

Plymouth and South West Devon Joint Local Plan Examination

JLP Councils Corrections

- A. JLP Councils responses to Inspectors' query about Revised Housing Topic Paper (Provision and Supply) TP3(rev) – Diagrams 1, 2, 3 and paragraph 7.67**
- B. Revised Housing Topic Paper (Provision and Supply) TP3(rev) Appendix A8.2 – Table A8.1 and paragraph A8.21**
- C. JLP Councils Matter 3 Hearing Statement (CS3) Paragraphs 3.128 to 3.134**
- D. JLP Councils Matter 3 Hearing Statement (CS3) Table 3 (Detail of Range of Housing supply consented at each monitoring point 2012-2017) on page 72**

26 January 2018



A. JLP Councils responses to Inspectors' query about Revised Housing Topic Paper (Provision and Supply) TP3(rev) – Diagrams 1, 2, 3 and paragraph 7.67

Query raised by the Inspectors 24 January 2018:

“How does the figure for JLP site allocation in para 7.67 of TP3 Rev relate to the figures shown for site allocations in Diagrams 2 and 3 on pages 67 and 68 of TP3Rev? And how do the figures for allocations in Diags 2 and 3 relate to the total in Diag 1?”

The figures in Diagrams 2 and 3 for site allocations are

Diagram 2: PPA 6004 +1960 = 7,964
 Diagram 3: TTVPA = 2,875
 Total = 10,839

But Diag 1: JLP Plan area total allocations = 11,268 Then
 Para 7.67 JLP Plan area total allocations to 2034 = 21,662
 Can the discrepancies be easily explained please?”

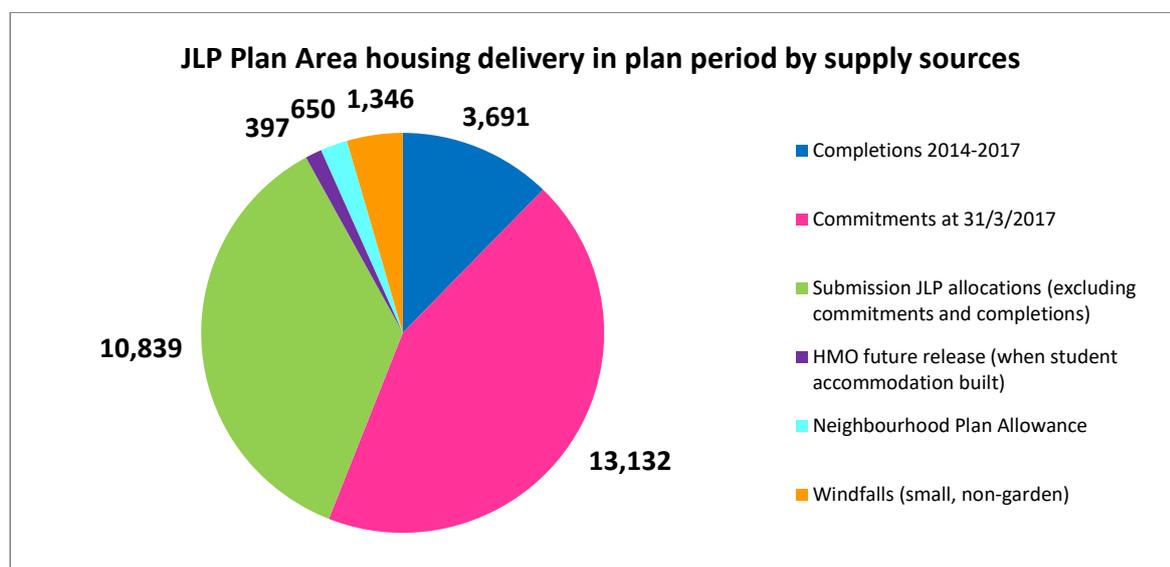
JLP Councils response

The JLP Councils submit the following response to the Inspectors' queries regarding Revised Housing Topic Paper (Provision and Supply) TP3(rev) paragraph 7.67, Diagrams 1, 2 and 3:

1. The site allocations totals in Diagrams 2 and 3 (7,964 and 2,875 respectively) are correct and the JLP total is 10,839. This is the number of dwellings forecast to be completed in the plan period on JLP site allocations that have not yet been committed as at 31 March 2017 (ie not built 2014 to 2017 or not with planning permission but not yet built at the 2017 monitoring point).

Diagram 1 should be the summation of the totals in Diagrams 2 and 3. Diagram 1 in TP3(rev) is therefore incorrect. **It is deleted and replaced by Diagram 1 (corrected)** as shown below.

Diagram 1 (corrected)



Please note that Graph JLP1 in document TP3E is correct. Diagram 1 (corrected) is now identical to Graph JLP1.

- The total supply from allocations in the JLP Plan area to 2034 is correctly stated in TP3 (rev) paragraph 7.67 as 21,662 dws. However, whilst TP3(rev) Tables 12b and 12c are correct, their summation in TP3(rev) Table 12a is not wholly correct due to typographical errors. **Table 12a is amended as set out in Table 12a (corrected) below** with the deletions shown by strike-through and insertions shown in red. Table 12a (corrected) is now identical to Table JLP2 in document TP3E.

Table 12a (Corrected)
PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN AREA – FORECAST
HOUSING SUPPLY IN PLAN PERIOD

Supply sources	Planning Status				
	Built 2014-2016	Permitted (not built)	Dwellings release	Not yet committed*	JLP TOTAL
Allocations	475	10,348	0	11,268 10,839	21,662
Sustainable Villages (Neighbourhood Plan) Allowance	0	0	0	350 650	350 650
Student Accommodation release	73	0	397	0	225 470
Small sites (non-allocations)	509	801	0	0	1,310
Large sites (non-allocations)	2,634	1,983	0	0	4,617
Small site (non garden land) Windfalls	0	0	0	1,346	1,346
SUPPLY TOTAL - All sources	3,691	13,132	397	12,835	30,055

Note * excluding dwellings that were permitted or built

Source: TP3E – Table JLP2

- Consequently corrections are made to TP3(rev) Paragraph 7.67** as follows (deletions are shown by strike-through and inserts are in red):

7.67 21,662 dwellings on JLP site allocations are forecast for completion during the plan period, equivalent to three quarters of supply. They are made up of sites with planning permission and sites yet to be committed as follows :

- ~~10,723~~ 10,823 dwellings on the JLP allocations are already permitted, comprise ~~49~~ 50% of the allocations. Of these 475 have been built (~~3~~ 4%) and 10,348 are permitted but not yet built (~~97~~ 96%); plus
- ~~11,268~~ 10,839 dwellings from the JLP allocations yet to be committed through planning permission, equating to ~~52~~ 50% of the supply in the plan period.

4. **TP3 (rev) paragraph 7.67** - The total supply forecast to be delivered to 2034 from JLP allocations is 21,662 dws. This is also the figure shown in Table 12a (corrected). The figure of 10,839 dws relates only to dwellings on the JLP sites allocations that are not committed. So they exclude dwellings built 2014 to 2017 on site allocations, and they exclude those dwellings on site allocations that have planning permission but which were not built as at the 2017 monitoring point. The legend for Diagram 1 (corrected) clearly states that the supply category of Submission JLP allocations shown in the pie chart in Diagram 1 excludes commitments and completions. This is to avoid double counting with the supply categories of commitments and completions shown in the pie chart in Diagram 1, because some JLP allocations already have commitments and completions. Table JLP2 Supply Categories and Planning Status in Document TP3E is helpful in showing the detailed breakdown of supply by supply categories and planning status, demonstrating that there is no double counting of the supply components.

**B. Revised Housing Topic Paper (Provision and Supply) TP3(rev)
Appendix A8.2 Table A8.1 and Paragraph A8.21**

The JLP Councils have identified the following corrections that should be made to the Revised Housing Topic Paper (Provision and Supply) TP3(rev) Appendix 8.2- Table A8.1 and paragraph A8.21. Deletions are shown by strike-through, insertions shown in red. These corrections do not materially alter the conclusions in paragraph A8.21.

Table A8.1	30% threshold	25% threshold
Net additional Annual affordable housing need above 35% threshold*	61 dpa	121dpa
X20 years additional affordable housing	1,220	2,420
Market housing uplift to contribute towards affordable housing	3,050 2,850	6,050 5,650
Total additional housing	4,270 4,070	8,470 8,070
Implications for Monitoring Target (Additional housing plus 4,500 Monitoring target)	8,770 8,570	12,970 12,570

A8.21 The effect that such increases in overall provision would have can be seen when these increases are compared to:

- 1. The 4,500 monitoring target for that part of South Hams in TTVPA.** These two sensitivity thresholds would nearly double and treble the monitoring target for the South Hams part of the TTV. The TTV housing trajectory already includes a significant boost to housing supply, as can be seen in the Graph TTV2A Plan-and Manage (TP3G). Over 60% of supply in TTVPA is already forecast to come from the South Hams part of the Policy Area. Expecting this scale of supply to double or treble is unrealistic and undeliverable.

Moreover, the JLP target would increase to about ~~31,000~~ 30,800 and ~~35,200~~ 34,800 (rounded) respectively at the 30% and 25% thresholds, and the TTV PA target would increase to ~~12,000~~ 11,800 and ~~16,200~~ 15,800 respectively. Consequently the Plymouth PA target as a proportion of the JLP target would fall from 71% to ~~63~~ 62% and ~~56~~ 55% respectively. This would be a significant reduction. The scale of additional growth in TTV- South Hams would undermine the JLP strategy of Plymouth being the main focus of growth. It also shifts the focus to the rural areas where the level of services, facilities and jobs growth forecast are less than at Plymouth.

- 2. The 10,300 monitoring target for the South Hams LPA area.** The sensitivity thresholds would increase the target by ~~44~~ 40% and ~~82~~ 79% to ~~14,600~~ 14,400 and ~~18,800~~ 18,400. The impact on the strategy would depend on how much of this growth could be met in the Plymouth Urban Fringe. Given that the 2017 Monitoring Point PPA housing trajectory currently forecasts that nearly 1,700 dwellings will not be delivered until after 2034 at the Sherford and Woolwell urban extension allocations, it seems highly unlikely that a significant proportion of the additional ~~34,300 to 8,500~~ 4,100 to 8,100 dwellings (approximately) in the South Hams that would arise from the sensitivity thresholds would be delivered at the urban fringe in the plan period. This is not realistic and therefore not justified.

C. JLP Councils Matter 3 Hearing Statement (CS3) Paragraph 3.128 to 3.134

The JLP Councils have identified a 'track changes' drafting error in the Councils' Matter 3 Hearing Statement (CS3) in response to question 3.3(ii) which begins on page 46. The error identified is merely the repetition of text within the statement and the inclusion of text that appears in the revised housing topic paper (TP3(rev)). The response to question 3.3 (ii) should read as follows:

CS3 Paragraphs 3.128, 3.129 then 3.134 followed by 3.131.

Paragraphs 3.130 (including the bullet points), 3.132 and 3.133 are deleted. The title "South Hams/West Devon" prior to paragraph 3.132 is also deleted.

D. JLP Councils Matter 3 Hearing Statement (CS3) Table 3 (Detail of Range of Housing supply consented at each monitoring point 2012-2017) on page 72

Table 3 in CS3 is incorrect. **Table 3 is deleted and replaced by the table below:**

	Total consented dwellings not commenced remaining to be built at each monitoring point between 2012-2017														
	2012/2013			2013/2014			2014/2015			2015/2016			2016/2017		
	Dwellings			Dwellings			Dwellings			Dwellings			Dwellings		
	PDL	Greenfield	Garden	PDL	Greenfield	Garden	PDL	Greenfield	Garden	PDL	Greenfield	Garden	PDL	Greenfield	Garden
Small Sites															
1-4	20	9	39	15	12	32	40	4	39	40	15	36	38	13	38
Small Sites Total	20	9	39	15	12	32	40	4	39	40	15	36	38	13	38
Large Sites															
5-9	31	13	0	33	13	0	43	19	0	47	24	0	30	13	14
10-24	198	35	13	236	3	11	144	15	0	168	11	0	204	7	8
25-49	145	0	0	225	0	0	112	0	0	144	0	0	115	0	0
50-99	420	165	0	357	165	0	434	161	0	378	161	0	469	262	0
100-249	619	0	0	415	0	0	469	0	0	554	0	0	489	176	0
250+	3508	0	0	3347	1106	0	3112	1106	0	2135	1028	0	2052	809	0
Large Sites Total	4921	213	13	4613	1287	11	4314	1301	0	3426	1224	0	3359	1267	22
Overall Total	4941	222	52	4628	1299	43	4354	1305	39	3466	1239	36	3397	1280	60