

Chapter 3 Spatial Strategy

Matter DSP1/2 and Matter DSP1/3; Chapter 3 Key Elements, policies ST1 to ST5, policy ST16 and proposal ST17

Development Strategy

3.1 Chapter 3 of the plan, and more particularly Section II: Accommodating Change, sets out the development strategy for Devon. The eight key elements of the strategy are illustrated on the Devon strategy diagram¹. From the analysis of these elements at the examination, the main points at issue can be summarised under the following headings:

- areas of economic activity
- principal urban areas
- sub regional centres, market and coastal towns and rural areas

3.2 We consider the principles of these elements of the development strategy below. The detailed implications that flow from our general recommendations will be addressed in subsequent chapters of this report.

Areas of economic activity

3.3 Considerable criticism was directed at the concept of areas of economic activity during the course of the examination. The main points of opposition can be summarised as follows: no strategic value especially in light of the changing planning policy context and in particular the publication of PPG3 and RPG 10; potential to undermine the RPG 10 principle of concentrating development at the principal urban areas²; no legitimate role in the sequential approach to the location of housing development; and areas of economic activity are unnecessary as the development strategy will satisfactorily provide for balanced development³.

3.4 The role and strategic value of the area of economic activity concept were tested during the examination in public in 1997. That panel, in considering the contemporary evidence, recommended the deletion of the Torbay/Newton Abbot and Barnstable/Bideford areas of economic activity on the basis that they could not be adequately justified. Despite expressing significant reservations in relation to Exeter and Plymouth areas of economic activity, that panel finally concluded that strategic value could be afforded to both on the basis that “both cities are

¹ *Devon Structure Plan 2001 to 2016*, Map 5, p.24.

² RPG 10 policy VIS 1 – Expressing the Vision.

³ This represents a collection of views expressed by many participants throughout the examination. In respect of the points listed, the main protagonists were Government Office for the South West, South West Regional Assembly and South Hams District Council.

subject to considerable pressure for growth and the [Structure Plan First Review's] strategy envisages that large scale development should be provided within or close to them. The solutions inevitably cross District boundaries⁴”.

3.5 Following the publication of that panel report and the adoption of the existing structure plan, a revised RPG 10 was published that promoted the new central concept of principal urban areas. RPG 10 policies VIS 1 and SS 2 require development to be primarily focused within such areas and, where this is not possible, development should be in the form of planned urban extensions in sustainable locations. It is our opinion that through introducing principal urban areas, RPG 10 has provided a more meaningful mechanism to enable large scale development to be located within or close to the urban areas. Indeed, it was of significance to us that areas of economic activity derive no pedigree from regional planning guidance. Whilst we acknowledge that areas of economic activity may have a role in recognising the complex inter-relationship between the city and its hinterland⁵, the implications of these inter-relationships should be considered through the proposed sub regional strategies⁶. We do not believe that such a role by itself is strong enough strategic justification for these areas. Pending their preparation and publication of sub regional strategies, we are content that the structure plan can provide an appropriate level of guidance.

3.6 We considered the suggestion⁷ that areas of economic activity create value by assisting with the objective in RPG 10 of promoting, supporting, enabling and focusing economic development in ways and locations where it can best contribute to meeting local, regional and national needs⁸. We are firmly of the opinion that the absence of the designation of areas of economic activity will not harm the plan's ability to achieve any or all of its high level policy aims, and in particular the objectives of urban concentration and securing economic development. We are satisfied that the policies and proposals in the plan are robust enough to guide development in accordance with RPG 10 and PPG3. Indeed, we are persuaded by the argument that the very existence of areas of economic activity could obscure the appropriate working of the concentration policy and the sequential approach to the location of housing development.

3.7 It was also suggested⁹ that areas of economic activity could have a role for monitoring purposes. The value of such a use would be limited by the ambiguous geographical definition of the areas. If there is a desire to monitor activity in a

⁴ Previous Structure Plan Panel Report, 1998, paragraph 3.10.

⁵ As noted by Plymouth City Council in its written statement for Matter DSP1/2.

⁶ That is sub regional strategic contributions to the proposed regional spatial strategies (RSS).

⁷ In the House Builders Federation statement for Matter DSP1/2.

⁸ RPG 10 key objective d. on p.14.

⁹ By the Government Office for the South West and the House Builders Federation in written and oral evidence to Matter DSP1/2.

wider area, attention should be focused on the travel to work area or some other area for which ordinary data sets are available.

3.8 We recognise that the designation of areas of economic activity has served generations of structure plans in Devon well. However, changing circumstances and progression in national planning policy have led us to conclude that the role of areas of economic activity in the distribution of development has become confused and needlessly complicated. In the absence of any evidence to suggest additional strategic value in the concept we therefore conclude that their strategic validity and relevance has been superseded by the concept of principal urban areas. We therefore recommend the deletion this designation. We will return to the locational implications of this recommendation elsewhere in the report.

Recommendation 3.1

Modify the plan by deleting the areas of economic activity and amend any elements of the explanatory text and key diagram accordingly.

Principal urban areas

3.9 As we have previously noted, a fundamental policy of RPG 10 is that growth should be concentrated at the principal urban areas¹⁰. Structure plans are given the role of defining “the general geographic extent of each in the same way that the general extent of the green belt is set out”¹¹. Three principal urban areas are described in Devon: Exeter, Torbay and Plymouth, the last mentioned extending across into Cornwall.

3.10 Just what constitutes a principal urban area is not clear from RPG 10, but some idea of the intention behind the concept may be derived from the report of the panel that conducted its public examination in March 2000. After discussing some contrasting ideas on extent and definition¹², the panel settled for defining a principal urban area as “the continuously built up area”.

3.11 On this basis it is clear to us that the definition of a principal urban area is essentially a matter of survey, and not the deliberate identification of a policy in spatial terms. However, the matter is complicated by the fact that the defined limits of a principal urban area have commonly come to be seen as an area of policy definition, in which proposed developments within the boundary in some way attract greater likelihood of success than those without.

¹⁰ RPG 10 Policy VIS 1 – Expressing the Vision at paragraph 2.6.

¹¹ RPG 10 Policy SS 5 – Principal Urban Areas at paragraph 24.

¹² At paragraph 4.55.

3.12 This complication has particular force in this structure plan where the definition of the three principal urban areas is represented in diagrammatic form¹³ as not only the three continuously built up areas as existing, but also including other areas that are proposed for development, not all of which are of a manifestly strategic character.

3.13 In our view, this diagrammatic approach reflects an undesirable conflation of survey and policy. Far from adding to the spatial understanding of the sequential test of PPG3, in our opinion it confuses it. The test is better applied to the situation as people find it on the ground, with all its complications of detail, rather than to a diagram which can at best only give the most general guidance.

3.14 Nevertheless, for all its troublesome character, we recognise that the definition of principal urban areas is a requirement of regional planning guidance. However, we would note that the reference in RPG 10 policy SS 5 to defining the general extent of principal urban areas like that of the green belt was not specifically recommended by the public examination panel, but was a subsequent addition. For this reason we have considerable sympathy for the way the Joint Structure Plan Authorities have sought to interpret that element of guidance and note that despite heavy criticisms other participants were not forthcoming in suggesting workable alternatives. Having considered a number of ways that the definition could be expressed cartographically, we consider that, at the strategic level, the smaller the scale and the greater the degree of generalisation, the better. For this reason, we are of the opinion that the way the Plymouth principal urban area is expressed in the key diagram of the Cornwall structure plan is the best and should be adopted in this structure plan¹⁴.

3.15 We recognise some merit in providing guidance on the general location of major developments of strategic significance. The general location of such developments, named in the proposals of the plan, should be shown by symbols on the key diagram.

3.16 In light of our recommendations to delete the areas of economic activity and to redefine the principal urban areas, the more detailed implications on the redistribution of development provision will be addressed elsewhere in this report. As a matter of principle, however, any redistribution will be provisional on a re-examination in the context of the impending sub regional strategies and local development framework preparation. In the interim, we are firmly of the opinion that the structure plan needs to take a clear lead, particularly in the light of delays to progress of the Planning and Compulsory Purchase Bill. It is vital that this structure plan provides full coverage until such time as it is replaced by sub regional strategy, to this effect we have given substantial consideration to the more detailed figures.

¹³ Diagrams 6, 7 and 8 in the pre-examination changes to the deposit draft proposed in January 2003.

¹⁴ To do this will necessitate the removal of the other symbols pointing to the three areas into a detached box, possibly located out at sea (on the diagram).

Recommendation 3.2

- (i) Do not modify the plan in accordance with proposed pre-examination change Diagrams 6, 7 and 8, but
- (ii) express the principal urban areas on the key diagram only, and there by a generalised line showing the extent of the continuous built up areas,
- (iii) indicate the major strategic developments by symbols, and
- (iv) modify the explanatory text to make it clear that the delineation of the principal urban areas has no intrinsic policy significance.

Sub regional centres, market and coastal towns and rural areas

3.17 The development strategy sets out a settlement hierarchy that consists of principal urban areas, sub regional centres, area centres, local centres and rural areas. Policy ST5 reinforces this somewhat extended hierarchy. The main issue at the examination was whether the difference in nomenclature between the RPG 10 hierarchy and that used in the plan could be adequately justified¹⁵. The key difference in our view is between the plan's 'sub regional centres' in contrast to the 'other designated centres for growth' in RPG 10.

3.18 It is not incumbent on a structure plan authority simply to repeat the titles used in RPG 10. We consider it is a matter for them to consider the terminology they think best fits the circumstances of the plan area. The plan provides a settlement hierarchy that would appear to be generally clearly understood. Indeed, this terminology has already been cascaded down to many local plans, as Table 1 in the plan indicates. We do not believe that the difference in terminology will lead to misinterpretation of the requirements of RPG 10 policies SS 6 and SS 7¹⁶. Notwithstanding that conclusion, whilst Table 1 is informative as a reflection of what the local plans have done, it is too easily read as part of the plan. We therefore recommend its deletion.

3.19 We are satisfied that the settlement hierarchy does not conflict with regional planning guidance, indeed the function and role of the settlements in the hierarchy and the direction of development to locations exhibits ample consistency with the RPG 10 settlement hierarchy. A change in terminology is not required to ensure consistency of intent.

3.20 Of lesser concern was the structure plan's reference to 'market and coastal towns' as an interpretation of regional guidance's rather more vague terminology for the lower levels of the hierarchy. It is needlessly confusing for the plan to

¹⁵ By Mr K Woodhead on behalf of South West Regional Assembly at Matter DSP1/2.

¹⁶ As suggested by the South West Regional Assembly in their statement for Matter DSP1/2.

refer to ‘market and coastal towns’ and ‘area centres’ in the explanatory text and policies¹⁷. For the sake of internal consistency and simplicity, we recommend that reference only be made to ‘area centres’. In so doing, the plan should take the opportunity to clarify the relationship of area centres to RPG 10 policy SS 7.

3.21 In general, we find the plan’s approach to development in rural areas to be too detailed for this level of strategic guidance, in particular references to villages and rural areas in policy ST16. We would expect local plans to deal adequately with such matters and therefore conclude that such wording in the policy is unnecessary.

3.22 We have supported the general distribution of development in the plan and consider that it has satisfactorily reflected the urban concentration principle. However, in light of our recommendation to delete areas of economic activity, we consider that the principle of urban concentration should apply to sub regional and area centres and their hinterlands in a similar way as to principal urban areas. Insofar as growth is permitted away from the principal urban areas, preference should always be to focus development in the larger settlements rather than in the smaller settlements, in effect cascading the principle of urban concentration down through the settlement hierarchy. We therefore recommend that reference in policy ST5 to rural areas be deleted and replaced with reference to development in local centres consistent with local needs. Policy ST15 does not recognise the importance of limiting growth lower down the settlement hierarchy. The policy should reinforce that area centres should meet local needs and the needs of their rural hinterlands, and only those needs.

Recommendation 3.3

- (i) Modify the plan by deleting references to ‘market and coastal towns’ in the explanatory text and only refer to ‘area centres’.
- (ii) Delete Table 1 on page 32 of the plan.
- (iii) Modify policy ST5 in accordance with the pre-examination changes (subject to Recommendation 3.1) but substitute “area centres” for “market and coastal towns” and delete the final sentence about rural areas and replace it with a form of wording along the following lines:

“In local centres, development should be limited to a scale consistent to meet local needs, where this can be accommodated without generating unnecessary travel.”
- (iv) Modify policy ST15 to add wording along the following lines at the end of the first sentence “and only those needs”.

¹⁷ In particular paragraphs 3.92 – 3.94 of the explanatory text and policies ST15 and ST16.

- (v) Modify policy ST16 by deleting the final two sentences relating to rural areas and open countryside.
- (vi) Note recommendations in Chapter 4 relating to policies ST15 and ST16.

Overall Distribution of Development

3.23 Plan policies ST1 to ST5 direct the overall distribution of development in Devon. Three key elements of this approach were addressed at the examination and can be summarised under the following headings:

- land use balance
- previously developed land
- sequential approach

Land use balance

3.24 During the course of the examination, the Joint Structure Plan Authorities produced diagrams detailing the dwelling provision in the Plymouth, Torbay and South Devon and Exeter and East Devon sub areas. We found these diagrams to be very helpful both during and after the examination, and their artistic appearance led us to refer to them affectionately as “the Mondrians”¹⁸. The original diagrams, and an amended set of diagrams to show the implications for distribution of our recommendations for each of the sub-areas, are attached as part of each relevant sub area chapter.

3.25 Potentially competing objectives are an all too common occurrence; never more so in land use planning than the desire to achieve sustainable patterns of development through urban concentration whilst aiming to regenerate rural areas and offering rural populations the opportunities for social and economic progress. It is a question of balance between focusing development on larger towns and urban areas whilst not causing rural areas to stagnate or contributing to increased isolation and social exclusion¹⁹. We gave considerable thought as to whether the strategy of the plan could achieve the correct balance.

3.26 Underlying all our consideration was the recognition that this whole process must be undertaken against a continuous background of choice. Individual choice can often be at variance with the aims and objectives of

¹⁸ Piet Mondrian (1872-1944) Dutch artist. Neo-Plasticism: restricting forms to purely geometrical shapes set at set angles to horizontal or vertical axes in the 3 primary colours (red, blue & yellow) and black, white and grey. Source: *Penguin Dictionary of Art and Artists*: 1968.

¹⁹ As recognised in RPG 10 policy SS 2 and paragraph 4.52 and the “Rural White Paper”. (MAFF/DETR, 2000, *Our countryside: the future, – a fair deal for rural England*. Cm 4009.)

national, regional, strategic and local strategies, but this is no reason to halt the plan making process. It is the case that whilst housing and employment can be located close together, people do not necessarily choose to live and work in both. However, we must work on the well-evidenced principle that the larger the settlement, the more facilities and choice it offers to people, increasing the likelihood that people will choose to live and work in close proximity.

3.27 We agree²⁰ that the synergy required between employment and housing provision will need to be monitored throughout the plan period. It will be important that the major strategic housing and employment sites are developed within the same time periods to maintain a balance that will provide employment close to new housing provision so that the levels of commuting are kept to a minimum. This will be particularly important for the new communities that we recommend elsewhere in the report, and the strategic employment sites that are proposed close by.

3.28 The essence of the urban concentration principle enshrined in RPG 10 ought to be, in our view, beyond contention and we certainly do not seek to diverge from the general approach to prevent towns in close proximity to the principal urban areas from growing. Indeed, this was at the forefront of our thoughts when considering the new community proposals for Exeter and Plymouth.

3.29 There is a strong symbiotic relationship between transport and land use policies in the realisation of development distribution and urban concentration. The success of this plan's spatial strategy is dependent on attaining its transport proposals. Urban concentration requires an attempt to minimise travel and to encourage mode transfer through adequate and workable public transport policies. If this is not the case, it can only result in worse congestion. The new community proposals offered the best opportunity to secure such sustainable transport benefits.

3.30 Throughout the examination we heard a stark clash of opinions as to whether the plan had achieved the correct distribution of development. On many occasions we heard the request²¹ for some easing of the urban concentration principle to facilitate the provision of affordable housing in areas where, we acknowledge, the evidence indicates a significant need. In effect, the argument was for a degree of sustainable growth in more rural areas but at a non-strategic scale.

3.31 Whilst we are sympathetic to the unenviable situation that the districts find themselves in, we cannot support the premise of this argument, as the cause of the problem is far more complex than such a solution could ever recognise. More bluntly, "planning gain" considerations cannot be the driving principle in the

²⁰ With Ms Muston, representing the House Builders Federation.

²¹ From many participants, with the main protagonist being South Hams District Council.

balance and distribution of development. In taking this view, we do however recognise that the obverse of the urban concentration approach is that the strategy for rural areas, at this strategic level, is effectively for no change other than by some small scale development through local plans. Where individual circumstances indicate, we recognise that the current focus on the urban areas may frustrate local needs as levels of windfalls in relation to provision will allow little scope for greenfield allocations.

3.32 A key role for the planning system generally, and the structure plan more specifically, is to help foster rural renaissance²². The plan plainly recognises that such renaissance should not be achieved at the expense of the landscape and the rural environment. The plan is less clear that it should not be at the expense of the spatial strategy either. We make more comment on the matter of rural regeneration in Chapter 4.

3.33 If the PRG 10 control figure for housing numbers were increased for Devon, we concur²³ that the expectation would remain that the additional dwellings would be accommodated primarily at the principal urban areas. Even using this argument then, we do not see increasing overall provision would affect, to any great extent, if at all, the distribution for the more rural districts.

3.34 Having reviewed the evidence, there was nothing of sufficient gravitas to convince us that the distribution of development in the plan was materially incorrect. We are satisfied that the plan has genuinely tried to achieve the objective of concentrating most development at the principal urban areas. Furthermore, we do not believe that the concentration policy would deny provision of local needs or prevent small scale local housing provision through local plans and policies.

3.35 In accepting that the plan has generally attempted to follow the concentration policy, whether it actually achieves this will be explored in more detail in the individual chapters. In summary we are content with the approach and intention of the plan, but consider that the evidence has indicated that the numerical balance is not entirely appropriate. This is for several reasons including: recognising the potential for increased urban capacity in Plymouth; recognising that in some cases distribution may frustrate local needs as levels of windfalls in relation to provision would allow little scope for greenfield allocations; recommending the deletion of areas of economic activity allows redistribution of the provision back to the principal urban areas to emphasise the urban principle as stated in RPG 10 policy SS 2; and the implications of reconsidering of the definition of principal urban areas²⁴.

²² As highlighted by the Church Commissioners in their statement for Matter DSP1/3.

²³ With Mr Ormerod of the Government Office for the South West at Matter DSP1/3.

²⁴ Arguments and their sources discussed in more detail in later sections of the report.

Previously developed land

3.36 In general terms there were two relevant issues discussed at the examination: whether a properly justified target should be incorporated into a policy; and whether there should be individual targets for each district.

3.37 Paragraph 3.108 of the plan notes the expectation that just over 50% of total dwelling provision proposed for Devon in the period 2001 to 2016 will be on previously developed land. This figure is consistent with the approach of RPG 10²⁵. The principle as enshrined in PPG3 is to maximise the re-use of previously developed land²⁶, and with this in mind we are satisfied that the approach of the plan provides adequate emphasis. We have insufficient evidence to be content that any target recommended would be either correct or achievable. Therefore, we do not endorse the need for an additional policy.

3.38 Turning to the matter of individual targets, all districts have undertaken an urban capacity study of some description and methodology. It is one option to simply express the conclusions as a minimum percentage contribution of previously developed land for each district²⁷. Whilst we agree with Torbay Council that the urban capacity study should inform what can be achieved, at this strategic level there was insufficient information to allow us to test sufficiently the individual studies. That is, in any event, the role of local plan inquiries.

3.39 We note that urban capacity studies prepared in accordance with *Tapping the Potential* are not merely an indication of previously developed land likely to come forward, but of all urban capacity including greenfield sites within the urban boundary. We highlight this as it is all too easy to be confused by the different definitions.

3.40 Monitoring will, of course, play a vital part in the future testing of the assumptions and conclusions of the urban capacity studies and will inform the “plan, monitor and manage” approach. Despite some significant questions being raised as to the accuracy and reliability of the information in, and the conclusions from, the Exeter, Torbay and Plymouth urban capacity studies, we generally (if not wholly) accept their outcomes and recognise that they form the best available information on which to begin to consider the distribution of housing provision throughout Devon. In individual cases, to manifest our concern about the validity of the particular study, we were persuaded that a nominal amount could be added to the provision for the area as a way of more fully recognising Government guidance and the emphasis of using previously developed land.

²⁵ In RPG 10 policy HO 5 – Previously Developed Land and Buildings.

²⁶ PPG3 paragraphs 21 – 23.

²⁷ As suggested by Mr J Keech of the Joint Structure Plan Authorities at the examination of Matter DSP1/3.

Sequential approach

3.41 Policy ST2 and paragraph 3.13 of the plan contain and explain the sequential approach to new development in Devon. Whilst we fully support the inclusion of a sequential approach in the explanatory text, it is clear to us that policy ST2 simply reiterates Government guidance and adds nothing at the strategic level. The guidance in PPG3 is quite clear in its approach, as local plans should be in theirs. We therefore recommend that policy ST2 be deleted and that the explanatory text should more fully reflect the guidance in PPG3. In so doing, the amended explanatory text would address the two outstanding issues from the examination that questioned the inclusion of ‘new sustainable settlements’ as the fourth point of the sequence²⁸ and the omission of an emphasis on nodes in good public transport corridors²⁹.

Recommendation 3.4

- (i) Do not modify the plan in accordance with the pre-examination changes to policy ST2, but
- (ii) delete policy ST2 and incorporate the text, if required, into the explanatory text.

²⁸ As raised by East Devon District Council in their written statement to Matter DSP1/3.

²⁹ As raised by North Devon District Council in their written statement to Matter DSP1/3.