible for undertaking the works on to be defined on plan and appended to s106s.

9. Other clauses/obligations

- Clause for arbitration
- Monitoring Contribution of circa for £44,100 App A; £32,400 for App B payable upon commencement of development of first dwelling.
- All contributions to be subject to Indexation (standard wording)
- Any part/ all of a contribution not spent or committed within 10 years of payment of said contribution, will be repaid to the payee.

Summary of Financial Contributions

	Total Contribution	App A	App B	Triggers
Primary Education	£9,562,872.00	£7,841,555.04	£1,721,316.96	50% by 10% occupation

	Total Contribution	App A	App B	Triggers
				50% by 50% occupation
Early Years	£500,000.00	£410,000.00	£90,000.00	50% by 10% occupation 50% by 50% occupation
SEN	£934,679.00	£766,436.78	£168,242.22	50% by 10% occupation 50% by 50% occupation
Secondary School Transport	£463,125.00	£379,762.50	£83,362.50	50% by 10% occupation 50% by 50% occupation
Medical Centre Expansion	£1,259,104.00	£1,032,465.28	£226,638.72	5% by 1st occupation 45% within 3 months of build contact (approved scheme with pp) but not payable prior to 12.5% occupation 50% payable in line with timetable linked to build contact
RMMS (approx. estimated cost)	£846,000.00	£693,720.00	£152,280.00	Prior to first occupation of each phase, calculated using formula for housing mix in that phase.
Community Park Commuted Sum	£1,704,426.00	£1,397,629.32	£306,796.68	Only payable if transferred to council: 50% by 25% occupation and 50% by 85% occupation

	Total Contribution	App A	App B	Triggers
Community Building	£821,804.00	£696,279.28	£125,524.72	10% at 20% occupation 45% within 3 months of build contact (for approved scheme with pp) 45% linked to timetable for build contract
Bus Contribution	£2,310,000.00	£1,894,200.00	£415,800.00	See HOTS summary
Bus Stops	£80,000.00	£60,000.00	£20,000.00	100% by 5% occupation
Mobility Hubs	£240,000.00	£180,000.00	£60,000.00	See HOTSs summary
Travel Plan Coordination/ Implementation	£1,011,388.00	£829,338.16	£182,049.84	10 instalments paid annually from commencement of first dwelling (final payment no later than 75% occupation)
Cycle Parking	£20,000.00	£16,400.00	£3,600.00	Prior to 50% occupation
Yelverton Cycle Improvement Scheme	£200,000.00	£164,000.00	£36,000.00	Prior to 20% occupations
Off Site Cycle Link (NCN27) Contribution	£100,000.00	£82,000.00	£18,000.00	50% occupation
WtTG	£6,800,000.00	£5,576,000.00	£1,224,000.00	See HOTS summary
Monitoring Contribution	£76,500.00	£44,100.00	£32,400.00	Prior to commencement of first dwelling
Total	£26,929,898.00	£22,082,516.36	£4,847,381.64	

Appendix E - Planning Conditions

Land at Woolwell: Planning Application Ref. 4185/19/OPA (Application A): Final Draft Planning Conditions (Without Prejudice)

Time Limit for Submission of Reserved Matters

1. The first application for the approval of reserved matters as set out in condition 1 above shall be submitted to the local planning authority within three years from the date of this permission.

Reason - To comply with Section 91 of the Town and Country Planning Act 1990, as amended by the Planning & Compulsory Purchase Act 2004.

Time Limit for Commencement

2. The development hereby permitted shall commence no later than the expiration of three years from the date this permission is granted or two years from the date of approval of the final reserved matters for the first phase, sub-phase, or development parcel (whichever is later).

Development of any subsequent phase, sub-phase or development parcel of the development shall commence no later than the expiration of two years from the date of approval of the final reserved matters for that phase, sub-phase, or development parcel.

Submission of the first reserved matters for the final phase of the development as identified on the approved phasing plan pursuant to condition 7 shall be submitted before the expiration of 20 years from the date of this permission.

Reason - To comply with Section 91 and Section 92 of the Town and Country Planning Act 1990, as amended by the Planning & Compulsory Purchase Act 2004.

Compliance with Parameters

3. The development hereby permitted shall be carried out in accordance with the following approved parameter plans listed below:
 - Parameter Plan – Land Use Ref. 26734 RG-M-61 Rev S
 - Parameter Plan – Density Ref. 26734 RG-M-62 Rev S
 - Parameter Plan – Green Infrastructure Ref. 26734 RG-M-63 Rev V
 - Parameter Plan – Building Heights Ref. 26734 RG-M-64 Rev S
 - Parameter Plan – Access Ref. 26734 RG-M-65 Rev Z

The development hereby permitted shall not exceed:

- 1,640 dwellings;
- 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses).

Reason: To clarify the permission and for the avoidance of doubt.

Compliance with Approved Plans and Drawings

4. The reserved matters for any phase, sub-phase or development parcel should (where applicable) be generally in accordance with the principles and approach to the development of the site shown on the following plans and documents, including any revisions to the same subsequently approved in writing by the local planning authority providing that those amendments do not result in any impacts which exceed the range and scope of those assessed in the Environmental Statement (ref 16.9004 dated December 2019 by Boyer Planning) and would require further mitigation:
- Site and EIA Boundary Plan (Barton Willmore drwg. No. 26734 RG-M-102 Rev A)
 - Environmental Statement (Boyer Ref 16.9004 dated December 2019 by Boyer Planning)
 - Land at Woolwell Flood Risk Assessment (Stantec Ref. Rev K v.2 dated February 2021)
 - Groundwater Monitoring Review Report (Stantec Ref. 38295-rev. 01 dated 25.07.2022)
 - Transport Assessment (Stantec Ref. 38295 Rev. Planning Issue. Dated October 2019)
 - Framework Travel Plan (Stantec ref 38295/5501 rev A Planning Issue – Resubmission. Dated October 2023)
 - Sustainability Statement (Stantec Ref. 38295/001 rev. 4 dated September 2019)
 - Energy Statement (Stantec ref. 38295/3004 rev. 04 dated September 2019)
 - Lighting Assessment (Stantec ref. 38295/3001 rev. 07 dated November 2019)
 - Utilities and Foul Drainage Appraisal (Stantec ref. 38295/5506 v8 dated November 2019)
 - Design and Access Statement (Barton Willmore Ref. Rev AB)
 - Allocation Wide Design Code (Barton Willmore Ref. Rev AB)
 - Illustrative Masterplan (Barton Willmore Ref. 26734-RG-M-104 Rev C)

Reason: For clarity, notwithstanding that it is an outline planning application and to ensure appropriate compliance with the approved strategies and drawings.

Reserved Matters

5. No part of the development shall take place on a particular phase, sub-phase, or development parcel until full details of the layout, scale, appearance and landscaping within that phase, sub-phase, or development parcel (hereinafter called “the reserved matters”) have been submitted to and approved in writing by the Local Planning Authority.

The Development shall thereafter be carried out in accordance with the approved details.

Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990, as amended, in recognition that the development will be phased.

Reserved Matters Supporting Information

6. Alongside the reserved matters applications, details shall be provided (where they are relevant to that particular reserved matters application) of the following:
 - a) Layout, scale, and appearance, including all building facing materials and finishes;
 - b) Soft and hard landscaping of the site including details of screen walls, gates, fences, and other means of enclosure;
 - c) Details of existing and proposed ground levels and site sections;
 - d) Details of proposed finished floor levels and building heights;
 - e) Details of retaining walls, steps, and ramps;
 - f) Details of carriageway, footway, cycleway and shared surface widths and surface material finishes for the highways, footpaths, cycle ways, private drives, and all other hard surfaces;
 - g) Details of car and cycle parking facilities;
 - h) Details of minor artefacts and structures (e.g. street furniture, signs, and lighting);i) Any retained and proposed landscape features, including trees and hedgerows and proposals for restoration where relevant;
 - i) For soft landscape works, to include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate, tree pits, tree establishment details including soil mediums and volumes; implementation programme.

Reason: For clarity about what information should support reserved matters applications.

Phasing

7. The development hereby permitted may be carried out in phases. Prior to or alongside the first reserved matters application a phasing strategy and sequencing for the construction of the development as a whole shall be submitted to and approved in writing by the local planning authority.

The Phasing Strategy shall include plans/ diagrams, sequencing, supporting text and rationale setting out:

- (i) The number of and boundaries for each Neighbourhood Design Code area;
- (ii) General locations of residential and non-residential uses including the local centre and primary school site;
- (iii) General location of open spaces, play areas, sports pitches/ pavilion (taking into consideration any required associated external areas such as parking), green infrastructure and surface water drainage features as well as the community park and tramway;
- (iv) The extent of the route of the existing disused tramway that will be completed and made available for public pedestrian and cycle use prior to the school opening;
- (v) Approximate number of market and affordable homes to be provided for each phase
- (vi) Approximate number of dwellings to be provided in each phase that will meet Category M4(2) and M4(3) standards as set out in the Building Regulations 2010;

- (vii) Accesses for pedestrians, cyclists, buses, and other vehicles, which shall include the approved northern gateway roundabout access and the Pick Pie Drive access within the first residential phase of the development;
- (viii) General location for the bus stop facilities and mobility hubs within the site, including generally in accordance with the strategy shown on Figure 7-5 of the Stantec Transport Framework Travel Plan (ref. 38295/5501 rev A dated October 2023).

Any subsequent amendment to the approved Phasing Strategy shall be submitted to and approved in writing by the Local Planning Authority in the form of a revised Phasing Strategy.

The development shall be carried out in accordance with the approved Phasing Strategy, including any approved amendments.

Reason: To ensure there is a clear and phased framework for both the development and for the submission of applications for Reserved Matters approvals and so that the development is carried out in a sustainable and coherent manner as envisaged in the AWDC throughout the duration of the construction phase in accordance with the aims of PLY44 of the Plymouth and South West Devon Joint Local Plan 2016-2034, Policies Bick02, Bick04, Bick05, Bick06 and Bick26 of the Bickleigh Parish Neighbourhood Plan 2016-2034 and the aims of the NPPF.

Neighbourhood Design Codes

8. Prior to or alongside the first reserved matters application for each Neighbourhood Design Code Area as defined on the Phasing Strategy Plan pursuant to condition 7, a Neighbourhood Design Code (NDC) for that NDC Area shall be submitted to and agreed in writing by the Local Planning Authority. Each NDC shall follow the structure and principles outlined in Figure 3 of the AWDC (revision AB dated November 2022).

Any subsequent amendments to any approved NDC shall be submitted to and agreed in writing by the LPA.

Any reserved matters shall be in general accordance with the design principles of the approved NDC (including any subsequent amendments) to which those reserved matters relate, unless otherwise agreed with the LPA.

Reason: To provide a detailed framework to achieve high quality, well-designed places in accordance with the aims of Policies PLY44 and DEV20 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034 and NPPF paragraph 134 and NPPF paragraph 134.

Housing Mix

9. Applications for the approval of the reserved matters for any phase, sub-phase, or development parcel which include residential development shall include details of the mix, type, size, and tenure of dwellings, as well as their locations and distribution within that application site. The proposals shall be informed by the most up to date version of the Council's "Strategic Housing Market Needs Assessment". Development shall be carried out in accordance with the approved details.

Reason: To best meet the housing needs of the community in accordance with the aims of Policy DEV9 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034, and Policy Bick09 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Dwelling Accessibility and Adaptability Standards

10. Unless otherwise agreed in writing by the local planning authority, a minimum of 20% of all homes shall meet Category M4(2) and M4(3) standards as set out in the Building Regulations 2010. Of the proportion of homes delivered to meet Category M4(2) and M4(3) standards, at least 2% shall meet Category M4(3) standards of the Building Regulations 2010. Applications for the approval of reserved matters for any phase, sub-phase or development parcel shall include details of their location and distribution within that application site and development shall be carried out in accordance with the approved details.

Reason: To ensure the delivery of a range of housing type and size, to address the different needs of the community, in accordance with NPPF paragraph 60 and in accordance with the aims of Policy SPT2 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Construction Environment Management Plan (CEMP)

11. No development shall take place on any part of the site, phase, sub-phase, or development parcel until a Construction Environment Management Plan (CEMP) for that part of the site, phase, sub-phase, or development parcel has been submitted to and approved in writing by the Local Planning Authority.

Each CEMP shall include and specify provision to be made for the following:

- a) Dust mitigation measures during the construction period, including of stockpiled materials;
- b) Control of noise emanating from the site during the construction period;
- c) The location of the constructor's compound(s) including provision for the storage of all plant, machinery, and materials with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority;
- d) Means of enclosure of phase, sub-phase, or development parcel;
- e) Provision for all site operatives, visitors and construction vehicles loading, offloading, parking, and turning within the site during the construction period including the amount and location of construction worker parking;
- f) Details of wheel washing facilities, arrangements, and guaranteed water source during the construction period to minimise the deposit of mud and other similar debris on the adjacent public highway;
- g) Details for the routing of all Heavy Goods Vehicle construction traffic exceeding 7.5 tonnes. For the avoidance of doubt, this shall exclude construction traffic entering or leaving the site via the Pick Pie Drive site access once the primary street is completed to base course and open to traffic along the entirety of the route between Pick Pie Drive and the new northern Roundabout site accesses, other than in emergencies;
- h) Full details of the advisory off-site signage for the routing of Heavy Goods Vehicle and all construction traffic;
- i) Full details and drawings of any proposed temporary accesses for construction works and details of remedial works (if applicable) along with any Safety Audit(s), if required by the Local Planning Authority;

- j) Details of the route and type of construction of any temporary haul routes across the site;
- k) Hours of Work, which should limit the hours of construction work including site clearance and delivery of materials to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays and at no times on Sundays, Bank and Public Holidays;
- l) Hours of Permitted Construction Access via Pick Pie Drive: During school term time, any construction access or egress via Pick Pie Drive by construction traffic exceeding 3.5 tonnes, including the delivery of materials, shall be limited to the hours of between 09:30 to 15:00; and 16:00 and 18:00 Monday to Friday; and 08:00 to 13:00 Saturdays; and at no times on Sundays, Bank and Public Holidays, except for any access or egress that is required for health & safety reasons and in emergencies. Outside of school term time, construction access and egress shall be limited to the hours of 08:00 to 18:00 Monday to Friday; and 08:00 and 13:00 on Saturdays; and at no times on Sundays, Bank or Public Holidays, except for any access or egress that is required for health and safety reasons and in emergencies;
- m) Details of any foundation designs (including piling) and ground source heating and cooling systems using penetrative methods and measures to address noise and vibration including permitted times for such work;
- n) Measures to protect surrounding properties from construction noise and vibration in accordance with the standards in BS5228: Code of practice for noise and vibration control on construction and open sites;
- o) Details of protection, mitigation and enhancement measures for habitats and protected or notable species within a specific Ecological Construction Method Statement (ECMS) for each phase, sub-phase or development parcel, with such details to include how ecological features and habitats such as bat flight lines (dark corridors), hedges and other habitats identified in the ES and AWDC will be protected for the duration of the build and approval of any proposed lighting required for construction purposes;
- p) Details of how the local authority and residential premises on and neighbouring the site will be notified of any unavoidable working outside of the hours of work specified in criteria k) which may cause disturbance. This shall include details of the potential circumstances when unavoidable working outside of permitted hours may occur and the minimum advanced notice period to be provided in writing; and where it is not possible to provide advanced notice of such works to the local planning authority in advance, the method and timescales within which the Local Planning Authority will be notified in writing to explain the reasons for this;
- q) Details of how car sharing amongst construction staff will be promoted to encourage reductions in the number of car borne trips to site;
- r) No burning on the site;
- s) Details of publicly displayed points of contact (such as a Construction Liaison Officer/site manager) and complaints procedure, detailing how complaints will be addressed, including an appropriate contact phone number and email;
- t) Water management (surface and groundwater) including measures to prevent the pollution of the water environment;
- u) Emergency vehicle access protocol, to include measures to ensure access by emergency vehicles maintained;
- v) Estimated number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;

- w) Measures for agreeing the details and locations of any temporary on-site storage of stockpiled earthworks arisings.

The construction of the Development shall thereafter be carried out in accordance with the approved Construction Environment Management Plan for that part of the development unless otherwise approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety, protecting the health and amenity of the local community and in the interests of wildlife and habitats in accordance with the aims of Policies DEV1, DEV23, DEV25 and DEV26 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policy Bick17 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Landscape and Ecological Management Plan (LEMP)

12. Prior to the commencement of the first phase of development a site-wide Landscape and Ecological Management Plan (sLEMP) shall be submitted to and approved in writing by the local planning authority. The sLEMP will be an overarching strategy document for the whole site, which describes the vision, strategic objectives, key management principles and broad approximate locations for the management of key landscape, ecological and arboricultural features of the site. The sLEMP shall be consistent with the relevant principles set out in Chapters XXX of the Environmental Statement (ref xxx), the Green Infrastructure Parameter Plan (ref. xxx) and Section 5.2 of the Allocation-Wide Design Code (rev. AB).

No development shall take place on a particular phase until a Landscape and Ecological Management Plan (LEMP) for that phase has been submitted to and approved in writing by the Local Planning Authority. The LEMP shall be consistent with the principles of the sLEMP and shall include:

- a) A description and evaluation of important landscape and habitat features to be retained, created, and managed thereafter;
- b) Details of the aims and objectives of ongoing management, including ecological trends and constraints on the site that might influence management;
- c) A management work programme, including an annual work plan capable of being rolled forward over a 10-year period. This shall demonstrate how the aims and objectives will be achieved, including details of ongoing monitoring, and set out how remedial measures will be agreed and implemented if required; and
- d) Details of the management body or organisation responsible for implementation of the LEMP.

Any amendments to any approved sLEMP or LEMP shall be submitted to and agreed in writing with the local planning authority.

The LEMP shall thereafter be implemented in accordance with the approved details (including any subsequent approved amendments).

Reason: In the interests of the retention, protection and enhancement of landscape, wildlife, and features of biological interest, in accordance with Joint Local Plan Policies SPT12, DEV23, DEV25 & DEV26 and Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034. A pre-commencement condition is required to ensure that the landscape and ecological management is acceptable and measures in place before development begins.

Retained Tree and Hedgerow Protection during Construction

13. No part of the Development within a phase, sub-phase, or development parcel shall take place until the existing tree(s) and hedgerow(s) to be retained within that phase, sub-phase, or development parcel have been protected in the following manner, unless otherwise previously agreed in writing by the Local Planning Authority:

- a) Protective barriers shall be erected:
 - i. around the retained tree(s) to a distance not less than a radius of 12 times the trunk diameter when measured at 1.5m above natural ground level (on the highest side) for single stemmed trees and for multi-stemmed trees 10 times the trunk diameter just above the root flare.
 - ii. around retained hedgerows, ensuring that those barriers are sited outside of the root protection areas for those hedgerows.
- b) The barriers shall comply with the specification set out in British Standard BS5837:2012 'Trees in Relation to Construction – Recommendations' that is steel mesh panels at least 2.3m tall securely fixed to a scaffold pole framework with the uprights driven into the ground a minimum of 0.6m depth and braced with additional scaffold poles between the barrier and the tree[s] at a minimum spacing of 3m.
- c) The barriers shall be erected before any equipment, machinery or materials are brought onto the site for the purposes of development and / or demolition and shall be maintained until all equipment, machinery and surplus material has been removed from the site.
- d) Nothing shall be stored or placed within the areas protected by the barriers erected in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavations be made, without the written consent of the Local Planning Authority.

Reason: To ensure the continued health of retained trees and in the interests of the visual amenity of the area in accordance with the aims of Policies DEV23 and DEV28 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Hard and Soft Landscaping Details

14. Applications for approval of landscape reserved matters shall include the following details:

- a) The trees and hedges to be retained and removed, where applicable.
- b) Hard Landscaping works including the proposed site levels or contours, pedestrian and cycle access and circulation areas, hard surfacing materials and any boundary treatments including fences and walls.
- c) Soft landscaping details shall include planting plans, written specifications (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers and densities where appropriate;
- d) A Schedule of Maintenance, including watering and the control of competitive weed growth, for a minimum period of five years from first planting;
- e) Implementation timetable.

The Landscaping Scheme should be in general accordance with the principles identified in the Green Infrastructure Parameter Plan Ref. 26734 RG-M-63 Rev V, Section 3.5 of the

Design and Access Statement Rev AB, Section 5 of the Allocation Wide Design Code, Rev. AB and any relevant approved Neighbourhood Design Code unless otherwise agreed in writing by the local planning authority.

Reason: In the interests of enhancing and conserving the character and visual amenity of the are in accordance with the aims of Policies DEV23 and DEV28 of the Plymouth and South West Devon Joint Local Plan 2014-2034. and Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Implementation and Maintenance of Approved Landscape Proposals

15. All hard and soft landscape works within a Phase shall be carried out in accordance with the approved details and any subsequent amendments that have been agreed in writing with the local planning authority.

All planting, seeding, or turfing comprised in the approved details of landscaping shall be carried out within a Phase as provided for in the approved implementation timetable pursuant to condition 14.

Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variations.

Reason: To assimilate the development into the landscape and to safeguard the appearance and character of the area.

REASON: To ensure a satisfactory standard of appearance of the development in the interests of the visual amenities of the area in accordance with the aims of Policies DEV23, DEV28 and PLY44 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Biodiversity Net Gain

16. Prior to the commencement of development, a site-wide framework biodiversity gain strategy to show how a biodiversity net gain will be achieved across the development, based on Defra Metric 2.0, shall be submitted to, and approved by the local planning authority.

Prior to the commencement of any phase of the development, a biodiversity gain plan for that phase of development which accords with the approved site-wide framework biodiversity gain strategy for the development, shall be submitted and approved by the local planning authority.

Any subsequent changes to the approved details shall be submitted to and approved in writing by the Local Planning Authority, on the basis that any changes shall still ensure a biodiversity net gain will be achieved across the development.

The development shall be implemented and maintained in accordance with the approved details (including any subsequent approved changes).

Reason: To ensure there is a net gain of biodiversity having regard to the aims of Policies DEV26 and PLY44 of the Plymouth and South West Devon Joint Local Plan 2014-2034, Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034 and guidance contained within the NPPF Section 15.

Energy

17. No part of the Development shall take place in a particular phase, sub-phase, or development parcel until proposals for an Energy Strategy within that phase, sub-phase, or development parcel, which is consistent with the principles established by the Energy Statement (Ref: PBA 38295/3004 rev 04, September 2019), has been submitted to and approved in writing by the Local Planning Authority. Development of the phase, sub-phase or development parcel shall thereafter be carried out in accordance with that approved Energy Strategy, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the development contributes toward delivering a low carbon future and supports the Plan Area target to halve 2005 levels of carbon emissions by 2034 in accordance with the aims of Policies PLY44, SPT1, SPT2, DEV32 and DEV33 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and the Plymouth and South West Devon Climate Emergency Planning Statement (November 2022).

EV Charging

18. Prior to the commencement of development on a phase, a scheme for the installation of Electric Vehicle charging infrastructure for that phase shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include the specification of the ducting infrastructure and charging facilities and a plan showing the locations of the ducting infrastructure and charging facilities for residential and non-residential uses and appropriate public locations (including the Mobility Hubs) to be delivered within that phase. Development of that phase shall be carried out as approved before the residential and non-residential buildings on that phase are first occupied and the public locations are opened for use.

Reason: In the interests of air quality and sustainability in accordance with the aims of Policy DEV32 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034 and the Plymouth and South West Devon Joint Local Plan Supplementary Planning Document (Adopted July 2020).

Waste Strategy

19. No part of the development within a phase, sub-phase, or development parcel hereby permitted shall take place until a detailed Waste Strategy/ Waste Audit Statement for that phase, sub-phase, or development parcel is submitted to and approved by the Local Planning Authority. The Detailed Waste Strategy/ Waste Audit Statement shall follow the principles of the Framework Pre-Construction Site Waste Management Plan (PBA Ref 38295-3014: V2.0, September 2019) and provide a strategy for:
- a) how sustainable management of the waste materials during construction, including demolition, excavation, storage, and construction processes; and
 - b) how waste will be handled, stored, and moved during the operational phase of the development, when the development is occupied, including measures to control the use, sorting, storage and collection of waste material and recycling from residential and commercial uses on site.

- c) The development for each phase, sub-phase, or development parcel, shall thereafter be carried out in full accordance with the agreed Detailed Waste Strategy.

Reason: To minimise and manage waste in accordance with the aims of Policy DEV31 of the Plymouth and South West Devon Local Plan 2014 – 2034 and Policy W4 of the Devon Waste Plan 2011 - 2031.

Contaminated Land Intrusive Investigation Scheme

20. No part of the Development within a phase, sub-phase, or development parcel hereby permitted shall take place until a scheme of intrusive investigation for that phase, sub-phase, or development parcel in order to characterise the type, nature and extent of any contamination present, the risks to receptors and to inform the remediation strategy proposals shall be documented as a report undertaken by a competent person and in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11' and shall be submitted to and approved in writing by the Local Planning Authority. No development shall take place unless the Local Planning Authority has given its written approval that it is satisfied that the risk from contamination has been adequately characterised as required by this condition.

Reason: To ensure that any ground and water contamination is adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV2 of Plymouth and South West Devon Joint Local Plan 2014-2034

Contaminated Land Remediation Scheme

21. If contamination is found in any phase, sub-phase, or development parcel by undertaking the work carried out under condition 20, prior to the commencement of the development within that phase, sub-phase, or development parcel hereby permitted, a scheme of remediation and/or monitoring to ensure the site is suitable for its proposed use shall be prepared by a competent person and in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land contamination, CLR 11' and shall be submitted to and approved in writing by the Local Planning Authority. No further development shall take place within that phase, sub-phase, or development parcel until the Local Planning Authority has given its written approval of the scheme of remediation and/or monitoring required by this condition.

Reason: To ensure that any ground and water contamination is adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV 2 Plymouth and South West Devon Joint Local Plan 2014-2034

Verification of Remedial Works for Contamination

22. If remedial works have been identified in any phase, sub-phase, or development parcel by condition 20, the development shall not be occupied until the remedial works have been carried out on that particular phase, sub-phase, or development parcel in accordance with the scheme approved under condition 21. A verification report that demonstrates the effectiveness of the remediation carried out on that particular phase, sub-phase, or development parcel must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that any ground and water contamination is adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV2 of the Plymouth and South West Devon Joint Local Plan 2014-2034

Unexpected Contamination

23. If during development of any phase, sub-phase or development parcel, contamination not previously identified is found to be present at the site, no further development within that phase, sub-phase, or development parcel shall be carried out until full details of a remediation strategy detailing how the unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. Thereafter the remediation strategy shall be carried out in accordance with the approved details.

Reason: To ensure that any ground and water contamination is identified and adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV2 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Archaeology

24. No development shall take place within any phase, sub-phase, or development parcel until a written scheme of archaeological investigation (WSI) for that phase, sub-phase, or development parcel consisting of a written scheme of investigation, and a timetable for that work has been submitted to and approved in writing by the Local Planning Authority. The WSI and the timetable for those works shall include details for the completion of the post investigation assessment as well as its analysis, publication, and dissemination of results, including archive deposition.

The WSI shall have regard to the results of the archaeological desk-based assessment (EDP Ref: EDP3488/r018e, dated September 2019), geophysical survey (Headland Archaeology Ref: WOPL17) and trial trench evaluation (Ref: 17701), as well as the principles outlined on Plan Refs. EDP3488/d088).

The Development shall thereafter be carried out at all times in accordance with the approved written scheme of investigation and timetable or other such details as may be subsequently agreed in writing by the Local planning Authority.

Reason: To ensure that an appropriate record is made of archaeological evidence that may be affected by the Development, in accordance with the aims of Policy DEV21 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and paragraph 205 of the National Planning Policy Framework, A pre-commencement condition is required to ensure that the archaeological works are agreed prior to the commencement of preparatory and/or construction works to avoid the disturbance of archaeological deposits

Accesses and Off-Site Highway Improvements

25. The Woolwell Pedestrian Cycle Improvements shall be completed generally in accordance with Stantec drwg ref. 38295/5501/ 102 Rev C (including the pedestrian and cycle crossing facility works but otherwise excluding those improvement works identified on Towerfield Drive) and 38295/5501/ 103 Rev C and 38295/5501/104 rev C prior to the occupation of any dwelling accessed from the Pick Pie Drive Site Access.

Reason: To provide infrastructure improvements to encourage sustainable travel choices to be made in accordance with the aims of Policies SPT2, PLY44 and Strategic Objective S04 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

26. The improvements to Cycle Facilities in Roborough Village shall be completed generally in accordance with Stantec drwg ref. 38295/5501/ 107 Rev C prior to the occupation of any dwelling accessed from the northern Roundabout Site Access.

Reason: To provide improvements to encourage sustainable travel choices to be made in accordance with the aims of Policies SPT2, PLY44 and Strategic Objective S04 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

27. No dwelling, commercial facility or community facility shall be accessed via the new northern roundabout site access until that roundabout access has been completed generally in accordance with Stantec drwg. Ref. 38295/5501/ 110 Rev D, Ref. 38295/5501/120C, Ref. 38295/5501/ 500D and Ref. 38295/5501/170D.

Reason: To ensure that adequate access and associated facilities are available for the vehicular and pedestrian traffic to and from the site in accordance with the aims of Policy DEV29 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

28. No dwelling, commercial facility or community facility shall be accessed via the Pick Pie Drive Access until the Pick Pie Drive Site Access has been completed generally in accordance with Stantec Drwg. Ref. 38295/5501/ 101 Rev C

Reason: To ensure that adequate access and associated facilities are available for the vehicular and pedestrian traffic to and from the site, including during construction in accordance with the aims of Policy DEV29 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Blackeven Hill Intersection

29. The primary street at its intersection Blackeven Hill shall be designed having regard to the principles set out in Stantec Technical Note TN003 (dated September 2021). The development shall thereafter be carried out in accordance with the details approved by the reserved matters application and any details approved by the Highway Authority under a Section 38 agreement of the Highways Act 1980 for this intersection.

Reason: To address how traffic flows along Bickleigh Down Road and Blackeven Hill are proposed to be managed through the build-out of development in accordance with the aims of Policy DEV29 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Highway infrastructure Serving Dwellings

30. No dwelling, community or commercial facility shall be occupied until:

- a) The spine road and cul-de-sac carriageway including the vehicle turning head serving that property has been laid out, kerbed, drained, and constructed up to and including base course level, the ironwork set to base course level and the sewers, manholes and service crossings completed;
- b) The street, footways, and footpaths (or section(s) thereof) which provide that property with direct pedestrian routes to an existing highway maintainable at public expense have been constructed up to and including base course level;
- c) The vehicular visibility splays applicable to that property have been laid out to their final level;
- d) The street lighting for street, footways, and footpaths (or section(s) thereof) applicable to that property has been erected and is operational;
- e) The car and cycle parking and any other vehicular access facility required for that property by this permission has/have been completed;
- f) The verge and service margin and vehicle crossing on the road frontage of that property has been completed with the highway boundary properly defined;
- g) The street nameplates for the spine road and cul-de-sac for that property has been provided and erected.

Reason: In the interests of public amenity and road safety in accordance with the aims of Policies DEV1, DEV20 and DEV29 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Estate Roads

- 31. Prior to the construction of any proposed estate road, cycleways, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, road maintenance/vehicle overhang margins, embankments, visibility splays, accesses, car parking and street furniture their details shall be submitted to and approved by the Local Planning Authority. They shall be constructed in accordance with the approved details unless otherwise agreed in writing. For this purpose, the details to be submitted comprise plans and sections indicating, as appropriate, the design, layout, levels, gradients, materials, and method of construction shall be submitted to the Local Planning Authority

Reason: To ensure that adequate information is available for the proper consideration of the detailed proposals.

WtTG Condition

- 32. No more than 400 dwellings hereby approved shall be occupied until the planned A386 highway capacity improvement scheme between Woolwell and The George has first been implemented and is operational. Alternatively, no more than 400 dwellings shall be occupied unless an alternative highway capacity improvement scheme or other measures to avoid impacts becoming severe has been submitted to and approved in writing by the Local Planning Authority and has first been implemented as approved and is operational. For the avoidance of doubt reference to “the planned highway capacity improvement scheme between Woolwell and The George” is a reference to Phases 1 (north of Woolwell Roundabout) and 2 (Woolwell Roundabout) of a highway capacity improvement scheme approved by Plymouth City Council on 18.3.2024 and any such reference includes any

modifications to Phases 1 and 2 that may be approved and implemented prior to the planned highway capacity improvement scheme becoming operational.

Reason: To ensure adequate capacity improvements have been delivered on the A386 to accommodate an additional quantum of housing development to avoid severe impacts on the A386 in accordance with the aims of Policy PLY44 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Employment and Skills

33. Prior to the commencement of development, an Employment and Skills Plan for the construction phases, shall be submitted to and approved in writing by the local planning authority. Any amendments to the approved Employment and Skills Plan shall be submitted to and approved in writing by the local planning authority. The development shall thereafter proceed in accordance with the approved details.

The Employment and Training Plan shall have regard to the National Skills Academy/Plymouth City Council's Guidance for Developers and Contractors: Maximising Employment and Skills Opportunities through Local Planning and Procurement (October 2016) and include details of how:

- a) Measures where it is reasonably possible to promote and advertise local jobs and skills training opportunities during the construction phase;
- b) Measures by which recruitment of contractors and sub-contractors from the local area to work on the Development during the construction phase, where it is reasonable possible, will be encouraged and advertised; and
- c) Measures where the recruitment of employees from the local area to work on the development during the construction phase will be encouraged and advertised.

Reason: To ensure a commensurate growth in the area's employment through investment in job skills, in accordance with the aims of Policy DEV19 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Surface Water Drainage

34. Applications for the approval of reserved matters for the permanent (and where applicable any temporary) detailed surface water drainage design for that phase, sub-phase or development parcel shall include the following information:
- a) A detailed drainage design based upon the approved Flood Risk Assessment, Land At Woolwell, part of the 'Land At Woolwell' JLP Allocation (Policy PLY44) Revision Kv.2 dated February 2021 and the results of the information submitted in relation to (b) below and the Groundwater Monitoring Review report Stantec 38295 Rev 01 July 2022, and for the avoidance of doubt, any drainage solutions or measures that rely on infiltration devices which are proposed to be in areas of shallow groundwater (as identified in said Ground Monitoring report) shall include measures to pipe or convey water into the strategic basins rather than directly into the ground;
 - b) Soakaway test results in accordance with BRE 365 at the proposed location and depth of the infiltration devices; and evidence that there is a low risk of groundwater re-emergence downslope of the site from any proposed soakaways or infiltration basins;

- c) A detailed drainage design using SuDS techniques including infiltration as well as the Simple Index Approach outlined in Tables 26.2 and 26.3 of the Ciria SuDS Manual C753 (or any superseding document), to address the following impacts on the water environment during construction (through the CEMP and/or surface water drainage strategy) and permanent operation:
 - i.) Erosion/sediment transport;
 - ii.) Chemical/pollution events;
 - iii.) Alteration/interruption of surface water flows; and
 - i. Alteration/interruption of groundwater flows;
- d) Proposals for the adoption, management, and maintenance of the permanent surface water drainage system;
- e) A plan indicating how exceedance flows will be managed at the site including no increase in risk of flooding to third parties;
- f) Detailed proposals for the management of surface water and silt run-off from the site during construction of the development hereby permitted.

No building within a phase, sub-phase or development parcel of the development hereby permitted shall be occupied until the detailed drainage design for that particular phase, sub-phase or development parcel has been implemented in accordance with the approved details under (a) - (f).

Thereafter, the approved drainage shall be retained, managed, and maintained in perpetuity in accordance with the approved details.

Reason: To ensure the proposed surface water drainage system will operate effectively and will not cause an increase in flood risk either on the site, adjacent land or downstream in accordance with the aims of Policy DEV35 of the Plymouth and South West Devon Local Plan 2014 – 2034, SuDS for Devon Guidance (2017) and NPPF Section 14. A pre-commencement is necessary to ensure that the proposed surface water drainage system is shown to be feasible before works begin to avoid redesign/unnecessary delays during construction when site layout is fixed.

Foul Water Drainage

- 35. First occupation of any dwelling, commercial unit or community infrastructure requiring foul drainage within a phase, sub phase or development parcel shall not take place until that phase's foul drainage is connected to the foul mains sewer.

All subsequent development within that phase shall similarly be connected to the mains foul network. In addition, no surface water connection shall be made to a combined sewer.

Reason – To ensure the details of the development are acceptable and help maximise capacity within the foul network in the interests of sustainability, pollution control and amenity in accordance with the aims of Policy DEV35 of the Plymouth and South West Devon Local Plan 2014 – 2034,

Primary Substation

36. As part of the reserved matters for the proposed primary substation, full details of the proposed Primary Substation, including its location, electrical equipment specification, any associated built development, boundary treatment, access, lighting, and landscaping shall be submitted to and approved by the local planning authority prior to development commencing on the delivery of the sub-station. The development shall thereafter proceed in accordance with the approved details.

Reason: In the interests of the character and visual amenities of the area in accordance with the aims of Policies PLY44 and DEV20 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Substations/Utility Buildings and Structures

37. The location of all sub-stations and similar utility buildings or structures required by statutory undertakers and all other appropriate bodies shall be identified as part of the reserved matters and shall be located in suitably concealed and/or screened locations where they are not visually prominent.

Reason: In the interests of the character and visual amenities of the area in accordance with the aims of Policies PLY44 and DEV20 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Undergrounding of services

38. All services shall be underground unless the latter are located internally within an approved building or details have first been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the character and visual amenities of the area in accordance with the aims of Policies PLY44 and DEV20 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Permitted Uses within Local Centre

39. The retail/ community hub hereby approved shall only be used for activities within Classes A1, A2, A3, A4, A5, D1 and D2 Schedule of the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to the Class in any statutory instrument revoking and re-enacting that Order with or without modification.

Reason: In order to ensure that uses are compatible with a local centre and in the interests of a sustainable development in accordance with the aims of Policy PLY44 of the Plymouth and South West Devon Local Plan 2014 – 2034.

Local Centre

40. No single unit within the local centre exceeding 200sqm gross internal floor area for uses within Classes A1-A5 shall first be brought into use without the prior written approval of the local planning authority. Any such application seeking prior approval from the local planning authority shall be accompanied by a retail impact assessment.

Reason: To ensure that the local centre provides an appropriate mix and scale of retail facilities in accordance with the aims of Policy PLY44 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Noise – External Equipment including Plant and Extraction Systems

41. Any building plant, extraction systems or externally located equipment shall be acoustically insulated in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority prior to installation. The scheme shall ensure that the rated noise level at the boundary of the nearest extant or proposed noise sensitive property will not increase above the existing background noise level in accordance with BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound. Any mitigation measures proposed to attain this level shall be clearly identified. The scheme shall be implemented as approved prior to the commencement of use of the plant or equipment and shall be retained and maintained in accordance with the manufacturer's instructions for the duration of the use.

Reason: In the interests of the character and amenities of the area in accordance with the aims of Policy DEV2 of the Plymouth and South West Devon Local Plan 2014 – 2034.

External Lighting

42. No external lighting of any development phase, sub-phase or development parcel shall be installed until a detailed lighting scheme (DLS) including details of any external lighting/ security lighting/ floodlighting including the design, position, orientation, and any screening of the lighting, has first been submitted to and approved in writing by the Local Planning Authority. The DLS shall be informed by the approved Lighting Assessment (LA) by Stantec (Ref: 38295/3001 | Rev: 07 | Date: November 2019) and shall be accompanied by a modelled lux contour plan of external lighting to allow suitable lighting levels to be provided near sensitive receptors identified in the LA and the Dark Corridors and Zones identified at Figure 28 of the approved Allocation Wide Design Code (rev. AB). The lighting shall be installed and maintained as approved.

With the exception of replacement lighting that accords with the approved details, no additional or replacement external lighting shall be installed near the identified sensitive receptors which exceed the levels in the lux contour plan without the written permission of the Local Planning Authority.

Reason: To avoid night time impacts on landscape character and visual amenities and to protect and enhance biodiversity in accordance with the aims of Policies DEV 1, Dev 20, DEV23, DEV25 and DEV26 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Noise – A386 Road Noise Mitigation

43. Reserved matters applications for any phase that includes new homes that will directly front onto the A386 shall be accompanied by a noise assessment to demonstrate that through mitigation, design and site layout, dwellings and their gardens will be protected from the impact of road traffic noise having regard to BS 8233:2014 Guidance on sound insulation and noise reduction for buildings and the WHO Guidelines for community noise. The development shall be carried out in accordance with the approved details before the occupation of any dwelling to which those mitigation measures relate.

Reason: In the interests of the amenities of future occupiers in accordance with the aims of Policy DEV2 of the Plymouth and South West Devon Local Plan 2014 – 2034.

Odour

44. Prior to the first occupation of any hot food outlet to be provided within the neighbourhood hub, full details of the proposed extraction and odour abatement system for that hot food outlets shall be submitted to and approved in writing by the Local Planning Authority. The odour abatement system shall comply with the principles of best practice contained within the EMAQ technical guidance, Control of Odour and Noise from Kitchen Exhaust Systems. The development shall be carried out in accordance with the approved details and installed and thereafter be maintained in accordance with the manufacturer's instructions.

With the exception of replacement odour abatement systems that accord with the approved details, no additional or replacement systems shall be installed without the written permission of the Local Planning Authority.

Reason: In the interests of the character and amenities of the area in accordance with the aims of Policy DEV2 of the Plymouth and South West Devon Local Plan 2014 – 2034.

Land at Woolwell: Planning Application Ref. 4181/19/OPA (Application B): Final Draft Planning Conditions (Without Prejudice)

Time Limit for Submission of Reserved Matters

1. The first application for the approval of reserved matters as set out in condition 1 above shall be submitted to the local planning authority within three years from the date of this permission.

Reason - To comply with Section 91 of the Town and Country Planning Act 1990, as amended by the Planning & Compulsory Purchase Act 2004.

Time Limit for Commencement

2. The development hereby permitted shall commence no later than the expiration of three years from the date this permission is granted or two years from the date of approval of the final reserved matters for the first phase, sub-phase, or development parcel (whichever is later).

Development of any subsequent phase, sub-phase or development parcel of the development shall commence no later than the expiration of two years from the date of approval of the final reserved matters for that phase, sub-phase, or development parcel.

Submission of the first reserved matters for the final phase of the development as identified on the approved phasing plan pursuant to condition 7 shall be submitted before the expiration of 10 years from the date of this permission.

Reason - To comply with Section 91 and Section 92 of the Town and Country Planning Act 1990, as amended by the Planning & Compulsory Purchase Act 2004.

Compliance with Parameters

3. The development hereby permitted shall be carried out in accordance with the following approved parameter plans listed below:
 - Parameter Plan – Land Use Ref. 26734 RG-M-92 Rev k
 - Parameter Plan – Density Ref. 26734 RG-M-93 Rev G
 - Parameter Plan – Green Infrastructure Ref. 26734 RG-M-94 Rev H
 - Parameter Plan – Building Heights Ref. 26734 RG-M-95 Rev H
 - Parameter Plan – Access Ref. 26734 RG-M-96 Rev L

The development hereby permitted shall not exceed 360 dwellings;

Reason: To clarify the permission and for the avoidance of doubt.

Compliance with Approved Plans and Drawings

4. The reserved matters for any phase, sub-phase or development parcel should (where applicable) be generally in accordance with the principles and approach to the development of the site shown on the following plans and documents, including any revisions to the same subsequently approved in writing by the local planning authority providing that those amendments do not result in any impacts which exceed the range and scope of those

assessed in the Environmental Statement (ref 16.9004 dated December 2019 by Boyer Planning) and would require further mitigation:

- Site and EIA Boundary Plan (Barton Willmore Drwg. No. 26734 RG-M-108 Rev A)
- Environmental Statement (Boyer Ref 19.9012 dated December 2019 by Boyer Planning)
- Land at Woolwell Flood Risk Assessment (Stantec Ref. 38295/4001 rev F dated October 2022)
- Transport Assessment (Stantec Ref. 38295 Rev. Planning Issue. Dated October 2019)
- Framework Travel Plan (Stantec ref 38295/5501 rev A Planning Issue – Resubmission. Dated October 2023)
- Sustainability Statement (Stantec Ref. 38295/3013 rev. 2 dated September 2019)
- Energy Statement (Stantec ref. 38295/3015 rev. 01 dated September 2019)
- Lighting Assessment (Stantec ref. 38295/3016 rev. 03 dated November 2019)
- Design and Access Statement (Barton Willmore Ref. Rev N)
- Allocation Wide Design Code (Barton Willmore Ref. Rev AB)
- Illustrative Masterplan (Barton Willmore Ref. 26734-RG-M-107 Rev B)

Reason: For clarity, notwithstanding that it is an outline planning application and to ensure appropriate compliance with the approved strategies and drawings.

Reserved Matters

5. No part of the development shall take place on a particular phase, sub-phase, or development parcel until full details of the layout, scale, appearance and landscaping within that phase, sub-phase, or development parcel (hereinafter called “the reserved matters”) have been submitted to and approved in writing by the Local Planning Authority.

The Development shall thereafter be carried out in accordance with the approved details.

Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990, as amended, in recognition that the development will be phased.

Reserved Matters Supporting Information

6. Alongside the reserved matters applications, details shall be provided (where they are relevant to that particular reserved matters application) of the following:
 - a) Layout, scale, and appearance, including all building facing materials and finishes;
 - b) Soft and hard landscaping of the site including details of screen walls, gates, fences, and other means of enclosure;
 - c) Details of existing and proposed ground levels and site sections;
 - d) Details of proposed finished floor levels and building heights;
 - e) Details of retaining walls, steps, and ramps;
 - f) Details of carriageway, footway, cycleway and shared surface widths and surface material finishes for the highways, footpaths, cycle ways, private drives, and all other hard surfaces;
 - g) Details of car and cycle parking facilities;

- h) Details of minor artefacts and structures (e.g. street furniture, signs, and lighting);i) Any retained and proposed landscape features, including trees and hedgerows and proposals for restoration where relevant;
- i) For soft landscape works, to include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate, tree pits, tree establishment details including soil mediums and volumes; implementation programme.

Reason: For clarity about what information should support reserved matters applications.

Phasing

7. The development hereby permitted may be carried out in phases. Prior to or alongside the first reserved matters application a phasing strategy and sequencing for the construction of the development as a whole shall be submitted to and approved in writing by the local planning authority.

The Phasing Strategy shall include plans/ diagrams, sequencing, supporting text and rationale setting out:

- (i) The number of and boundaries for each Neighbourhood Design Code area;
- (ii) General locations of residential uses;
- (iii) General location of open spaces, play areas, green infrastructure, and surface water drainage features;
- (iv) Approximate number of market and affordable homes to be provided for each phase;
- (v) Approximate number of dwellings to be provided in each phase that will meet Category M4(2) and M4(3) standards as set out in the Building Regulations 2010;
- (vi) Accesses for pedestrians, cyclists, buses, and other vehicles, which shall include the approved Towerfield Drive access within the first phase of the development;
- (vii) General location for the bus stop facilities and mobility hub within the site, including generally in accordance with the strategy shown on Figure 7-5 of the Stantec Transport Framework Travel Plan (ref. 38295/5501 rev A, dated October 2023).

Any subsequent amendment to the approved Phasing Strategy shall be submitted to and approved in writing by the Local Planning Authority in the form of a revised Phasing Strategy.

The development shall be carried out in accordance with the approved Phasing Strategy, including any approved amendments.

Reason: To ensure there is a clear and phased framework for both the development and for the submission of applications for Reserved Matters approvals and so that the development is carried out in a sustainable and coherent manner as envisaged in the AWDC throughout the duration of the construction phase in accordance with the aims of PLY44 of the Plymouth and South West Devon Joint Local Plan 2016-2034, Policies Bick02, Bick04, Bick05, Bick06 and Bick26 of the Bickleigh Parish Neighbourhood Plan 2016-2034 and the aims of the NPPF..

Neighbourhood Design Codes

8. Prior to or alongside the first reserved matters application for each Neighbourhood Design Code Area as defined on the Phasing Strategy Plan pursuant to condition 7, a Neighbourhood Design Code (NDC) for that NDC Area shall be submitted to and agreed in writing by the Local Planning Authority. Each NDC shall follow the structure and principles outlined in Figure 3 of the AWDC (revision AB dated November 2022).

Any subsequent amendments to any approved NDC shall be submitted to and agreed in writing by the LPA.

Any reserved matters shall be in general accordance with the design principles of the approved NDC (including any subsequent amendments) to which those reserved matters relate, unless otherwise agreed with the LPA.

Reason: To provide a detailed framework to achieve high quality, well-designed places in accordance with the aims of Policies PLY44 and DEV20 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034 and NPPF paragraph 134 and NPPF paragraph 134.

Housing Mix

9. Applications for the approval of the reserved matters for any phase, sub-phase, or development parcel which include residential development shall include details of the mix, type, size, and tenure of dwellings, as well as their locations and distribution within that application site. The proposals shall be informed by the most up to date version of the Council's "Strategic Housing Market Needs Assessment". Development shall be carried out in accordance with the approved details.

Reason: To best meet the housing needs of the community in accordance with the aims of Policy DEV9 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034, and Policy Bick09 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Dwelling Accessibility and Adaptability Standards

10. Unless otherwise agreed in writing by the local planning authority, a minimum of 20% of all homes shall meet Category M4(2) and M4(3) standards as set out in the Building Regulations 2010. Of the proportion of homes delivered to meet Category M4(2) and M4(3) standards, at least 2% shall meet Category M4(3) standards of the Building Regulations 2010. Applications for the approval of reserved matters for any phase, sub-phase or development parcel shall include details of their location and distribution within that application site and development shall be carried out in accordance with the approved details.

Reason: To ensure the delivery of a range of housing type and size, to address the different needs of the community, in accordance with NPPF paragraph 60 and Plymouth and in accordance with the aims of Policy SPT2 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Construction Environment Management Plan (CEMP)

11. No development shall take place on any part of the site, phase, sub-phase, or development parcel until a Construction Environment Management Plan (CEMP) for that part of the site, phase, sub-phase, or development parcel has been submitted to and approved in writing by the Local Planning Authority.

Each CEMP shall include and specify provision to be made for the following:

- a) Dust mitigation measures during the construction period, including of stockpiled materials;
- b) Control of noise emanating from the site during the construction period;
- c) The location of the constructor's compound(s) including provision for the storage of all plant, machinery, and materials with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority
- d) Means of enclosure of phase, sub-phase, or development parcel;
- e) Provision for all site operatives, visitors and construction vehicles loading, offloading, parking, and turning within the site during the construction period including the amount and location of construction worker parking;
- f) Details of wheel washing facilities, arrangements, and guaranteed water source during the construction period to minimise the deposit of mud and other similar debris on the adjacent public highway;
- g) Details for the routing of all Heavy Goods Vehicle construction traffic exceeding 7.5 tonnes. For the avoidance of doubt, this shall exclude construction traffic entering or leaving the site via the Pick Pie Drive site access once the primary street is completed to base course and open to traffic along the entirety of the route between Pick Pie Drive and the new northern Roundabout site accesses, other than in emergencies;
- h) Full details of the advisory off-site signage for the routing of Heavy Goods Vehicle and all construction traffic;
- i) Full details and drawings of any proposed temporary accesses for construction works and details of remedial works (if applicable) along with any Safety Audit(s), if required by the Local Planning Authority;
- j) Details of the route and type of construction of any temporary haul routes across the site;
- k) Hours of Work, which should limit the hours of construction work including site clearance and delivery of materials to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays and at no times on Sundays, Bank and Public Holidays.
- l) Hours of Permitted Construction Access via Pick Pie Drive: During school term time, any construction access or egress via Pick Pie Drive by construction traffic exceeding 3.5 tonnes, including the delivery of materials, shall be limited to the hours of between 09:30 to 15:00; and 16:00 and 18:00 Monday to Friday; and 08:00 to 13:00 Saturdays; and at no times on Sundays, Bank and Public Holidays, except for any access or egress that is required for health & safety reasons and in emergencies. Outside of school term time, construction access and egress shall be limited to the hours of 08:00 to 18:00 Monday to Friday; and 08:00 and 13:00 on Saturdays; and at no times on Sundays, Bank or Public Holidays, except for any access or egress that is required for health and safety reasons and in emergencies
- m) Details of any foundation designs (including piling) and ground source heating and cooling systems using penetrative methods and measures to address noise and vibration including permitted times for such work;

- n) Measures to protect surrounding properties from construction noise and vibration in accordance with the standards in BS5228: Code of practice for noise and vibration control on construction and open sites;
- o) Details of protection, mitigation and enhancement measures for habitats and protected or notable species within a specific Ecological Construction Method Statement (ECMS) for each phase, sub-phase or development parcel, with such details to include how ecological features and habitats such as bat flight lines (dark corridors), hedges and other habitats identified in the ES and AWDC will be protected for the duration of the build and approval of any proposed lighting required for construction purposes;
- p) Details of how the local authority and residential premises on and neighbouring the site will be notified of any unavoidable working outside of the hours of work specified in criteria k) which may cause disturbance. This shall include details of the potential circumstances when unavoidable working outside of permitted hours may occur and the minimum advanced notice period to be provided in writing; and where it is not possible to provide advanced notice of such works to the local planning authority in advance, the method and timescales within which the Local Planning Authority will be notified in writing to explain the reasons for this;
- q) Details of how car sharing amongst construction staff will be promoted to encourage reductions in the number of car borne trips to site;
- r) No burning on the site;
- s) Details of publicly displayed points of contact (such as a Construction Liaison Officer/site manager) and complaints procedure, detailing how complaints will be addressed, including an appropriate contact phone number and email;
- t) Water management (surface and groundwater) including measures to prevent the pollution of the water environment;
- u) Emergency vehicle access protocol, to include measures to ensure access by emergency vehicles maintained;
- v) Estimated number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
- w) Measures for agreeing the details and locations of any temporary on-site storage of stockpiled earthworks arisings.

The construction of the Development shall thereafter be carried out in accordance with the approved Construction Environment Management Plan for that part of the development unless otherwise approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety, protecting the health and amenity of the local community and in the interests of wildlife and habitats in accordance with the aims of Policies DEV1, DEV23, DEV25 and DEV26 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policy Bick17 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Landscape and Ecological Management Plan (LEMP)

12. Prior to the commencement of the first phase of development a site-wide Landscape and Ecological Management Plan (sLEMP) shall be submitted to and approved in writing by the local planning authority. The sLEMP will be an overarching strategy document for the whole site, which describes the vision, strategic objectives, key management principles and broad approximate locations for the management of key landscape, ecological and arboricultural

features of the site. The sLEMP shall be consistent with the relevant principles set out in Chapters XXX of the Environmental Statement (ref xxx), the Green Infrastructure Parameter Plan (ref. xxx) and Section 5.2 of the Allocation-Wide Design Code (rev. AB).

No development shall take place on a particular phase until a Landscape and Ecological Management Plan (LEMP) for that phase has been submitted to and approved in writing by the Local Planning Authority. The LEMP shall be consistent with the principles of the sLEMP and shall include:

- a) A description and evaluation of important landscape and habitat features to be retained, created, and managed thereafter;
- b) Details of the aims and objectives of ongoing management, including ecological trends and constraints on the site that might influence management;
- c) A management work programme, including an annual work plan capable of being rolled forward over a 10-year period. This shall demonstrate how the aims and objectives will be achieved, including details of ongoing monitoring, and set out how remedial measures will be agreed and implemented if required; and
- d) Details of the management body or organisation responsible for implementation of the LEMP.

Any amendments to any approved sLEMP or LEMP shall be submitted to and agreed in writing with the local planning authority.

The LEMP shall thereafter be implemented in accordance with the approved details (including any subsequent approved amendments).

Reason: In the interests of the retention, protection and enhancement of landscape, wildlife, and features of biological interest, in accordance with Joint Local Plan Policies SPT12, DEV23, DEV25 & DEV26 and Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034. A pre-commencement condition is required to ensure that the landscape and ecological management is acceptable and measures in place before development begins.

Retained Tree and Hedgerow Protection during Construction

13. No part of the Development within a phase, sub-phase, or development parcel shall take place until the existing tree(s) and hedgerow(s) to be retained within that phase, sub-phase, or development parcel have been protected in the following manner, unless otherwise previously agreed in writing by the Local Planning Authority:
 - a) Protective barriers shall be erected:
 - i.) around the retained tree(s) to a distance not less than a radius of 12 times the trunk diameter when measured at 1.5m above natural ground level (on the highest side) for single stemmed trees and for multi-stemmed trees 10 times the trunk diameter just above the root flare.
 - i. around retained hedgerows, ensuring that those barriers are sited outside of the root protection areas for those hedgerows.
 - b) The barriers shall comply with the specification set out in British Standard BS5837:2012 'Trees in Relation to Construction – Recommendations' that is steel mesh panels at least 2.3m tall securely fixed to a scaffold pole framework with the uprights driven into

the ground a minimum of 0.6m depth and braced with additional scaffold poles between the barrier and the tree[s] at a minimum spacing of 3m.

- c) The barriers shall be erected before any equipment, machinery or materials are brought onto the site for the purposes of development and / or demolition and shall be maintained until all equipment, machinery and surplus material has been removed from the site.
- d) Nothing shall be stored or placed within the areas protected by the barriers erected in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavations be made, without the written consent of the Local Planning Authority.

Reason: To ensure the continued health of retained trees and in the interests of the visual amenity of the area in accordance with the aims of Policies DEV23 and DEV28 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Hard and Soft Landscaping Details

14. Applications for approval of landscape reserved matters shall include the following details:

- a) The trees and hedges to be retained and removed, where applicable.
- b) Hard Landscaping works including the proposed site levels or contours, pedestrian and cycle access and circulation areas, hard surfacing materials and any boundary treatments including fences and walls.
- c) Soft landscaping details shall include planting plans, written specifications (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers and densities where appropriate;
- d) A Schedule of Maintenance, including watering and the control of competitive weed growth, for a minimum period of five years from first planting;
- e) Implementation timetable.

The Landscaping Scheme should be in general accordance with the principles identified in the Green Infrastructure Parameter Plan Ref. 26734 RG-M-94 Rev. H, Section 3.5 of the Design and Access Statement Rev N, Section 5 of the Allocation Wide Design Code, Rev. AB and any relevant approved Neighbourhood Design Code unless otherwise agreed in writing by the local planning authority.

Reason: In the interests of enhancing and conserving the character and visual amenity of the area in accordance with the aims of Policies DEV23 and DEV28 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Implementation and Maintenance of Approved Landscape Proposals

15. All hard and soft landscape works within a Phase shall be carried out in accordance with the approved details and any subsequent amendments that have been agreed in writing with the local planning authority.

All planting, seeding, or turfing comprised in the approved details of landscaping shall be carried out within a Phase as provided for in the approved implementation timetable pursuant to condition 14.

Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variations.

Reason: To assimilate the development into the landscape and to safeguard the appearance and character of the area.

REASON: To ensure a satisfactory standard of appearance of the development in the interests of the visual amenities of the area in accordance with the aims of Policies DEV23, DEV28 and PLY44 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policy Bick01 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Biodiversity Net Gain

16. Prior to the commencement of development, a site-wide framework biodiversity gain strategy to show how a biodiversity net gain will be achieved across the development, based on Defra Metric 2.0, shall be submitted to, and approved by the local planning authority.

Prior to the commencement of any phase of the development, a biodiversity gain plan for that phase of development which accords with the approved site-wide framework biodiversity gain strategy for the development, shall be submitted and approved by the local planning authority.

Any subsequent changes to the approved details shall be submitted to and approved in writing by the Local Planning Authority, on the basis that any changes shall still ensure a biodiversity net gain will be achieved across the development.

The development shall be implemented and maintained in accordance with the approved details (including any subsequent approved changes).

Reason: To ensure there is a net gain of biodiversity having regard to the aims of Policies DEV26 and PLY44 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and guidance contained within the NPPF Section 15.

Energy

17. No part of the Development shall take place in a particular phase, sub-phase, or development parcel until proposals for an Energy Strategy within that phase, sub-phase, or development parcel, which is consistent with the principles established by the Energy Statement (Ref: PBA 38295/3015/01, September 2019), has been submitted to and approved in writing by the Local Planning Authority. Development of the phase, sub-phase or development parcel shall thereafter be carried out in accordance with that approved Energy Strategy, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the development contributes toward delivering a low carbon future and supports the Plan Area target to halve 2005 levels of carbon emissions by 2034 in accordance with the aims of Policies PLY44, SPT1, SPT2, DEV32 and DEV33 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and the Plymouth and South West Devon Climate Emergency Planning Statement (November 2022).

EV Charging

18. Prior to the commencement of development on a phase, a scheme for the installation of Electric Vehicle charging infrastructure for that phase shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include the specification of the ducting infrastructure and charging facilities and a plan showing the locations of the ducting infrastructure and charging facilities for residential and non-residential uses and appropriate public locations (including the Mobility Hubs) to be delivered within that phase. Development of that phase shall be carried out as approved before the residential and non-residential buildings on that phase are first occupied and the public locations are opened for use.

Reason: In the interests of air quality and sustainability in accordance with the aims of Policy DEV32 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034 and the Plymouth and South West Devon Joint Local Plan Supplementary Planning Document (Adopted July 2020).

Waste Strategy

19. No part of the development within a phase, sub-phase, or development parcel hereby permitted shall take place until a detailed Waste Strategy/ Waste Audit Statement for that phase, sub-phase, or development parcel is submitted to and approved by the Local Planning Authority. The Detailed Waste Strategy/ Waste Audit Statement shall follow the principles of the Framework Pre-Construction Site Waste Management Plan (PBA Ref 38295-3014: V1.0, October 2019) and provide a strategy for:
- a) how sustainable management of the waste materials during construction, including demolition, excavation, storage, and construction processes; and
 - b) how waste will be handled, stored, and moved during the operational phase of the development, when the development is occupied, including measures to control the use, sorting, storage and collection of waste material and recycling from residential and commercial uses on site.

The development for each phase, sub-phase, or development parcel, shall thereafter be carried out in full accordance with the agreed Detailed Waste Strategy.

Reason: To minimise and manage waste in accordance with the aims of Policy DEV31 of the Plymouth and South West Devon Local Plan 2014 – 2034 and Policy W4 of the Devon Waste Plan 2011 - 2031.

Contaminated Land Intrusive Investigation Scheme

20. No part of the Development within a phase, sub-phase, or development parcel hereby permitted shall take place until a scheme of intrusive investigation for that phase, sub-phase, or development parcel in order to characterise the type, nature and extent of any contamination present, the risks to receptors and to inform the remediation strategy proposals shall be documented as a report undertaken by a competent person and in

accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11' and shall be submitted to and approved in writing by the Local Planning Authority. No development shall take place unless the Local Planning Authority has given its written approval that it is satisfied that the risk from contamination has been adequately characterised as required by this condition.

Reason: To ensure that any ground and water contamination is adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV2 the Plymouth and South West Devon Joint Local Plan 2014-2034

Contaminated Land Remediation Scheme

21. If contamination is found in any phase, sub-phase, or development parcel by undertaking the work carried out under condition 20, prior to the commencement of the development within that phase, sub-phase, or development parcel hereby permitted, a scheme of remediation and/or monitoring to ensure the site is suitable for its proposed use shall be prepared by a competent person and in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land contamination, CLR 11' and shall be submitted to and approved in writing by the Local Planning Authority. No further development shall take place within that phase, sub-phase, or development parcel until the Local Planning Authority has given its written approval of the scheme of remediation and/or monitoring required by this condition.

Reason: To ensure that any ground and water contamination is adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV 2 of the Plymouth and South West Devon Joint Local Plan 2014-2034

Verification of Remedial Works for Contamination

22. If remedial works have been identified in any phase, sub-phase, or development parcel by condition 20, the development shall not be occupied until the remedial works have been carried out on that particular phase, sub-phase, or development parcel in accordance with the scheme approved under condition 21. A verification report that demonstrates the effectiveness of the remediation carried out on that particular phase, sub-phase, or development parcel must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that any ground and water contamination is adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV2 of the Plymouth and South West Devon Joint Local Plan 2014-2034

Unexpected Contamination

23. If during development of any phase, sub-phase or development parcel, contamination not previously identified is found to be present at the site, no further development within that phase, sub-phase, or development parcel shall be carried out until full details of a remediation strategy detailing how the unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. Thereafter the remediation strategy shall be carried out in accordance with the approved details.

Reason: To ensure that any ground and water contamination is identified and adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use, to comply with Policy DEV2 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Archaeology

24. No development shall take place within any phase, sub-phase, or development parcel until a written scheme of archaeological investigation (WSI) for that phase, sub-phase, or development parcel consisting of a written scheme of investigation, and a timetable for that work has been submitted to and approved in writing by the Local Planning Authority. The WSI and the timetable for those works shall include details for the completion of the post investigation assessment as well as its analysis, publication, and dissemination of results, including archive deposition.

The WSI shall have regard to the results of the archaeological desk-based assessment (EDP Ref: EDP3488/r018e, dated September 2019), geophysical survey (Headland Archaeology Ref: WOPL17) and trial trench evaluation (Ref: 17701), as well as the principles outlined on Plan Refs. EDP3488/d089.

The Development shall thereafter be carried out at all times in accordance with the approved written scheme of investigation and timetable or other such details as may be subsequently agreed in writing by the Local planning Authority.

Reason: To ensure that an appropriate record is made of archaeological evidence that may be affected by the Development, in accordance with the aims of Policy DEV21 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and paragraph 205 of the National Planning Policy Framework, A pre-commencement condition is required to ensure that the archaeological works are agreed prior to the commencement of preparatory and/or construction works to avoid the disturbance of archaeological deposits

Accesses and Off-Site Highway Improvements

25. The Woolwell Pedestrian Cycle Improvements shall be completed generally in accordance with Stantec drwg ref. 38295/5501/ 102 Rev C (those on Towerfield Drive north of the pedestrian and cycle crossing facility only) and 38295/5501/ 103 Rev C and 38295/5501/104 rev C prior to the occupation of any dwelling accessed from the Pick Pie Drive Site Access.

Reason: To provide infrastructure improvements to encourage sustainable travel choices to be made in accordance with the aims of Policies SPT2, PLY44 and Strategic Objective S04 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

26. Prior to the occupation of any dwelling hereby approved, the Towerfield Road site access shall be completed generally in accordance with Stantec drwg. Ref. 38295/5501/105 rev. D.

Reason To ensure that adequate access and associated facilities are available for the vehicular and pedestrian traffic to and from the site in accordance with the aims of Policies SPT2, PLY44 and Strategic Objective S04 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

27. The improvements to Cycle Facilities in Roborough Village shall be completed generally in accordance with Stantec drwg ref. 38295/5501/ 107 Rev C prior to the occupation of any dwelling.

Reason: To provide improvements to encourage sustainable travel choices to be made in accordance with the aims of Policy DEV29 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

28. No dwelling, commercial facility or community facility shall be accessed via the Pick Pie Drive Access until the Pick Pie Drive Site Access has been completed generally in accordance with Stantec Drwg. Ref. 38295/5501/ 101 Rev C.

Reason: To ensure that adequate access and associated facilities are available for the vehicular and pedestrian traffic to and from the site, including during construction in accordance with the aims of Policy DEV29 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Bickleigh Down Road Intersection

29. Prior to the occupation of any dwelling hereby approved, the improvements and reconfiguration of Bickleigh Down Road shall be completed generally in accordance with Stantec drwg. ref. 38295/5501/105 rev. D.

Reason: To address how traffic flows along Bickleigh Down Road and Blackeven Hill are proposed to be managed through the build-out of development construction in accordance with the aims of Policy DEV29 of the Plymouth and South West Devon Joint Local Plan 2014-2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Highway infrastructure Serving Dwellings

30. No dwelling shall be occupied until:

- a) The spine road and cul-de-sac carriageway including the vehicle turning head serving that property has been laid out, kerbed, drained, and constructed up to and including base course level, the ironwork set to base course level and the sewers, manholes and service crossings completed;
- b) The street, footways, and footpaths (or section(s) thereof) which provide that property with direct pedestrian routes to an existing highway maintainable at public expense have been constructed up to and including base course level;
- c) The vehicular visibility splays applicable to that property have been laid out to their final level;
- d) The street lighting for street, footways, and footpaths (or section(s) thereof) applicable to that property has been erected and is operational;
- e) The car and cycle parking and any other vehicular access facility required for that property by this permission has/have been completed;
- f) The verge and service margin and vehicle crossing on the road frontage of that property has been completed with the highway boundary properly defined;

- g) The street nameplates for the spine road and cul-de-sac for that property has been provided and erected.

Reason: In the interests of public amenity and road safety in accordance with the aims of Policies DEV1, DEV20 and DEV29 of the Plymouth and South West Devon Joint Local Plan 2014 – 2034 and Policies Bick17 and Bick19 of the Bickleigh Parish Neighbourhood Plan 2016-2034.

Estate Roads

31. Prior to the construction of any proposed estate road, cycleways, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, road maintenance/vehicle overhang margins, embankments, visibility splays, accesses, car parking and street furniture their details shall be submitted to and approved by the Local Planning Authority. They shall be constructed in accordance with the approved details unless otherwise agreed in writing. For this purpose, the details to be submitted comprise plans and sections indicating, as appropriate, the design, layout, levels, gradients, materials, and method of construction shall be submitted to the Local Planning Authority

Reason: To ensure that adequate information is available for the proper consideration of the detailed proposals.

WtTG Grampian Condition

32. No dwellings hereby approved shall be occupied until the planned A386 highway capacity improvement scheme between Woolwell and The George has first been implemented and is operational. Alternatively, no dwellings shall be occupied unless an alternative highway capacity Improvement scheme or other measures to avoid impacts becoming severe has been submitted to and approved in writing by the Local Planning Authority and has first been implemented as approved and is operational. For the avoidance of doubt reference to “the planned highway capacity improvement scheme between Woolwell and The George” is a reference to Phases 1 (north of Woolwell Roundabout) and 2 (Woolwell Roundabout) of a highway capacity improvement scheme approved by Plymouth City Council on 18.3.2024 and any such reference includes any modifications to Phases 1 and 2 that may be approved and implemented prior to the planned highway capacity improvement scheme becoming operational.

Reason: To ensure adequate capacity improvements have been delivered on the A386 to accommodate an additional quantum of housing development to avoid severe impacts on the A386 in accordance with the aims of Policy PLY44 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Employment and Skills

33. Prior to the commencement of development, an Employment and Skills Plan for the construction phases, shall be submitted to and approved in writing by the local planning authority. Any amendments to the approved Employment and Skills Plan shall be submitted to and approved in writing by the local planning authority. The development shall thereafter proceed in accordance with the approved details.

The Employment and Training Plan shall have regard to the National Skills Academy/Plymouth City Council’s Guidance for Developers and Contractors: Maximising

Employment and Skills Opportunities through Local Planning and Procurement (October 2016) and include details of how:

- a) Measures where it is reasonably possible to promote and advertise local jobs and skills training opportunities during the construction phase;
- b) Measures by which recruitment of contractors and sub-contractors from the local area to work on the Development during the construction phase, where it is reasonable possible, will be encouraged and advertised; and
- c) Measures where the recruitment of employees from the local area to work on the development during the construction phase will be encouraged and advertised.

Reason: To ensure a commensurate growth in the area's employment through investment in job skills, in accordance with the aims of Policy DEV19 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Surface Water Drainage

34. Applications for the approval of reserved matters for the permanent (and where applicable any temporary) detailed surface water drainage design for that phase, sub-phase or development parcel shall include the following information:
- a) A detailed drainage design based upon the approved Flood Risk Assessment, Land At Towerfield Drive, part of the 'Land at Woolwell' JLP Allocation (Policy PLY44)' Ref. 38295/4001 rev F dated October 2020;; and the results of the information submitted in relation to (b) below, and, for the avoidance of doubt, any drainage solutions or measures that rely on infiltration devices which are proposed to be in areas of shallow groundwater (as identified in said Ground Monitoring report) shall include measures to pipe or convey water into the strategic basins rather than directly into the ground;
 - b) Soakaway test results in accordance with BRE 365 at the proposed location and depth of the infiltration devices; groundwater monitoring results in line with our DCC groundwater monitoring policy; and evidence that there is a low risk of groundwater re-emergence downslope of the site from any proposed soakaways or infiltration basins;
 - c) A detailed drainage design using SuDS techniques including infiltration as well as the Simple Index Approach outlined in Tables 26.2 and 26.3 of the Ciria SuDS Manual C753 (or any superseding document), to address the following impacts on the water environment during construction (through the CEMP and/or surface water drainage strategy) and permanent operation:
 - i. Erosion/sediment transport;
 - ii. Chemical/pollution events;
 - iii. Alteration/interruption of surface water flows; and
 - iv. Alteration/interruption of groundwater flows;
 - d) Proposals for the adoption, management, and maintenance of the permanent surface water drainage system;
 - e) A plan indicating how exceedance flows will be managed at the site including no increase in risk of flooding to third parties) Detailed proposals for the management of surface water and silt run-off from the site during construction of the development hereby permitted.

No building within a phase, sub-phase or development parcel of the development hereby permitted shall be occupied until the detailed drainage design for that particular phase, sub-phase or development parcel has been implemented in accordance with the approved details under (a) - (e).

Thereafter, the approved drainage shall be retained, managed, and maintained in perpetuity in accordance with the approved details.

Reason: To ensure the proposed surface water drainage system will operate effectively and will not cause an increase in flood risk either on the site, adjacent land or downstream in accordance with the aims of Policy DEV35 of the Plymouth and South West Devon Local Plan 2014 – 2034, SuDS for Devon Guidance (2017) and NPPF Section 14. A pre-commencement is necessary to ensure that the proposed surface water drainage system is shown to be feasible before works begin to avoid redesign/unnecessary delays during construction when site layout is fixed.

Foul Water Drainage

35. First occupation of any dwelling, commercial unit or community infrastructure requiring foul drainage within a phase, sub phase or development parcel shall not take place until that phase's foul drainage is connected to the foul mains sewer.

All subsequent development within that phase shall similarly be connected to the mains foul network. In addition, no surface water connection shall be made to a combined sewer.

Reason – To ensure the details of the development are acceptable and help maximise capacity within the foul network in the interests of sustainability, pollution control and amenity in accordance with the aims of Policy DEV35 of the Plymouth and South West Devon Local Plan 2014 – 2034,

Substations/Utility Buildings and Structures

36. The location of all sub-stations and similar utility buildings or structures required by statutory undertakers and all other appropriate bodies shall be identified as part of the reserved matters and shall be located in suitably concealed and/or screened locations where they are not visually prominent.

Reason: In the interests of the character and visual amenities of the area in accordance with the aims of Policies PLY44 and DEV20 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

Undergrounding of services

37. All services shall be underground unless the latter are located internally within an approved building or details have first been submitted to and approved in writing by the Local Planning Authority.

Reason: To avoid clutter in the interests of visual amenity.

External Lighting

38. No external lighting of any development phase, sub-phase or development parcel shall be installed until a detailed lighting scheme (DLS) including details of any external lighting/

security lighting/ floodlighting including the design, position, orientation, and any screening of the lighting, has first been submitted to and approved in writing by the Local Planning Authority. The DLS shall be informed by the approved Lighting Assessment (LA) by Stantec (Ref: 38295/3016 | Rev: 03 | Date: November 2019) and shall be accompanied by a modelled lux contour plan of external lighting to allow suitable lighting levels to be provided near sensitive receptors identified in the LA and the Dark Corridors and Zones identified at Figure 28 of the approved Area Wide Design Code (rev. AB). The lighting shall be installed and maintained as approved.

With the exception of replacement lighting that accords with the approved details, no additional or replacement external lighting shall be installed near the identified sensitive receptors which exceed the levels in the lux contour plan without the written permission of the Local Planning Authority.

Reason: To avoid night time impacts on landscape character and visual amenities and to protect and enhance biodiversity in accordance with the aims of Policies DEV 1, Dev 20, DEV23, DEV25 and DEV26 of the Plymouth and South West Devon Joint Local Plan 2014-2034.

**Appendix F – Habitats Regulation Assessment for Land at Woolwell Ref
4184/19/OPA**



Final Habitats Regulations Assessment (subject to consultation with Natural England) – 18th January 2022

Habitats Regulations Assessment:

Application A (4185/19/ OPA) Outline application for provision of up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; new sport and playing facilities; new access points and vehicular, cycle and pedestrian links; strategic landscaping and attenuation basins; a primary substation and other associated site infrastructure. All matters reserved except for access.

Location: Land at Woolwell Part of the Land at Woolwell JLP Allocation (Policy PLY44)

January 2022

Habitats Regulations 2017 Stage 1: Habitats Regulations Assessment - Screening of likely significant effect on a European site	
1. Type of permission/activity:	Residential led mixed used development.
2. Application reference no:	Application A: 4185/19/OPA
3. Site address:	Land at Woolwell
4. Brief description of proposal:	<p>Application A: 4185/19/OPA Outline application for provision of up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; new sport and playing facilities; new access points and vehicular, cycle and pedestrian links; strategic landscaping and attenuation basins; a primary substation and other associated site infrastructure. All matters reserved except for access.</p> <p>This application is one of two applications (A and B) submitted together as part of Woolwell urban extension as allocated in the Plymouth and South Hams JLP Policy PLY44.</p> <p>Application B (4181/19/OPA) in an outline application for up to 360 dwellings and associated landscaping, new access points from Towerfield Drive and Pick Pie Drive and site infrastructure. All matters reserved except for access. Location: Land off Towerfield Drive Woolwell Part of the Land at Woolwell JLP Allocation (Policy PLY44).</p>

	<p>Applications A and B together provide of the order of 2000 new homes as part of the Woolwell urban extension</p>
<p>5. European site name(s), Qualifying Features and Conservation Objectives:</p>	<p>Based on the Plymouth and South Hams JLP HRA and Natural England response (dated 5th February 2020) it is agreed that all European Sites other than those listed below can be screened out at this stage due to distance or lack polluter pathways. Note that there are no other European Sites within 15km of the proposed development.</p> <p>Dartmoor SAC</p> <ul style="list-style-type: none"> - Wet heathland with cross-leaved heath - European dry heaths - Blanket bogs - Western acidic oak woodland - Southern damselfly - Atlantic salmon - Otter <p>South Dartmoor Woods SAC</p> <ul style="list-style-type: none"> - European dry heaths - Western acidic oak woodland <p>Plymouth Sound and Estuaries SAC</p> <ul style="list-style-type: none"> - Sandbanks which are slightly covered by sea water all the time - Estuaries - Mudflats and sandflats not covered by seawater at low tide - Large shallow inlets and bays - Reefs - Atlantic salt meadows - Shore dock - Allis shad <p>Tamar Estuaries Complex SPA</p> <ul style="list-style-type: none"> - Internationally important populations of Avocet and Little Egret <p><u>Conservation objectives</u> common to each site with regard to the natural habitats and/or species for which the site has been designated (“the Qualifying Features”) are listed below;</p> <p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p>

	<ul style="list-style-type: none"> - The extent and distribution of qualifying natural habitats and habitats of qualifying species; - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species; - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; - The populations of qualifying species; - The distribution of qualifying species within the site
<p>6. Ecological characteristics associated with the features (including those associated with the site, and information on general trends, issues or sensitivities associated with the features if available).</p>	<p>Dartmoor SAC</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Human intrusion/disturbance - Hydrological changes - Wildfire/arson - Air pollution (atmospheric nitrogen) - Water pollution - Overgrazing - Undergrazing - Invasive species - Change in land management <p><u>Effects from development (general)</u></p> <ul style="list-style-type: none"> - Increased recreational pressure associated with development – trampling, erosion and disturbance of wildlife - Increased air pollution from traffic (nitrogen deposition) - Introduction of invasive species <p>South Dartmoor Woods SAC</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Human intrusion/disturbance - Wildfire/arson - Air pollution (atmospheric nitrogen) - Water pollution - Invasive species <p><u>Effects from development (general)</u></p> <ul style="list-style-type: none"> - Increased recreational pressure associated with development – trampling and erosion - Increased air pollution from traffic (nitrogen deposition) - Introduction of invasive species <p>Plymouth Sound and Estuaries SAC</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Increased pressure for recreational moorings and facilities, port development, dredging - Sensitivity to oil pollution - Allis shad vulnerable to noise, vibration and degraded water quality <p><u>Effects from development (general)</u></p>

	<ul style="list-style-type: none"> - Increased physical damage from visitor and recreational pressure on shoreline habitats associated with new development - Increased recreational use and potential for oil pollution and disturbance of allis shad - Waterside development including coastal defences, boat ramps, pontoons - <p>Tamar Estuaries Complex SPA</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Disturbance to Avocet and Little Egret - Habitat loss - water quality, acid and nitrate deposition in important wetland areas <p><u>Effects from development (general)</u></p> <ul style="list-style-type: none"> - Increased recreational pressure associated with development - visual and noise disturbance of Avocet and Little Egret - Additional housing in vicinity of SAC increasing discharge of pollutants from wastewater treatment works (non-toxic contamination)
<p>7. Is this application necessary to the management of the site for nature conservation?</p>	<p>No</p>
<p>8. The identified ways in which the Qualifying Features of the European site could be affected by the proposal (as identified in the JLP HRA)</p>	<p>Dartmoor and South Dartmoor Woods SACs</p> <p>Increased visitor and recreational pressure from new residents associated with the proposed development. South Dartmoor Woods SAC at greater risk because the nearest component (Shaugh Prior Woods SSSI) is nearer (c.2.4km NE) and is a smaller area in which effects may be more concentrated. Dartmoor SAC is considered to be at lesser risk because the nearest component is more distant (c.6km E) and is a larger area in which effects may more dispersed.</p> <p>Air pollution impacts (i.e. from increased vehicle emissions) have been screened out based on the separation distances of the SACs from the nearest major roads, with Dartmoor SAC and South Dartmoor Woods SAC being c.5km and c.2.4km away respectively.</p> <p>Plymouth Sound and Estuaries SAC + Tamar Estuaries Complex SAC</p> <p>Increased visitor and recreational pressure (terrestrial and marine) from new residents associated with the proposed development (2.9km away)</p> <p>Water quality impacts (pollution of water courses feeding into the estuaries) during construction and operation of the proposed development. The site falls within the 'Lower River Plym' catchment which drains (over a distance of approximately 8km) into the</p>

	Plymouth Sound. These impacts are fully addressed at Section 15 of the submitted ES.
9. Assessment of risks without avoidance or reduction measures	<p>Dartmoor and South Dartmoor Woods SACs Increased recreational pressure could have direct (trampling) or indirect (disturbance) impacts on woodland and moorland habitats.</p> <p>Plymouth Sound and Estuaries SAC + Tamar Estuaries Complex SPA Increased recreational pressure could have direct (trampling) or indirect (pollution/disturbance) impacts on shoreline and marine habitats and disturb avocet and little egret activity within the shore and marine environments.</p> <p>Construction activities may increase sediment, hydrocarbon and heavy metal load in surface water runoff. During the operational phase increased traffic, domestic chemicals and a reduced vegetative cover may also increase the likelihood of contaminants entering the surface water runoff. These could have an indirect impact of decreasing water quality of downstream waterbodies including the Plymouth Sound and Estuaries SAC. (see ES Section 15)</p>
10. Conclusion of Screening stage (Is the proposal likely to have a significant effect 'alone' or 'in combination' on a European site?)	In the absence of consideration of mitigation measures, it is considered that the proposal is likely to have a significant effect in combination in respect of Dartmoor SAC and South Dartmoor Woods SAC as well as Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA (collectively referred to as the Plymouth Sound and Estuaries European Marine Site, or PSEEMS). An Appropriate Assessment of the proposed project is therefore necessary.
Stage 2: Habitats Regulations Assessment - Appropriate Assessment	
11. Assessment of effects taking account of avoidance or reduction measures included in the proposal	
<p>Relevant background information on recreational impacts extracted (text in italics) from JLP HRA (2018): https://www.plymouth.gov.uk/sites/default/files/UpdatedHabitatRegulationsAssessmentChangesAgreedStatementOfCommonGroundWithNaturalEngland.pdf</p> <p>Dartmoor SAC <i>"The Dartmoor SAC is in three main sections. The smaller eastern section covering Postbridge to Lettaford is 2,000ha. It is bisected by the B3213 on which are situated several car parks with much of the site under open access. There are a number of widely spaced footpaths and rights of way through the site. The northern section stretching from Two Bridges to just south of Okehampton is the largest at 13,800 ha. It is a remote site with few footpaths, although much is open access. It is used by the military for training and is closed on a number of days during the year. There are very few car parks at the periphery and there are no roads. The southern area covering 7,000 ha between Princetown and Ivybridge and includes the Stall Moor, Lee Moor and Penn Moor. There are no roads through the designated site although there is a long</i></p>	

distance trail and a number of rights of way. The nearest access point is Cadover Bridge, from where there is a 2km walk on rough tracks up onto the moor.

All of the Dartmoor SAC is in active management through Dartmoor National Park, and they have designated it either a 'Quiet Area' or an 'Area for Exploration and Tranquillity' in their Area Recreation Management Plan. The National Park Authority has a plan in place to promote other parts of Dartmoor as Areas of Heavy Recreation Use so are actively implementing management measures to avoid impacts on the Dartmoor SAC. The evidence suggest that most visitors do not venture more than a mile from their car and that also that visitor numbers have remained static."

The closest proposed development to this is at Woolwell, Derriford, and Newnham north of Plymouth, Tavistock and Okehampton.

South Dartmoor Woods SAC

"The South Dartmoor Woods SAC consists of a complex of sites. Sampford Spiney Woods is a steep sided valley along the River Walkham. There are minor roads only though the site and whilst there are some tracks, and a PRow does cross part of the site. Much of it is in private ownership and there is nothing to encourage access.

Shaugh Prior Woods lie 3km south east of Yelverton and consist of a steep sided valley. Whilst there are Rights of Way along the valley bottom, there are no visitor facilities on the site, although there is a small car park on the south west edge. The site is in active National Trust ownership and management and they do promote walking on the site."

Both Sites

"The Recreation and Access Strategy for Dartmoor (Dartmoor National Park, 2011) sets out the objective of ensuring that "everybody who wants to come and enjoy Dartmoor is able and confident to do so". The Dartmoor National Park Authority sets out to achieve this by ensuring that there is appropriate management in place to ensure that the right activities take place in the right places. This is achieved through the zonation of the park, with different parts being designated for different levels of use. Those areas designated as 'Areas of Heavy Recreation Use' are away from the designated sites, whilst the SACs are within areas designated either as 'Quiet areas – for wildlife havens and solitude where recreational infrastructure will be minimised' or 'Areas for Exploration and Tranquillity' where again there is minimal use as shown in Figure 12-3.

Both the Dartmoor SAC and the South Dartmoor Woods SAC are isolated, located away from the main 'honeypot areas', they are usually in remote areas and are further away from car parks that most people are prepared to walk.

Where honeypot sites are close, then car parking capacity is low, with little or no potential for expansion. All visitors are funnelled into the site on well signed footpaths and steep terrain encourages visitors to remain on the established paths.

Strategic Approach to Mitigation

"The major development centres include new sites for greenspace as part of the proposal in order to enable people to access the countryside close to where they live. In addition, a network of strategic greenspace sites also form part of the plan in order to deliver high quality sites for all kinds of recreation in order to provide an alternative to going to visiting the sensitive sites on Dartmoor."

12.3.10 - The strategic approach to greenspace provision in the Joint Plan area, combined with the choice of other sites available and the active management of Dartmoor National Park will avoid any impacts on the Dartmoor SAC or the Dartmoor Woods SAC.

PLY44: Woolwell sustainable urban extension and community park Land at Woolwell is allocated for comprehensive residential led mixed use development to provide a sustainable urban extension and a defined edge to the north of the city, including a new community park. Provision is made for in the order of 2,000 new homes (about 1,880 of which are anticipated to come forward within the plan period), with no occupation of new homes until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network:

4. Delivery of a new Community Park and will form part of the network of Strategic Greenspace sites. It will therefore need to be of a sufficient scale, design and quality and must be multifunctional in nature. The park must:

i. Meet the recreational needs of the new community to prevent an unacceptable impact on South Dartmoor Woods European Protected Site.

Woolwell urban extension is 2.4km from Shaugh Prior Woods, part of South Dartmoor Woods so there is a risk of increased recreational pressure arising from this development. However, the urban community park, combined with the links to the Plym Valley Strategic Greenspace will mean that pressures on the more remote Dartmoor sites is less likely as more suitable sites for recreation are provided close by.

Context for Plymouth Sound and Estuaries European Marine Site

JLP HRA (2018) - 12.8 PROPOSED AVOIDANCE / MITIGATION RECOMMENDATIONS

Recreational pressures of the types identified can be managed through a programme of measures which raise awareness and understanding of importance of a European site, change visitor behaviours, introduce management interventions to minimise the impacts and provide alternative spaces to encourage people to visit other less-sensitive areas. This approach has been successfully adopted in the Solent (Portsmouth City Council, 2017)⁷⁰ and in South East Devon (Liley, Hoskin, Lake, Underhill-Day, & Cruickshanks, 2013)⁷¹. In both of these areas local authorities have worked together to identify and deliver a single mitigation strategy for European sites funded through planning contributions. The Joint Local Plan proposes to use this method to build on the approach which was previously adopted by Plymouth as part of the Local Development Framework (Plymouth City Council, 2007)⁷² in order to reflect best practice emerging from areas such as Exe and the Solent and in line with advice from Natural England. In order to address the impacts arising from the increased recreational pressure, a single mitigation strategy will be agreed with Plymouth City Council, South Hams District Council and West Devon Borough Council and also with Cornwall Council and a mechanism for securing the funding through planning obligations will be set out and agreed in a Supplementary Planning Document (SPD). Using evidence from the Plymouth Sound and Tamar Estuaries Recreation Study (Marine Biological Association, 2017), a single mitigation strategy will identify the interventions required and the SPD will then set out the charge that will be applied to all new dwellings and tourist developments within a 'Zone of Charging' as set out in Policy SPT13 'European Protected Sites – mitigation of recreational impacts from development'.

In addition, there is a programme of strategic greenspace allocations which will ensure that the city is served by a network of attractive greenspaces for recreation, thereby providing alternative sites for activities which do not necessarily require waterfront access.

The Recreation Mitigation and Management Scheme for the Marine sites <http://www.plymouth-mpa.uk/wp-content/uploads/2019/11/Recreation-Mitigation-and-Management-Scheme.pdf> sets out the mitigation requirements and developer contributions. All mitigation and associated costs are clearly

<p>focused on mitigating impacts on marine based activities and the costs of these (see Appendix A of the RMMS). Significantly SANGs (Community Parks) are not included as part of the mitigation package in the RMMS. Critically, whilst Woolwell Community Park is likely to reduce the number of terrestrial visits to the Marine site it will not lead to a reduction in any of the mitigation costs identified in the RMMS and cannot be used as bespoke mitigation to justify reduced payments. It is, as the JLP HRA states, additional mitigation.</p>			
Aspect of project which will be potentially damaging	Avoidance and mitigation measures included in the proposal (and any additional measures required for inclusion in the proposal) at both Construction and Operational Phases	Secured by	Residual effects
Dartmoor Woods SAC and South Dartmoor Woods SAC			
<p>Increased visitor and recreational pressure associated with new residents associated with the proposed development.</p>	<p>As enshrined within JLP Policy PLY44 (which allocates the site in the order of 2,000 homes), the proposed development includes bespoke on-site mitigation designed to reduce off-site recreational impacts on sensitive sites in the surrounding area, targeted at South Dartmoor Woods SAC but also applicable to Dartmoor SAC. This bespoke mitigation is in the form of an over provision of public open space and useable green infrastructure (GI) within the development, including the community park. The extent of this over provision is summarised within Table A below.</p> <p>It must be noted that this over provision is part of a strategic approach agreed in the JLP HRA for the Woolwell urban extension. Table A below shows that Application A provides almost 18ha of useable GI in excess of policy requirements ensuring that even though Application B under provides, the strategic green space requirement is easily met for the site as a whole.</p> <p>In addition to the overall quantum of the GI, its layout in respect of the development is such that local residents will be able follow significant uninterrupted routes through natural greenspace on foot or bicycle, thereby significantly reducing the incentive to travel by car to more distant locations within the National Park. The community park is to be designed and managed specifically as a secluded natural area of open grassland interspersed with existing hedgerows and trees and separated physically and visually from the development by the existing former tramway and new woodland planting.</p> <p>As shown on Figure A below (which is based on Figure 57 on page 62 of the DAS for Application A), a potential circular route over 4km in length can</p>	<p>s106 and conditions – see Section 13 for details</p>	<p>None/negligible</p>

	<p>be completed by following the Indicative Leisure Route through the Community Park, connected green space running south, west and then back up to and along the tramway. This would be an attractive route for dog walking, running and other forms of outdoor recreation for new residents as well as the existing population of Woolwell, and therefore an attractive alternative to a longer trip elsewhere for the same purposes. The proposals include parking facilities for people outside of the immediate area to easily access the new Community Park.</p> <p>The risk of adverse impacts on the National Park is further reduced by the proximity of the Plym Valley Strategic Greenspace, directly adjacent to the proposed development site, which provides residents with another alternative destination to the National Park for recreational activities such as walking and cycling via the existing permissive paths and the National Cycle Network Route 27. For example, local residents seeking longer distance cycle routes beyond those provided within the site can connect with the West Devon Way (National Cycle Network Route 27) by exiting the site via Blackeven Hill on the northern boundary and traveling 1.7km through Bickleigh along New Road (a signed cycle route). Also, every effort will be made to secure the delivery of a shorter direct off-road link to NCN 27.</p> <p>A s106 will secure appropriate timing of delivery (yet to be agreed) of a Community Park and other public open space as set out in this HRA.</p>		
Plymouth Sound and Estuaries European Marine Site			
Water quality impacts	<p>Construction Phase:</p> <p>Prior to construction, a Construction Environmental Management Plan (CEMP) will be submitted to and agreed with the LPA. The CEMP will detail pollution prevention measures to be employed and will also include the construction of the attenuation areas to manage surface water runoff (in the locations of the post-development drainage strategy) first alongside enabling works.</p> <p>Operational Phase</p> <p>The Surface Water Drainage Strategy for the site is established in the submitted FRA, The strategy incorporates a</p>	Condition	None/ negligible

	<p>sustainable drainage systems (SuDS) which intercepts pollutants and sediments through filtration or settlement to maintain or improve the quality of surface water discharging via infiltration. The approach is agreed in principle with the LLFA (Devon County Council).</p> <p>Outline permission will be subject to a condition requiring drainage for each phase to follow the principles of the approved drainage strategy set out in the FRA.</p>	Condition	None/negligible
<p>Increased visitor and recreational pressure (terrestrial and marine) associated from new residents associated with the proposed development.</p>	<p>Operational Phase</p> <p>The Plymouth and South West Devon JLP Authorities have published a PSEEMS Recreation Mitigation and Management Scheme¹, which is stated to have been designed to address recreational effects of new housing in the Plymouth and South West Devon Joint Local Plan (JLP) and neighbouring local authority areas. It is intended that the Scheme is to be funded by a roof tax on new dwellings within the 12.3km Zone of Influence (ZOI) around the PSEEMS based on visitor survey evidence, however, it also states:</p> <p><i>“That developer contribution will be required for every net additional dwelling within 12.3 kilometres of the boundaries of the Plymouth Sound and Estuaries EMS Charging Zone (see Figure 2) unless the developer can demonstrate to the satisfaction of the local planning authority and Natural England, it will provide alternative 'bespoke mitigation' which will fully mitigate the recreational impact of the development.”</i></p> <p>As set out above the JLP HRA refers to the mitigation strategy (RMMS) and also to additional strategic greenspace providing alternative sites for activities which do not require waterfront access.</p> <p>The developer agrees to provide the appropriate mitigation identified by the current RMMS, in accordance with the requisite CIL122 tests set out in The Community Infrastructure Levy Regulations 2010 (as amended).</p>	s106 and conditions – see Section 13 for details	None/negligible
<p>Additional Information Regarding Proposed Mitigation</p>			

¹ Plymouth Sound European Marine Sites Recreation Mitigation and Management Scheme. Plymouth City Council November 2019.

Table A: Summary of accessible POS/GI provision

ACCESSIBLE OPEN SPACE REQUIRED (Ha)				
Type	Policy Requirements*			
	Per 1,000 pop/n	Whole site (2,000 homes)**	Appl/n A (1,640 homes)**	Appl/n B (360 homes)**
Amenity Green Space	1.44	6.48	5.31	1.17
Parks and Gardens	1.15	5.18	4.24	0.93
Natural/Semi-Natural Green Space	2.50	11.25	9.23	2.03
Urban Local Nature Reserves	1.00	4.50	3.69	0.81
Playing pitches	0.79	3.56	2.92	0.64
Outdoor Sports Facilities	0.0951	0.43	0.35	0.08
Play Spaces	0.08	0.36	0.30	0.06
Allotments	0.15	0.68	0.55	0.12
Total	7.2051	32.42	26.59	5.84
ACCESSIBLE OPEN SPACE PROVIDED (Ha)				
Type	Whole site	Appl/n A	Appl/n B	
Existing Woodland	3.32	3.32	-	
Existing Disused Tramway	3.39	3.39	-	
Other Green Infrastructure (non-sport, mostly informal, incl allotments)	25.8	23.57	2.23	
Formal Sports and Play Areas	4.58	4.58	-	
Community Park (demarcated separately on the GI parameter plan to secure informal character of specific areas)	12.82	12.82	-	
Sub-total	49.91	47.68	2.23	
NON-ACCESSIBLE OPEN SPACE PROVIDED (Ha)				
Type				
Open Space not in Policy categories: includes non-accessible buffer planting, areas of existing woodland and hedgerow corridor	17.91	16.40	1.51	
PROVIDED VS REQUIRED (Ha) (+ = over provision, - = under provision)				
Accessible Open Spaces	+17.49	+21.09	-3.61	
Accessible and Non-Accessible Open Spaces	+35.40	+37.49	-2.10	
<p>*Ref. JLP Policy SPT 2 Spatial Strategy –</p> <p>**Assumed average occupancy rate of 2.25</p> <p>As summarised above the whole site provides over 17ha of useable open space in excess of policy requirements. Application A provides 21ha of useable GI in excess of policy requirements. Application B alone under provides 3.61 ha, and therefore relies upon Application A to meet its basic open space requirements and effectively to provide ‘off-site’ mitigation in respect of recreational impacts on European Sites.</p> <p>Further information on the design principles and typologies for the public open space is provided in Section 4 of the Allocation Wide Design Code.</p>				

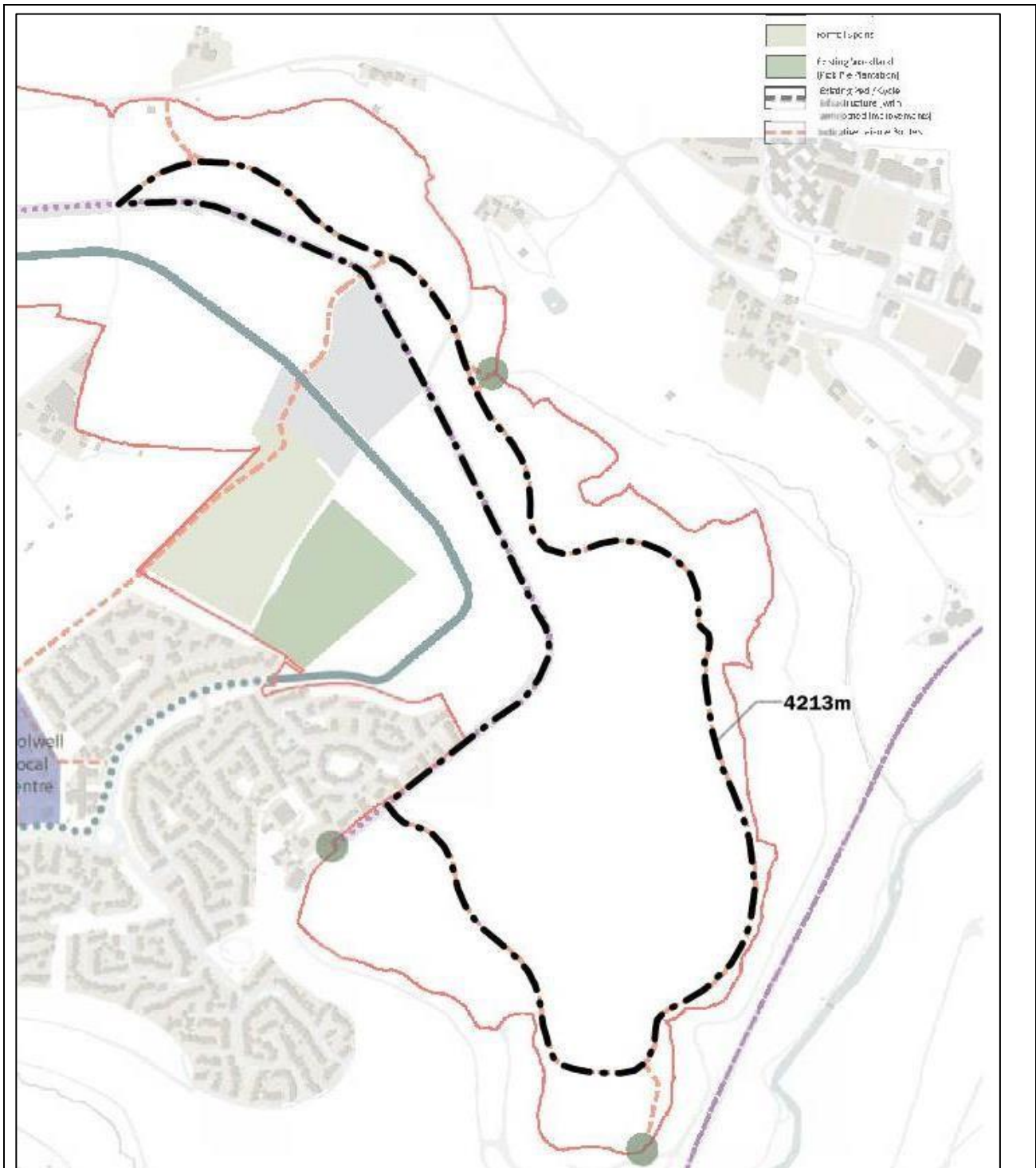


Figure A: Illustrative example of c.4.2km circular walking route through natural greenspace

12. Does the proposal have potential for in-combination effects with other plans or projects individually or severally

Dartmoor SAC and South Dartmoor Woods SAC

The impacts from increased visitor and recreational pressure identified within this HRA (and as reflected within the HRA of the JLP) is an in-combination impact - i.e. it is unlikely that any one development would have a likely significant effect alone, however, without the mitigation outlined above, when developments within Plymouth, South Hams, West Devon and Cornwall are considered in-combination there is potential for a likely significant effect.

Plymouth Sound and Estuaries European Marine Site

	<p>The impacts from increased visitor and recreational pressure identified within this HRA (and the HRA of the JLP) is an in- combination impact - i.e. it is unlikely that any one development would have a likely significant effect alone, however, when developments within Plymouth, South Hams, West Devon and Cornwall are considered in-combination there is potential for a likely significant effect.</p>
<p>Conclusion</p>	
<p>13. List of mitigation measures and safeguards to be covered by s106 planning obligations and/or conditions</p>	<p>The applicant has agreed in principle to the following:</p> <ol style="list-style-type: none"> 1. s106 obligation to provide the appropriate RMMS mitigation at agreed triggers (exact wording to be agreed), in accordance with the requisite CIL122 tests set out in the Community Infrastructure Levy Regulations 2021 (as amended). <p>Additional strategic greenspace will be provided through:</p> <ol style="list-style-type: none"> 2. Planning condition or s106 obligation to secure the appropriate triggers for the phased delivery of Community Park and other public open space in accordance with development phasing; 3. s106 obligation to secure the mechanism for the future management of Community Park and other public open space. 4. Planning conditions requiring an Open Space Strategy and/or a Soft Landscape Scheme containing details of the design the public open space. 5. Planning conditions requiring a Landscape and Ecological Management Plan (LEMP) containing details of the implementation and long-term management of the informal public open space. Requirement for monitoring of the success of the delivery/mitigation and measures for redress. 6. Requirement for monitoring of the success of the delivery/mitigation and measures for redress.
<p>14. Will the proposed development have an adverse effect on integrity?</p>	<p>It is concluded that, based on existing available evidence, the proposal will not, either alone or in-combination, have an adverse effect on the integrity of South Dartmoor Woods SAC or Dartmoor SAC subject to the measures listed in part 13 being secured by planning obligations and conditions.</p>

**Appendix G – Habitats Regulation Assessment for Land at Towerfield Drive Ref
4181/19/OPA**

Habitats Regulations Assessment:

Application B (4181/19/OPA) Outline application for up to 360 dwellings and associated landscaping, new access points from Towerfield Drive and Pick Pie Drive and site infrastructure. All matters reserved except for access.

Location: Land off Towerfield Drive Woolwell Part of the Land at Woolwell JLP Allocation (Policy PLY44)

January 2022

Habitats Regulations 2017 Stage 1: Habitats Regulations Assessment - Screening of likely significant effect on a European site	
1. Type of permission/activity:	Residential led mixed used development.
2. Application reference no:	Application B: 4181/19/OPA
3. Site address:	Land off Towerfield Drive Woolwell Part of the Land at Woolwell
4. Brief description of proposal:	<p>Application B (4181/19/OPA) Outline application for up to 360 dwellings and associated landscaping, new access points from Towerfield Drive and Pick Pie Drive and site infrastructure. All matters reserved except for access.</p> <p>Location: Land off Towerfield Drive Woolwell Part of the Land at Woolwell JLP Allocation (Policy PLY44)</p> <p>This application is one of two applications (A and B) submitted together as part of Woolwell urban extension as allocated in the Plymouth and South Hams JLP Policy PLY44.</p> <p>Application A (4185/19/ OPA) Outline application for provision of up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floorspace (A1-A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; new sport and playing facilities; new access points and vehicular, cycle and pedestrian links; strategic landscaping and attenuation basins; a primary substation and other associated site infrastructure. All matters reserved except for access.</p>

	Applications A and B together provide of the order of 2000 new homes as part of the Woolwell urban extension
5. European site name(s), Qualifying Features and Conservation Objectives:	<p>Based on the Plymouth and South Hams JLP HRA and Natural England response (dated 5th February 2020) it is agreed that all European Sites other than those listed below can be screened out at this stage due to distance or lack polluter pathways. Note that there are no other European Sites within 15km of the proposed development.</p> <p>Dartmoor SAC</p> <ul style="list-style-type: none"> - Wet heathland with cross-leaved heath - European dry heaths - Blanket bogs - Western acidic oak woodland - Southern damselfly - Atlantic salmon - Otter <p>South Dartmoor Woods SAC</p> <ul style="list-style-type: none"> - European dry heaths - Western acidic oak woodland <p>Plymouth Sound and Estuaries SAC</p> <ul style="list-style-type: none"> - Sandbanks which are slightly covered by sea water all the time - Estuaries - Mudflats and sandflats not covered by seawater at low tide - Large shallow inlets and bays - Reefs - Atlantic salt meadows - Shore dock - Allis shad <p>Tamar Estuaries Complex SPA</p> <ul style="list-style-type: none"> - Internationally important populations of Avocet and Little Egret <p><u>Conservation objectives</u> common to each site with regard to the natural habitats and/or species for which the site has been designated (“the Qualifying Features”) are listed below;</p> <p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> - The extent and distribution of qualifying natural habitats and habitats of qualifying species;

	<ul style="list-style-type: none"> - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species; - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; - The populations of qualifying species; - The distribution of qualifying species within the site
<p>6. Ecological characteristics associated with the features (including those associated with the site, and information on general trends, issues or sensitivities associated with the features if available).</p>	<p>Dartmoor SAC</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Human intrusion/disturbance - Hydrological changes - Wildfire/arson - Air pollution (atmospheric nitrogen) - Water pollution - Overgrazing - Undergrazing - Invasive species - Change in land management <p><u>Effects from development (general)</u></p> <ul style="list-style-type: none"> - Increased recreational pressure associated with development – trampling, erosion and disturbance of wildlife - Increased air pollution from traffic (nitrogen deposition) - Introduction of invasive species <p>South Dartmoor Woods SAC</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Human intrusion/disturbance - Wildfire/arson - Air pollution (atmospheric nitrogen) - Water pollution - Invasive species <p><u>Effects from development (general)</u></p> <ul style="list-style-type: none"> - Increased recreational pressure associated with development – trampling and erosion - Increased air pollution from traffic (nitrogen deposition) - Introduction of invasive species <p>Plymouth Sound and Estuaries SAC</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Increased pressure for recreational moorings and facilities, port development, dredging - Sensitivity to oil pollution - Allis shad vulnerable to noise, vibration and degraded water quality <p><u>Effects from development (general)</u></p> <ul style="list-style-type: none"> - Increased physical damage from visitor and recreational pressure on shoreline habitats associated with new development - Increased recreational use and potential for oil pollution and disturbance of allis shad

	<ul style="list-style-type: none"> - Waterside development including coastal defences, boat ramps, pontoons - <p>Tamar Estuaries Complex SPA</p> <p><u>Site vulnerabilities</u></p> <ul style="list-style-type: none"> - Disturbance to Avocet and Little Egret - Habitat loss - water quality, acid and nitrate deposition in important wetland areas <p><u>Effects from development (general)</u></p> <ul style="list-style-type: none"> - Increased recreational pressure associated with development - visual and noise disturbance of Avocet and Little Egret - Additional housing in vicinity of SAC increasing discharge of pollutants from wastewater treatment works (non-toxic contamination)
<p>7. Is this application necessary to the management of the site for nature conservation?</p>	<p>No</p>
<p>8. The identified ways in which the Qualifying Features of the European site could be affected by the proposal (as identified in the JLP HRA)</p>	<p>Dartmoor and South Dartmoor Woods SACs</p> <p>Increased visitor and recreational pressure from new residents associated with the proposed development. South Dartmoor Woods SAC at greater risk because the nearest component (Shaugh Prior Woods SSSI) is nearer (c.2.4km NE) and is a smaller area in which effects may be more concentrated. Dartmoor SAC is considered to be at lesser risk because the nearest component is more distant (c.6km E) and is a larger area in which effects may more dispersed.</p> <p>Air pollution impacts (i.e. from increased vehicle emissions) have been screened out based on the separation distances of the SACs from the nearest major roads, with Dartmoor SAC and South Dartmoor Woods SAC being c.5km and c.2.4km away respectively.</p> <p>Plymouth Sound and Estuaries SAC + Tamar Estuaries Complex SAC</p> <p>Increased visitor and recreational pressure (terrestrial and marine) from new residents associated with the proposed development (2.9km away)</p> <p>Water quality impacts (pollution of water courses feeding into the estuaries) during construction and operation of the proposed development. The site falls within the 'Lower River Plym' catchment which drains (over a distance of approximately 8km) into the Plymouth Sound. These impacts are fully addressed at Section 15 of the submitted ES.</p>

<p>9. Assessment of risks without avoidance or reduction measures</p>	<p>Dartmoor and South Dartmoor Woods SACs Increased recreational pressure could have direct (trampling) or indirect (disturbance) impacts on woodland and moorland habitats.</p> <p>Plymouth Sound and Estuaries SAC + Tamar Estuaries Complex SPA Increased recreational pressure could have direct (trampling) or indirect (pollution/disturbance) impacts on shoreline and marine habitats and disturb avocet and little egret activity within the shore and marine environments.</p> <p>Construction activities may increase sediment, hydrocarbon and heavy metal load in surface water runoff. During the operational phase increased traffic, domestic chemicals and a reduced vegetative cover may also increase the likelihood of contaminants entering the surface water runoff. These could have an indirect impact of decreasing water quality of downstream waterbodies including the Plymouth Sound and Estuaries SAC. (see ES Section 15)</p>
<p>10. Conclusion of Screening stage (Is the proposal likely to have a significant effect 'alone' or 'in combination' on a European site?)</p>	<p>In the absence of consideration of mitigation measures, it is considered that the proposal is likely to have a significant effect in combination in respect of Dartmoor SAC and South Dartmoor Woods SAC as well as Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA (collectively referred to as the Plymouth Sound and Estuaries European Marine Site, or PSEEMS). An Appropriate Assessment of the proposed project is therefore necessary.</p>
<p>Stage 2: Habitats Regulations Assessment - Appropriate Assessment</p>	
<p>11. Assessment of effects taking account of avoidance or reduction measures included in the proposal</p>	
<p>Relevant background information on recreational impacts extracted (text in italics) from JLP HRA (2018): https://www.plymouth.gov.uk/sites/default/files/UpdatedHabitatRegulationsAssessmentChangesAgreedStatementOfCommonGroundWithNaturalEngland.pdf</p> <p>Dartmoor SAC</p> <p><i>“The Dartmoor SAC is in three main sections. The smaller eastern section covering Postbridge to Lettaford is 2,000ha. It is bisected by the B3213 on which are situated several car parks with much of the site under open access. There are a number of widely spaced footpaths and rights of way through the site. The northern section stretching from Two Bridges to just south of Okehampton is the largest at 13,800 ha. It is a remote site with few footpaths, although much is open access. It is used by the military for training and is closed on a number of days during the year. There are very few car parks at the periphery and there are no roads. The southern area covering 7,000 ha between Princetown and Ivybridge and includes the Stall Moor, Lee Moor and Penn Moor. There are no roads through the designated site although there is a long distance trail and a number of rights of way. The nearest access point is Cadover Bridge, from where there is a 2km walk on rough tracks up onto the moor.</i></p>	

All of the Dartmoor SAC is in active management through Dartmoor National Park, and they have designated it either a 'Quiet Area' or an 'Area for Exploration and Tranquillity' in their Area Recreation Management Plan. The National Park Authority has a plan in place to promote other parts of Dartmoor as Areas of Heavy Recreation Use so are actively implementing management measures to avoid impacts on the Dartmoor SAC. The evidence suggest that most visitors do not venture more than a mile from their car and that also that visitor numbers have remained static."

The closest proposed development to this is at Woolwell, Derriford, and Newnham north of Plymouth, Tavistock and Okehampton.

South Dartmoor Woods SAC

"The South Dartmoor Woods SAC consists of a complex of sites. Sampford Spiney Woods is a steep sided valley along the River Walkham. There are minor roads only though the site and whilst there are some tracks, and a PRow does cross part of the site. Much of it is in private ownership and there is nothing to encourage access.

Shaugh Prior Woods lie 3km south east of Yelverton and consist of a steep sided valley. Whilst there are Rights of Way along the valley bottom, there are no visitor facilities on the site, although there is a small car park on the south west edge. The site is in active National Trust ownership and management and they do promote walking on the site."

Both Sites

"The Recreation and Access Strategy for Dartmoor (Dartmoor National Park, 2011) sets out the objective of ensuring that "everybody who wants to come and enjoy Dartmoor is able and confident to do so". The Dartmoor National Park Authority sets out to achieve this by ensuring that there is appropriate management in place to ensure that the right activities take place in the right places. This is achieved through the zonation of the park, with different parts being designated for different levels of use. Those areas designated as 'Areas of Heavy Recreation Use' are away from the designated sites, whilst the SACs are within areas designated either as 'Quiet areas – for wildlife havens and solitude where recreational infrastructure will be minimised' or 'Areas for Exploration and Tranquillity' where again there is minimal use as shown in Figure 12-3.

Both the Dartmoor SAC and the South Dartmoor Woods SAC are isolated, located away from the main 'honeypot areas', they are usually in remote areas and are further away from car parks that most people are prepared to walk.

Where honeypot sites are close, then car parking capacity is low, with little or no potential for expansion. All visitors are funnelled into the site on well signed footpaths and steep terrain encourages visitors to remain on the established paths.

Strategic Approach to Mitigation

"The major development centres include new sites for greenspace as part of the proposal in order to enable people to access the countryside close to where they live. In addition, a network of strategic greenspace sites also form part of the plan in order to deliver high quality sites for all kinds of recreation in order to provide an alternative to going to visiting the sensitive sites on Dartmoor."

12.3.10 - The strategic approach to greenspace provision in the Joint Plan area, combined with the choice of other sites available and the active management of Dartmoor National Park will avoid any impacts on the Dartmoor SAC or the Dartmoor Woods SAC.

PLY44: *Woolwell sustainable urban extension and community park Land at Woolwell is allocated for comprehensive residential led mixed use development to provide a sustainable urban extension and a defined edge to the north of the city, including a new community park. Provision is made for in the order of 2,000 new homes (about 1,880 of which are anticipated to come forward within the plan period), with no occupation of new homes until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network:*

4. Delivery of a new Community Park and will form part of the network of Strategic Greenspace sites. It will therefore need to be of a sufficient scale, design and quality and must be multifunctional in nature. The park must:

i. Meet the recreational needs of the new community to prevent an unacceptable impact on South Dartmoor Woods European Protected Site.

Woolwell urban extension is 2.4km from Shaugh Prior Woods, part of South Dartmoor Woods so there is a risk of increased recreational pressure arising from this development. However, the urban community park, combined with the links to the Plym Valley Strategic Greenspace will mean that pressures on the more remote Dartmoor sites is less likely as more suitable sites for recreation are provided close by.

Context for Plymouth Sound and Estuaries European Marine Site

JLP HRA (2018) - 12.8 PROPOSED AVOIDANCE / MITIGATION RECOMMENDATIONS

Recreational pressures of the types identified can be managed through a programme of measures which raise awareness and understanding of importance of a European site, change visitor behaviours, introduce management interventions to minimise the impacts and provide alternative spaces to encourage people to visit other less-sensitive areas. This approach has been successfully adopted in the Solent (Portsmouth City Council, 2017)⁷⁰ and in South East Devon (Liley, Hoskin, Lake, Underhill-Day, & Cruickshanks, 2013)⁷¹. In both of these areas local authorities have worked together to identify and deliver a single mitigation strategy for European sites funded through planning contributions. The Joint Local Plan proposes to use this method to build on the approach which was previously adopted by Plymouth as part of the Local Development Framework (Plymouth City Council, 2007)⁷² in order to reflect best practice emerging from areas such as Exe and the Solent and in line with advice from Natural England. In order to address the impacts arising from the increased recreational pressure, a single mitigation strategy will be agreed with Plymouth City Council, South Hams District Council and West Devon Borough Council and also with Cornwall Council and a mechanism for securing the funding through planning obligations will be set out and agreed in a Supplementary Planning Document (SPD). Using evidence from the Plymouth Sound and Tamar Estuaries Recreation Study (Marine Biological Association, 2017), a single mitigation strategy will identify the interventions required and the SPD will then set out the charge that will be applied to all new dwellings and tourist developments within a 'Zone of Charging' as set out in Policy SPT13 'European Protected Sites – mitigation of recreational impacts from development'.

In addition, there is a programme of strategic greenspace allocations which will ensure that the city is served by a network of attractive greenspaces for recreation, thereby providing alternative sites for activities which do not necessarily require waterfront access.

The Recreation Mitigation and Management Scheme for the Marine sites <http://www.plymouth-mpa.uk/wp-content/uploads/2019/11/Recreation-Mitigation-and-Management-Scheme.pdf> sets out the mitigation requirements and developer contributions. All mitigation and associated costs are clearly focused on mitigating impacts on marine based activities and the costs of these (see Appendix A of the RMMS). Significantly SANGs (Community Parks) are not included as part of the mitigation package in the RMMS. Critically, whilst Woolwell Community Park is likely to reduce the number of terrestrial visits to the Marine site it will not lead to a reduction in any of the mitigation costs identified in the RMMS and

cannot be used as bespoke mitigation to justify reduced payments. It is, as the JLP HRA states, additional mitigation.			
Aspect of project which will be potentially damaging	Avoidance and mitigation measures included in the proposal (and any additional measures required for inclusion in the proposal) at both Construction and Operational Phases	Secured by	Residual effects
Dartmoor Woods SAC and South Dartmoor Woods SAC			
Increased visitor and recreational pressure associated with new residents associated with the proposed development.	<p>Enshrined within JLP Policy PLY44 (which allocates the site in the order of 2,000 homes), is a requirement for bespoke on-site mitigation designed to reduce off-site recreational impacts on sensitive sites in the surrounding area, targeted at South Dartmoor Woods SAC but also applicable to Dartmoor SAC. This bespoke mitigation is in the form of an over provision of public open space and useable green infrastructure (GI) within the development, including the community park. The extent of this over provision is summarised within Table A below.</p> <p>It must be noted that this over provision is part of a strategic approach agreed in the JLP HRA for the Woolwell urban extension. Table A below shows that Application A provides almost 18ha of useable GI in excess of policy requirements ensuring that even though Application B under provides, the strategic green space requirement is easily met for the site as a whole.</p> <p>In addition to the overall quantum of the GI, its layout in respect of the development is such that local residents will be able follow significant uninterrupted routes through natural greenspace on foot or bicycle, thereby significantly reducing the incentive to travel by car to more distant locations within the National Park. The community park is to be designed and managed specifically as a secluded natural area of open grassland interspersed with existing hedgerows and trees and separated physically and visually from the development by the existing former tramway and new woodland planting.</p> <p>As shown on Figure A below (which is based on Figure 57 on page 62 of the DAS for Application A), a potential circular route over 4km in length can be completed by following the Indicative Leisure Route through the Community Park, connected green space running south, west and then back up to and along the tramway. This would be an attractive route for dog walking, running and other</p>	s106 and conditions – see Section 13 for details	None/-negligible

	<p>forms of outdoor recreation for new residents as well as the existing population of Woolwell, and therefore an attractive alternative to a longer trip elsewhere for the same purposes. The proposals include parking facilities for people outside of the immediate area to easily access the new Community Park.</p> <p>The risk of adverse impacts on the National Park is further reduced by the proximity of the Plym Valley Strategic Greenspace, directly adjacent to the proposed development site, which provides residents with another alternative destination to the National Park for recreational activities such as walking and cycling via the existing permissive paths and the National Cycle Network Route 27. For example, local residents seeking longer distance cycle routes beyond those provided within the site can connect with the West Devon Way (National Cycle Network Route 27) by exiting the site via Blackeven Hill on the northern boundary and traveling 1.7km through Bickleigh along New Road (a signed cycle route). Also, every effort will be made to secure the delivery of a shorter direct off-road link to NCN 27.</p> <p>The master plan shows that while walking and cycling links will form part of App B, none of the Community Park/Green infrastructure identified above will be on App B land, the vast majority being on App A land.</p> <p>A s106 will secure appropriate timing of delivery (yet to be agreed) of a Community Park and other public open space as set out in this HRA. This will need to incorporate a mechanism for the phasing/timing of when this development comes forward, which cannot be in advance of the required delivery of the Community Park/GI on App A land – see section 13 below.</p>		
Plymouth Sound and Estuaries European Marine Site			
Water quality impacts	<p>Construction Phase:</p> <p>Prior to construction, a Construction Environmental Management Plan (CEMP) will be submitted to and agreed with the LPA. The CEMP will detail pollution prevention measures to be employed and will also include the construction of the attenuation areas to manage surface water runoff (in the locations of the post-development</p>	Condition	None/ negligible

	<p>drainage strategy) first alongside enabling works.</p> <p>Operational Phase</p> <p>The Surface Water Drainage Strategy for the site is established in the submitted FRA, The strategy incorporates a sustainable drainage systems (SuDS) which intercepts pollutants and sediments through filtration or settlement to maintain or improve the quality of surface water discharging via infiltration. The approach is agreed in principle with the LLFA (Devon County Council).</p> <p>Outline permission will be subject to a condition requiring drainage for each phase to follow the principles of the approved drainage strategy set out in the FRA.</p>	Condition	None/ negligible
<p>increased visitor and recreational pressure (terrestrial and marine) associated from new residents associated with the proposed development.</p>	<p>Operational Phase</p> <p>The Plymouth and South West Devon JLP Authorities have published a PSEEMS Recreation Mitigation and Management Scheme¹, which is stated to have been designed to address recreational effects of new housing in the Plymouth and South West Devon Joint Local Plan (JLP) and neighbouring local authority areas. It is intended that the Scheme is to be funded by a roof tax on new dwellings within the 12.3km Zone of Influence (ZOI) around the PSEEMS based on visitor survey evidence, however, it also states:</p> <p><i>“That developer contribution will be required for every net additional dwelling within 12.3 kilometres of the boundaries of the Plymouth Sound and Estuaries EMS Charging Zone (see Figure 2) unless the developer can demonstrate to the satisfaction of the local planning authority and Natural England, it will provide alternative 'bespoke mitigation' which will fully mitigate the recreational impact of the development.”</i></p> <p>As set out above the JLP HRA refers to the mitigation strategy (RMMS) and also to additional strategic greenspace providing alternative sites for activities which do not require waterfront access.</p>	s106 and conditions – see Section 13 for details	None/ negligible

¹ Plymouth Sound European Marine Sites Recreation Mitigation and Management Scheme. Plymouth City Council November 2019.

	The developer agrees to provide the appropriate mitigation identified by the current RMMS, in accordance with the requisite CIL122 tests set out in The Community Infrastructure Levy Regulations 2010 (as amended). See below for further assessment of this issue.		
--	---	--	--

Additional Information Regarding Proposed Mitigation

Table A: Summary of accessible POS/GI provision

ACCESSIBLE OPEN SPACE REQUIRED (Ha)				
Type	Policy Requirements*			
	Per 1,000 pop/n	Whole site (2,000 homes)**	Appl/n A (1,640 homes)**	Appl/n B (360 homes)**
Amenity Green Space	1.44	6.48	5.31	1.17
Parks and Gardens	1.15	5.18	4.24	0.93
Natural/Semi-Natural Green Space	2.50	11.25	9.23	2.03
Urban Local Nature Reserves	1.00	4.50	3.69	0.81
Playing pitches	0.79	3.56	2.92	0.64
Outdoor Sports Facilities	0.0951	0.43	0.35	0.08
Play Spaces	0.08	0.36	0.30	0.06
Allotments	0.15	0.68	0.55	0.12
Total	7.2051	32.42	26.59	5.84
ACCESSIBLE OPEN SPACE PROVIDED (Ha)				
Type	Whole site	Appl/n A	Appl/n B	
Existing Woodland	3.32	3.32	-	
Existing Disused Tramway	3.39	3.39	-	
Other Green Infrastructure (non-sport, mostly informal, incl allotments)	25.8	23.57	2.23	
Formal Sports and Play Areas	4.58	4.58	-	
Community Park (demarcated separately on the GI parameter plan to secure informal character of specific areas)	12.82	12.82	-	
Sub-total	49.91	47.68	2.23	
NON-ACCESSIBLE OPEN SPACE PROVIDED (Ha)				
Type	Whole site	Appl/n A	Appl/n B	
Open Space not in Policy categories: includes non-accessible buffer planting, areas of existing woodland and hedgerow corridor	17.91	16.40	1.51	
PROVIDED VS REQUIRED (Ha) (+ = over provision, - = under provision)				
Accessible Open Spaces	+17.49	+21.09	-3.61	
Accessible and Non-Accessible Open Spaces	+35.40	+37.49	-2.10	

*Ref. JLP Policy SPT 2 Spatial Strategy –

**Assumed average occupancy rate of 2.25

As summarised above the whole site provides over 17ha of useable open space in excess of policy requirements. Application A provides 21ha of useable GI in excess of policy requirements. Application B alone under provides 3.61 ha, and therefore relies upon Application A to meet its basic open space

requirements and effectively to provide 'off-site' mitigation in respect of recreational impacts on European Sites.

Further information on the design principles and typologies for the public open space is provided in Section 4 of the Allocation Wide Design Code.

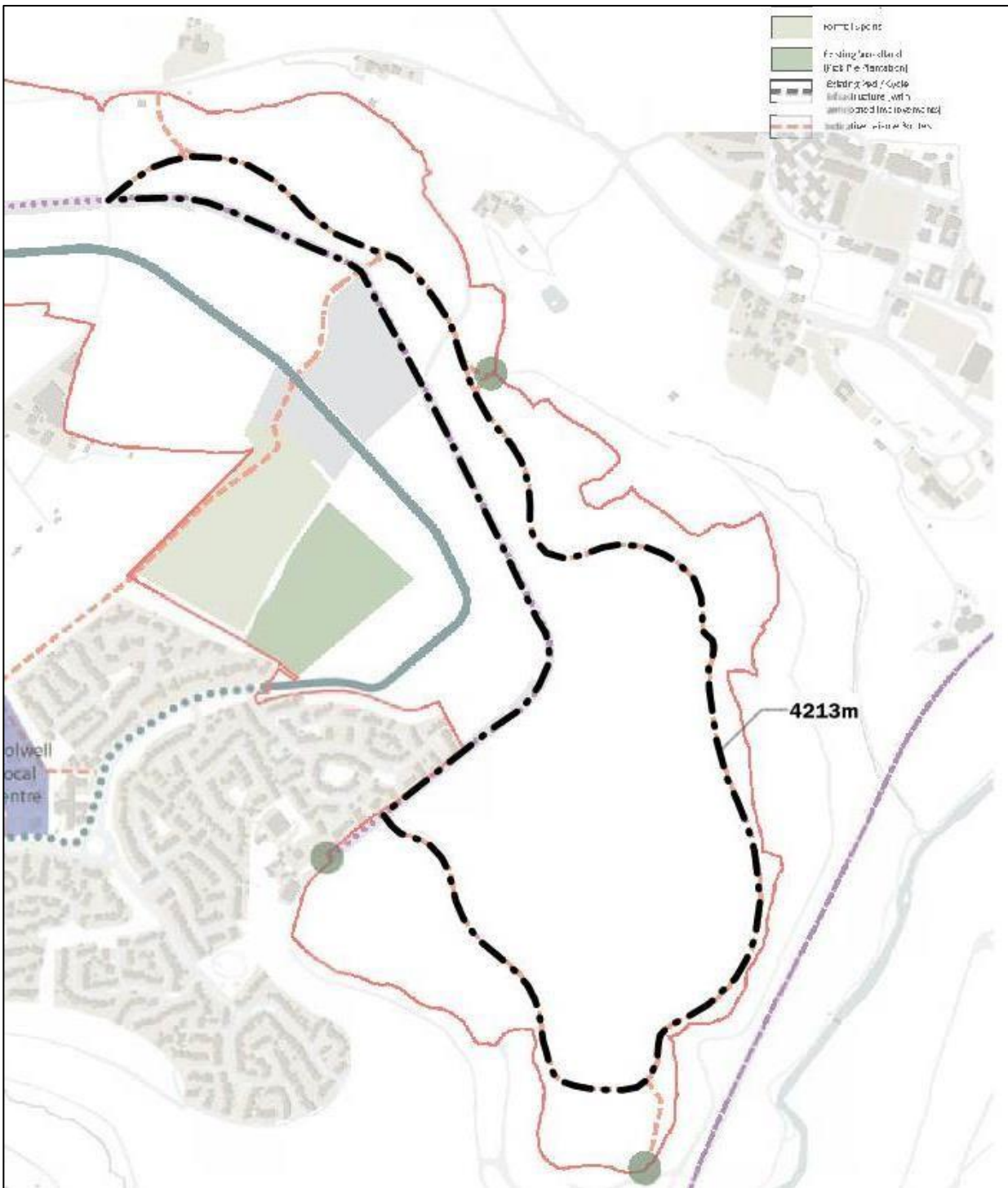


Figure A: Illustrative example of c.4.2km circular walking route through natural greenspace

12. Does the proposal have potential for in-combination effects with other plans or projects individually or severally

Dartmoor SAC and South Dartmoor Woods SAC

The impacts from increased visitor and recreational pressure identified within this HRA (and as reflected within the HRA of the JLP) is an in-combination impact - i.e. it is unlikely that any one development would have a likely significant effect alone, however,

	<p>without the mitigation outlined above, when developments within Plymouth, South Hams, West Devon and Cornwall are consider in-combination there is potential for a likely significant effect.</p> <p>Plymouth Sound and Estuaries European Marine Site The impacts from increased visitor and recreational pressure identified within this HRA (and the HRA of the JLP) is an in-combination impact - i.e. it is unlikely that any one development would have a likely significant effect alone, however, when developments within Plymouth, South Hams, West Devon and Cornwall are considered in-combination there is potential for a likely significant effect.</p>
Conclusion	
<p>13. List of mitigation measures and safeguards to be covered by s106 planning obligations and/or conditions</p>	<p>The applicant has agreed in principle to the following:</p> <ol style="list-style-type: none"> 1. s106 obligation to provide the appropriate RMMS mitigation at agreed triggers (exact wording to be agreed), in accordance with the requisite CIL122 tests set out in the Community Infrastructure Levy Regulations 2021 (as amended). <p>Additional strategic greenspace will be provided through:</p> <ol style="list-style-type: none"> 2. Planning condition or s106 obligation to secure the appropriate triggers for the phased delivery of Community Park and other public open space in accordance with development phasing; 3. s106 obligation to secure the mechanism for the future management of Community Park and other public open space. 4. Planning conditions requiring an Open Space Strategy and/or a Soft Landscape Scheme containing details of the design the public open space. 5. Planning conditions requiring a Landscape and Ecological Management Plan (LEMP) containing details of the implementation and long-term management of the informal public open space. Requirement for monitoring of the success of the delivery/mitigation and measures for redress. <p>Requirement for monitoring of the success of the delivery/mitigation and measures for redress.</p>
<p>14. Will the proposed development have an adverse effect on integrity?</p>	<p>It is concluded that, based on existing available evidence, the proposal will not, either alone or in-combination, have an adverse effect on the integrity of South Dartmoor Woods SAC or Dartmoor SAC subject to the measures listed in part 13 being secured by planning obligations and conditions.</p>

Appendix H - Glossary

Acronym	Definition
AC	Asbestos Cement
AH	Affordable Housing
AIA	Arboricultural Impact Assessment
AOD	Above Ordnance Datum
ATE	Active Travel England
AWDC	Allocation Wide Design Code
BNG	Biodiversity Net Gain
BPNP	Bickleigh Parish Neighbourhood Plan
CAs	Character Areas
CCAs	Climate Change Allowances
CDA	Critical Drainage Area
CEMP	Construction Environmental Management Plan
CEPS	Climate Emergency Planning Statement
CIL	Community Infrastructure Levy
CP	Community Park
CPOs	Compulsory Purchase Orders
DAS	Design and Access Statement
DCC	Devon County Council
DfE	Department for Education
DfT	Department for Transport
DNP	Dartmoor National Park
DNPA	Dartmoor National Park Authority
EA	Environment Agency
EIA	Environmental Impact Assessment
ELF	Extremely Low Frequency
EMFs	Electromagnetic Fields
ES	Environmental Statement
EV	Electric Vehicle
FRA	Flood Risk Assessment
FTP	Framework Travel Plan
GFA	Gross Floor Area
GI	Green Infrastructure
HDT	Housing Delivery Test
HoTs	Heads of Terms
HP	High Pressure
HRA	Habitats Regulations Assessment
ICB	Integrated Care Board

Acronym	Definition
JLP	Joint Local Plan
LEMPs	Landscape and Ecological Management Plans
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
LRN	Local Road Network
LUF	Levelling Up Fund
LV	Low Voltage
LVIA	Landscape and Visual Impact assessment
ManCo	Management Company
MHCLG	Ministry of Housing, Communities and Local Government
MP	Medium Pressure
MUGA	Multi-Use Games Area
NCN	National Cycle Network
NDCs	Neighbourhood Design Codes
NE	Natural England
NGED	National Grid Electricity Distribution
NGR	Northern Gateway Roundabout
NH	National Highways
NHS	National Health Service
NPPF	National Planning Policy Framework
OSSR	Open Space, Sport and Recreation
PARFC	Plymouth Argam Rugby Football Club
PCC	Plymouth City Council
POC	Points of Connection
PPA	Plymouth Policy Area
PPD	Pick Pie Drive
PPG	Planning Practice Guidance
PPs	Parameter Plans
Pre-app	Pre-application
PSED	Public Sector Equality Duty
PT	Public Transport
RMMS	Recreation and Mitigation Management Scheme
RMs	Reserved Matters
SAC	Special Areas of Conservation
SAGE	Scientific Advisory Group for Emergencies
SEN	Special Education Needs
SHDC	South Hams District Council
SPA	Special Protection Areas

Acronym	Definition
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
SWW	South West Water
TA	Transport Assessment
TD	Towerfield Drive
TTVPA	Thriving Towns and Villages Policy Area
TVNL	Tamar Valley National Landscape
UF	Urban Fringe
UHP	University Hospitals Plymouth
uPVC	Unplasticized Polyvinyl Chloride
VA	Viability Assessment
WDBC	West Devon Borough Council
WSI	Written Scheme of Investigation
WtTG	Woolwell to The George
WWU	Wales & West Utilities

Appendix I - Application Documents

Application A:

Initial Submission

Application Form

Site Location Plan 26734 RG-M-01 rev V

Allocation Wide Illustrative Plan 26734.RG.M.71 rev L

Site and EIA Boundary Plan 26734.RG.M.102 rev A

Section 106 Boundary Plan 26734.RG.M.103 rev A

Planning Statement BRE.16.9004 v5

Statement of Community Involvement

Transport Assessment 38295 v3

Sustainability Statement 38295-3002 rev4

Energy Statement 38295/3004 rev04

Lighting Assessment 38295-3001 rev07

Utilities and Foul drainage Appraisal 38295.5506 V8

Environmental Statement Volume 1 – Main Statement 16.9004

Environmental Statement Volume 2 – Technical Appendices list

Environmental Statement Volume 3 – Non-technical Statement

Landscape Long Sections 31-36 edp3488.d069.A

Revised Submission

Summary of Changes Letter App A

Illustrative Master Plan App A 26734.RG.M.104 rev C

Design and Access Statement App A rev AB

Allocation Wide Design Code rev AB

Parameter Plan – Land Use 26734-RG-M-61 rev S

Parameter Plan – Density 26734-RG-M-62 rev S

Parameter Plan – Green Infrastructure 26734-RG-M-63 revV

Parameter Plan – Building Heights 26734-RG-M-64 rev S

Parameter Plan – Access 26734-RG-M-65 rev Z

Draft S106 Heads of Terms App A

Flood Risk Assessment App A 38295/4001 revK.v2

Groundwater Monitoring Review – July 2022 38295 Rev01

Framework Travel Plan App A 38295/5501 rev A

Pick Pie Drive Site Access 38295/5501/101 rev C

Woolwell Pedestrian-Cycle Improvements 38295/5501/102 rev C

Woolwell Pedestrian-Cycle Improvements 38295/5501/103 rev C

Woolwell Pedestrian-Cycle Improvements 38295/5501/104 rev C

Proposed Cycle Facilities for Roborough Village 38295/5501/107 rev C

Proposed New Access Roundabout with Shared Foot/Cycleway – General Arrangement 38295/5501/110.revD

Proposed New Access Roundabout with Shared Foot/Cycleway – Cycleway Contours and String Label Plan 38295/5501/120.revC

Proposed New Access Roundabout with Shared Foot/Cycleway – Engineering Layout 38295/5501/170.revD

Proposed New Access Roundabout with Shared Foot/Cycleway – Drainage Layout 38295/5501/500.revD

Environmental Impact Assessment App A Technical Note: EIA 003A

Planning Report: Summary Response to On-Site Matters – Application A P20-0153

Planning Technical Note: Provisions for Traveller Sites P20-0153 TN 001

Planning Technical Note: Open Space and Play Space Requirements P20-0153 TN 002

Planning Technical Note: Revised NPPF July 2021 P20-0153 TN 003

Flooding Technical Note 004: LLFA Application Response and Stantec Responses 38295/4001 TN 004

Ecology Response to issues raised by County Ecologist on 06/07/2020

Ecology Response to issues raised by County Ecologist in 03/2021

Linear Habitat Plan edp3488_d083a

Updated BIA Calculations – Hedgerows as Linear App A and B v1

Updated BIA Calculations – Hedgerows as Linear App A v1

Updated BIA Calculations – Hedgerows as Areas App A v2

Updated BIA Calculations – Hedgerows as Areas App A and B v2

Landscape Technical Note concerning potential impact on setting of DNP edp3488_r041a

Highways Technical Note 001: Phase 1 Transport Strategy Proposals 38295 TN_5501_001

Highways Technical Note 002: Responses to SHDC/DCC Transport Assessment Comments 38295TN_5502_002

Highways Technical Note 003: Bickleigh Down Road / Blackeven Hill – Primary Street Principles 38295_TN003

Design: Barton Willmore Response to SHDC Comments on AWDC

Design: Barton Willmore Response to SHDC Comments on App A DAS

Ecology Technical Note (updated Extended Phase 1) edp3488_r042

Instructions to Counsel Paul G Tucker KC to advise

Opinion of Counsel Paul Tucker KC and Philip Robson dated 19/07/2023

Highways & Transportation Update Letter App A

Flood Risk and Drainage: Email correspondence between Pegasus, LLFA and Stantec – 17/09/2020 to 30/10/2020.

Landscape: Letter supporting EDP Tech Note edp3488_r041a in response to the DNPA comments 004_KF_SHDC_P20-0153_110920

Highways: Email response to queries on Stantec Technical Notes 001 and 002

Planning Response to Hitchin, Foot Anstey Letter dated 19/04/2022 P20-0153

Planning Response re. Open Space, Sport and Recreation 017_KF_SHDC_P20-0153_200522

Planning Response re. First Homes 018_KF_SHDC_P20-0153_200522

Application B:

Initial Submission

Application Form App B

Site Location Plan App B 26734 RG-M-98 rev C

Allocation Wide Illustrative Plan 26734 RG-M-71 rev L

Site and EIA Boundary Plan 26734 RG-M-102 rev A

Planning Statement BRE.16.9012 v3

Statement of Community Involvement 10.2019

Transport Assessment App B 38295

Sustainability Statement App B 38295/3013 rev02

Energy Statement 38295/3015 rev01

Lighting Assessment 38295/3016 rev03

Environmental Statement Volume 1 - Main Statement 19.9012.02

Environmental Statement Volume 2 - Technical Appendices list

Environmental Statement Volume 3 - Non-technical Statement

Landscape Long Sections 31-36 edp3488_d069a

Revised Submission

Summary of Changes Letter App B

Illustrative Master Plan 26734 RG-M-107 rev B

Design and Access Statement App B rev N

Allocation Wide Design Code rev AB

Parameter Plan - Land Use 26734 RG-M-92 rev K

Parameter Plan – Density 26734 RG-M-93 rev G

Parameter Plan – Green Infrastructure 26734 RG-M-94 rev H

Parameter Plan – Building Heights 26734 RG-M-95 rev H

Parameter Plan – Access 26734 RG-M-96 rev L

Draft S106 Heads of Terms App B

Flood Risk Assessment App B 38295/4001 rev F

Framework Travel Plan App B 38295/5501 rev A

Pick Pie Drive Site Access 38295/5501/101 rev C

Woolwell Pedestrian-Cycle Improvements 38295/5501/102 rev C

Woolwell Pedestrian-Cycle Improvements 38295/5501/103 rev C

Woolwell Pedestrian-Cycle Improvements 38295/5501/104 rev C

Proposed Cycle Facilities for Roborough Village 38295/5501/107 rev C

Towerfield Drive / Bickleigh Down Road Junction Arrangement 38295/5501/105 rev D

Towerfield Drive Site Access Arrangement 38295/5501/106 rev C

Environmental Impact Assessment App B Technical Note: EIA003B

Planning Report: Summary Response to On-Site Matters App B P20-0153

Planning Technical Note: Traveller Sites P20-0153 TN 001

Planning Technical Note: Open Space and Play Space P20-0153 TN 002

Planning Technical Note: NPPF July 2021 P20-0153 TN 003

LLFA Application Response: Stantec Technical Note App B 38295/4001 TN005

Ecology Response to issues raised by County Ecologist on 06/07/2020

Ecology Response to issues raised by County Ecologist in 03/2021

Linear Habitat Plan edp3488_d083a

Updated BIA Calculations - Hedgerows as Linear App A and B v1

Updated BIA Calculations - Hedgerows as Linear App B v1

Updated BIA Calculations - Hedgerows as Areas App B v2

Updated BIA Calculations - Hedgerows as Areas App A and B v2

Landscape Technical Note concerning potential impact on setting of DNP edp3488_r041a

Highways Technical Note 001: Phase 1 Transport Strategy Proposals 38295 TN_5501_001

Highways Technical Note 002: Responses to SHDC/DCC Transport Assessment Comments 38295TN_5502_002

Highways Technical Note 003: Bickleigh Down Road / Blackeven Hill - Primary Street Principles 38295_TN003

Design: Barton Willmore Response to SHDC Comments on AWDC

Design: Barton Willmore Response to SHDC Comments on App B DAS

Ecology Technical Note (updated Extended Phase 1) edp3488_r042

Instructions to Counsel Paul G Tucker KC to advise

Opinion of Counsel Paul Tucker KC and Philip Robson dated 19/07/2023

Highways & Transportation Update Letter App B

Flood Risk and Drainage: Email correspondence between Pegasus, LLFA and Stantec - 17/09/2020 to 30/10/2020.

Landscape: Letter supporting EDP Tech Note edp3488_r041a in response to the DNPA comments 004_KF_SHDC_P20-0153_110920

Highways: Email response to queries on Stantec Technical Notes 001 and 002

Planning Response to Hitchin, Foot Anstey Letter dated 19/04/2022 P20-0153

Planning Response re. Open Space, Sport and Recreation 017_KF_SHDC_P20-0153_200522

Planning Response re. First Homes 018_KF_SHDC_P20-0153_200522

