

PLYMOUTH & SOUTH WEST DEVON JOINT
LOCAL PLAN EXAMINATION

HEARING STATEMENT

TUESDAY
30TH JANUARY

MATTER NO 3
ISSUE NO 3.2

JANUARY 2018



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STATEMENT

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HOUSING

3.2 *Spatial strategy – overall distribution of the housing provision across the JLP area*

- i. The Councils' calculation of OAN indicates a requirement for the following distribution between the three Council areas in the JLP:

Plymouth City 18,217
South Hams 3,924
West Devon 5,162

Of this total, some 600 would be provided within the DNP, leaving a requirement for 26,700 dwellings in the JLP.

Taking into account the Councils' assessment of housing land supply throughout the JLP area, the strategic objective to strengthen the focus of growth on Plymouth and in order to support the greater use and viability of sustainable transport modes in commuting to work (TP3 para 5.57), the distribution proposed as a monitoring target for the plan period in the JLP (Annex 2) is:

Plymouth City 13,200
South Hams 10,300
West Devon 3,200

To what extent is it reasonable to distribute the housing requirement between the 3 Councils as proposed? Is this supported by credible evidence?

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- ii. The housing requirement is directed in Policy SPT3 to the two Policy Areas proposed in the JLP. A requirement for at least 19,000 dwellings is allocated to the Plymouth Policy Area (PPA), with at least 7,700 to the Thriving Towns and Villages Policy Area (TTVPA). Is the split between the PAs justified, and will it meet the needs of local communities and be sustainable?

Introduction

- 1.1 As we have previously explained (in our statement on issued 3.1), the Councils' OAN has been artificially suppressed and is not objective. We maintain that criticism.
- 1.2 Putting that to one side, and accepting (for arguments sake) that the figures stated in the question form a sound basis upon which to plan for (a premise that we do not accept) our comments upon spatial distribution are set out below.

The Principle

- 1.3 The confusion created by the discrepancy between the OAN outputs and the plan targets is unnecessary and should be avoided. The artificial PPA/TTVPA policy areas simply add another layer of unnecessary confusion.
- 1.4 There is no good justification to do anything other than to align plan targets to existing administrative boundaries. Much better to have a plan figure and a clear dis-aggregation to each of the three existing administrative areas.
- 1.5 It is folly to confuse/break the link between planning policy and responsibility for the outcomes that may stem from the pursuit of that policy – for example, how will 5 year land supply matters be assessed going forward? On a district basis, or a policy area basis? If costs are awarded on appeal who will those costs fall upon (presumably the relevant administrative district, irrespective of which policy area they lie within)?
- 1.6 If policy is to stand a chance of being effective it must be clearly understood by those who will implement it (and that is not the authors of the policy). The consequences of a lack of success of implementation must also be clearly understood by those who will bear those consequences (and that, in the case of this plan, will not be the authors of the policy).

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- 1.7 The PPA designation is essentially a tool to export Plymouth's housing requirement to the South Hams (SHDC), and to leave the city of Plymouth with a low target growth level. The consequences of a lack of delivery against targets are likely to be principally felt SHDC (since the low residual delivery rate from Plymouth City of 660 dwellings p/a should not be problematic assuming a reasonable approach to viability matters by PCC [which is not a given]).
- 1.8 We are surprised that SHDC are agreeable to this scenario, but that's a matter for them.
- 1.9 There is no evidence, nor justification, to reduce the requirement for Plymouth City to below the level of that required for that administrative area. On the contrary, the City is the principal urban area in this part of Devon and has acknowledged untapped potential. It is supposedly planning for growth.
- 1.10 It is acknowledged that, in recent times, the number of sites coming forward has been limited and, as a consequence, delivery has been below growth levels that have been planned for. The reasons for that need to be understood. To some extent site delivery has been suppressed by:
- a weak property market (house prices in Plymouth are lower than across much of the region).
 - That many sites have some significant degree of abnormal cost associated them (such as demolition and remediation costs), particularly when compared to other sites in Devon (which are generally greenfield).
- 1.11 But, despite these factors fettering viability, PCC persist with CIL, together with significant S106 requirements (often pursued on an unlawful 'head charge' basis, but seldom challenged).
- 1.12 It is not within our instruction to comment in detail upon the viability evidence that underpins this plan but please don't believe what has been proffered to you. In our experience lack of viability is the largest reason for the evident significant undersupply that has occurred over the DP (CS) period to date. Many sites in Plymouth would become viable if the Council suspended CIL, and/or properly respected CIL regulation 122, and took a flexible approach to affordable housing delivery.

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- 1.13 The necessary response to these factors should be a facilitatory approach to development – not a cutting of targets to allow the Council to persist with its' current failing approach.
- 1.14 There is a large stock of sites within the City boundary. The existing Core Strategy for Plymouth identified the need to deliver 17,500 dwellings across the period 2006- 2021, with sites allocated for development through the Area Action Plans (AAPs). For the period 2006 - 2016 there was a total of 7,638 net housing completions (including PBSA). In the monitoring year 2016/17 a total of 585 dwelling completions in the JLP Plymouth Policy Area (Table PPA5 of EXC9). Assuming that the majority of these completions were within the City, it is estimated that 8,223 dwellings have been completed since 2006. This leaves a residual provision in the DP of 9,862 units. If PSBA completions are netted out from this figure, then residual provision should rise to in excess of 10,000 units. This existing provision leaves only a provision of circa 3,200 to be provided by the JLP over the period 2021 – 2034 (246 units per annum).
- 1.15 The spatial distribution proposed by the monitoring targets are not supported by any credible evidence

Context Check

- 1.16 The strategy to focus growth on the Plymouth urban area is not new – it was fostered through the emerging RSS process and is enshrined in existing DP's within the JLP area. Therefore, it's a worthwhile exercise is to check the proposed requirement in the JLP, against that enshrined in existing DP's.
- 1.17 Appendix 9 to our issue 3.1 statement summaries those provisions. Appendices 5 and 6 provide further information on the spatial distribution of that provision.

Table 1 - SWRSS Panel Report (see appendix 5)

Area	Absolute	%	Annual Rate
Plymouth HMA	41,700	100	2,085
West Devon	4,400	10	220
Plymouth City	24,500	59	1,225
South Hams (at Plymouth Fringe)	6,000	14	300
South Hams (rest of district)	5,800	14	290

Table 2 - JLP (Monitoring)

Area	Absolute	%	Annual Rate
Plymouth HMA	26,700	100	1,335
West Devon	3,200	12	160
Plymouth City	13,200	49	660
South Hams	10,300	39	515

1.18 It is clear that:

- West Devon is not particularly affected by this strategy – and its growth requirement is predominately focussed on Tavistock and Okehampton.
- Plymouth City currently has a growth requirement that is significantly in excess of the (PBA) OAN requirement for Plymouth, and almost threefold that contained in the JLP Annex 2 monitoring target.
- That the existing growth target allocated to the South Hams is split broadly 50/50 between the Plymouth urban fringe (predominately Sherford) and the rest of the district – that's roughly 300 p/a to each sub area.

1.19 If one takes the RSS panel report as a basis for spatial distribution (see appendix 5) and makes a simplified apportionment of the output of the (PBA) OAN then

Table 3 JLP – SPT3

Area	Absolute	%	Annual Rate
Plymouth HMA	26,700	100	1335
PPA (Plymouth 13,200 + SHDC 5,800)	19,000	71	950
TTVA (W Devon 3,200 + SHDC 4,500)	7,700	29	385

1.20 It becomes clear that:

- This plan increases the proportional level of development to take place in the South Hams, as opposed to within Plymouth City (by about 10%).
- That the growth levels are lower than those currently enshrined in the existing DP coverage across the plan area
- That reduction is most evident within Plymouth

Conclusion

1.21 The words of the plan (set out at SO1, page 13), are not met by the policies of the Plan. The plan does not maximise growth at Plymouth – in fact it minimises it.

1.22 An appropriate strategy for the Plan, and one that would match the words used in the stated objectives for the plan, needs to allocate significantly more growth at Plymouth, whilst also allocating a sensible level of growth to the key towns and villages set out in SO1 (3).

1.23 That level of growth needs to be higher than proposed, both at Plymouth and across the rest of the plan area. That uplift needs to be more at Plymouth (in both proportional and absolute terms), than proposed.

1.24 Otherwise, on the evidence presented, the only conclusion that can reasonably be drawn is that Plymouth has given up any serious approach to planning for growth, despite the words they are espousing.