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Date: 5th January 2018

Robert Young
Programme Officer
Joint Local Plan Team
Strategic Planning and Infrastructure
Plymouth City Council
Ballard House
West Hoe Road
Plymouth
PL1 3BJ

Dear Sir/Madam,

PLYMOUTH & SOUTH WEST DEVON JOINT LOCAL PLAN MATTER 3: PRE-HEARING STATEMENT

We are pleased to enclose a joint pre-hearing statement on behalf Bloor Homes South West Ltd and Millwood Homes SW Ltd.

Policy SPT3 – Provision of New Homes

We strongly object to this policy on the basis that the proposed housing requirement and Objectively Assessed housing Need (OAN) is too low. Aligned to this the Councils' housing requirement and housing supply calculations contain significant errors, meaning that insufficient allocations are proposed even to meet the artificially low OAN.

Objectively Assessed Housing Need

During the Reg 19 consultation, we made detailed comments on matter in relation to the housing requirement for the joint districts. At that time a housing figure was proposed but only a brief OAN statement was provided in support of the housing requirement. As part of this consultation a Housing Topic Paper dated March 2017, containing a more detailed OAN, has been prepared that we have reviewed.

In response to the Housing Topic Paper we still have significant concerns regarding the soundness of the





OAN conclusions for a number of reasons. These concerns are summarised as follows:

- No justification is provided to justify the distribution between Plymouth and South Hams & West Devon.
- The OAN makes no allowance for economic growth or sensitivity testing the proportion of affordable housing need that would be met by the proposed housing requirement.
- A lower housing requirement is proposed than the currently adopted housing requirements for each district. On this basis we consider that the OAN is artificially low and contrary to the NPPF that requires local authorities “to boost significantly the supply of housing”.
- There is insufficient headroom within the South Hams and West Devon housing land supply. The housing requirement is considered to be 8,700 and the proposed sites account for some 9,055 dwellings. This results in only a 4% contingency (355 dwellings). Such a low contingency in our opinion takes insufficient account of non-implementation and lapse rates which are between 10-20% each¹. We therefore consider that additional sites should be identified which would allow for greater choice, increase flexibility and help to improve overall delivery rates across the Plan period.

South Hams Detailed Housing Requirement Analysis

Again, during the Reg 19 consultation, we provided detailed analysis of the housing requirement calculations underpinning the proposed allocations in South Hams. A significant number of errors were identified that have not been corrected in the latest evidence available. In summary these concerns were as follows:

- The annualised requirement of 297 dwelling per annum is lower than the currently adopted South Hams Core Strategy requirement of 307 dwellings per annum in the rural South Hams area.
- Various appeals in South Hams have shown the existing housing requirement on 307 dwellings per annum to be too low. An appeal in Kingsbridge² considered that a rate of 547 dwellings per annum was appropriate to take account of the backlog in housing.
- There is an overreliance upon windfall that makes up 20% of the housing commitments, i.e. from unknown sources. This is contrary to the NPPF that requires compelling evidence for windfall inclusion. The Council’s reliance upon windfall sites has been discredited at many appeals.

¹ DCLG Planning Update by Ruth Stanier Director of Planning – HBF Planning Conference September 2015.

² Appeal decision at Allocated site K5, West Alvington Hill, Kingsbridge, Devon. Appeal reference APP/K1128/A/13/2210602. See paragraphs 30 to 41.





- The evidence states that there have been 177 completions in the 2014/2015 but that the Council expects completion rates of 350 dwellings going forward, double that of previous years. Based on past trend the proposed completion estimates are considered to be overly optimistic.
- In terms of committed sites, allocations comprise approximately 4,000 dwellings, however approximately 1,900 of these sites already benefit from planning permission. The Council relies upon all sites with permission being completed, however as mentioned above DCLG consider that lapse rates of 10%-20% are common.
- In our previous representations we identified some 562 dwellings with permission that are unlikely to come forward on sites in Kingsbridge and Totnes.
- The Council has double counted sites with permission, including these in both the housing commitment and housing supply calculations. With this matter corrected there is a 700 dwelling shortfall that should be made up by additional allocations.
- There is an overreliance upon delivery of housing via the Neighbourhood Plan process on unknown sites.
- There is an overreliance upon allocations in Totnes and Kingsbridge where a number of DPD allocated sites, which are again proposed to be allocated, have not come forward in the 5 years that they have been allocated.
- Ivybridge and Dartmouth appear more suited to accommodate strategic growth given that the strategic allocations in these towns have made good progress through the planning system.
- Currently the proportion of housing attributed to the villages (12%) exceeds that of the local centres (8%). Local centres, such as Modbury for example, are more sustainable places to accommodate housing as they contain many more services than the villages.
- The proportion of housing in the local centres should at least be equal to or exceed the amount of houses distributed to the villages.
- A more sustainable distribution would be achieved by reducing windfall to 6%, increasing the town requirement by 8% and increasing the local centre requirement by 7%.

Conclusions

We strongly object to **Policy SPT3 – Provision of New Homes** on the grounds that the OAN evidence has artificially lowered the housing requirement for the districts. Given the national housing shortage, it cannot be the case that the current housing requirement is lower than the historic adopted housing requirements for each district. In addition, the proposed housing allocations do not propose sufficient sites to meet the artificially low housing requirement due to a number of fundamental errors in the trajectory calculations and overreliance upon unjustified windfall.





We trust that this pre-hearing statement provides an overview of the issues and matters to be discussed at the examination hearing for Matter 3, and we look forward to attending the session in due course.

Yours sincerely



Robin Upton
Director
For and on behalf of WYG

CC: Millwood Homes and Bloor Homes

