Plymouth & South West Devon Joint Local Plan

Revised Housing Topic Paper (Provision and Supply)

Addendum

October 2018

Note: This Housing Topic Paper Addendum (October 2018) relates to updated supply evidence provided by a suite of housing trajectories produced by the JLP Councils in response to the Inspectors’ Post Hearing Advice Note 15 August 2018 (EXC15). Those trajectories have an end March 2017 Monitoring Point.

The end March 2017 Monitoring Point trajectories (TP3J; TP3K, TP3L) provide the latest supply evidence and therefore supersede the end March 2017 Monitoring Point trajectories (TP3E; TP3F, TP3CG) that were part of the January 2018 Revised Housing Topic Paper (TP3(rev)) and the amalgamated EXC9.

The Addendum supersedes parts of the Revised Housing Topic Paper (TP3(rev) January 2018). These are the matters highlighted in yellow in the contents page of this Addendum. It should therefore be read in conjunction with those parts of TP3(rev) that have not been superseded - these are indicated by (TP3(rev)) on the contents page.
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Executive summary

ES1 The Revised Housing Topic Paper Addendum (referred to as the ‘Addendum’) is part of the evidence base for the Plymouth and South West Devon Joint Local Plan (JLP). It updates parts of the Revised Housing Topic Paper (January 2018) (TP3(rev)) which was the evidence audit trail document which revised Housing Topic Paper (March 2017 – TP3). The latter was based on 2016 Monitoring Point housing trajectories (TP3A/Ai, TP3B/Bi and TP3C/Cii).

ES2 After the start of the JLP Examination the Inspectors for the Examination requested that the 2016 Monitoring Point housing trajectories to be updated to the 2017 Monitoring Point. The JLP Councils responded to that request and published the new trajectories on 30 November 2017 (TP3E – JLP Plan Area; TP3F -Plymouth Policy Area, TP3G -Thriving Towns and Villages Policy Area). Consequently Housing Topic Paper TP3 no longer referred to the latest published information and was not up to date. The JLP Councils concluded that it was necessary to revise TP3 so that it was up to date. Work to update TP3 was undertaken in December 2017, with TP3(rev) published when the JLP Councils submitted the document to the Examination in early January 2018, before the scheduled Examination hearings.

ES3 Since the hearings, the Inspectors have published their Post Hearing Advice Note (EXC15). The Councils have responded and have subsequently proposed Main Modifications to the JLP that are subject to consultation. The Addendum provides evidence to support Main Modifications. The Addendum relies on the evidence in the latest end March 2017 Monitoring Point housing trajectories (TP3J – JLP Plan Area; TP3K -Plymouth Policy Area, TP3L -Thriving Towns and Villages Policy Area). At the hearings the JLP Councils confirmed that the JLP would proceed under the 2012 National Planning Policy Framework (NPPF) in accordance with the transitional arrangements set out in draft revised NPPF (subsequently published by MHCLG 24 July 2018).

ES4 The content of the Addendum, read in conjunction with those parts of TP3(rev) that have not been superseded by the Addendum, therefore contains the latest evidence and analysis about housing need and supply in the plan period, and justification of the housing provision policy targets in submission JLP policy SPT3. It also amplifies the analysis and provides greater clarity, partly in response to representations received on the Pre-Submission JLP, and to the Inspectors’ Advice Note.

ES5 HOUSING NEED: The JLP Councils continue to endorse the conclusions in the Strategic Housing Market Assessment Part 1 (February 2017 HO13) and, for the purposes of National Planning Policy Framework 2012 (NPPF) paragraphs 159 and 47, the Councils accept the recommendations relating to:

1. the extent of the Plymouth Housing Market Area, and
2. the Objectively Assessed Need (OAN) relating to housing need in the Plymouth HMA.

ES6 The JLP Councils agree with the scale of the uplift for market signals which is included in each District’s OAN. The scale of uplift reflects the different circumstances in each District. The uplifts are necessary because of previous market undersupply relative to demand, and affordability. The uplifts are significant,
particularly in the South Hams where affordability is challenging. This is in accordance with national Planning Practice Guidance (PPG) that relates to NPPF 2012. There is no justification for a further uplift to the OAN regarding undersupply and no ‘backlog’ of need requiring additional policy provision to be made. Moreover, no further uplift is necessary for employment trend reasons because the uplift for market signals already enables sufficient labour supply to be housed within the plan area.

ES7 Table 7\(^1\) replicates the results in SHMA Part 1 Table 19 (HO13)

<table>
<thead>
<tr>
<th></th>
<th>10-year trend projections 2014-2034*</th>
<th>Market Signals uplift</th>
<th>OAN (dwellings) 2014-2034</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>16,561</td>
<td>10%</td>
<td>18,217</td>
</tr>
<tr>
<td>South Hams</td>
<td>3,139</td>
<td>25%</td>
<td>3,924</td>
</tr>
<tr>
<td>West Devon</td>
<td>4,302</td>
<td>20%</td>
<td>5,162</td>
</tr>
<tr>
<td>PLYMOUTH HMA</td>
<td>24,002</td>
<td></td>
<td>27,303</td>
</tr>
</tbody>
</table>

(Source: TP3(rev) Table 7)

ES8 As well as the overall OAN of 27,300 total for the Plymouth HMA as recommended in SHMA Part 1, the JLP Councils also accept the individual OAN results for the administrative areas of Plymouth City, South Hams District and West Devon Borough Councils. This enables the Councils to understand the need in their areas.

ES9 **JLP HOUSING PROVISION POLICY TARGET** The JLP Councils considered whether the housing requirement target should be higher than the OAN because of affordable housing need. They concluded that there was no evidence to justify a further uplift for any administrative area or Policy Area in the JLP area, or for the JLP plan area for affordable housing need reasons.

ES10 There is evidence to justify deducting from the 27,300 Plymouth OAN an allowance of 600 dwellings for that part of the Plymouth HMA which lies within the Dartmoor National Park (DNP). This is justified by supply-side evidence. It avoids double counting and avoids over provision in the HMA that could otherwise undermine the ability of the DNP Authority to plan effectively for its area. This leaves 26,700 dwellings need to be accommodated in JLP area.

ES11 There is no evidence to justify the JLP area accommodating housing need arising from other LPAs outside the JLP. So there is no need to add external need when calculating the housing provision policy requirement targets for the JLP.

ES12 There is also no evidence to justify accommodating housing need from the Plymouth and South West Devon JLP area outside the JLP area. Sufficient supply

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1 To avoid confusion, all references to tables, graphs and figures in this Executive Summary use the same reference numbers as in the main report of the Addendum (or the cross reference Revised Housing Topic Paper, where relevant).
has been identified in the JLP area to accommodate the need for the plan period and provide sufficient headroom.

ES13 A total JLP area housing provision policy target, expressed as a minimum, of at least 26,700 dwellings in the plan period continues to be justified.

ES14 **DISTRIBUTION OF THE 26,700 REQUIREMENT IN THE PLAN AREA.** Latest evidence in the latest 2017 Monitoring Point housing trajectories (TP3J, TP3K and TP3L) demonstrates a housing supply forecast to be delivered in plan period totalling of just under 30,000 dwellings in the JLP plan area. At 3,277 above the 26,700 dwellings JLP area need and minimum requirement, this equates to 12.3% headroom which is sufficient flexibility. However, housing supply in the LPA areas did not match housing need distribution in the LPA areas. The differences are shown in Table 9. There were also differences for those parts of LPA areas within one of the two Policy Areas as shown in Table 11a. The JLP resolved those differences through strategy and policy requirement targets, so that the plan is sound.

**Table 9 Housing need and supply within LPA areas in the plan period**

<table>
<thead>
<tr>
<th>LPA</th>
<th>OAN (District) 2014-2034</th>
<th>DNP allowance deduction #</th>
<th>JLP need</th>
<th>Housing Supply in LPA area</th>
<th>LPA Surplus/Shortfall (-ve)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>18,217</td>
<td>0</td>
<td>18,217</td>
<td>14,746</td>
<td>-3,471</td>
</tr>
<tr>
<td>South Hams</td>
<td>3,924</td>
<td>-600</td>
<td>8,486</td>
<td>15,231</td>
<td>+6,745</td>
</tr>
<tr>
<td>West Devon</td>
<td>5,162</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PLYMOUTH HMA</td>
<td>27,303</td>
<td>-600</td>
<td>26,703 **</td>
<td>29,977</td>
<td>3,274 **</td>
</tr>
</tbody>
</table>

# see Addendum paragraph ES22

* Without ‘headroom’

** rounded to 26,700, resulting in shortfall of 3,277 compared to the rounded need figure

**Table 11a LPA areas within TTVPA -: LPA need compared to LPA supply**

<table>
<thead>
<tr>
<th>LPA areas within TTVPA</th>
<th>Supply*</th>
<th>JLP Need (excl DNP)</th>
<th>Shortfall/Surplus</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Hams</td>
<td>5,701</td>
<td>3,624</td>
<td>2,077</td>
</tr>
<tr>
<td>West Devon</td>
<td>3,608</td>
<td>4,862</td>
<td>-1,254</td>
</tr>
<tr>
<td>TOTAL</td>
<td>9,309</td>
<td>8,486</td>
<td>823</td>
</tr>
</tbody>
</table>

Source: Table 10 and the TTVPA housing trajectory in TP3L (*supply disaggregated by the JLP Councils into the constituent LPA areas*)
The first issue which the JLP Councils resolved was the supply to meet the need of Plymouth City. The latest forecast of 14,746 dwellings supply in the plan period within the administrative boundary of Plymouth City was below the rounded 18,200 need. Supply was sufficient for a monitoring target for Plymouth City of 13,200 dwellings allowing for nearly 12% headroom, but this meant that there were 5,000 dwellings of Plymouth City need not met in the City’s administrative boundary, so this unmet need must be accommodated outside the City.

Directing this 5,000 dwellings need of Plymouth City was an internal, strategic cross-boundary HMA issue for the JLP. The Councils resolved the issue by applying the JLP spatial strategy based on two policy areas, not administrative boundaries. Addressing this issue through collaborative working was one of the reasons why the JLP Councils chose to prepare a joint local plan. It is part of the wider task for the Councils to distribute LPA needs across the two policy areas. Plymouth Policy Area (PPA) comprises Plymouth City and the Plymouth Urban Fringe. The latter is in the administrative area of the South Hams. The Thriving Towns and Villages Policy Area (TTVPA) comprises the remainder of the JLP plan area, made up of South Hams LPA (outside of the Plymouth Urban Fringe) and West Devon LPA.

Table 9 shows the combined South Hams and West Devon LPA areas’ supply of over 15,200 dwellings. The supply ‘surplus’ of 6,745 dwellings in those combined LPA areas reflects the delivery forecast which includes supply from the Plymouth strategic urban extensions (SUEs). 5,922 dwellings supply at the proposed SUE allocations within the Plymouth Urban Fringe are forecast to be delivered by 2034.

Those 5,922 dwellings are located in that part of the Plymouth Policy Area that lies within the South Hams. These include the existing planned supply at Sherford which is mostly in the South Hams adjoining the City. That urban extension of 5,500 dwellings is already allocated in the South Hams and Plymouth DPDs adopted in 2006 and 2007, and development has commenced. 4,254 of the 5,500 dwellings are currently forecast to be delivered in the plan period. So the Sherford commitments are part of the South Hams and West Devon LPA ‘surplus’ and are already in the existing development plan. They are already part of the solution to the meeting the need of Plymouth City at Plymouth. This long standing planning policy is a cornerstone in the spatial strategy for the Plymouth area, and rightly continues to be part of the JLP. The positive decision made in the submitted plan to apply the JLP strategy of focusing growth at Plymouth therefore continues and develops that approach to meeting City need at Plymouth.

Adding the 5,922 supply forecast for delivery in the plan period in the Plymouth Urban Fringe to the forecast City supply of 14,746 gives a Plymouth Policy Area supply of 20,668 dwellings in the plan period. This would be about 13% above the City need of 18,217 dwellings.

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2 That supply forecast does not include those dwellings at Sherford and Woolwell urban extensions in the Plymouth Urban Fringe currently forecast to be delivered after the end of the plan period.
Together, the Policy Area approach and these strategic allocations enable the needs of Plymouth City needs of to be met in the plan area at Plymouth. This is consistent with strategy and demonstrating an effective Duty to Cooperate outcome. Consequently, it is not necessary to disperse 5,000 dwellings need from the City to the Thriving Towns and Villages Policy Area outside the PPA. Such dispersal would have been contrary to the spatial strategy and undermined delivery of the strategic objectives.

The second issue which the JLP Councils resolved was the distribution of need from West Devon LPA that cannot be met in that LPA. The resolution was shaped by the spatial strategy and informed by the supply ‘reality check’.

First, the JLP Councils considered that an allowance should be made for a modest quantum of supply in that part of the Dartmoor National Park that is in the Plymouth HMA to be taken into account when determining the JLP housing provision policy target. Table 9 incorporates the deduction of an allowance of 600 dwellings of Plymouth HMA being met from supply delivered in the National Park within the HMA. The JLP Councils consider that it is appropriate to assume that:

1. 300 of the DNP allowance relates to the 3,924 South Hams district need, resulting in 3,624 dwellings need being in the South Hams LPA area; and
2. 300 of the DNP allowance relates to the 5,162 West Devon district need, resulting in 4,862 dwellings need being in the West Devon LPA area.

The latest forecast delivery of 3,608 supply in the plan period in West Devon LPA is below the rounded 4,900 dwellings LPA need. Supply is sufficient for a monitoring target of 3,200 for the West Devon LPA allowing for a headroom of nearly 13% (408 dwellings). Adding the 408 to the 1,254 difference between supply and need in West Devon (‘shortfall’ in Table 11a) sums to 1,662 dwellings. Rounded, this equates to 1,700 dwellings of the 4,900 need (rounded) in West Devon that would not met in West Devon. So those 1,700 need to be accommodated in the JLP area outside West Devon.

<table>
<thead>
<tr>
<th>Within TTVPA</th>
<th>Supply</th>
<th>JLP Need (excl DNP)</th>
<th>Shortfall/ Surplus</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Hams*</td>
<td>5,701</td>
<td>3,624</td>
<td>2,077</td>
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<td>-1,254</td>
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<tr>
<td>TOTAL</td>
<td>9,309</td>
<td>8,486</td>
<td>823</td>
</tr>
</tbody>
</table>

* Excludes that part of the South Hams within the Plymouth Urban Fringe

Addressing this strategic cross boundary issue was another key reason for joint working to produce a joint local plan. In resolving this issue of ‘unmet’ need from West Devon the JLP Councils demonstrated an effective ‘Duty to Cooperate’ outcome.
The task was to identify the way to distribute this unmet need within the HMA need. The options were driven by spatial strategy and the opportunities provided by the strategic policy area approach. The JLP strategy takes account of the distribution of settlements within TTVPA and their ability to support growth. The Councils are mindful that there are only 2 main towns in West Devon. This constrains the potential to accommodate growth compared to other parts of the plan area. The options were constrained by the ‘reality check’ of the ability to deliver supply consistent with the strategy, and the ability to justify the options.

The 1,700 dwellings West Devon need could not be accommodated in Plymouth City. There’s no surplus supply forecast in the administrative City area. So the options available relate to supply in the Plymouth Urban Fringe i.e. within the South Hams and supply in the South Hams part of the TTVPA. The principal options are:

1) **All 1,700 West Devon unmet need is met in the PPA in the plan period.** This is consistent with strategic focus on Plymouth growth but it is not realistic. A total need of 19,900 (ie 18,200 plus 1,700) compared to the forecast supply of 20,668 leaves less than 4% head room in PPA. This doesn’t provide sufficient flexibility. Furthermore:
   - Increasing the net developable area of urban extensions already allocated by the JLP would not increase supply in the plan period. Planned development at Sherford and Woolwell is already forecast to extend beyond 2034, so enlarging these allocations would not deliver additional housing before 2034.
   - Alternatively, increasing the number of sites within the urban fringe may simply displace demand between the urban extensions rather than add to delivery overall, particularly if the extra sites are close to the JLP allocations.

2) **All 1,700 West Devon unmet need is met in the South Hams part of the TTVPA.** A total need of 5,300 to be met in the South Hams (ie 3,600 plus 1,700) compared to the forecast supply of 5,701 would provide headroom in the South Hams part of TTV (about 8%) but it is not realistic or sustainable because:
   - There is no evidence to justify an assumption of high levels of labour force commuting from South Hams to jobs in West Devon. Current evidence shows that commuting from South Hams to West Devon is very low. This is a reflection of the transport network, and the locations of these areas relative to each other and to Dartmoor.
   - In addition, a transfer of a significant number jobs from West Devon to South Hams appears unlikely and this option could result in jobs being lost from the HMA. The alternative is for jobs to transfer from West Devon to Plymouth. The housing distribution option would then increase commuting from South Hams to jobs at Plymouth. Whilst this is more likely as there is evidence of commuting already from the South Hams to Plymouth, the option would depend on commuting over longer distances from across the South Hams area. It is not as sustainable as co-locating jobs and labour force at Plymouth particularly if workers have shorter travel to work.
3) **The 1,700 dwellings unmet need from West Devon is divided between PPA and the South Hams part of the TTVPA.** The JLP Councils consider that there is evidence to justify this option to meet that need, that it is deliverable and consistent with strategy. It is based on JLP housing provision policy directing 800 dwellings need to PPA and directing 900 dwellings need to the South Hams part of the TTVPA. The benefits are as follows:

a) **Directing 800 dwellings need to PPA** is consistent with strategic focus on Plymouth growth. Adding 800 to the 18,200 City need results in the total PPA need of 19,000. Compared to the 20,668 dwellings supply, this results in a sufficient headroom of 9% in the PPA.

- There is evidence to justify an expectation that some of the residents in those dwellings would commute from the PPA to jobs in West Devon providing labour force to support the West Devon economy.
- There is evidence to justify anticipating that some West Devon jobs would transfer to Plymouth where there is sufficient employment land supply, a labour force and a large local market, supporting the growth of Plymouth, with the benefits of co-locating jobs and workers. This would mean that jobs are not be lost from HMA.

**PPA TARGET:** Adding the 5,922 dwellings supply from the urban extensions to the City supply of 14,746 gives a PPA supply of 20,668. Adding the 800 dwellings need directed from West Devon to the 18,200 Plymouth City need raises the need to be accommodated in the PPA to 19,000 dwellings. This results in a 9% headroom compared to supply in the plan period, providing reasonable flexibility in the PPA. The Councils are mindful that a further 1,686 dwellings in the Plymouth Urban Fringe within the South Hams part of PPA are currently forecast for delivery after the end of the plan period. They could come forward earlier if the housing market were to strengthen further, thereby providing additional flexibility.

**Conclusion:** The evidence justifies the Plymouth Policy Area housing provision policy target of at least 19,000 dwellings.

b) **Directing 900 dwellings need to the South Hams part of the TTVPA.** The JLP Councils conclude that there is evidence to support delivery of this scale of direction of need within the Policy Area, and to anticipate a mix of beneficial impacts as the result of:

- Co-locating jobs and workers consequential to a limited transfer of jobs from West Devon to South Hams attracted by the local labour force.
- Modest levels of commuting of residents in those 900 dwellings in the South Hams to jobs in West Devon.
- Moderate commuting to jobs at Plymouth, some in the South Hams (eg Langage a strategic employment site, serving both Policy Areas).
A reasonable expectation that migrants that would otherwise be drawn by the attractiveness of West Devon as a place to live would find the South Hams equally appealing.

Additional market housing delivered in the South Hams part of the TTVPA would then support the additional delivery of much needed affordable housing in the South Hams.

Supply in the South Hams is forecast to deliver 5,701 dwellings in the plan period. This is 2,077 about the South Hams need (excluding the DNP allowance). Directing 900 dwellings from West Devon to the South Hams part of the TTVPA would increase the monitoring target to 4,500 but still leave a headroom of 1,200 dwellings equating to about 27%.

TTVPA TARGET

Directing 900 dwellings need within the TTVPA from West Devon to South Hams does not change the total TTVPA need. It is an internal transfer. But directing 800 dwellings need from the West Devon part of TTVPA to PPA (see a) above) reduces the combined scale of the South Hams and West Devon need to be accommodated in the TTVPA from 8,500 (rounded) down to 7,700 dwellings. Compared to the TTVPA need, the forecast supply of 9,309 dwellings in the plan period results in a healthy TTVPA headroom of 21%, providing considerable flexibility in the Policy Area.

Conclusion: The evidence justifies the Thriving Towns and Villages Policy Area housing provision policy target of at least 7,700 dwellings.

Table 11c replicates the Total Housing Provision requirement for the plan period that is expressed in Submission JLP Policy SPT3, and which is justified on the evidence summarised in this Executive Summary, and detailed in the Addendum.

Table 11c Summary of the Total Housing Provision Target for the JLP area and the two Policy Areas

<table>
<thead>
<tr>
<th></th>
<th>Total Housing Provision Target (at least)</th>
<th>Annualised rate (pa)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth Policy Area</td>
<td>19,000</td>
<td>950</td>
</tr>
<tr>
<td>Thriving Towns and Villages Policy Area</td>
<td>7,700</td>
<td>385</td>
</tr>
<tr>
<td>JLP PLAN AREA</td>
<td>26,700</td>
<td>1,335</td>
</tr>
</tbody>
</table>

The annualised rates in Table 11c are simply the policy targets divided by the 20 years in the plan period. These rates inform the calculations of the 5 year housing land supply and the plan-monitor-manage analysis of supply performance set out in this Addendum.

The supply evidence is up to date, relevant proportionate and robust for each of the supply categories included in the housing trajectories. The latest end March
2017 Monitoring Point housing trajectories (in TP3J, TP3K and TP3L) benefitted from recent consultations that resulted in the latest intelligence provided by the developers and agents for the large sites regarding the trajectories. The level of agreement about large sites’ trajectories and the Councils’ evidence used to justify lead in times and delivery rates where there isn’t agreement are set out in TP3H and TP3I. Additional information supplied during the period of JLP examination hearings has now been taken into account in the latest trajectories.

ES30 **Tables and graphs accompanying these latest trajectories** (in TP3J, TP3K and TP3L). These illustrate the forecast supply. They provide ample evidence about the forecast delivery of supply in total; by supply category and by development status. They justify the conclusions that there are reasonable prospects of the overall targets being achieved and of supply being maintained over the plan period.

ES31 **Reality check** TP3 provided the audit trail to demonstrate how the JLP Councils used supply evidence from the 2016 Monitoring Point trajectories as a reality check to justify the distribution of housing need within the JLP Plan area through the SPT3 housing targets in the Submission JLP. The latest evidence on housing supply and its analysis in this Addendum re-affirms that this ‘reality check’ approach is appropriate when justifying the housing targets in SPT3.

ES32 **Boosting supply** The latest evidence from the 2017 Monitoring Point trajectories and its analysis in this Addendum demonstrates that the JLP meets the NPPF policy to boost significantly the supply of housing. The annualised target for the plan area for the plan period is 23% above the 1,087 dwellings per annum (dpa) delivery rate achieved in the 13 years prior to 2014. At 1,499 dpa, the forecast delivery rate in the plan period is even higher, at 38% above that historic delivery rate. The forecasts are up to date and robust.

ES33 The JLP does not rely on historic policy provision targets. It is illogical to assert that to boost supply the JLP must exceed previous targets. Neither NPPF nor PPG require the JLP to use old targets as the basis for justifying a new plan. Housing provision policy targets in the Plymouth Core Strategy and the West Devon Core Strategy derived from an emerging Regional Spatial Strategy that was not approved due to the repeal of legislation. The Devon Structure Plan (containing the target on which the South Hams Core Strategy relied) was revoked when the Revocation Order came into effect. The targets relating to all 3 plans are irrelevant. They were generated pre-NPPF, and they pre-date the latest needs and supply evidence.

ES34 **Maintaining supply** The latest trajectory evidence also demonstrates that there continues to be reasonable prospect of a 5 year housing supply existing in the JLP plan area and in each of the two Policy Areas (PPA and TTVPA) at the point of plan adoption, based on anticipated adoption at end March 2019. The change to policy SPT3 proposed in Main Modification MM3 clarifies the operation of the spatial strategy in relation to managing the delivery and distribution of housing in the Plan area.

“The Policy Area housing requirements are separate and non-transferable. Only housing proposals within each Policy Area will be considered to contribute to meeting the housing requirement for that Policy Area. Any
shortfall in the supply of housing sites in a Policy Area must be made up within that Policy Area, and cannot be remedied in the other Policy Area."

Having a 5 year land supply in each Policy Area at the point of adoption is necessary if the plan is not to be out of date for the purposes of NPPF paragraphs 49 and 14, and for the Examination of the JLP to find the plan 'sound'. The Addendum provides the evidence demonstrating that there are reasonable prospects of each Policy Area having a 5 year housing land supply (and more) at the anticipated point of adoption. For JLP evidence purposes, the Addendum also assesses supply at the plan area level. The evidence also demonstrates the reasonable prospect of a 5 year housing land supply being maintained for years after the point of adoption in both Policy Areas and also in the JLP area.

ES35 **LPA monitoring targets** The monitoring targets in JLP Annex 2, as amended by Main Modification MM3, are intended to assist the JLP Councils in monitoring delivery, but not for NPPF paragraphs 47 and 49 purposes regarding 5 year housing land supply calculations. The latest evidence in the 2017 Monitoring Point trajectories underpins the following conclusions, demonstrating robust supply in the LPA areas.

- The monitoring target for Plymouth City (LPA) is 13,200 which provides sufficient headroom at nearly 12% above the forecast supply of 14,746.

- Deducting the 13,200 City monitoring target from the PPA policy target of 19,000 results in a 5,800 Plymouth Urban Fringe monitoring target. Compared to the forecast supply of 5,922 in the Fringe, this leads to a headroom of 2%. The flexibility for this part of PPA comes from the 1,686 dwellings in the urban extension allocations (1,246 of which have outline planning permission) currently forecast for delivery after the end of the plan period. They could come forward earlier if the market strengthens or if other PPA sites are not developed as forecast by the trajectories.

- The monitoring target for West Devon LPA is 3,200. This provides sufficient headroom at 13% above the forecast supply of 3,608. The West Devon LPA area is the same as the West Devon part of the TTVPA.

- Deducting the 3,200 West Devon monitoring target from the TTVPA policy target of 7,700 results in a monitoring target of 4,500 dwellings for the South Hams part of the TTVPA. The forecast supply of 5,701 dwellings in the South Hams part of the TTVPA results in a very healthy headroom of 27%.

- Adding the 4,500 monitoring target for the South Hams part of the TTVPA to the 5,800 monitoring target for the South Hams part of the PPA, results in the South Hams LPA monitoring target of 10,300 dwellings. With a forecast supply of 11,623 in the plan period this gives a headroom of nearly 13% in the South Hams LPA area.

ES36 **Affordable housing need and affordability**. Evidence justifies the affordable housing provision targets in Policy SPT3. The scale of affordable housing need based on the baseline assessment 35% of gross income spent on housing costs is about 6,900 households in the plan period (SHMA Part 2 (HO13A)). The JLP
Councils consider that 300 of this may be met in the Dartmoor National Park, effectively reducing the JLP area need to be met to 6,600. This is the starting point for justifying SPT3 targets. The ability to meet need is constrained by the ‘reality check’ from the overall JLP Viability assessment in document O5. The plan is generally viable based on the JLP policy of seeking 30% of housing development on qualifying sites as affordable. Applying that percentage to qualifying sites forecast for delivery but not yet permitted and adding the result to completions and existing commitments results in the supply forecast for delivery in the plan period of about 7,000 affordable dwellings. This provides the evidence that potential forecast supply in the plan area is sufficient to deliver the forecast need for the plan area.

ES37 The level of OAN in the Plymouth Housing Market Area already incorporates significant uplifts for market signals purposes, including past under-delivery and affordability. This ranges from 10% uplift in Plymouth to a substantial 25% uplift in the South Hams where affordability is a particular issue.

ES38 The Councils have considered whether the total housing requirement in SPT3 should be uplifted further above the OAN for affordable housing need reasons, for PPG paragraph 29 purposes. From the evidence, the Councils continue to conclude that further uplift to the requirement is not justified. Therefore the total housing provision requirement remains 26,700 expressed as a minimum.

ES39 The affordable housing targets for the two policy areas reflect the application of the spatial strategy and the Policy Area approach to distribution of need. They also reflect the reality check from the scale of supply forecast for the Thriving Towns and Villages which justifies the affordable housing provision target of 2,050. Subtracting 2,050 from the JLP need of 6,600 result in the Plymouth Policy Area affordable housing provision target of 4,550 for the plan period. The 400 dwellings supply in the PPA above that need is an appropriate level of headroom, mindful that affordable housing on market led schemes are subject to negotiation. Collaborative joint, working between the Councils and other partners, and the approach to governance and implementation support the delivery of affordable housing and the JLP strategy.
1. INTRODUCTION:  
THE PURPOSE OF THIS DOCUMENT AND THE POLICY IT SUPPORTS

1.1 This topic paper Addendum has been prepared jointly by the three administrative local authorities producing the Plymouth and South West Devon Joint Local Plan (JLP), namely: Plymouth City Council (PCC); South Hams District Council (SHDC); and West Devon Borough Council (WDBC). The three Councils in their Local Planning Authority roles are responsible for plan making through the preparation of Development Plan Documents, including the Joint Local Plan. They are referred to in this document as the ‘JLP Councils’.

1.2 Document status – This is a technical paper and is part of the Plymouth and South West Devon Joint Local Plan (JLP) evidence base. It supersedes parts of the Revised Housing Topic Paper (TP3(rev)), and should be read in conjunction with that document. The addendum explains the reasons for the changes to the supply forecasts, and implications of those changes. It also confirms that this latest evidence continues to justify Policy SPT3 - Provision for New Homes.

1.3 Revised Housing Topic Paper Addendum (October 2018) (TP3(rev2)) is part of the evidence base for the Plymouth and South West Devon Joint Local Plan (JLP). The Addendum is the evidence audit trail document which revises parts of the Revised Housing Topic Paper (January 2018 – TP3(rev)).

1.4 The Addendum relates to updated supply evidence provided by a suite of housing trajectories (TP3J; TP3K; and TP3L) produced by the JLP Councils in response to the Inspectors’ Post Hearing Advice Note 15 August 2018 (EXC15). Those trajectories have an end March 2017 Monitoring Point. They supersede the 2017 Monitoring Point housing trajectories (TP3E, TP3F and TP3G) on which TP3(rev) relied. They also post-date revisions to the housing trajectories produced 19 April 2018.

1.5 The Addendum should be read in conjunction with those parts of the Revised Housing Topic paper that have not been superseded. In combination, these two documents contain the latest evidence and analysis about housing need and supply in the plan period, confirming that the housing provision policy targets in submission JLP policy SPT3 remain justified.

1.6 Purpose The Addendum enables the latest evidence on housing delivery, including updated trajectories, to be available for the JLP Examination. The evidence is also available to help inform the emerging Dartmoor National Park Local Plan review.

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3 JLP Examination documents EXD61A –JLP Plan Area; EXD61B – Plymouth Policy Area and EXD61C Thriving Towns and Villages Policy Area. Those trajectories were produced by the JLP Councils in response to a request by the Inspector at the Matter 12 hearing on 22 March 2018 (see amended paragraph 7.24 of this Addendum)
4 Part of the National Park lies within the Plymouth Housing Market Area (HMA) and abuts the JLP plan area. The Issues consultation on the Dartmoor National Park Local Plan closed on 16 January 2017, with an Issues consultation report published in April 2017. The Dartmoor National Park Authority held consultation events in October and November 2017 to start to talk with communities about the potential for sites to be developed.
1.7 In particular, evidence in this Addendum:

a) Provides the latest evidence on housing supply (actual and forecast) – including the latest housing trajectories (March 2017 Monitoring Point); and

b) Considers the implications of this evidence supply in the context of the submitted Joint Local Plan (SUB1) as amended by the proposed Main Modifications

c) Does not change the explanations about the JLP Councils’ consideration of the evidence about housing need that is provided by SHMA part 1 and SHMA part 2 (HO13)\(^5\) and HO13A\(^6\). Those explanations are as set out in TP3(rev)).

1.8 The Addendum aims to help readers to understand the JLP as it progresses towards adoption. It addresses two key matters on which JLP Policy SPT3 relies:

- Supply of housing (evidence)
- Housing provision requirements (the use of evidence to justify policy)

1.9 The Addendum should be read together with TP3(rev) – which addressed the key issue of housing need and the evidence about the Objective Assessment of Need, on which the JLP and Policy SPT3 relies.

1.10 Together the Addendum plus those parts of TP3(rev) that have not been superseded, present a narrative that justifies the housing provision totals for the plan area and the two Policy Areas set out in Policy SPT3. This continues to show that the JLP housing provision policy has been established in accordance with national planning policy\(^7\) and practice guidance. The new evidence continues to demonstrate that the policy is sound.

**Previous supply evidence: Housing trajectories**

1.11 The JLP Councils produce evidence which forecasts delivery of net additional dwellings in the plan period. These are dwelling completions that add to housing supply. This evidence forecasts housing delivery on each large site\(^8\), for every year in the plan period from 2014 to 2034. Forecasts for every year are also made for each of the other supply categories counted towards meeting housing need.

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\(^5\) Plymouth and South West Devon Joint Local Plan - Strategic Housing Market Assessment (SHMA Part 1: The Housing Market Area and Updating the Objectively Assessed Need February 2017 Peter Brett Associates) HO13

\(^6\) SHMA Part 2 Objectively Assessed Need for Affordable Housing February 2017 HDH Planning and Development Ltd/PBA) HO13A

\(^7\) At the hearings in 2018, the Councils confirmed that the Plymouth and South West Devon Joint Local Plan would proceed under the 2012 National Planning Policy Framework, in accordance with transitional arrangements proposed in the consultation draft revised National Planning Policy Framework. The provision for transitional arrangements were subsequently confirmed in the Revised NPPF published on 24 July 2018.

\(^8\) Due to the history of different development monitoring systems in the three councils, large sites in South Hams and West Devon are sites of net 10 or more dwellings, but are sites of gross 5 or more dwellings in Plymouth City.
1.12 The Submission Local Plan relied on a suite of March 2016 Monitoring Point trajectories (TP3A; TP3B, TP3C) that were part of the March 2017 Housing Topic Paper (TP3) - amalgamated in EXC3C. The information in those trajectories was subsequently reformatted and published in TP3Ai; TP3Bi, TP3Ci in October 2017.

**New supply evidence: Housing trajectories (end March 2017 Monitoring Point)**

1.13 The suite of 2016 Monitoring Point trajectories were superseded by new information. The evidence on forecast housing delivery for the plan period was updates through a suite of three new housing trajectories. Those new trajectories used an end March 2017 Monitoring Point. They were published in November 2017. They identify the forecast delivery for each of the two Policy Areas specified in JLP policy SPT3 - that is Plymouth Policy Area and the Thriving Town and Villages Policy Area, as well as the JLP plan area (TP3E; TP3F; TP3G). Those three trajectories were also amalgamated into a single document EXC9. The assessment of supply and justification of policy set out in the January 2018 housing topic paper (TP3(rev)) took account of those new housing trajectories.

1.14 This new trajectory evidence was submitted as part of the Councils' evidence to the JLP Examination hearings. The JLP Councils produced that evidence in response to the Inspectors’ request in their letter of 4 September 2017 (EXC2) see paragraph 1.9 of EXC3. The Councils submitted the updated trajectories to the Examination on 29 November 2017 and these trajectories have been added to the evidence base. This evidence meets the JLP Inspectors’ requests set out in their letter of 4 September 2017 as follows:

- The updated trajectories had an end March 2017 monitoring point. This means that they include information on:
  - the number of dwellings with planning commitments as at end March 2017 (dwellings with planning permission that have not yet completed or starter and where the permission has not expired), and
  - the number of additional dwellings built between 1 April 2016 and 31 March 2017.

- The JLP Councils produced the detailed housing trajectories for each Policy Area in A3 format. The related graphs, tables and pie charts for each Policy Area and the JLP area were also published in TP3E; TP3F and TP3G.

- The trajectories included the latest information about delivery, and the Councils have considered the extent to which the lead in times and delivery have been agreed with the main developers for each large site. The Councils sought the views of the main developers regarding the Councils’ draft trajectories and assumption from mid-October to early November 2017. The JLP Councils considered all responses received. In some cases the Councils revised their trajectories taking account of new information from the developers. In other cases, the Councils’ trajectories have not been amended. The Councils maintained an audit trail of responses. The areas of agreement are set out in TP3H and TP3I. Where there isn’t agreement the JLP Councils have set out the assumptions regarding lead in times and delivery for the relevant sites.
1.15 Since the Examination hearings, the JLP Councils have updated the trajectories to reflect proposed Main Modifications and in response to the Inspectors’ Post Hearing Advice Note (EXC15). They were published October 2018 in documents TP3J, TP3K and TP3L in A3 format and still use an end March 2017 Monitoring Point. The Addendum analyses the evidence in these latest trajectories.

**Housing need evidence and its conversion into JLP housing provision policy**

1.16 This Addendum explains how the housing provision totals have been calculated. The focus is on converting forecast housing need into policy as housing provision targets for the plan period 2014 to 2034. The updated evidence on housing supply provides a ‘reality check’ relating to deliverability as part of the justification of that conversion.

1.17 The method to justify housing provision within the plan area follows the staged process advocated in the Planning Advisory Service (PAS)\(^9\). There are two stages and they establish the following:

- **The objectively assessed need for housing (OAN) on which the plan relies** – this is derived from an objective analysis of the evidence to the exclusion of any policy objectives and value judgments. Section 2 of this paper considers the relevant context provided by legislation, government policy and practice guidance. Evidence about the OAN is entirely about need and demand, to the exclusion of any supply side factors. This is sometimes referred to as ‘policy-off’. Section 3 of this topic paper focuses on the evidence which identifies the OAN for the Plymouth HMA that is derived by aggregating the forecast OAN from each of the three administrative local authority areas to the HMA total. Section 4 is the JLP Councils’ consideration and endorsement of that OAN evidence.

- **Housing provision totals** - These are a matter of policy and are referred to in this paper as housing ‘targets’. Sections 5 and 6 translate OAN into JLP housing provision policy targets. Supply side matters, for both market and affordable housing, are taken into account when translating the OAN into the JLP housing provision targets. Those targets are ‘policy-on’. Supply sources and delivery (including housing trajectories) are set out in Section 7, followed by Section 8 on maintaining housing supply and the housing implementation strategy. The relationship between OAN, affordable housing need, and the affordable housing requirement targets in JLP policy, is complex. This is looked at in Section 9. The Councils are mindful that consideration of market signals, including affordability, for OAN purposes is wholly separate from the Councils’ consideration about whether affordable housing need justifies further uplifting the JLP housing provision targets, above the OAN.

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Geography

1.18 NPPF paragraph 159 requires housing need to be assessed for housing market areas. Together, the three local authority administrative areas of Plymouth, South Hams and West Devon comprise the Plymouth Housing Market Area.

1.19 The Plymouth HMA straddles local authority boundaries. Consequently the three authorities have worked together to assess needs across the Housing Market Area as a whole. This is in line with National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). The analysis of the objectively assessed housing need of the Plymouth HMA was undertaken through the Strategic Housing Market Assessment Part 1 (SHMA) (document HO13). The document provides the evidence about housing need in the Plymouth HMA. This relies on the assessment of need calculated at the district level which is aggregated to the HMA total.

1.20 The Plymouth HMA includes that part of the Dartmoor National Park (DNP) which is situated in South Hams and West Devon. Housing needs of the Plymouth HMA identified for the SHMA include the needs in this part of the DNP. However the Plymouth HMA excludes that part of the DNP which is within the administrative area of Teignbridge District Council. The latter is in the Greater Exeter HMA.

1.21 The JLP area lies wholly within the Plymouth HMA, and contains most of the HMA’s population and much of its land area. The area of the Joint Local Plan comprises the administrative areas of the Local Planning Authorities of Plymouth City, South Hams and West Devon, but not the Dartmoor National Park Authority (DNPA). The JLP’s reliance on the SHMA Part 1 evidence for justifying and testing the Plymouth HMA is set out in Section 3 of this Topic Paper.

Consistency with national planning policy

1.22 The topic paper demonstrates how the Submission JLP strategy and policy for housing provision emerged through the JLP Councils considering: the guidance to be followed; evidence collected; assessment of all reasonable options; and the sustainability appraisal of the policy. Having confirmed that the JLP is proceeding under the 2012 National Planning Policy Framework in accordance with transitional arrangements, all references to NPPF in this Addendum are to the NPPF published in 2012, unless specified otherwise.

1.23 To boost significantly the supply of housing, the JLP Councils have used the evidence base to meet the full objectively assessed needs for housing and affordable housing in the HMA, subject to the caveats set out in NPPF. They have worked collaboratively with each other to meet development requirements in the JLP area that cannot be wholly met within individual Authority areas, where it is reasonable to do so and consistent with achieving sustainable development. They have also worked collaboratively with the adjoining LPAs including the DNPA to consider strategic cross boundary issues. This is consistent with national policy (NPPF paragraph 47). Section 2 of this topic paper identifies the key planning policy and related guidance. Sections 3 to 9 demonstrate how the JLP and the plan making are consistent with government policy and guidance.
1.24 **Section 10** focused on main findings from the sustainability appraisal of JLP Policy SPT3 on housing provision at Submission. Finally, **Section 11** draws conclusions about the JLP policies on housing provision and supply by applying the tests of soundness.

**Evidence signposting**

1.25 As well as providing evidence, this document also signposts relevant documents that are in the JLP evidence base and the Examination Library. The document references are those used by the Examination Library. The Addendum, when read together with those parts of the Revised Housing Topic TP3(rev) that have not been superseded by the Addendum, provides the audit trail of information and data about housing need and supply within the wider evidence base which has been prepared to support the preparation of the JLP and its examination. The narrative in these two documents draws extensively on a range of evidence documents including the SHMA. They pull together the evidence to justify the planned scale of housing growth, the strategic distribution of housing development, and the alignment of housing, jobs and the labour force. The JLP Councils rely on this evidence to justify the housing provision targets set out in Policy SPT3, and to confirm that the targets remain justified by the latest evidence.
2. CONTEXT

2.1 The assessment of housing need and its translation into the JLP policy targets was undertaken within the context provided by legislation, national planning policy and guidance, whilst cognisant of other relevant guidance that exists or is emerging.

Legislative Position

2.2 Section 19(2) of the Planning and Compulsory Purchase Act 2004 provides that, in preparing a local development document (under which definition the JLP falls), an authority must, amongst other things, have regard to ‘national policies and advice contained in guidance issued by the Secretary of State’. As such, in preparing a Local Plan, it is necessary for the LPA to give due consideration to the Government’s national planning policy and guidance. This is a legal test.

National Policy and Guidance

National Planning Policy Framework (NPPF)

2.3 The Government’s approach to planning is principally set out in NPPF. Paragraphs 2.10 to 2.22 of this topic paper focus primarily on the version of NPPF current as at February 2017.10

2.4 For the JLP to be found sound, the plan will need to meet the 4 tests of soundness set out in paragraph 182. One of these is that the plan is:

- ‘Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.’

For paragraphs 2.5 to 2.38 see TP3(rev)

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10 The Government has since published NPPF2018 that includes housing provision and supply matters and plan making, but under transitional arrangements the JLP is proceeding under NPPF 2012
3. EVIDENCE:
   SHMA AND THE OBJECTIVE ASSESSMENT OF HOUSING NEED

See TP3(rev)
4. JLP COUNCILS CONSIDERATION OF THE OBJECTIVE ASSESSMENT OF HOUSING NEED - HMA AND DISTRICT TOTALS

See TP3(rev)
5. CONVERTING HMA NEED TO JLP AND POLICY AREA HOUSING PROVISION

5.1 A key task for the Plymouth and South West Devon Joint Local Plan is to establish the policy setting out how much housing is to be provided in the plan period (2014 to 2034). Submission JLP Policy SPT3 achieves this through housing provision policy targets for the plan period that are expressed as ‘minimums’. As well as an overall target for the plan area, there are targets for the two Policy Areas that are Plymouth PA and Thriving Towns and Villages PA.

5.2 Section 5 of this Addendum provides the audit trail of how evidence has been used by the JLP Councils to derive the total SPT3 housing provision targets for the JLP area and the two Policy Areas. The Councils’ task has been to convert the evidence on housing need into the housing provision targets. This Addendum explains the steps in carrying out this task and the evidence on which the Councils rely.

5.3 The starting point is the evidence in SHMA Part 1 (HO13) on the Objectively Assessed Need for housing (OAN). The JLP Councils have accepted the recommendation in the evidence about the scale of OAN in the Plymouth HMA and that the total HMA OAN of 27,300 dwellings is calculated by aggregating the OAN for each of the three Local Authority areas comprising the HMA. (See paragraphs 4.3 to 4.13 of Revised Topic Paper TP3(rev)).

5.4 As explained in Revised Topic Paper paragraph 4.2, the OAN for the Plymouth HMA and the OAN for its constituent Local Authority areas is ‘policy off’. A two stage process has therefore been undertaken by the JLP Councils to convert the OAN to ‘policy on’ housing provision targets for the plan period, involving:

1. Consideration of affordable housing need; and
2. Conversion of OAN to policy targets, including the ‘distribution’ of need within the plan area

STAGE 1 – Consideration of Affordable Housing Need

5.5 The first stage is the JLP Councils’ consideration of ‘Affordable Housing Need’ for NPPG paragraph 29 purposes. That is, whether or not the JLP housing target in the Local Plan should be increased above the OAN to assist with meeting the need for affordable housing. This is separate from the consideration of affordability as part of the Market Signals uplift already included in the OAN calculations. The Councils

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11 Section 9 of this topic paper provides the audit trail to justify the SPT3 Policy targets for the provision of affordable housing for the JLP area and the two Policy Areas, and confirms that those affordable housing provision targets are not additional to the overall housing provision targets.

12 The PPG sets out the assessment of the OAN (PPG 2a-14 to PPG 2a-20) separately to the assessment of Affordable Housing Need (PPG 2a-22 to PPG 2a-29). Paragraph 4.5 of TP3(rev) confirms that the OAN in SHMA Part 1 includes the uplifts made market signals and these uplifts were made for reasons of affordability (ie house prices) as well as undersupply, but paragraph 4.8 to 4.10 makes clear that SHMA Part 1 does not, and should not, adjust the OAN for Affordable Housing Need reasons.
are mindful that the uplift above the demographic forecasts for market signals has already been significant, notably the uplift of 25% in the South Hams where housing affordability is particularly challenging.

5.6 The JLP Councils have had to consider whether there is evidence relating to Affordable Housing Need (AHN) to justify a housing target for the plan area that differs from the OAN which is recommended in SHMA Part 1. Appendix 8.2 TP3(rev) provides the analysis demonstrating how the Councils have considered evidence about AHN.

5.7 Based on the analysis in Appendix 8.2 and the evidence about forecast affordable housing supply in this Addendum - Section 9 and Appendix 8.1, the JLP Councils conclude that there is no evidence to justify further increasing the JLP housing provision target above the scale of the OAN for housing identified in SHMA Part 1 Table 19 ((HO13) for affordable housing need reasons. Consequently, the Councils have decided that the Plymouth HMA OAN of 27,300 continues to be the correct starting point for Stage 2 in the conversion process.

**STAGE 2: Conversion of OAN to Policy targets**

5.8 The LPAs have then undertaken the remaining steps in the task to convert the OAN of 27,300 into the 'policy-on' housing provision targets set out in JLP policy SPT3.

5.9 An authority’s housing provision target does not necessarily equal its objectively assessed need. Although the Councils have decided not to further uplift the targets for affordable housing need reasons, other factors can come between the OAN and the target relating to cross boundary issues and supply.

5.10 The JLP was prepared within the context of NPPF and PPG. The JLP Councils had to consider PPG_ID: 12-002-20140306 where the Local Plan should aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs of neighbouring areas where this is consistent with policies in the NPPF as a whole’.

5.11 The evidence audit trail for Stage 2 encompasses:

1. Duty to cooperate- strategic cross boundary issues (Addendum paragraphs 5.16 to 5.33)
   - Step 1 – Any unmet needs external to the plan area?
   - Step 2 – Any unmet needs internal to the plan area, to resolve?
     - Applying strategy
     - Applying a reality check

2. Is a JLP target higher than 26,700 justified? (Addendum paragraphs 5.44 to 5.49)

3. Is a JLP target lower than 26,700 justified? (Addendum paragraphs 5.50 to 5.56)
1. Duty to Cooperate – strategic cross boundary housing issues

5.12 The JLP Councils have considered the issue of unmet housing needs within the wider issue of 'Duty to Cooperate. The Councils are cognisant of Section 100 (3) of the Localism Act which amends Section 20(5) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004). It requires the Local Plan Inspector to consider whether the local authority has complied with any duty imposed on the SWCs by Section 33 A (Duty to Cooperate) in relation to the preparation of the plan.

5.13 The Local Plan Inspector will also consider whether the Plan has met the tests of soundness set out in NPPF paragraph 182. That is, whether cooperation has been effective. PPG states that Inspectors testing compliance with the Duty will assess the outcomes of co-operation and not just whether local planning authorities have approached others. Effective co-operation is likely to require sustained joint working with concrete actions and outcomes and evidence submitted to an Examination should be robust and include details about who the Authority has co-operated with, the nature and timing of co-operation and how it has influenced the Plan.

5.14 The JLP Councils’ Duty to Cooperate Statement (SUB12) provides evidence demonstrating how the Duty to Cooperate has been met for the JLP and why it has been effective.

5.15 This Addendum draws on specific evidence about joint working which relates to housing provision and supply. It considers strategic, cross-boundary issues in two steps:

- **Step 1 – External to the JPL plan area** The first step, set out in paragraphs 5.16 to 5.36, relates to LPAs outside the plan area, involving two steps: a) the area of Dartmoor National Park (DNP) within the Plymouth HMA; and b) other HMAs adjoining the Plymouth HMA.

- **Step 2 – Internal to the JPL plan area** The second step relates to the cross boundary distribution of housing needs within the JLP area. This step depended on the JLP Councils undertaking the following approach:

  1. Cognisant of the SHMA evidence about the housing need in each district, and its aggregation to the HMA, the Councils applied the JLP strategy to that OAN forecast at a simple, high level. This was driven by the strategic focus on Plymouth, thereby meeting Plymouth’s needs at Plymouth, with the remaining HMA need, excluding an allowance for DNP, met in the rest of the plan area aligned with the TTVPA settlement hierarchy.

  2. A ‘reality check’ was then undertaken by the JLP Councils using evidence about housing delivery, focused on the location of forecast deliverable and sustainable housing supply in the plan area. This tested the alignment between the high level distribution of based on the OAN and the supply capacity. It checked whether the high level distribution was realistic, or
needed to be modified, consistent with strategy. Section 7 of this Topic Paper sets out the audit trail of evidence on which the Councils rely to assess housing supply capacity. This ‘reality check’ informed the development of policy targets, and helps to demonstrate the ability of the plan to meet the housing need distributed across the plan area.

Step 1 Are there unmet housing needs of areas outside the JLP area?

a) Discount need in the Plymouth HMA to be met in Dartmoor National Park.

5.16 Part of the Dartmoor National Park is in the administrative areas of South Hams District and West Devon Borough Councils. That part lies within the Plymouth Housing Market Area. The Plymouth SHMA Part 1 OAN report calculates the Objective Assessment of Housing Need for the entire area of each of the 3 Authority areas (the city and the two districts in the HMA). Consequently, the Plymouth HMA OAN includes housing need from this part of the National Park but it does not separately calculate the level of OAN for this part of the National Park.

5.17 The Dartmoor National Park Authority (DNPA) is the Local Planning Authority for the National Park. As well as parts of the administrative areas of South Hams and West Devon, Dartmoor also covers part of the administrative area of Teignbridge District Council which is part of the Exeter HMA and adjoins the Plymouth HMA. The DNPA will produce a consolidated single Local Plan for the whole of Dartmoor National Park. This is evidenced in the Dartmoor National Park Local Development Scheme September 2015 (paragraph 3.5). Consequently the DNP area is not part of the Plymouth and South West Devon JLP and this is evidenced by the Local Development Schemes for the 3 LPAs. So the JLP excludes policies for the Dartmoor National Park.

5.18 This Addendum shows how the SPT3 housing provision target has been generated by making an allowance for 600 dwellings of supply forecast to be delivered within that part of the National Park within the districts of South Hams and West Devon. It would meet housing need related to Dartmoor National Park, translating Plymouth HMA need to the JLP policy targets. In accordance with Duty to Coordinate requirements, the JLP Councils have worked with the DNPA to quantify the DNP allowance. Deducting that allowance from the total OAN for the HMA identifies the scale of HMA need to be accommodated in the JLP area.

5.19 The JLP Councils have collaborated with the DNPA when producing the OAN evidence for the Plymouth HMA which has informed the JLP. This is also expected to inform future work on the Dartmoor Local Plan. It is understood that further evidence about the OAN for the National Park will emerge in due course. This collaborative working led to the JLP making an allowance for 600 of the total 27,300 OAN from the Plymouth HMA to be accommodated in the DNPA area. Those 600 dwellings are therefore deducted from the Plymouth HMA OAN, resulting in the remaining need of 26,700 dwellings to be accommodated in the JLP area during the JLP plan period.
5.20 TP3(rev) Appendix 2.1 provides the evidence about from the DNPA to confirm that they have collaborated with the JLP Councils on the development of the distribution strategy during the Regulation 18 stage. This resulted in the JLP making an allowance of 600 homes to be delivered in the National Park 2014-2034, covering the South Hams and West Devon parts of the National Park. In their letter, the DNPA makes clear that it has welcomed the approach to housing and concluded that the recognition of the JLP of the need to accommodate the bulk of housing delivery in the JLP area was positive. In the DNPA representations in August 2016, the ‘Dartmoor Provisional Allowance’ indicated was the product of discussion, based upon our combined best available evidence at the time.

5.21 The JLP Councils note that the DNPA will be taking forward the work on the Plymouth HMA OAN, and the Dartmoor Provisional Allowance into their own Local Plan review work, which is underway, and their letter in Appendix 2.1 states that the DNPA “will refine and confirm this housing allocation figure through continued joint work on an overarching ‘story’ for the HMA’s distribution strategy.”

5.22 In their representations on the Regulation 19 JLP, the DNPA subsequently stated:

“it is important to recognise that this is based upon the information available for our own plan area at this point in time, and DNPA cannot be ‘committed’ to this figure at such an early stage in our own local plan process. We will seek to confirm the deliverability of this figure through our own local plan review and in doing so will continue to work with you as necessary to seek to meet the OAN of the Housing Market Area in full”.

5.23 The Dartmoor National Park Authority published an Issues Consultation Report (April 2017) following an Issues Paper in October 2016. The DNPA held meetings with local communities in autumn 2017 to start to talk with them about as the first step in the process of looking at sites for development. The current DNP Local Development Scheme shows that the Publication stage (Reg. 19) of the Local Plan review is scheduled for 2018, with submission in 2019.

Quantifying the DNP allowance

5.24 It would be unreasonable to make no allowance for the potential for housing supply to be delivered in that part of DNP which is located in South Hams and West Devon. There is clear evidence that housing development occurs within this part of the DNP (see Appendix 2.2 in TP3(rev)). Making no allowance would therefore lead to double counting and over provision in total. In addition, it could have an adverse impact on the demographic mix of communities in the National Park by accommodating households outside the DNP that might otherwise contribute to that mix, and in turn this increase the risk of rural depopulation in the Park.

5.25 The 600 dwellings allowance has been calculated on the basis of actual supply trends within the National Park. As shown in the evidence in TP3(rev) Appendix 2.2, an average of 31 dwellings per year have been built within those parts of the National Park located within the administrative areas of South Hams and West Devon. This is rounded to 30 dwellings pa for the purpose of this analysis. In the absence of a new
draft Dartmoor National Park local plan and an up to date published OAN for the National Park at this time, the JLP Councils consider that:

- it is reasonable to base the DNP allowance on supply information
- the evidence in TP3(rev) Appendix 2.2 provided by the DNPA is robust, proportionate evidence, consistent with NPPF
- supply continuing at the historic rate of 30 dpa is a reasonable prospect
- the actual delivery rate of 30dpa in the last 10 years is a reasonable indicator on which to then forecast the potential for future supply in this area.

5.26 Applying the delivery rate of 30 dpa to the 20 years of the JLP plan period results in the 600 dwellings allowance for supply that should be taken into account when calculating the JLP housing provision target. That is, subtracting 600 from 27,300 dwellings housing need identified in the SHMA Part 1 leaves 26,700 dwellings to be met within the JLP plan area in the period 2014 to 2034.

5.27 The JLP Councils continue to collaborate with the Dartmoor National Park Authority regarding this cross boundary matter. The JLP Councils emphasise that the 600 dwellings allowance is made for the purposes of deriving the JLP housing provision target, based on supply evidence to justify the DNP ‘allowance’. The JLP does not prejudge or predetermine the National Park housing provision policy target that would be set by the emerging DNP Local Plan. Nor does the Plymouth OAN (HO13) evidence prejudge the housing needs assessment work being undertaken for the DNPA.

b) Consider whether there is any cross boundary unmet need arising from outside the HMA

5.28 This section of the Addendum shows how the JLP Councils have considered whether it has been clearly established through the plan-making process of other Local Plans that the housing needs of other LPAs outside the Plymouth HMA must be met through provision in the JLP area. This is in accordance with the Duty to Cooperate requirements. At this time no such need has been identified. Consequently there is no external unmet need to add to the objectively assessed need of the JLP area.

5.29 Other areas - Devon: The JLP Councils have worked with Devon County Council and the local authorities neighbouring the JLP area on cross boundary issues using the Duty to Cooperate. The outcomes of this collaborative working are as follows:

1. Torbay – Torbay Council adopted the Torbay Local Plan 2012 to 2030 in December 2015. The plan does not identify any unmet housing need that should be accommodated outside Torbay for the plan period. Nevertheless, Duty to Cooperate discussion between the JLP authorities and Torbay Council are ongoing. In part, this is because Policy SS12 Housing includes the following clause:
“The overall provision of homes will be carefully monitored to ensure that it is provided in a sustainable manner and maintains a rolling five year supply of deliverable sites in accordance with Policy SS13. Where there is evidence that there is a need to bring forward additional housing beyond the figure above\textsuperscript{13}, appropriate locations will be identified through cross boundary review of strategic housing land availability.”

The reasoned justification in paragraph 4.5.42 states that “Development in Torbay is nearing the area’s total capacity. A cross-boundary review of strategic housing land availability will be undertaken as part of a longer term assessment of growth options…….”

2. **Greater Exeter** – this covers the administrative areas of the Exeter, Mid Devon, East Devon and Teignbridge LPAs. These authorities have agreed to prepare a joint plan and work is in progress on preparing the Greater Exeter Strategic Plan Consultation on the GESP: Issues commenced on 27 February 2017 and end on 10 April 2017. The Local Development Schemes for these LPAs show that the GESP: Publication Plan is anticipated in February 2019. The Objectively Assessed Need for housing has not yet been established and published. Consequently there is no evidence at this time to demonstrate that there is any unmet housing need from the Greater Exeter area that should be accommodated by the PSWDJLP.

3. **Torridge and North Devon** – the North Devon and Torridge Joint Local Plan has been submitted for Examination. Policy in the plan and its supporting evidence confirm that that plan is accommodating the full OAN, and hence there is no unmet housing need to be accommodated elsewhere.

Examination hearings have been held. In her Note to the Councils of 9 December 2016 following the Closure of Hearings on the 6 November 2016, the Inspector found that the Councils’ calculation of OAHN and the proposed housing requirement for the period of the Local Plan to be sound. However, the Inspector concluded that the Councils need to review their housing land trajectory, including in particular the availability of land to meet the initial five years supply from adoption of the Plan. In order to identify a housing land supply which includes a 20% buffer and adopts the Sedgefield methodology, it is most likely that the Councils will need to identify additional sites from the SHLAA or from omission sites put forward during the examination of the plan. She has Councils are requested to carry out the above work on the housing land supply, and to identify a supply of specific deliverable sites to provide 5 years supply of housing from the adoption of the Plan. The Inspector has made clear that she looks to the Councils to develop and put forward the process through which they will undertake to secure a five year housing land supply in accordance with Government policy, throughout the lifetime of the Local Plan.

\textsuperscript{13} 8,900 dwellings over the plan period
The Councils completed that work on housing supply and consulted on Further Proposed Main Modifications for a period of 6 weeks from 20 July to 1st September 2017. The Inspector has considered the results of the consultation. Two further examination hearing days were scheduled for January 2018 to discuss issues relating to the housing requirement and housing supply. The Inspector’s Report was published on 11 September 2018 and found that the plan can be made sound and the Councils can take the plan forward to adoption.

5.30 Other areas – Cornwall: - The Cornwall Local Plan Strategic Policies was adopted on 22nd November 2016. The Inspector’s report into the examination of the Cornwall Local Plan Strategic Policies concluded that.... with the recommended main modifications the plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF. It is an appropriate basis for the planning of the Cornwall, providing the modifications.... are made to the Plan. The plan makes provision in Policy 21 for development proposals to 2030 to deliver a minimum of 52,500 homes. This has been rounded up from the OAN of 52,263 dwellings\(^\text{14}\). By accommodating the full OAN for Cornwall within Cornwall, there is therefore no unmet need from Cornwall to be accommodated within the PSWD-JLP area.

External housing needs - conclusion

5.31 In conclusion, the JLP LPAs have carefully considered whether it had been clearly established through the plan-making process of other Local Plans that the housing needs of other LPAs outside the Plymouth HMA must be met through provision in the JLP area. This is in accordance with the Duty to Cooperate requirements. At the time of plan preparation no such need had been identified.

5.32 Consequently there is no external unmet need to add to the level of objectively assessed need from the Plymouth HMA that is to be accommodated in the JLP area.

5.33 Policy SPT7 sets out the JLP policy towards working with neighbouring areas.

**STEP 1 CONCLUSION:**

**Total housing provision in the JLP plan area (2014 to 2034)**

5.34 In conclusion, based on robust, up to date, proportionate evidence, starting with the 27,300 dwellings Plymouth OAN set out in SHMA Part 1:

- No dwellings should be added for Affordable Housing Need reasons
- 600 dwellings should be deducted for an allowance for housing accommodated in Dartmoor National Park, based on supply evidence
- No dwellings should be added for accommodating unmet need from other HMAs.

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\(^{14}\) [https://www.cornwall.gov.uk/media/17156524/cornwalls-full-objectively-assessed-need.pdf](https://www.cornwall.gov.uk/media/17156524/cornwalls-full-objectively-assessed-need.pdf) -Cornwall’s Full Objectively Assessed Need paragraphs 77 and 81, December 2015 – which is a reassessment of the FOAN following the Local Plan Inspector’s preliminary findings
5.35 Consequently the total housing provision for the JLP Plan area is the Plymouth HMA OAN of 27,300 dwellings minus 600 dwellings for the DNP allowance; that is 26,700 dwellings.

5.36 This evidence underpins the SPT3 target of at least 26,700 dwellings provision for the JLP plan area in the plan period. That target is justified.

### Step 2 Any unmet needs internal to the plan area to resolve?

5.37 A key question for the JLP Councils has been - can the remaining Plymouth HMA need of at least 26,700 dwellings for the JLP area be fully met within the plan area? Step 2 of this analysis provides the evidence to demonstrate that the answer is yes. Key to this is the strategic approach to plan making taken by the Councils.

5.38 SHMA Part 1 evidence (HO13) established the scale of objectively assessed housing need in each district in the Plymouth HMA and then aggregated the OAN to the HMA level. This enables each Local Planning Authority to understand the needs of its area as required by NPPF paragraph 47.

5.39 SHMA evidence sets out housing need at an LPA level but this is because Local Authority areas are the statistical building blocks that enable the HMA OAN figure to be calculated. This does not mean that planning policy should be based on administrative boundaries.

5.40 Collaborative, joint plan making enabled the JLP Councils to take a strategic approach across the plan area towards meeting housing need. The NPPG (PPG ID 2a-010-20140306) suggests that joint local plans are able to distribute the need figure across the joint plan area, and this is the approach the JLP Authorities have taken. This approach has been reinforced in the recent DCLG consultation “Planning for the Right Homes in the Right Places: Consultation Proposals”, which says in paragraph 31: 

“In such cases (where joint plans are being prepared) we propose that the housing need for the defined area should be the sum of the local housing need for each local planning authority. It will be for the relevant planning authorities or elected Mayor to distribute this total housing need figure across the plan area.”

5.41 One of the reasons why the LPAs choose to take a joined up approach to plan making is to plan to meet the needs of the Plymouth HMA, in cooperation with each other and with the Dartmoor National Park Authority. Consequently, when developing the most appropriate strategy, the Councils were able to consider how to direct need within the JLP area, and set JLP Policy Area targets for the plan period.

5.42 The Strategy Topic Paper (TP5) explains that the JLP authorities have adopted the strategic approach, and therefore investigated options for distributing the total housing need figure across the joint plan area. That Topic Paper went on to set out a Preferred Option for the distribution strategy, based upon the assessment of options set out in the paper.
5.43 The distribution of development requires policy on judgements and decisions. Before those judgements are made it is first necessary to decide whether it is reasonable to plan for levels of housing growth overall in the plan area higher or lower than 26,700 dwellings.

1. Is a JLP target higher than the **26,700 dwellings** OAN justified?

5.44 The JLP Councils are mindful that Policy SPT3 expresses the housing provision targets as minimums, so the total for the JLP area is “at least 26,700 dwellings”. So, the question is whether a higher minimum target is appropriate.

5.45 The Councils are cognisant that NPPF policy is that LPAs should boost significantly housing supply, and that NPPF and NPPG do not preclude consideration of housing provision targets that are higher than the forecast OAN for housing. However, there is no evidence to warrant such an uplift at this time. It is unnecessary for the following reasons.

5.46 First because of the conclusions in paragraphs 5.34 to 5.36 regarding Step 1, notably:

- The LPAs have concluded that an uplift for affordable housing reasons is not justified; and
- There is no evidence of external need arising from outside the plan area that should be met in the JLP plan area.

5.47 Second, the HO13 SHMA Part 1 OAN evidence is robust, up to date, and proportionate. The Councils note that representations on the Pre-submission JLP asked why the minimum target is not based on previous evidence available at earlier stages of plan that suggested a scale of housing need of 30,300 in the HMA. That evidence had informed the JLP documents published for consultation in July/August 2016 (JLP4 page 3 and JLP6 page 7). The JLP Councils consider that the June 2016 assessment of OAN has been wholly superseded by the SHMA Part 1 (HO13) evidence on OAN. The June 2016 evidence is not up to date, and was not informed by the latest 2014-based national household projections or the 2015 and 2016 Mid Year Population Estimates.

5.48 Third, the scale of housing growth as recommended in SHMA Part 1 is consistent with the ability to support job growth within the plan area without the need for significantly higher levels of total commuting into the plan area. Policy SPT3 is expressed as a minimum ie of “at least 26,700” with forecast supply more than matching that target. There is sufficient headroom and flexibility in the plan’s forecast supply to allow for a swift response if economic conditions were to strengthen faster and jobs to grow more than predicted in the Experian forecast. Higher minimum growth rates could support further job growth but this comes at a cost. SHMA Part 1 already provides evidence that the recommended demographic trend scenario results in a slightly higher unemployment rate and lower economic activity rate compared to the baseline. Increasing the housing growth that is not be matched by the job growth,

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15 Joint Local Plan – Plymouth, South Hams, West Devon: Establishing the Objectively Assessed Need June 2016 (HO17)
could lead to a rise in unemployment rates and/or a fall in economic activity rates. Neither is consistent with the plan strategy. This could be particularly problematical in Plymouth which has the highest unemployment rates in the plan area. The alternative is that the additional housing would lead to higher levels of out commuting to neighbouring areas.

5.49 Consequently, on the basis of current evidence the JLP Councils conclude that there is no justification for a policy with a higher scale of housing provision. **Therefore, housing provision greater than “at least 26,700” is not justified.**

2. Is a JLP target lower than the **26,700 dwellings** OAN justified?

5.50 The LPAs are cognisant that NPPF and NPPG do not preclude a policy that provides for less than the OAN to be accommodated in the JLP, provided that:

- There is robust evidence that sufficient supply cannot be identified. During local plan Examinations, Inspectors have made clear that they expect the plan making authorities to have undertaken a robust, thorough and exhaustive search for and analysis of housing supply potential; and
- There is up to date evidence to demonstrate that the Duty to Co-operate has been undertaken effectively, which identifies effective means for the unmet need to be accommodated by neighbouring authorities — including their on-going, documented agreement.

5.51 The evidence set out in section 7 of this topic paper demonstrates that the housing supply forecast to be delivered in the plan period is sufficient to meet the forecast level of OAN of 26,700 to be met in the JLP area, and the scale of supply is sufficient to provide ‘headroom’ and flexibility. Therefore, there is no necessity for a policy that makes provision for less than the forecast OAN to be met in the plan area.

5.52 The determination of the scale of the JLP housing provision target has taken account of the Cornwall Local Plan Strategic Policies (adopted 22\(^{nd}\) November 2016). The Cornwall plan has not accommodated any housing need from Plymouth. The Inspector’s Report\(^{16}\) includes a section on Duty to Cooperate and housing need. The Inspector concluded that:

> **Plymouth City Council has a long-established aim of growing the City well above demographic projections. A new Plymouth Plan aims to continue this approach, but it has not yet been submitted for Examination. The City Council is not currently seeking any of its aspirational need to be met in Cornwall. Whether or not the City’s needs/aspirations are justified and whether they can be adequately met outside Cornwall will be a matter for the Examination of the City’s plan in due course. But at the present time there is no requirement for additional housing for Plymouth to be accommodated in Cornwall. It is appropriate for the Plan to refer**

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\(^{16}\) Published 23\(^{rd}\) September 2016 [https://www.cornwall.gov.uk/media/21914730/cornwall-inspectors-report-final-23-september.pdf](https://www.cornwall.gov.uk/media/21914730/cornwall-inspectors-report-final-23-september.pdf)
5.53 The 2017 objective assessment of housing need in the Plymouth HMA takes account of cross boundary matters including commuting flows between South East Cornwall and Plymouth. However, given the forecast housing supply in the JLP area evidence (see Section 7 of this Topic Paper), there is no unmet need that would justify the JLP seeking to plan for any Plymouth HMA housing need to be met outside the HMA in Cornwall, or elsewhere. Furthermore, the LPAs have also been mindful of the current capacity constraints on the Tamar bridge. This approach to accommodating need within the JLP is consistent with the stance taken to date by Plymouth City Council.

5.54 For the avoidance of doubt, and on the basis of the evidence base, this Topic Paper confirms that no housing need from the Plymouth HMA in the plan period is to be met outside the HMA. Consequently, the JLP evidence base demonstrates that all the housing need for the JLP area can be met within the JLP area.

5.55 The JLP Councils conclude that there is no justification for a policy with a lower scale of housing provision.

5.56 Therefore, housing provision less than “at least 26,700” is not justified.

DISTRIBUTION OF 26,700 DWELLINGS NEED WITHIN THE JLP PLAN AREA

5.57 The distribution of housing needs therefore focuses on how to apportion the 26,700 new homes according to the distribution strategy set out in the Distribution of Development Topic Paper (TP1).

5.58 The introduction to the Distribution Topic Paper “Deciding upon the distribution of development” (November 2016) (TP1), made clear that the JLP needs to have a strategy for distributing development in the plan area. This is a cornerstone of the plan that will support the plan’s objectives and guide its policies and proposals. It is a response to the question of how to address needs that have been identified, in particular the need for housing and employment. The section on “What are we trying to achieve with the Joint Local Plan?” signposted the emerging work on the Housing and Economic Development Needs Assessment17, as a part of the evidence base.

5.59 That topic paper assessed the alternative approaches for a development strategy. From this evidence, the LPAs developed the strategic approach that is now set out in the Development Strategy within the JLP. The topic paper assessed the alternative options. Details are in the appendix to that paper.

5.60 The Strategy Topic Paper (July 2017) (TP5) explains the strategic principles which underpin the aims and objectives of the Plymouth and South West Devon Joint Local Plan. It explains and clarifies the approach taken by the three local authorities in setting out a vision for Plymouth and South West Devon up to 2034, and signposts to

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17 Now produced as a suite of documents including SHMA Part 1 and SHMA Part 2
the key evidence base documents which have informed that approach. The approach to the distribution of housing reflects the key drivers for change (TP5 – pages 2 to 3). Producing a Joint Local Plan has enabled the JLP Councils to consider HMA matters comprehensively. The Housing Topic Paper provided considerable evidence to support that joint working. Clear themes have been identified which guide the vision, objectives and spatial strategy (TP5 pages 5 and 6 – including the clear intention of the JLP Councils that they want needs of the Plymouth HMA to be met in full within the HMA.)

5.61 The approach to the distribution of housing need taken by the JLP, and justified in the Revised Housing Topic Paper and Addendum, needs to be consistent with that spatial strategy; and with the governance mechanisms which the JLP Authorities are putting in place to ensure that the JLP is effectively monitored, that delivery is properly managed, and that strategic planning continues to take place collaboratively between the 3 LPAs.

A. Strategy: TP5 (Page 6) states that:

“Within this Strategy, there is a clear understanding of how the JLP will meet the need for new homes and jobs in the HMA.

- All needs, and the requirements to meet those needs are understood at the HMA level. The HMA need derives from aggregating the need calculated for each district. The latter ensures that each LPA can meet the primary duty of assessing the needs of the LPA area. This does not mean that the housing and employment policy requirements must be based on LPA administrative boundaries. The JLP presents us with the opportunity to approach the identification of needs, the translation of those needs into plan requirements, and the identification of a spatial strategy for the distribution of those requirements at a strategic level which is meaningful to local residents and businesses, and which results in the most appropriate strategy.

- When setting the Joint Local Plan policy requirements for new homes and jobs, these are expressed in the JLP firstly at the whole plan level, and then for the two policy areas:
  - Plymouth Policy Area .....
  - Thriving Towns and Villages Policy Area.....

B Governance - The Revised Governance Topic Paper (TP6(rev) March 2018 paragraphs 1.11 to 1.14) considers the issue of managing the distribution of development and the implications for the Delivery of Housing. It emphasises that the JLP sets out a strategic framework for managing the relationship between the growing city of Plymouth and the surrounding rural areas which is not constrained by local authority boundaries. It does this by framing the strategy around two Policy Areas. The reason for expressing the distribution of the Plan Area housing provision between the two Policy Areas as set out in Policy STP3 is to ring-fence the development needed to drive the Plymouth growth agenda and meet the city’s needs to the PPA. The definition of the Policy Areas in this way recognises the relationship between housing, economic activity, infrastructure and movement, and seeks to move towards more sustainable patterns of development.
5.62 The starting point for Step 2, Spatial strategy and governance provide the context for consideration of the distribution of housing need. The starting point is the identified need of the districts in the Plymouth HMA as evidenced by the SHMA Part 1 Table 19 (H013) OAN forecasts for each district. Table 8 shows the following identified need for each local authority district:

<table>
<thead>
<tr>
<th>TABLE 8 Local Authority</th>
<th>OAN (2014 to 2034)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>18,217</td>
</tr>
<tr>
<td>South Hams</td>
<td>3,924</td>
</tr>
<tr>
<td>West Devon</td>
<td>5,162</td>
</tr>
<tr>
<td>Plymouth HMA</td>
<td>27,303</td>
</tr>
</tbody>
</table>

5.63 The JLP Councils have considered the necessity for and the ability of the Plan to direct housing need within the plan area. This Addendum provides the audit trail of evidence on which the JLP relies:

a) to identify the extent to which the level of OAN relating to the individual LPA areas in the plan area can be met within those areas; and

b) to decide whether unmet need from one or more of the LPA areas can be accommodated elsewhere in the plan area.

5.64 Once the Dartmoor allowance of 600 dwellings is deducted from South Hams and West Devon, this leaves a need for 18,217 dwellings at Plymouth and 8,486 at West Devon and South Hams as shown in Table 9. This distribution of need represents a pattern which broadly fits the distribution strategy – that is, by concentrating growth at Plymouth to meet Plymouth’s 18,217 dwellings needs at Plymouth represents 68% of the total housing requirement for the JLP. The distribution strategy therefore ‘fits’ with meeting local housing needs.

**Table 9 Housing need and supply within LPA areas in the plan period**

<table>
<thead>
<tr>
<th>LPA</th>
<th>OAN (District) 2014-2034</th>
<th>DNP allowance deduction</th>
<th>JLP need</th>
<th>Housing Supply in LPA area</th>
<th>LPA Surplus/ Shortfall (-ve)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>18,217</td>
<td>0</td>
<td>18,217</td>
<td>14,746</td>
<td>-3,471</td>
</tr>
<tr>
<td>South Hams</td>
<td>3,924</td>
<td>-600</td>
<td>8,486</td>
<td>15,231</td>
<td>+6,745</td>
</tr>
<tr>
<td>West Devon</td>
<td>5,162</td>
<td>-600</td>
<td>8,486</td>
<td>15,231</td>
<td>+6,745</td>
</tr>
<tr>
<td>PLYMOUTH HMA</td>
<td>27,303</td>
<td>-600</td>
<td>26,703</td>
<td>29,977</td>
<td>3,274</td>
</tr>
</tbody>
</table>
5.65 The JLP Councils used the evidence about housing supply to undertake a ‘reality check’ of the OAN distribution. This led to the JLP Councils identifying options to distribute the ‘unmet’ need identified in Tables 9 (Plymouth) and 11a (West Devon) in this Addendum. Sections 7 and 8 of this Addendum provide the audit trail about the evidence on housing supply.

- The housing supply forecast to be delivered in Plymouth City in the plan period is 14,746 dwellings. This is the PPA supply of 20,668 minus the forecast delivery of 5,922 dwellings in that part of PPA in the South Hams (see TP3K Table PPA4 for details).
- The supply forecast to be delivered in South Hams and West Devon LPA areas is the TTV supply 9,309 dwellings (see TP3L Table TTV4) plus the forecast delivery of 5,922 dwellings in that part of PPA in the South Hams.

Plymouth

5.66 Table 9 shows that supply in Plymouth City is 3,471 dwellings less than the City need. This ‘shortfall’ is a strategic, cross boundary issue. A collaborative approach to resolve this issue is one of the main reasons why the three JLP Councils chose to prepare a joint local plan. This led to the strategy in the JLP of two policy areas.

5.67 The combined supply LPA ‘surplus’ of + 6,745 dwellings in South Hams and West Devon LPA areas in Table 9 reflects the existing adopted development plan policy in South Hams Core Strategy (2006) and the Plymouth Core Strategy (2007) plus the Sherford AAP (2007) and North Plymstock AAP (2007) which allocated the urban extension of Sherford including 5,500 dwellings. That site also benefits from planning permission for an urban extension and is presently under construction. This long standing planning policy is a cornerstone in the spatial strategy for the Plymouth area, and rightly continues to be part of the JLP.

5.68 It also reflects the positive decision made in the submitted plan to apply the JLP strategy of focusing growth at Plymouth and the resultant supply of 5,922 dwellings (forecast for delivery in the plan period) at the strategic urban extension allocations proposed in that part of the PPA which is located in the South Hams. It means that the needs of Plymouth are met at Plymouth and not dispersed to the rural parts of the JLP Plan area. The scale of supply also means that there is sufficient headroom and flexibility in the Plymouth Policy Area. The Councils are mindful that a further 1,686 dwellings within the PPA are also in this part of the South Hams but are forecast for delivery after the end of the plan period and thus not reflected in the 6,745 ‘surplus’.

5.69 **Option DoN-A** This option for Distribution of Need is based on the Plymouth Policy Area target matching the Plymouth City OAN. This would mean that all the needs of Plymouth City are met in the Plymouth Policy Area. Consequently all the housing needs of South Hams and West Devon in the Thriving Towns and Villages Policy area (ie excluding the National Park allowance) are met outside the PPA. The targets would be based on the JLP need shown in Table 10 below. This table is the first step in converting need expressed at the City/District level to a Policy Area need. In this
option PPA need equates to the Plymouth City need; and TTVPA need equates to the combined South Hams and West Devon district need minus the DNP allowance. The supply in each Policy Area can then be compared to the Policy Area need.

<table>
<thead>
<tr>
<th>Table 10</th>
<th>OAN (dwellings) 2014-2034 District</th>
<th>DNP deduction</th>
<th>JLP need POLICY AREA</th>
<th>Housing Supply POLICY AREA</th>
<th>Surplus/Shortfall (-ve) POLICY AREA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>18,217</td>
<td>0</td>
<td>PPA 18,217</td>
<td>PPA 20,668</td>
<td>2,451</td>
</tr>
<tr>
<td>South Hams</td>
<td>3,924</td>
<td>-600</td>
<td>TTVPA 8,486</td>
<td>TTVPA 9,309</td>
<td>823</td>
</tr>
<tr>
<td>West Devon</td>
<td>5,162</td>
<td>-600</td>
<td>JLP 26,703</td>
<td>JLP 29,977</td>
<td>3,274</td>
</tr>
<tr>
<td>PLYMOUTH HMA</td>
<td>27,303</td>
<td>-600</td>
<td>JLP 26,703</td>
<td>JLP 29,977</td>
<td>3,274</td>
</tr>
</tbody>
</table>

5.70 This means that part of the growth of Plymouth City is directed into the Plymouth Fringe which is located in the South Hams, but it would all be located in the Plymouth Policy Area. The distribution would be consistent with the strategic objective of focusing growth at Plymouth. All the JLP need could be met within the Plan Area.

5.71 However, there is an imbalance between the degree of flexibility in the policy areas. The total surplus at Plymouth would be nearly 300% more than that in South Hams and West Devon. Compared to a 13% headroom for Plymouth, the headroom for meeting the South Hams and West Devon ‘target’ is only 11%. Whilst this is an improvement on the position reported in TP3 based on 2016 Monitoring Point supply, further improvement is needed. The PPA headroom doesn’t include the 1,686 dwellings currently forecast for completion after March 2034 on two of the urban extensions in the Plymouth Fringe, but could be brought forward earlier\(^{18}\).

**West Devon**

5.72 A reality check on supply within the Thriving Towns and Villages Policy Area identified another issue. Policy targets must be realistic. The LPAs have to take account of the potential for housing supply to be delivered within the Thriving Towns and Villages Policy Area. Based on the information within the Thriving Towns and Villages housing trajectory, the supply within the two parts of the policy area is as set out in Table 11a below. That supply includes completions and existing commitments plus some sites previously allocated in adopted Local Plans and DPDs that have been allocated in the JLP. It also includes the 550 dwellings in the Sustainable

\(^{18}\) And that 13% headroom doesn’t include the possibility of large windfall sites in Plymouth City that could occur in the future.
Villages allowance (this is to be included in Policy TTV30 under proposed Main Modification MM34) 260 of which would relate to the South Hams LPA and 290 to the West Devon LPA area within the TTVA. The scale of forecast supply in the West Devon part of the TTVA reflects the ability to identify sites through site selection process that is consistent with the strategy.

### Table 11a LPA areas within TTVA: - LPA need compared to LPA supply

<table>
<thead>
<tr>
<th>LPA areas within TTVA</th>
<th>Supply* (excl DNP)</th>
<th>JLP Need</th>
<th>Shortfall/ Surplus</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Hams</td>
<td>5,701</td>
<td>3,624</td>
<td>2,077</td>
</tr>
<tr>
<td>West Devon</td>
<td>3,608</td>
<td>4,862</td>
<td>-1,254</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>9,309</strong></td>
<td><strong>8,486</strong></td>
<td><strong>823</strong></td>
</tr>
</tbody>
</table>

Source: Table 10 and the TTVA housing trajectory in TP3L (*supply disaggregated by the JLP Councils into the constituent LPA areas)

5.73 In the absence of detailed assessments of the scale of existing or forecast population or households within the South Hams and the West Devon parts of the National Park, this topic paper assumes a simple 50:50 split of the 600 dwellings allowance, ie 300 is deducted from each District’s OAN forecast, to give the JLP need in each LPA area within the TTVA as set out in Table 11 above. The combined need for South Hams and West Devon LPAs is 8,486 (rounded to 8,500).

5.74 Allowing for headroom of about 13% in West Devon, results in a 3,200 dwellings share of the TTVA need. Adding the gap for flexibility of 408 (ie 3,608 minus 3,200) to the West Devon shortfall of 1,254 in Table 11a results in the need to consider where to direct 1,662 dwellings (in other words, the forecast West Devon need of 4,862 minus the 3,200 need to be met in West Devon LPA). Rounded, this becomes 1,700 dwellings of unmet need from West Devon that will need to be accommodated in the JLP Plan area. Evidence in Table 11a in this Addendum demonstrates a small increase in forecast supply in West Devon LPA (+47 dwellings) in the plan period compared to Table 11a in TP3(rev). That increase provides evidence of improved flexibility in the forecast housing supply in West Devon. However, the JLP Councils conclude that it is not sufficient to justify increasing the monitoring target indicator for West Devon above the 3,200 dwellings shown in JLP Annex 2.

5.75 NPPG allows the JLP Councils to take a policy approach in a Joint Local Plan to the distribution of housing need. Within the Framework and guidance there is no requirement for policy to be solely based on administrative areas. It is clear that housing requirements can apply across the joint plan area. The Policy Area approach

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19 010 Reference ID: 2a-010-20140306
is consistent with the Framework, central to the JLP spatial strategy and justifies the distribution of housing need across the plan area.

Options for distributing the unmet West Devon need

5.76 If the 1,700 dwellings shortfall from West Devon were not accommodated elsewhere in the Plan area, then that would need would be unmet. NPPF requires that need to be accommodated. In the first instance the JLP Councils needed to consider whether it could be accommodated elsewhere in the Plan area.

5.77 The JLP Councils considered the following three options for directing unmet need from West Devon within the JLP plan area:

a) Direct all 1,700 dwellings from West Devon to other parts of the TTVPA (ie South Hams)
b) Direct all 1,700 dwellings from West Devon to the PPA
c) Direct part of the 1,700 dwellings from West Devon to PPA and part to the TTVPA (ie South Hams), aiming for at least 10 to 11% headroom in each of the ‘receiving’ areas.

a) OPTION DoN-B1 Direct all 1,700 dwellings from West Devon to other parts of the TTVPA (ie South Hams)

5.78 Whilst the supply forecast in South Hams is more than 1,700 there is evidence to indicate that it is not reasonable to expect that 1,700 dwellings directed to the South Hams would house a significant number of workers who would commute to West Devon. The main reasons are:

- Available commuting evidence indicates that commuting from the South Hams to West Devon was low at 203 travel to work trips per day (SHMA Part 1-Table 2) – at a time when there were about 36,850 households in the South Hams (equating to a commuting ‘rate’ from the South Hams to West Devon of about 0.6%).
- Applying a 14.8% vacancy rate to the 11,623 dwellings forecast for delivery in the South Hams LPA (see paragraph ES30) plus the 300 dwellings supply allowance assumed in the South Hams part of the DNPA plus a net additional direction of 800 dwellings from West Devon to South Hams would result in an increase of about 10,840 households between 2014 and 2034 in South Hams district. Applying the 0.6% ‘commuting’ rate to that growth equates to an extra 65 travel to work trips per day.
- The ratio of jobs growth (2,390) to household growth (about 4,478) in West Devon is about 50%. Applying this rate to 1,700 dwellings directed in this option from

20 The 11,623 supply accommodates the 900 dwellings being directed from West Devon to South Hams under Option DoN-B3. So a further 800 dwellings would be added if South Hams were to meet all 1,700 dwellings from West Devon under option DoN-B2.
West Devon to the South Hams part of the TTVPA (about 1,450 households) would suggest that this is equivalent to supporting about 700 jobs. The implied level of commuting by car or van\(^{21}\) could be of the order of 640 travel to work journeys per day. This is 3 times the magnitude of the number of journeys based on the current commuting ‘rate’ in South Hams district. The JLP Councils consider that this is unlikely. This is due to the challenges of the transport network, distances involved, awkward journeys and limited public transport services connecting the two Districts.

- Given the location of West Devon and the South Hams, travel to work by public transport would be very low. Current data indicates that about 90% of travel to work journeys in the South Hams are made by car or van. Even with car share this would be a substantial uplift in commuting by private vehicles, if the workforce were willing to commute. The LPAs consider that this is less than sustainable.

- Alternatively, if the labour force was not willing to commute to West Devon it could lead to either businesses not growing or leaving the West Devon area because sufficient labour supply is not available. If those businesses did not move to the South Hams then they could be lost from the HMA contrary to strategic objectives for economic growth.

Consequently, the JLP Councils consider that this option is not justified.

b) OPTION DoN-B2 Direct all 1,700 dwellings from West Devon to the PPA

5.79 Directing 1,700 dwellings to PPA would increase the total need in PPA to 19,917. With a PPA supply of 20,668, this would leave headroom of less than 4% (751 dwellings). Supply is therefore not sufficient to be able to accommodate all 1,700 dwellings need and have sufficient headroom.

Consequently, the JLP Councils consider that this option is not justified.

c) Option DoN-B3 Direct part of the 1,700 dwellings from West Devon to PPA and part to the TTVPA (ie South Hams)

5.80 Directing a proportion of the unmet West Devon need to PPA and the remainder to the South Hams part of TTVPA starts with the strategic objective of focussing growth at Plymouth to the extent consistent with providing sufficient headroom in the supply, but then directs the remaining need to the South Hams part of the TTVPA where the supply reality check demonstrates a healthy level of headroom.

5.81 Directing 800 dwellings of the 1,700 unmet need to PPA would increase the total need to be met in PPA from 18,200 to 19,000. With a PPA supply of 20,668, this gives a 9% headroom (1,668 dwellings). Supply in PPA is therefore sufficient to be able to accommodate 800 dwellings need with sufficient headroom (mindful of the

\(^{21}\) 91% travel to work journeys from South Hams to West Devon (184 of the 203) were made by driving a car or van (NOMIS- 2011 Census data)
other 1,686 dwellings in the urban extensions forecast to be delivered after the plan period so are not counted in this headroom). The JLP Councils therefore consider that directing 800 dwellings to the PPA is justified.

Table 11b  Distribution of unmet West Devon need: 800 to PPA, 900 retained in TTVPA

<table>
<thead>
<tr>
<th>POLICY AREA</th>
<th>OAN (dwellings) 2014-2034</th>
<th>DNP deduction</th>
<th>Target rounded POLICY AREA</th>
<th>Housing Supply POLICY AREA</th>
<th>Surplus/ Shortfall (-ve)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>18,217</td>
<td>0</td>
<td>19,000</td>
<td>20,668</td>
<td>1,668</td>
</tr>
<tr>
<td>South Hams</td>
<td>3,924</td>
<td>-600</td>
<td>7,700</td>
<td>9,309</td>
<td>1,609</td>
</tr>
<tr>
<td>West Devon</td>
<td>5,162</td>
<td>-600</td>
<td>26,700</td>
<td>29,977</td>
<td>3,277</td>
</tr>
<tr>
<td>PLYMOUTH HMA</td>
<td>27,303</td>
<td>-600</td>
<td>26,700</td>
<td>29,977</td>
<td>3,277</td>
</tr>
</tbody>
</table>

5.82 With 800 directed to the PPA, the combined need of South Hams and West Devon accommodated in the TTVPA falls to 7,700 (ie 8,500\(^{22}\) minus 800) which can then be compared to TTVPA supply of 9,309 dwellings as shown in Table 11b. The Policy Area targets in Option B3 would therefore be:

- Plymouth Policy Area = 19,000
- Thriving Towns and Villages PA = 7,700

**The main benefits of Option DoN-B3 distribution**

5.83 The JLP Councils consider that this option offers significant benefits, as follows:

- It supports the strategy. The accommodation of housing need strengthens the focus on Plymouth in line with strategic objectives, including the long term aspiration to support employment growth at Plymouth.
  - Part of the forecast employment growth for West Devon could occur in Plymouth Policy Area and South Hams, attracted by the availability of employment land and the labour supply accommodated in those areas. This would then retain employment in the HMA, consistent with the vision and development strategy.
  - Given the proximity of Plymouth to West Devon, including the urban extensions for example at Woolwell, there is still the potential for some of this directed housing need to be from labour force commuting to jobs in West Devon, supporting the West Devon economy.

- It is deliverable. Need is met where there is forecast housing supply to accommodate the distribution and provides sufficient headroom, so it is realistic.

\(^{22}\) See Addendum paragraph 5.73
The scale of surplus at PPA very similar to that in TTVPA. The options alters the degree of flexibility between the policy areas; with a 21% headroom for meeting the TTVPA’ target’ compared to a 9% headroom for Plymouth. But the latter doesn’t include the 1,686 dwellings forecast for completion after March 2034 on two of the urban extensions in the Plymouth Fringe.

- It is sustainable. The distribution pattern reduces the risk of significant increase in commuting, and concentrates more development in Plymouth where there are opportunities to support greater use and viability of sustainable transport modes. It also supports the market for housing within the South Hams that provides the opportunity to deliver much needed additional affordable housing in this area. It also reflects the fact that the number of towns and key villages (ie which have concentrations of facilities supporting the rural communities) are greater in South Hams than in West Devon.

- All the JLP housing need can be met within the plan area. There is no unmet need to be accommodated outside the JLP area (having discounted the 600 dwellings allowance related to the Dartmoor National Park calculated on a supply basis). This is consistent with national planning policy.

- It demonstrates effective collaboration on a strategic cross boundary issue, compliant with legislation.

**Dis-benefits of Option DoN -B3**

5.84 The scale of the monitoring target for West Devon is 3,200 dwellings (ie housing need to be met in West Devon). This is less than the West Devon need (excluding DNP) of 4,862 as shown in Table 11a in this Addendum. The principal disbenefit is that some job growth that was forecast to occur in West Devon may transfer elsewhere within the plan area for labour supply reasons. This could potentially have adverse consequences for the local economy. However, the option mitigates the impact by directing part of the need to Plymouth. The JLP Councils expect that Plymouth can provide a sufficiently attractive offer to encourage the retention of jobs within the plan area and the HMA. There is sufficient employment land in both Plymouth City and the South Hams to accommodate relocated or new employment development that may arise as a result of this option, as well as the needs of the City and the South Hams.

5.85 **On this evidence, the JLP Councils consider that Option DoN-B3 is justified.**

5.86 By accommodating all the housing need within the JLP Plan area, it has not been necessary to consider further steps such as revisiting the SHLAA and then the site selection process to identify additional supply capacity internal to the plan area. Nor has it been necessary to investigate the potential to identify additional supply capacity outside the plan area.
Policy Area targets

5.87 The JLP is a joint plan that has been positively prepared and addressed strategic cross-boundary issues. Through joint working and co-operation the Plan directs need across the plan area to the two Policy Areas, consistent with the plan’s vision, objectives and the spatial strategy. This enables all the housing need to be accommodated in the Plan area. It means that when the need to be met in the JLP area is added to the allowance for 600 dwellings to be accommodated in Dartmoor National Park there is no unmet housing need in the Plymouth HMA.

5.88 The strategic approach in the JLP that focuses on Policy Areas and the identification of those Policy Areas are justified in the Strategy Topic Paper (TP5). This is the reason why JLP policies, including the policy targets in SPT3, focus on policy areas and are not expressed in terms of Local Planning Authority areas. The Revised Governance Topic Paper (TP6(rev) March 2018 provides further evidence about managing the distribution of development and the implications for the delivery of housing, aligned with that strategy.

5.89 The policy area targets in SPT3 are used to manage housing land supply, and are the basis for assessing the 5 year housing land supply position for the purposes of plan-making and NPPF paragraphs 47 and 49 (see Section 8 of this Topic Paper). To clarify the operation of the spatial strategy in relation to managing the delivery and distribution of housing in the Plan Area, the JLP Councils have proposed a Main Modification (MM3) to the JLP (additional text is shown in bold underlined and deletions are shown by strikeout). The following changes to Policy and the reasoned justification in the JLP are part of MM3:

“Policy SPT3

Provision for new homes

The LPAs will plan, 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 this plan. Housing provision will be made for at least 26,700 dwellings (net) in the Plan Area during the plan period 2014 to 2034, comprising the policy area totals and the related market housing and affordable housing provision as follows:

1. Within the Plymouth Policy Area - at least 19,000 new homes, of which 4,550 should be affordable.
2. Within the Thriving Towns and Villages Policy Area - at least 7,700 new homes of which 2,050 should be affordable.

... The delivery and availability of housing land will be monitored annually. Any necessary adjustments will be made in order to deliver the overall local plan housing target and maintain a rolling 5 year supply of deliverable housing land, consistent with the policy area totals. The Policy Area housing requirements are separate and non-transferable. Only housing proposals within each Policy Area will be considered to contribute to meeting the housing...
3.22 “Full details of the OAN calculation, and the approach taken by the LPAs to meeting the need for housing, are set out in the Strategic Housing Market Needs Assessment 2017 (SHMNA) and the Revised Housing Topic Paper (TP3(rev), February 2017 January 2018 and the Addendum October 2018.”

3.25 “Local Plans must demonstrate that a five year land supply of specific deliverable sites is available at the point of adoption of the plan, measured against their housing requirements. The JLP sets out a housing requirement figure for the Plan Area as a whole as well as for the Plymouth Policy Area and the Thriving Towns and Villages Policy Area. It must therefore demonstrate a five year land supply against each of these targets. Additionally, for monitoring purposes the five year land supply will be assessed at local planning authority level.”

7.23 (3rd bullet) “Each The LPAs will additionally monitor housing delivery to ensure the requirements of the NPPF are being met, and set out a 5 year land supply for their area. This is to ensure that the requirements of paragraph 47 of the NPPF are being met, and is also to show how each LPA is contributing to delivering new homes as envisioned by the strategy and policies set out in the JLP, and chiefly to demonstrate that growth is taking place across the two policy areas as set out in the spatial strategy. LPA housing monitoring indicative requirements are set out as Indicator I1a in Annex 2 of the JLP”

Annex 2, Indicator I1a “Total homes completed (including brownfield and windfall) by Local Planning Authority area (base date 1 April 2014)
PCC: 13,200
WDBC: 3,200
SHDC: 10,300
5,800 in Plymouth Policy Area; 4,500 in TTV Policy Area”

CONCLUSION

5.90 Based on the above assessment with the latest evidence taken account of by this Addendum, the JLP Councils continue to conclude that of the distribution of housing need options considered, Option DoN-B3 is preferred because it is justified, consistent with strategy, and deliverable. It is therefore the option which the Councils selected as the basis for the Policy Area housing provision targets set out in JLP Policy SPT 3, and the indicators, including the monitoring targets set out in Annex 2 Indicator I1a, as amended by proposed Main Modification MM3.
6. POLICY DEVELOPMENT – HOUSING PROVISION TARGETS

6.1 A crucial element of the formulation of the JLP has been to distribute the Local Plan housing requirement across the joint area, guided by the distribution strategy and the analysis and evidence in Section 5 of this topic paper. The JLP sets out a plan-wide housing requirement of 26,700 new homes to be delivered between 2014 and 2034, and this requirement will ensure that needs are met in full.

6.2 Table 11c sets out the housing provision targets which are included in the Submission Plymouth and South West Devon Joint Local Plan.

Table 11c

<table>
<thead>
<tr>
<th>Policy Area</th>
<th>Total Housing Provision Target (at least)</th>
<th>Annualised rate (pa)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth Policy Area</td>
<td>19,000</td>
<td>950</td>
</tr>
<tr>
<td>Thriving Towns and Villages Policy Area</td>
<td>7,700</td>
<td>385</td>
</tr>
<tr>
<td>JLP PLAN AREA</td>
<td>26,700</td>
<td>1,335</td>
</tr>
</tbody>
</table>

6.3 For the avoidance of doubt, the policy target for the provision of at least 7,700 homes to be built in the plan period in South Hams and West Devon as included in JLP policy SPT3 excludes the allowance for 600 dwellings in the HMA to be accommodated in Dartmoor National Park based on potential supply in the plan period in that part of Dartmoor National Park within the Plymouth HMA.

6.4 The total housing provision targets include both market and affordable housing. The affordable housing targets for each of the Policy Areas are set out in JLP Policy STP3 and the justification of the separate targets for affordable housing is set out in Section 9 of this Addendum.

6.5 For the avoidance of doubt, the Submission JLP expresses policy provision targets in SPT3 as totals for the plan period, not as annual rates, and the totals are “minimums”. The JLP housing provision is at least 26,700 dwellings for the plan period. There are separate targets for the two Policy Areas, and these are used for 5 year housing land supply assessment purposes (see Section 8).

6.6 The annualised rate of housing provision is the rate that is used in the calculations of the 5 year housing land supply assessment (see Section 8 of this Addendum). Annualised rates are calculated by simply dividing the target total by 20 which is the number of years in the JLP plan period. Annualised rates have two principal uses:
1. An annualised requirement rate is used in the Plan-Monitor-Manage analysis. For example, the analysis for the plan area is set out in Table JLP3 (based on the 2017 monitoring point trajectory for the plan area in TP3J). This is one of a suite of metrics and indicators that are used to assess and help to manage housing supply performance. The rate for the Joint Local Plan area is calculated by dividing the total policy requirement figure of 26,700 by 20 which is the number of years in the plan period. This results in an annualised rate of 1,335 dwellings per annum. The rate is the same in all years in the plan period. This rate is illustrated by the green ‘Plan’ line in Graph JLP2A (Plan – Manage) in TP3J. The annualised rate is used to calculate the red Monitor line in Graph JLP2B and the orange Manage line in Graph JLP2A (TP3J).

2. The annualised rate is also used in calculating the 5 year housing land supply position. For example, the 1,335 dwellings per year rate is included in Table JLP4 Rolling 5 year housing land supply (TP3J) which informs Graph JLP3.

6.7 The annualised housing provision requirement is also calculated for each of the two Policy Areas, as follows:

a) The annualised housing provision requirement for the Plymouth Policy Area is **950 dwellings per year**, calculated by dividing the minimum requirement of 19,000 by 20 years. The latest housing trajectory in TP3K underpins the Plan Monitor Manage analysis for the PPA in Table PPA5 which uses this annualised rate (illustrated by graphs PPA2A and PPA2B) and the rolling 5 year housing land supply analysis in Table PPA6 (illustrated by graph PPA3).

b) Likewise the annualised housing provision requirement for the Thriving Towns and Villages Policy Area is **385 dwellings per year**, calculated by dividing the minimum requirement of 7,700 by 20 years. The latest housing trajectory in TP3L underpins the Plan Monitor Manage analysis for the TTVPA in Table TTV5 which uses this annualised rate (illustrated by graphs TTV2A and TTV2B) and the rolling 5 year housing land supply analysis in Table TTV6 (illustrated by graph TTV3).

6.8 These illustrative graphs are also included in this Addendum at Appendix 6.2.
7. FORECAST HOUSING SUPPLY

BOOSTING HOUSING SUPPLY

7.1 Government planning policy specifies the ways for Local Planning Authorities to boost significantly the supply of housing (NPPF paragraph 47). This section of the Addendum therefore focuses on:

- the scale of housing growth forecast to be delivered through development in the plan period and how this boosts supply
- evidence demonstrating the scale of supply – notably the trajectories, and evidence, including SHLAA and industry intelligence, about lead in times and delivery rates
- the sources of supply; and
- how supply meets the objectively assessed need for housing in the Plymouth HMA to be accommodated in the JLP plan area.

7.2 The JLP makes provision for substantially more housing than that that has been achieved across the three authority areas previously, thereby significantly boosting housing supply. 1,087 dwellings per annum were delivered in the plan area between April 2001 and March 2014 (See TP3(rev) Appendix 5 for past delivery in each LPA in the 13 years before the start of the JLP plan period). Both the JLP housing provision target and the forecast supply in the plan area exceed that rate.

- The annualised target rate of 1,335 dwellings per annum in the plan area based on SPT3 is nearly 23% above that historic delivery rate.
- The latest JLP housing trajectory (TP3E – Table JLP1) shows 29,977 dwellings supply is forecast to be delivered in the plan period. The annualised delivery rate is 1,499 dpa. This is 38% above historic rates.

7.3 NPPF policy is about boosting housing supply. The evidence in this topic paper and the trajectories demonstrates that the JLP policies and proposals significantly boost supply, compliant with NPPF.

7.4 Assertions have been made in representations on the Regulation 19 JLP that to boost supply the JLP must exceed historic policy provision targets. Those assertions are illogical and irrelevant. Neither NPPF nor PPG requires the JLP to use historic policy targets as the basis for justifying a new plan. The JLP Councils are mindful that housing provision policy targets in the Plymouth Core Strategy and the West Devon Core Strategy derived from an emerging Regional Spatial Strategy that was not approved and subsequently abandoned due to the repeal of legislation for RSS preparation. The Devon Structure Plan (containing the target on which the South Hams Core Strategy relied) was revoked when the Revocation Order made by the Secretary of State came into effect on 20 May 2013. The targets relating to all three plans were generated pre-NPPF and, unlike the Submission JLP housing provision
targets, none are based on the latest, up to date objective assessment of housing need.

**EVIDENCE - HOUSING TRAJECTORIES**

7.5 The NPPF (paragraph 47 – 4th bullet point), requires that local planning authorities should set out the expected rate of housing delivery through a housing trajectory for the plan period. The information about housing delivery which has been used to inform the Joint Local Plan is set out in suites of housing trajectories. These trajectories provide evidence about actual and forecast future delivery of housing in the plan period. They are part of the JLP evidence base (see Addendum paragraphs 1.10 to 1.14). Further explanation and details are set out in paragraphs 7.6 to 7.12 of the Addendum.

7.6 Each suite contains three housing trajectories. These show the land supply position based on a specific monitoring point relating to the following areas:

- The Plymouth and South West Devon Joint Local Plan area;
- The Plymouth Policy Area; and
- The Thriving Towns and Villages Policy Area.

**Trajectory production timeline**

7.7 The oldest suite of trajectories related to a 31st March 2016 Monitoring Point. Subsequent suites related to a 31st March 2017 Monitoring Point. The most recent suite are the trajectories for the JLP area (TP3J); the Plymouth Policy Area (TP3K) and the Thriving Towns and Villages Policy Area trajectory (TP3L). These are the latest source of evidence to demonstrate the scale and forecast timing of dwellings completions, and analysis of delivery performance used for managing housing supply (details set out in Topic Paper Section 8). The timeline for the production and use of the suites of housing trajectories is as follows, with the latest suite superseding the earlier suites:

1. **The 2016 Monitoring Point trajectories** (published in March 2017 in TP3A, TP3B and TP3C, and later republished in A3 format in October 2017 in documents TP3Ai, TP3Bi and TP3Ci). These were analysed in Housing Topic Paper March 2017 (TP3). Those trajectories and that analysis were subsequently superseded by the 2017 Monitoring Point housing trajectories.

2. **The 2017 Monitoring Point trajectories** (TP3E, TP3F and TP3G - published November 2017) were produced by the Councils in response to the request by the Inspectors’ in their letter of 4 September 2017 (EXC2). Those trajectories were illustrated through the plan-monitor-manage graphs in Appendix 4 of the revised topic paper (TP3(rev)) These are the same graphs as in Graphs JLP2A & B (TP3E), Graphs PPA2A & B (TP3F) and Graphs TTV2A & B (TP3G). This suite of trajectories informed the analysis about housing supply and distribution of housing need in TP3(rev). That analysis has now been superseded by the analysis in this Addendum.
3. **Updated 2017 Monitoring Point trajectories** (EXD61A; EXD61B and EXD61C-published 19 April 2018) were produced by the JLP Councils in response to the Inspectors’ request at the Matter 12 hearing on 22 March 2018, when the Inspector asked the Councils:

a) To update the end March 2017 Monitoring Point housing trajectories (TP3E, TP3F, TP3G) to show changes to JLP allocations’ site capacity and forecast delivery where that had been agreed by the Councils during the hearings; and

b) To update the 5 year housing land supply tables previously provided in EXD61, consequential to the changes to the trajectories.

The Councils therefore revised the housing trajectories, including the updated suites of tables and graphs. Changes to site allocations’ forecast delivery that were included in trajectories EXD61A; EXD61B and EXD61C were as follows (details are set out in paragraph 7.68 in this Addendum):

**New Table ADD1**: PPA changes to forecast delivery of dwellings

<table>
<thead>
<tr>
<th>NEW TABLE ADD1</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PLY25 Sugar House, Sutton Harbour</td>
<td>+10</td>
</tr>
<tr>
<td>PLY59.12 Fields to north of St Budeaux A38 junction</td>
<td>-26</td>
</tr>
<tr>
<td>NET CHANGE</td>
<td>-16</td>
</tr>
</tbody>
</table>

Source: EXD61B

**New Table ADD2**: TTVPA changes to forecast delivery of dwellings

<table>
<thead>
<tr>
<th>NEW TABLE ADD2</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>TTV6 Noss-on-Dart. DARTMOUTH</td>
<td>+26</td>
</tr>
<tr>
<td>TTV13 The Quayside, KINGSBRIDGE</td>
<td>– 40</td>
</tr>
<tr>
<td>TTV22 Plymouth Road, TAVISTOCK</td>
<td>+50</td>
</tr>
<tr>
<td>New TTV site replacing TTV29.4+TTV29.5 Dartington Estate, DARTINGTON</td>
<td>-30</td>
</tr>
<tr>
<td>NET CHANGE</td>
<td>+6</td>
</tr>
</tbody>
</table>

Source: EXD61C

It should be noted that some changes to site allocation capacities had already captured by trajectories TP3E, TP3F and TP3G. So their continuing inclusion in trajectories EXD61A; EXD61B and EXD61C did not change the forecast supply further. Ie NET NIL CHANGE.24

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23 Those trajectories, and the related tables and graphs pre-date the Post Hearing Advice Note, so have now been superseded by the latest 2017 Monitoring Point trajectories. (Please note: the changes to the forecast of sites’ delivery in the trajectories in EXD61A; EXD61B and EXD61C have now been included in the latest suite of trajectories (TP3J; TP3K and TP3L)).

24 However, changes to allocations’ indicative capacity have required proposed Main Modifications to the JLP (see Addendum New Tables ADD5, ADD6, and ADD7).
4. **Revised 2017 Monitoring Point trajectories** (TP3J, TPK, and TP3L - published October 2018). These comprise the latest suite of trajectories. These revisions were produced by the JLP Councils following the Inspectors’ Post Hearing Advice Note (EXC15). The revised 2017 trajectories are illustrated through the plan-monitor-manage graphs in the revised Appendix 4 included in this Addendum. They are the same graphs as in Graphs JLP2A & B (TP3J), Graphs PPA2A & B (TP3K) and Graphs TTV2A & B (TP3L). The JLP Councils consider that it is appropriate for these graphs to be included in the plan, to illustrate the trajectories (See Main Modification MM4-Annex 5).

   a) As well as amending TP3E, TP3F and TP3G by including the changes to the trajectories set out in EXD61A; EXD61B and EXD61C, the latest trajectories TP3J, TPK, and TP3L contain the following changes to site allocations proposed by the JLP Councils in response to the Inspectors’ Post Hearing Advice Note:

   - **PPA Changes** – NONE
   - **TTVPA changes** - site allocations proposed to be deleted (see New Table ADD3)

   **NEW TABLE ADD3**

<table>
<thead>
<tr>
<th>TTV15.1*</th>
<th>West Alvington Hill, KINGSBRIDGE</th>
<th>-60</th>
</tr>
</thead>
<tbody>
<tr>
<td>TTV29.23</td>
<td>Land South East of Carehouse Cross, STOKENHAM</td>
<td>-20</td>
</tr>
<tr>
<td>NET CHANGE</td>
<td></td>
<td>-80</td>
</tr>
</tbody>
</table>

   * Note: TTV15.1 has planning permission, so the 60 dwellings forecast for delivery on this site are now included as large site (non-allocation) commitments in TP3L.

   b) As a result of the April 2018 and October 2018 changes, the total number of dwellings forecast for completion on JLP site allocations has decreased by 90 from 21,662 to 21,572 dwellings.

   c) Other changes to forecast housing delivery consequential to the Post Hearing Advice Note have also been made relating to: the Sustainable Villages Allowance (with a decrease of 100 dwellings); and to the TTVPA small windfall forecast (with an increase of 52 dws)\(^{25}\). The overall change in the JLP 2017 Monitoring Point trajectory as a result of the April 2018 and October 2018 changes is therefore a reduction of 78 dwellings in total supply forecast for delivery in the plan period, down from 30,055 to 29,977. New Table ADD4 summarises the changes.

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\(^{25}\) Paragraphs 16 to 20 in Annex 1 to Appendix 7.6, and New Table15 of this Addendum provide the detailed explanation of these changes.
### NEW TABLE ADD4 Changes to forecast supply compared to TP3(rev) /TP3E

<table>
<thead>
<tr>
<th>Source of change</th>
<th>Change made to supply components in the housing trajectories</th>
<th>No of dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXD61B April 2018</td>
<td>PPA site allocations</td>
<td>-16</td>
</tr>
<tr>
<td>EXD61C April 2018</td>
<td>TTVPA site allocations</td>
<td>+6</td>
</tr>
<tr>
<td>TP3L October 2018</td>
<td>Proposed deletion of site allocations TTV15.1 and TTV29.23</td>
<td>-80</td>
</tr>
<tr>
<td>TP3L October 2018</td>
<td>Re-categorisation of TTV15.1 as a large site commitment</td>
<td>+60</td>
</tr>
<tr>
<td>TP3L October 2018</td>
<td>Reduction in Sustainable Villages Allowance supply category</td>
<td>-100</td>
</tr>
<tr>
<td>TP3L October 2018</td>
<td>Consequential increase in TTVPA Small windfalls (non-garden land) allowance</td>
<td>+52</td>
</tr>
<tr>
<td><strong>TOTAL CHANGE</strong></td>
<td></td>
<td><strong>-78</strong></td>
</tr>
</tbody>
</table>

### Reaching agreement on the housing trajectories

7.8 TP3(rev) provides the audit trail about evidence demonstrating where agreement has been reached on site trajectories, The Submission JLP relied on evidence from the 2016 Monitoring Point trajectories (TP3Ai, TP3Bi and TP3Ci). Data in the end March 2016 Monitoring Point housing trajectories was informed by the SHLAA process which included SHLAA panel ratification of the lead in times/delivery rate methodology (see for example HO2 paragraphs 3.4.8 to 3.4.14 and HO2G & HO2H) and correspondence with site promoters and landowners to establish delivery timeframes and rates (see HO2D). To inform the data in the end March 2016 Monitoring Point TTVPA housing trajectory (TP3C) that was published in March 2017, South Hams and West Devon Councils sought information with Plymouth on two separate occasions. This was part of a joint exercise to gather evidence about delivery timeframes and rates from developers/landowners promoting sites. Although the level of response was limited those responses received informed the production of the SHLAA’s and also the 2016 housing trajectory (see HO2D).

7.9 However, the 2016 trajectory was wholly superseded by the end March 2017 Monitoring Point housing trajectories (TP3E, TP3F, TP3G). The process to produce the individual site trajectories included in the 2017 Monitoring Point Policy Area trajectories included discussion with the main developers for each of the large sites. This was undertaken in response to the request by the Inspectors’ in their letter of 4 September 2017 (EXC2). They asked that, in producing the trajectories, the Councils should consider as part of their evidence for the hearings, the extent to which the lead in times and delivery rates have been agreed with the main developers for each site, and if not, what assumptions are being made in relation to lead in times and delivery rates for each of the sites. This provided a timely opportunity to update the forecasts of completions in the trajectories with the latest evidence about delivery. The Councils consulted the developers, agents and landowners in October/November 2017.
7.10 The results were set out in evidence document TP3H and TP3I. As a result, the Councils concluded that the trajectories were robust. They were up to date, locally specific, and informed by the latest intelligence about sites. They had also benefitted from the “reality check” applied by the Councils to avoid unrealistic forecasts on individual sites and in combination from multiple sites at a settlement. Details about the consultation process are set out in Addendum paragraphs 7.11 and 7.12. Through discussions on specific sites at examination Hearings, the JLP Councils agreed a limited number of refinements to site trajectories – see Addendum paragraph 7.24. These changes extended the agreement that has been reached on housing trajectories. Those changes are captured in trajectories TP3K and TP3L.

PPA large site trajectories - consultation process:

7.11 The process to produce the individual site trajectories included in the Plymouth Policy Area trajectory included correspondence and/or discussion with the main developers/landowners for each of the large sites.

- PCC produced an initial updated forecast for each large (5+) site included in the PPA with consent at the 2017 monitoring point using evidence of delivery rates on sites underway, dwellings and sites under construction as at April 1st 2017.

- PCC updated the forecast for JLP allocation sites without consent applying the SHLAA methodology for lead in times and delivery rates which included analysis of the evidence submitted by developers/landowners to inform the SHLAA (HO2D) and the status of sites some 12 months on.

- Plymouth City Council then consulted all the main developers and landowners where applicable of those large sites in October 2017, and provided them with the latest forecast seeking their views on whether they agreed or disagreed with the forecast. If there was disagreement PCC asked if the reasons for disagreement could be set out and alternative forecasts provided.

- Nearly all developers/landowners responded in November 2017, mostly in writing and the odd number by telephone. Some developers have agreed with those initial trajectories. Others provided updated forecasts particularly where development was already underway. Most of the responses received made clear they considered that the Councils’ initial forecasts were too cautious and there was an expectation of earlier and faster delivery on their sites. Furthermore, many supported this by stating that they would be submitting planning applications in the next year or two and anticipated early site starts.

- PCC have carefully considered that evidence and have modified the PPA trajectory in light of this new evidence, except for a few sites where the Councils considered it prudent to build in a longer lead time as per the SHLAA methodology or for location specific reasons because the combined annual forecasts for sites in close proximity offering the same product would have been unrealistic (see TP3H).

- Consequently the JLP Councils submitted evidence to the Examination on 29 November 2017 (published on the 30th) about the large sites in the PPA identifying where the site trajectory has been agreed with the developer or there is broad agreement (TP3H). Where there is only partial agreement or the
trajectory has not been agreed, then the assumptions relating to lead in times and delivery rates are set out in TP3H.

TTVPA large site trajectories - consultation process:

7.12 The process to produce the individual site trajectories included in the Thriving Towns and Villages Policy Area trajectory included correspondence and/or discussion with the main developers/landowners for each of the large sites.

- The South Hams and West Devon Councils produced an initial detailed assessment for each large site included in the TTVPA 2017 Monitoring Point housing trajectory that was not complete at the 2017 monitoring point. That is, sites with planning permission at March 2017 or allocated in the JLP submission plan. For each site, the Councils collated detailed information about applications and development management processes, lead in times and delivery into a standard template. This produced the forecast of the number of dwellings (net) completed in each year on each site in the plan period. They were cautious forecasts based on local, historical evidence of lead in times, first completions, and delivery over the last 10 years (this evidence is set out in TP3(rev) Appendix 11.2). At that time most of the initial trajectory forecasts did not benefit from further intelligence from the industry.

- The South Hams and West Devon Councils then consulted all the main developers of those large sites in October 2017, and provided them with these detailed assessments. Meetings and/or telephone conversations were also held with some developers.

- Nearly all developers responded in November 2017, mostly in writing and a limited number by telephone. Some developers have agreed with those initial trajectories. But the developers’ responses received made clear that most considered that the Councils’ initial forecasts were too cautious. They expect earlier and faster delivery on their sites. Furthermore, many supported this by stating that they would be submitting planning applications in the next 12 months and anticipated early site starts.

- This is new evidence from the industry, providing up to date intelligence about likely delivery.

- The South Hams and West Devon Councils have carefully considered that evidence and have modified the TTV trajectory in light of this new evidence, except for a few sites where the Councils considered it prudent to build in a longer lead time, either for site specific reasons or because the combined annual forecasts for a settlement would have been unrealistic.

- Consequently the JLP Councils submitted evidence to the Examination on 29 November 2017 (published on the 30th) about the large sites in South Hams and West Devon identifying where the site trajectory has been agreed with the developer or there is broad agreement (TP3I). Where there is only partial agreement or the trajectory has not been agreed, then the assumptions relating to lead in times and delivery rates are set out in TP3I. More details about the
local historic evidence under pinning lead in times assumptions in TTVPA is set out in Appendix 11.2 in the Revised Housing Topic Paper TP3(rev).

EVIDENCE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

7.13 Strategic Housing Land Availability Assessments are evidence documents that are used to establish realistic assumptions about the availability, suitability and the likely economic viability of land that could meet the identified need for housing over the plan period, in line with NPPF paragraph 159. A SHLAA is a key source of evidence for assessing whether sites are available, deliverable or developable, to inform plan making.

7.14 The Strategic Housing Land Availability Assessments that underpin the Joint Local Plan area have been produced on a Local Planning Authority basis covering the extent of the three local authorities and the extent of the housing market area. They therefore exclude that part of the Plymouth HMA that lies within Dartmoor National Park. The three LPAs have previously published SHLAA as evidence documents to support early stages of plan preparation and preparation of previous Development Plan Documents.

7.15 Evidence from these SHLAA reports and related the viability assessments informed the preparation of the Joint Local Plan and the decision by the JLP Councils to submit the JLP for examination.

7.16 The Councils have collaborated to produce the SHLAA, including coordinating recent calls for sites and panel consultations. The SHLAA have been prepared with a joint panel of developers, agents and public bodies and planning consultants. Peter Brett Associates have carried out the Market and Viability Assessment of the sites considered available, developable and suitable for both the Plymouth and South Hams & West Devon SHLAA in liaison with the combined SHLAA panel across the plan area.

7.17 Both SHLAA establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing across the Joint Local plan area over the plan period. This is consistent with the requirements of NPPF paragraph 159 and NPPG Paragraph: 007 Reference ID: 3-007-20140306.

7.18 PPG paragraph ID: 3-005-20140306 sets out what inputs and processes should lead to a robust assessment of land availability. The methodology used for both SHLAA is consistent with that approach, and as follows:

26 The SHLAA reports in the evidence accompanying the submitted JLP are: the Plymouth SHLAA February 2017 (HO2) and appendices (HO2A to HO2I); South Hams West Devon SHLAA Final Report March 2017 (HO4 and Site Information Packs – HO4A to HO4G, and Site Information Pack – Plymouth Urban Fringe) July 2017 (HO4H)

27 Plymouth SHLAA Appendix 1 (Plymouth SHLAA Viability Report – February 2017 (HO2B) and South Hams and West Devon SHLAA Viability Report February 2017 (HO3)
1. **Plymouth SHLAA**
   - The assessment of availability is set out in Paragraphs 3.3.4 to 3.3.6 and 3.4.18 to 3.4.21. This is consistent with NPPF paragraph 47 footnote 11 and paragraph 007 ID:3-007-20140306 of NPPG.
   - The approach to assessing site suitability is set out in Paragraphs 3.4.15 to 3.4.17. This is consistent with paragraph 019 reference ID:3-019-20140306 of NPPG.
   - The approach taken to the likely economic viability of land is set out in Paragraphs 3.4.22 to 3.4.32, Appendix 1 (HO2A) and the Plymouth and South West Devon Joint Local Plan viability study (O5). This is consistent with Paragraph: 021 Reference ID: 3-021-20140306 of NPPG and PPG on viability and plan making.

2. **South Hams and West Devon SHLAA**
   - The assessment of availability is set out in Paragraphs 3.15 and 3.5. This is consistent with NPPF paragraph 47 footnote 11 and paragraph 007 ID:3-007-20140306 of PPG.
   - The approach to assessing site suitability is set out in Paragraphs 3.12 to 3.14 and 3.10. The results of the sites assessments to determine the suitability of a site are provided within the Site Information Packs (HO4A to HO4H). This is consistent with paragraph 019 reference ID:3-019-20140306 of PPG.
   - The approach taken to the likely economic viability of land (achievability) is set out in Paragraphs 3.16 to 3.20 and the Plymouth and South West Devon Joint Local Plan viability study (O5). This is consistent with Paragraph: 021 Reference ID: 3-021-20140306 of NPPG and PPG on viability and plan making.

7.19 Consequently the JLP Councils consider that this evidence is proportionate, adequate up to date and relevant which are the tests in NPPF paragraphs 158 and 182.

**SHLAA and the process of JLP site selection**

7.20 The SHLAA reports provide background evidence on the potential supply of housing land in the plan area. The SHLAAAs reject some sites, in accordance with the methodology set out in the SHLAA documents. The SHLAAAs identified a pot of sites to go forward in the site selection process to identify the most suitable to meet needs as per NPPG.

7.21 The JLP Councils emphasise that a SHLAA report is a technical report and is not a decision or policy making document. It does not allocate land for housing. It is a technical background study of potential sites for housing. It provides a database of possible sites for development, an assessment of their development potential and deliverability to inform later potential housing site allocations. The documents provide evidence that informed preparation of the submitted JLP. Readers are reminded that the SHLAA includes a disclaimer (see TP3(rev) Appendix 7.8).
7.22 The SHLAA helps to inform the selection of appropriate housing site allocations are subject to consultation through the plan-making process. The evidence in the SHLAA is a thorough assessment of the sites, produced in accordance with the PPG on SHLAAs.

7.23 Consequently, it is the subsequent work of the JLP Councils when selecting sites to allocate and the scale of development which they propose, together with the monitoring information as at end March 2017, plus the net forecasts of potential supply from Sustainable Villages Allowance, small windfalls and HMO dwellings release as a consequence of student accommodation development, that is the basis for the supply assessment used in this topic paper.

ADDITIONAL INTELLIGENCE

7.24 SHLAA is one source of information used by the JLP Councils. Other sources of information about sites and delivery have informed the Councils preparation of the latest housing trajectories. In particular:

1. Further detailed analysis of lead in times in South Hams and West Devon – used by the Councils as a means to start the October/November 2017 consultation on the 2017 Monitoring Point trajectories for the individual large sites (see TP3(rev) Appendix 11.2)

2. Site specific information about lead in times and delivery rates received by the JLP Councils from developers, agents and landowners during the October/November 2017 consultation.

3. Additional information received during the Examination including the hearings.

4. Proposed changes to JLP site allocations in response to the Inspectors’ Post Hearing Advice Note.

SCALE OF SUPPLY

7.25 Tables 12.a, 12.b and 12.c in this Addendum summarise the scale of housing supply in the plan period by planning status and supply source. These tables set out the net supply. Demolitions have been deducted, and the net effect of conversions have been taken into account. These tables replicate the summary tables JLP2, PPA4 and TTV4 in the latest March 2017 monitoring point trajectories (TP3J, TP3K and TP3L).

7.26 Planning status is assessed at the monitoring point of 31 March 2017, as follows:

- Built - dwellings completed between 1 April 2014 and 31 March 2017
- Permitted (not built) – dwellings with planning permission (ie a signed decision notice) that had not lapsed, and had not been completed as at 31 March 2017.
- Not yet committed – dwellings without planning permission as at 31 March 2017
- Student accommodation release – forecast of Houses in Multiple Occupation expected to be released and available for housing as the result of completions of student accommodation.
7.27 Dwellings are those forms of housing development within Use Class C3, including Extra Care dwellings. The following types of housing are excluded:

- Purpose built student accommodation (PBSA)
- Short term housing (Use Class C1)
- Institutional accommodation (Use Class C2)
- Development permitted only for holiday lets (ie not permanent residences)

7.28 Some dwellings that are permitted and built may then be used as second homes. These are included in the supply counts provided they are not within any of the excluded categories listed in paragraph 7.27.

7.29 This is consistent with the methodology for calculating the Objectively Assessed Need for housing (see SHMA Part 1 paragraphs 3.5.5- 3.5.6 and Table 9) and NPPF (2012) and related NPPG.
### Table 12a PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN AREA – FORECAST HOUSING SUPPLY IN PLAN PERIOD

<table>
<thead>
<tr>
<th>Supply sources</th>
<th>Built 2014-2017</th>
<th>Permitted (not built)</th>
<th>Dwellings release</th>
<th>Not yet committed*</th>
<th>JLP TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Allocations</strong></td>
<td>475</td>
<td>10,288</td>
<td>0</td>
<td>10,809</td>
<td>21,572</td>
</tr>
<tr>
<td><strong>Sustainable Villages Allowance</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>550</td>
<td>550</td>
</tr>
<tr>
<td><strong>Student Accommodation release</strong></td>
<td>73</td>
<td>0</td>
<td>397</td>
<td>0</td>
<td>470</td>
</tr>
<tr>
<td><strong>Small sites (non-allocations)</strong></td>
<td>509</td>
<td>801</td>
<td>0</td>
<td>0</td>
<td>1,310</td>
</tr>
<tr>
<td><strong>Large sites (non-allocations)</strong></td>
<td>2,634</td>
<td>2,043</td>
<td>0</td>
<td>0</td>
<td>4,677</td>
</tr>
<tr>
<td><strong>Small site (non garden land) Windfalls</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1,398</td>
<td>1,398</td>
</tr>
<tr>
<td><strong>SUPPLY TOTAL - all sources</strong></td>
<td>3,691</td>
<td>13,132</td>
<td>397</td>
<td>12,757</td>
<td>29,977</td>
</tr>
</tbody>
</table>

Note * excluding dwellings that were permitted or built

Note: Table 12a published in TP3(rev) was subsequently replaced by Table 12a (corrected) in document EXC13 published 26 January 2018. Both are now superseded by Table 12a in this Addendum

Source: TP3J – Table JLP2
# Table 12b PLYMOUTH POLICY AREA – FORECAST HOUSING SUPPLY IN PLAN PERIOD

<table>
<thead>
<tr>
<th>Supply sources</th>
<th>Built 2014-2017</th>
<th>Permitted (not built)</th>
<th>Dwellings release</th>
<th>Not yet committed*</th>
<th>JLP TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Allocations – Plymouth City</strong></td>
<td>374</td>
<td>3,960</td>
<td>0</td>
<td>5,988</td>
<td>10,322</td>
</tr>
<tr>
<td><strong>Allocations – Plymouth Fringe</strong></td>
<td>0</td>
<td>3,962</td>
<td>0</td>
<td>1,960</td>
<td>5,922</td>
</tr>
<tr>
<td><strong>Allocations- SUB TOTAL</strong></td>
<td>374</td>
<td>7,922</td>
<td>0</td>
<td>7,948</td>
<td>16,244</td>
</tr>
<tr>
<td><strong>Sustainable Villages Allowance</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Student Accommodation release</strong></td>
<td>73</td>
<td>0</td>
<td>397</td>
<td>0</td>
<td>470</td>
</tr>
<tr>
<td><strong>Small sites (non-allocations)</strong></td>
<td>151</td>
<td>113</td>
<td>0</td>
<td>0</td>
<td>264</td>
</tr>
<tr>
<td><strong>Large sites (non-allocations)</strong></td>
<td>1,699</td>
<td>1,389</td>
<td>0</td>
<td>0</td>
<td>3,088</td>
</tr>
<tr>
<td><strong>Small site (non garden land) Windfalls</strong></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>602</td>
<td>602</td>
</tr>
<tr>
<td><strong>SUPPLY TOTAL - all sources</strong></td>
<td>2,297</td>
<td>9,424</td>
<td>397</td>
<td>8,550</td>
<td>20,668</td>
</tr>
</tbody>
</table>

Note * excluding dwellings that were permitted or built

Source: TP3K – Table PPA4
<table>
<thead>
<tr>
<th>Supply sources</th>
<th>Built 2014-2017</th>
<th>Permitted (not built)</th>
<th>Dwellings release</th>
<th>Not yet committed*</th>
<th>JLP TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allocations</td>
<td>101</td>
<td>2,366</td>
<td>0</td>
<td>2,861</td>
<td>5,328</td>
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<tr>
<td>Sustainable Villages Allowance</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>550</td>
<td>550</td>
</tr>
<tr>
<td>Student Accommodation release</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Small sites (non-allocations)</td>
<td>358</td>
<td>688</td>
<td>0</td>
<td>0</td>
<td>1,046</td>
</tr>
<tr>
<td>Large sites (non-allocations)</td>
<td>935</td>
<td>654</td>
<td>0</td>
<td>0</td>
<td>1,589</td>
</tr>
<tr>
<td>Small site (non garden land) Windfalls</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>796</td>
<td>796</td>
</tr>
<tr>
<td>SUPPLY TOTAL - all sources</td>
<td>1,394</td>
<td>3,708</td>
<td>0</td>
<td>4,207</td>
<td>9,309</td>
</tr>
</tbody>
</table>

Note * excluding dwellings that were permitted or built

Source: TP3L – Table TTV4
7.30 Table 12a, 12b and 12c summarise the housing supply position in the plan and the individual policy areas, based on the end March 2017 monitoring point trajectories. They are the source of the data in Tables 13a and 13b, which bring together information from the policy areas, and the source for the comparative analysis provided in this Addendum paragraphs 7.31 to 7.32 below.

Table 13a

<table>
<thead>
<tr>
<th></th>
<th>Built</th>
<th>Permitted (not built)</th>
<th>Student Accommodation release*</th>
<th>Not yet committed</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth PA</td>
<td>2,297</td>
<td>9,424</td>
<td>397</td>
<td>8,550</td>
<td>20,668</td>
</tr>
<tr>
<td>Thriving Towns &amp; Villages PA</td>
<td>1,394</td>
<td>3,708</td>
<td>0</td>
<td>4,207</td>
<td>9,309</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3,691</td>
<td>13,132</td>
<td>397</td>
<td>12,757</td>
<td>29,977</td>
</tr>
</tbody>
</table>

*not yet delivered at the monitoring point

7.31 69% of supply in the plan period is forecast to be delivered in the Plymouth Policy Area, with 31% in the Thriving Towns and Villages Policy Area. This is consistent with the Vision and spatial strategy, focusing major growth at Plymouth. It also effectively aligns with the strategic balance of housing provision set out in SPT3 where 71% of the total provision is in Plymouth PA and 29% is in the Thriving Towns and Villages PA. The forecast supply of 29,977 dwellings in the plan period does not include the residue of two urban extensions at Plymouth (Sherford and Woolwell) where a further 1,686 dwellings are forecast for delivery after 31 March 2034.

7.32 12% of supply has been built in the plan period, with a further 44% permitted but not built by end March 2017. Another 43% has not yet been committed, although some of this had been approved as at end March 2017 subject to completion of a S106 agreement. Finally, a modest 1% of supply is forecast for delivery from HMO dwellings expected to be released in Plymouth as the result of the completion of student accommodation development.

Table 13b

<table>
<thead>
<tr>
<th></th>
<th>JLP Allocations</th>
<th>Small and Large sites (not allocations)</th>
<th>Student Accommodation release</th>
<th>NP allowance</th>
<th>Small windfalls</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth PA</td>
<td>16,244</td>
<td>3,352</td>
<td>470</td>
<td>0</td>
<td>602</td>
<td>20,668</td>
</tr>
<tr>
<td>Thriving Towns &amp; Villages PA</td>
<td>5,328</td>
<td>2,635</td>
<td>0</td>
<td>550</td>
<td>796</td>
<td>9,309</td>
</tr>
<tr>
<td>TOTAL</td>
<td>21,572</td>
<td>5,987</td>
<td>470</td>
<td>550</td>
<td>1,398</td>
<td>29,977</td>
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</tbody>
</table>
7.33 The pie charts in Diagrams 1 to 3 (based on the evidence in Tables 13a, 13b and 13c and Graphs JLP1, PPA1 and TTV1 in TP3J, TP3K and TP3L respectively) provide another means to illustrate the pattern of supply for the Policy Areas and for the plan area, showing the relative share of the supply in each area by the supply category. Both Policy Areas have significant proportions of their targets met by completions and commitments.

Diagram 1

Diagram 2
Comparing the housing supply forecast to be delivered in the Plan period to housing provision targets provides the evidence about the amount of ‘headroom’. This is shown in Table 14.

### Table 14

<table>
<thead>
<tr>
<th></th>
<th>Supply</th>
<th>Target</th>
<th>Total Headroom</th>
<th>% Headroom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth Policy Area</td>
<td>20,668</td>
<td>19,000</td>
<td>1,668</td>
<td>8.8%</td>
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<tr>
<td>Thriving Towns and Villages Policy Area</td>
<td>9,309</td>
<td>7,700</td>
<td>1,609</td>
<td>20.9%</td>
</tr>
<tr>
<td>JLP TOTAL</td>
<td>29,977</td>
<td>26,700</td>
<td>3,277</td>
<td>12.3%</td>
</tr>
</tbody>
</table>

The LPAs consider that the forecast housing supply offers a healthy level of ‘headroom’ for the purposes of plan making and managing supply. The implications of this are considered further in Section 8 on Maintaining Supply.
SOURCES OF SUPPLY

7.36 The housing trajectories include projected housing completions from a range of sources where there is an expectation for them to be delivered during the plan period. In addition to actual completions (2014 – 2017), sites with planning permission, JLP (Submission) allocations, future small windfalls (non-garden land), together with the potential for supply from Sustainable Villages Allowance supply category and the release of HMO dwellings resulting from student accommodation development are included. Further detailed evidence about each source from the latest 2017 Monitoring Point trajectories is given in Tables PPA1, PPA2, PPA3 and PPA4 (TP3K) and Tables TTV1, TTV2, TTV3 and TTV4 (TP3L). Analysis of the sources of supply is set out in paragraph 7.37 to 7.89 below.

Completions 2014 to 2017

7.37 Cumulative net completions of 3,691 dwellings were delivered between April 2014 and March 2017 (this includes an estimated 73 HMO dwellings released as a result of student accommodation development). This equates to 1,230 pa, which is 92% of the annualised JLP target for those three years. Of these:

- 2,297 of these are in the Plymouth PA, equating to 766 pa, which is 81% of the cumulative Policy Area target. Completions on small and large sites are listed on a site by site basis in the housing trajectory
- 1,394 are in the Thriving Towns and Village PA, equating to 465 pa which is 121% of the cumulative Policy Area target. Completions on large sites are listed on a site by site basis in the housing trajectory, and completions on small sites are listed in Appendix 7.1 of Revised Housing topic paper (TP3(rev)).

7.38 475 (13%) of the 3,691 dwellings built are on JLP site allocations, with 3,216 (87%) on non-allocation sites (including 73 from HMO release when student accommodation was built).

Commitments

7.39 The category of ‘commitments’ comprise small and large sites which are not allocated. These are dwellings on sites with planning permission that are not allocated for housing development in the JLP that have not yet been completed as at the Monitoring Point, and where the planning permission had not lapsed at that point. Unless there is evidence to demonstrate that they are not capable of being delivered, they are included in the housing trajectory and count towards the supply to meet the housing provision requirement in the plan period.

7.40 Large and Small sites. In the housing trajectories produced by the JLC Councils, large sites are sites of 5 or more dwellings (gross) in PPA, and 10 or more (net) in TTVPA. The reason for the different thresholds is historical, due to the different monitoring systems in the three LPAs. The JLP Councils consider that this does not materially reduce the robustness of the evidence, as the difference is explicit and does not adversely impact on the strategic or operational use of the data. It is more
important that the thresholds are applied consistently within each Policy Area when counting supply, to avoid double counting or omissions.

7.41 **Net Completions** The forecasts of housing supply in the plan period are ‘net’. All the tables in the TTVPA trajectories (TP3L) are expressed as net numbers. In the PPA trajectory the numbers in Table PPA1 and Table PPA2 (TP3K) are expressed in terms of gross completions but in the latter there is an additional row that identifies the number of housing demolitions in each year. These are then subtracted from the supply to give total net completions in each year.

7.42 **2016 Monitoring Point Trajectories** – The housing trajectories provide the data source for the forecasts of housing delivery in the plan period. These 2016 monitoring point trajectories were the basis for the housing supply information used in Submission JLP including Figures 3.3 to 3.5. They were also the basis for the supply data in the Housing Topic Paper (TP3) with a publication date of March 2017. Those trajectories related to the end March 2016 monitoring point, where planning permission relates to the date on the decision notice being on or before that point. Table 12a in TP3 summarised supply for the plan area using that monitoring point.

7.43 Large sites were listed individually in the housing trajectories in TP3Ai-Table PPA1 and in TP3Ci – Table TTV1. The combined small sites commitments totals were listed in a single row in Table TTV2. The detailed evidence about the individual small sites commitments in TTVPA was set out:

a) For PPA in the trajectory in TP3A/Ai; and

b) For TTVPA in Appendix 7.2 in TP3B/Bi.

7.44 It should be noted that the outstanding commitments in Submission JLP Table 3.3 and the small and large sites (non-allocations) that are not built shown in Table 12a in TP3 are net figures, ie where the lapse rate had already been applied (in addition to any demolitions on these sites having been deducted).

7.45 The A3 format 2016 monitoring point trajectories in Tables PPA1 and PPA2 (TP3Bi) and TTV1 and TTV2 (TP3Ci) summarised the small site and large site commitment trajectories before the lapsed rate was applied and have separate rows to show the specific number of dwellings deducted based on applying the lapsed rates to commitments where the site has not started.

7.46 **2017 Monitoring Point Trajectories.** Updated evidence was provided by

1. The 2017 Monitoring Point data on large and small site commitments is set out in the PPA housing trajectory in Tables PPA1 and PPA2 (TP3F) and in the TTVPA housing trajectory in Tables TTV1 and TTV2 (TP3G). Details about the small sites are in the TP3(rev) Appendices 7.1 and 7.2. With the additional intelligence about large sites, the approach had been modified so that supply is counted as nil for a limited number of sites where that new evidence confirms that sites with permission will not or are unlikely to be developed. This significantly reduced the need to apply a lapse rate to large sites. A lapse rate was applied to the small
sites that have not yet started /(see paragraphs 7.49 to 7.53). The 1,310 and 4,617 small and large site (non-allocation) commitments included in the JLP supply count for the plan period equated to 19.8% of forecast supply in the plan period, and 3,143 of these have been built (between 2014 to 2017), with the remaining 2,784 (net) forecast to be built in the plan period. It was therefore appropriate to include this supply source, and the scale of supply is justified.

2. The 2017 Monitoring Point data was subsequently revised, in response to the inspectors’ Post Hearing Advice Note. These revised trajectories in TP3J, TP3K and TP3L are the source of the data for the information about housing supply set out in proposed Main Modification MM3 and the trajectories illustrated in MM4.

7.47 Commitments - Revised 2017 Monitoring Point Trajectories Results – In these latest trajectories (TP3J, TP3K and TP3L):

- The net number of dwellings with planning permission that had not lapsed as at the 2017 monitoring point and are forecast for delivery in the plan period was 16,823\(^{28}\). This comprised 3,691 dwellings built 2014 to 2017 plus 13,132 dwellings counted as 'net commitments' that were either under construction or not started. (See Tables JLP2 (TP3J); PPA4 (TP3K) and TTV4 (TP3L).)

- 13,132 of the 16,823 are forecast to be delivered in the remainder of the plan period ie between 2017 and 2034. Of these 13,132 net commitments\(^{29}\) at end March 2017, 9,424 (72%) are in the Plymouth PA and 3,708 (28%) are in the Thriving Towns and Village PA. The evidence is provided by the Plymouth PA housing trajectory in Table PPA3 (TP3K) and the Thriving Towns and Villages PA housing trajectory in Table TTV3 (TP3L). The net figure of 9,424 in the Plymouth PA takes account of 145 dwellings that will be demolished on those sites. Demolitions in the Thriving Towns and Villages PA are taken account of in calculating net supply but are not separately recorded at this time.

- 901 of the 9,424 dwellings in the PPA were under construction at end March 2017. 371 of the 3,708 dwellings in the Thriving Towns and Villages were under construction at end March 2017.

- Of the 16,823 dwellings, 5,987 were permissions on non-allocation sites. They comprised 1,310 on small sites and 4,677 on large sites (non-allocation).

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\(^{28}\) The net number of 16,823 has discounted demolitions and other losses eg when existing dwellings are converted.

\(^{29}\) A commitment is a dwelling that has not yet been completed and is on a site with planning permission that has not lapsed. The row relating to commitments in Tables PPA3 (TP3K) and TTV3 (TP3L) includes all sites with planning permission for housing at the monitoring point, including sites that are also JLP allocations that had permission.

Note: the proposal in Main Modification MM31 to delete the allocation for housing development at TTV15.1 West Alvington Hill, Kingsbridge, in response to the Inspectors’ Post Hearing Advice Note, does not change the supply forecast for commitments. This site remains a commitment at the 2017 Monitoring Point as it had planning permission for residential development at that date, and is included in forecast supply, in line with paragraph 6 of the Advice Note.
commitments and these are included in the JLP supply count for the plan period. This equated to 20% of the total forecast supply for the plan period. Of these, 3,143 had been built between 2014 and 2017. The remaining 2,844 (net) are forecast to be built in the plan period. The evidence for the scale of delivery from this supply category is robust. It is therefore appropriate to include this supply source in the forecast of housing supply, and the scale of supply from this supply category is justified.

7.48 Large site commitments as at end March 2017 are listed individually on the detailed housing trajectories for the two Policy areas. As requested by the Inspectors in their letter of 4 September 2017, the small sites information on commitments and completions are aggregated into a single row in the detailed Policy Area trajectories. The detailed evidence about small site commitments is set out in Appendix 7.2 of the topic paper (TP3(rev)) where they are listed on a site by site basis, for each Policy Area.

**Lapse rates**

7.49 Planning permissions that had expired by end March 2017 cannot be implemented. They have ‘lapsed’ and are not counted as commitments in the housing trajectories.30

7.50 A general lapse rate has not been applied to large sites in the 2017 Monitoring Point trajectories. Instead, because the JLP Councils had up to date evidence about future site delivery, this was considered and taken into account by the Councils when forecasting future housing supply. Appendix 11 of this Topic Paper includes the assessment of the level of agreement about the forecast delivery of large sites. This includes large sites with planning permissions that had not expired as at end March 2017. Where there is evidence that large sites with permission that are not allocated and cannot be implemented or are highly unlikely to be delivered, the Councils have listed the sites on the trajectories but counted those sites as NIL dwellings for the plan period supply. Examples of sites that are counted as NIL are (number of dwellings permitted are highlighted):

- Fort Bovisand (undeliverable - Heritage Lottery funding bid unsuccessful) **50 dws**
  (note: a second application on this site has since been granted conditional approval, on 20 June 2018, so this data will be captured at the relevant monitoring point)

- Venn Farm Phase 2b Brixton (applicant (housebuilder) confirmed no intention to pursue development) **17 dws**

- The Old Woollen Mill, North Tawton (applicant (housebuilder) confirmed no intention to implement the planning permission) **62 dws**

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30 If the site is also a JLP site allocation for housing, then the site capacity continues to be counted towards supply because it is an allocation, but the Councils have reassessed the lead in time which is reflected in the updated 2017 monitoring point trajectory. Two large sites totalling 28 units in TTVPAN with consent but not allocated have had a lapse rate of 15% applied because they are considered ‘developable’ and either the landowner/agent didn’t respond to the October 2017 consultation or there may be some short term viability issues. Both sites are forecast for delivery after the point of plan adoption.
- Melville Building, Royal William Yard (intention now to develop as hotel) **40 dws**
- St Andrews Court, 12 St Andrews Street (permission for office development is now being implemented) **33 dws**
- Brown Bear, 20 Chapel Street (land owner indicated existing consent is not deliverable) **17 dws**

7.51 The Councils’ approach is to rely on individual site assessment of large sites using up to date evidence on delivery combined with the removal from the supply count of sites forecast as not being delivered or as unlikely to be delivered in the plan period. This is the correct approach to managing future uncertainty relating to large sites for the purposes of the trajectory. Making a further reduction for lapsing on large sites is both unnecessary and inappropriate. It would be ‘double-discounting’.

7.52 Monitoring has identified the number of dwellings on small sites with planning permission that have not yet expired but not yet started. These sites have not been individually assessed regarding future delivery. So the correct approach is to apply a lapse rate to these outstanding commitments, for the purposes of the trajectory, as some may lapse in the future and not contribute to housing supply.

7.53 A lapse rate of 10% has been applied to the 80 dwellings on small sites with outstanding commitments in the Plymouth Policy Area that had not started as at end March 2017. Justification of the 10% lapse rate is set out in Appendix 7.3a of this topic paper. Lapse rates in the last 3 years has been low at 2%, 2% and 1%. However, intelligence on a number of planning consents leads the councils to conclude that there is evidence which suggests non implementation. Lapse rate is not been applied to large sites PPA sites that have permission, are not allocated but remain in the trajectory count because the Councils have already removed consents that are not deemed deliverable.

7.54 A rate based on actual historic lapsed permissions on small sites in South Hams and West Devon has not yet been calculated. So instead, a lapse rate of 15% has been assumed and applied to 727 dwellings on small sites with outstanding commitments in the Thriving Towns and Villages Policy Area that had not started as at end March 2017. 15% is the mid-point of the range of 10 to 20% ‘drop out’ rate which was included in a CLG presentation to the HBF planning conference in September 2015 (For a year’s permissions for housing around 10-20% do not materialise into a start; the permission ‘drops out’). The slide from that presentation containing this evidence is reproduced in Appendix 7.3b of TP3(rev). Reliance on this assumption for the purposes of the trajectory in the evidence base for the JLP Publication Plan does not preclude the use of a locally specific lapse rate in the future, for plan making or development management, provided that appropriate, proportionate evidence is forthcoming.

7.55 A discount has not been applied to sites that have commenced, particularly where dwellings are under construction, as it is reasonable to expect these sites to be completed.
Future Windfalls

7.56 Table 3.3 in the Submission JLP includes forecast supply from small, non-garden land windfalls. This supply category is consistent with NPPF paragraph 48 and NPPG ID: 3-24-20140306. The JLP Councils have compelling evidence that a windfall allowance is justified in the 5 year housing land supply and as part of the supply in the plan period, for small non-garden windfalls only.

7.57 Windfalls are sites that have not been allocated in Local Plans or Development Plan Documents, and are not on residential gardens. The forecast of the potential for future housing supply delivery from this supply category is based on evidence about past delivery of small windfalls that meet this definition. Detailed evidence about small windfall completions was set out in Appendix 7.4 of the Housing Topic Paper (TP3). That evidence was updated by the 2017 Monitoring Point housing trajectories (TP3F and TP3G), and the detailed evidence about the additional 2016/17 actual windfalls completions was included in the updated Housing Topic Paper (TP3(rev) Appendix 7.4). Evidence on forecast delivery from future windfalls has been further updated further by the JLP Councils in response to the implications of the Inspectors’ Post Hearing Advice Note (see Addendum paragraphs 7.62, and 7.74 to 7.82).

7.58 Robust evidence supports the supply of small, non-garden windfalls forecast, consistent with the NPPF. The detailed evidence used to justify the annual rate of windfalls of 43 pa (for Plymouth PA) and approximately 57 pa (Thriving Towns and Villages PA) expected to be delivered in the future is set out respectively in Topic Paper Appendix 7.4a and Appendix 7.4b. Rates of ‘net’ windfalls differ within the TTVPA (45 to 46 pa in the South Hams and 10 to 12 in West Devon) and this is recorded in the TTVPA housing trajectory.

7.59 The forecast of windfalls included in the housing trajectories’ supply forecast for the plan period relates to small sites. Small sites in PPA relate to sites of 4 or less (gross), whereas in the South Hams and West Devon areas in TTVPA they are sites of 9 or less (net). The reason for this is because of historical differences between the monitoring systems of the three LPAs. The JLP Councils consider that this does not impact on the robustness of the evidence as the different thresholds are explicit, and it does not alter the strategic or operational use of the data. Consistency of counting supply in each Policy Area is more important, to avoid double counting or omissions.

7.60 The housing trajectories therefore include forecast supply from small, non–garden windfall sites amounting to 602 and 796 dwellings between April 2020 and March 2034 in the PPA and the TTVPA respectively. Together these equate to about 4.5% of total supply forecast for delivery in the plan period.

7.61 To avoid double counting with supply from existing commitments that are small windfalls, the windfall rate applies from 2020/21 onwards. No allowance for delivery of dwellings from small site windfalls is included in the years 2017/18, 2018/19 and 2019/20, to avoid overlap with delivery of dwellings on small site commitments. It is therefore appropriate to include this supply source, and the scale of supply from this category is justified.
7.62 In TTVPA, the historic rate of 70 pa has been reduced by 12 to 15 dws pa (the annualised potential capacity from small sites that might be delivered through the neighbourhood plan process in the Sustainable Villages allowance supply category - see Appendix 7.6), down to 55 to 58 pa. This avoids the risk of potential double count with dwellings delivered in the future from small sites in Sustainable Villages that are allocated for development in Neighbourhood Plans. (See Addendum paragraphs 7.74 to 7.82.)

7.63 Future large windfalls are not forecast and no allowance is made for future large windfalls in the supply assessment in the housing trajectories. However, if delivered they will be reported through the monitoring of development.

7.64 For the avoidance of doubt, the LPAs confirm that the windfall allowance made in the Plymouth PA applies only to that part within Plymouth City. There is no forecast of future windfall delivery within that part of the Plymouth PA which lies within the South Hams. This is because there are unlikely to be any significant numbers of windfall sites in the PPA outside the City given:

- the location and extent of the PPA urban extension sites in the South Hams;
- the boundary of the Plymouth urban fringe (that part of the PPA which is within the South Hams); and
- the area within the Plymouth urban fringe that is ‘countryside’. This the area that is subject to proposed Main Modification MM50 which provides a policy framework for Plymouth’s urban fringe countryside and is subject to NPPF and JLP policies that control housing development in the countryside.

**JLP Site Allocations**

7.65 The Joint Local Plan allocates sites for development. They includes sites for housing or for mixed use where housing is one of the uses specified. This only includes sites over a 0.25 hectares threshold. Justification for the sites allocated is set out in the sites assessments\(^3\). The process of assessing which sites to allocate in this plan has sought to:

- Bring forward sites that are deliverable (either within the first five years, to contribute to the five-year housing land supply of the two policy areas, or within the plan-period).
- Accord with the principles of sustainable development, sustainable linked neighbourhoods and sustainable communities.
- Safeguard the special environment qualities of the Plan Area, including its landscape and historic environment and its marine environment.
- Respond positively to site constraints and development site capacity, whilst also taking account of past delivery rates and a proactive agenda for boost housing supply and delivery.

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\(^3\) Summary of allocated and rejected sites October 2017 (EXC3D)
7.66 In TP3(rev) the total capacity of JLP site allocations was estimated to be 23,348 dwellings. However, the total capacity of JLP site allocations has reduced to 23,258 dwellings as the result of the following changes in forecast supply:

A. **Additional information received during the JLP Examination including during the hearings.** Consequentially, at the Matter 12 hearing on 22 March 2018, the Inspector asked the Councils

1. To update the end March 2017 Monitoring Point housing trajectories (TP3E, TP3F, TP3G) to show changes to JLP allocations’ site capacity and forecast delivery where that had been agreed by the Councils during the hearings; and

2. To update the 5 year housing land supply tables previously, consequential to the changes to the trajectories.

The Councils therefore revised the housing trajectories, including the updated suites of tables and graphs. These trajectories had a production date of 19 April 2018 (so pre-date the Post Hearing Advice Note) and they were provided by the JLP Councils in the following documents submitted to the Examination:

- EXD61A - JLP Plan Area
- EXD61B – Plymouth Policy Area
- EXD61C – Thriving Towns and Villages Policy Area

**PPA changes** During the course of the PPA hearings the quantum of two allocations (PLY59.12 - Fields North of St Budeaux A38 Junction, reduction of -26 dwellings and PL25 – Sugar House, an increase of +10 dwellings) were amended as per Statement of Comment Ground’s agreed with Historic England (SCG4) and Sutton Harbour Company (SCG10). – See Document EXD57 – and summary in New Table ADD5 below

**New Table ADD5**

<table>
<thead>
<tr>
<th>JLP Policy</th>
<th>Site</th>
<th>TP3F site capacity</th>
<th>TP3K site capacity</th>
<th>Main Mod.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLY25</td>
<td>Sugar House, Sutton Harbour</td>
<td>150</td>
<td>160</td>
<td>MM12</td>
</tr>
<tr>
<td>PLY59.12</td>
<td>Fields to north of St Budeaux A38 junction</td>
<td>120</td>
<td>94</td>
<td>MM19</td>
</tr>
<tr>
<td></td>
<td><strong>NET CHANGE (TP3K capacity minus TP3F capacity)</strong></td>
<td></td>
<td>-16</td>
<td></td>
</tr>
</tbody>
</table>

Source: EXD61B – and now included in TP3K

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32 This capacity includes 1,686 dwellings that are forecast for completion after the plan period
33 In document EXD57 the JLP Councils provided tables for each policy area showing the forecast 5 year housing land supply position as end March 2017, end March 2018 and end March 2019. Those tables were based on the 2017 Monitoring Point trajectories published in TP3F (PPA) and TP3G (TTVPA). The tables in EXD57 provided calculation details, accompanied by detailed footnotes explaining each step of the calculation including the relevant data source.
TTVPA changes  The quantum of housing on the following was amended by the JLP Councils during and as a consequence of the discussions at the TTVPA hearings in March 2018 relating to the policy allocations listed in New Table ADD6 and set out in Main Modifications, which arose from:

- proposed hearing modifications\(^{34}\) relating to TTV6 and TTV13, and
- the statement of Common Ground SCG11 relating to TTV29.4 and TTV29.5\(^ {35}\), and
- the JLP Councils’ response to the Inspectors’ request at the hearing to provide clarity within Policy TTV22 on how proposed uses would be broadly distributed within the site\(^ {36}\)

### New Table ADD6

<table>
<thead>
<tr>
<th>JLP Policy</th>
<th>Site</th>
<th>TP3G site capacity</th>
<th>TP3L site capacity</th>
<th>Main Mod.</th>
</tr>
</thead>
<tbody>
<tr>
<td>TTV6</td>
<td>Noss-on-Dart. DARTMOUTH</td>
<td>100</td>
<td>126</td>
<td>MM23</td>
</tr>
<tr>
<td>TTV13</td>
<td>The Quayside, KINGSBRIDGE</td>
<td>100</td>
<td>60</td>
<td>MM26</td>
</tr>
<tr>
<td>TTV22</td>
<td>Plymouth Road , TAVISTOCK</td>
<td>250</td>
<td>300</td>
<td>MM27</td>
</tr>
<tr>
<td>TTV (NEW1)</td>
<td>Dartington Estate, DARTINGTON</td>
<td>150</td>
<td>120</td>
<td>MM30</td>
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<tr>
<td></td>
<td><strong>NET CHANGE (TP3L capacity minus TP3G capacity)</strong></td>
<td><strong>+6</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: EXD61C – and now included in TP3L

\(^{34}\) TTV6 and TTV13 - See Document EXD5vi Hearing Modifications(draft) and the reasons why the modifications were being put forward:
- HM34 TTV6 increased to 130 dws gross (equates to 126 dws net of demolition of existing dwellings);
- HM36 TTV13 decreased to 60 dws

It should be noted that Hearing Modification HM37 reduced the site capacity on TTV29.20 (Shadycombe Salcombe) from 30 to 20 dws but the trajectory in TP3G had already taken account of the reduced delivery in the plan period on this site ie reduced to 20 dwellings.

\(^{35}\) Policy TTV (NEW1)- Development at Dartington Hall Estate - The reduction of 30 dwellings in forecast supply at Dartington reflects the JLP Councils’ position expressed in the Statement of Common Ground SCG11 and during discussions in the TTVPA hearings relating to housing allocations TTV29(4) Higher Barton, Dartington and to TTV29(5) Foxhole, Dartington (as well as TTV29.10 employment) and their replacement by new JLP policy relating to development at Dartington Hall Estate.

\(^{36}\) TTV22 – the increase of 50 dwellings at Plymouth Road, Tavistock results in a site capacity of 300 dwellings. That capacity is justified as follows. It reflects the clarification that the whole site is a mixed use allocation; where development is housing led development in the southern part, and employment led in the northern part. For the purposes of justifying the TTVPA housing trajectory for TTV22, the 50 dwellings increase in capacity relies on an assumption that at least 2 Ha of the 3.66 Ha of land comprising the northern part of the site is for employment use. 2 hectares represents the majority of that part of the site. A density of 30dph is applied to the residue of 1.66 Hectares. This equates to 50 dwellings. The evidence available does not justifying reducing the number of dwellings calculated for the rest of the site. Those 50 are added to the 250 units indicated in the Submission Plan; resulting in an amended allocation site capacity of 300 dwellings.
Those changes to capacity and to the forecast of sites’ delivery in the plan period have now been incorporated into the latest suite of trajectories (TP3J; TP3K and TP3L).

B. Proposed changes to site allocations to align housing figures with the updated housing trajectory

The changes to indicative site capacity in JLP policy are expressed in Proposed Main Modifications MM4 and MM33 (Note: these proposed changes to site allocations to reflect updated information about site capacity and/or delivery are listed in New Table ADD7 and were already captured by trajectories TP3E, TP3F and TP3G, so their continuing inclusion in trajectories TP3J, TP3K and TP3L does not change the supply forecast further.)

<table>
<thead>
<tr>
<th>Site</th>
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<th>Latest site capacity</th>
<th>Main Mod</th>
</tr>
</thead>
<tbody>
<tr>
<td>PPA Sites</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PLY28 - Land north of Cliff Road, The Hoe</td>
<td>80</td>
<td>88</td>
<td>MM4</td>
</tr>
<tr>
<td>PLY36.1 – Melville Building, Royal William Yard</td>
<td>40</td>
<td>0</td>
<td>MM4</td>
</tr>
<tr>
<td>PLY36.3 – Mount Wise, Devonport – Area D</td>
<td>75</td>
<td>73</td>
<td>MM4</td>
</tr>
<tr>
<td>PLY46.10 – Land adjacent to Plumer Road, Crownhill</td>
<td>20</td>
<td>61</td>
<td>MM4</td>
</tr>
<tr>
<td>PLY58.5 – North Prospect redevelopment Phase 4</td>
<td>190</td>
<td>182</td>
<td>MM4</td>
</tr>
<tr>
<td></td>
<td>a net increase of 50 homes)</td>
<td>a net increase of 42 homes)</td>
<td></td>
</tr>
<tr>
<td>PLY58.6 – North Prospect redevelopment Phase 5</td>
<td>133</td>
<td>143</td>
<td>MM4</td>
</tr>
<tr>
<td></td>
<td>(a net increase of 35 homes)</td>
<td>(a net increase of 45 homes)</td>
<td></td>
</tr>
<tr>
<td>PLY58.15 – Savage Road, Barne Barton</td>
<td>230</td>
<td>226</td>
<td>MM4</td>
</tr>
<tr>
<td>PLY59.19 – Former Lakeside residential home</td>
<td>14</td>
<td>15</td>
<td>MM4</td>
</tr>
<tr>
<td>Net change in PPA</td>
<td></td>
<td>+6</td>
<td></td>
</tr>
<tr>
<td>PLY48 – Sherford new community</td>
<td>5,500</td>
<td>5,500</td>
<td>MM4</td>
</tr>
<tr>
<td></td>
<td>4,508 of which are anticipated to be delivered in the plan period)</td>
<td>4,254 of which are anticipated to be delivered in the plan period)</td>
<td></td>
</tr>
</tbody>
</table>

*Net change is based on the difference between the previous and latest site capacities for each site.
C. Proposed changes to site allocations in response to the Inspectors’ Post Hearing Advice Note

i. Paragraph 5 of the Inspectors’ Post Hearing Advice Note (EXC15) states that “Unless clear evidence is available now, sites within the AONBs should be deleted as housing allocations. Exceptions to this are TTV6 (Dartmouth); TTV13 and TTV15.2 (Kingsbridge); TTV29.1, TTV29.2 (Bere Alston) and TTV29.19, TTV29.20 and TTV29.21 (Salcombe) which should remain as allocations.”

ii. Paragraph 6 goes on to state that “Those housing sites within the AONB where planning permission has been granted and has not lapsed should still be included as commitments in the housing trajectory but should not be included within the JLP as allocations”.

iii. The JLP Councils have considered all allocations for housing and concluded that only two allocation sites are located within AONBs and are not the exceptions identified by the Inspectors. These sites are

- TTV15.1 West Alvington Hill, Kingsbridge
- TTV29.23 Land South East of Carehouse Cross, Stokenhan

**TTVPA changes - site allocations to be deleted as set out in Proposed Main Modification MM31** (sites removed in response to the guidance in the inspectors’ post hearing advice note that the available evidence does not demonstrate that sufficient weight has been given to this requirement when allocating some sites)

See New Table ADD8.

* Note: the indicative capacity figures are net of any demolitions of dwellings that are or were on these sites
iv. However, the site at TTV15.1 has planning permission, so the 60 dwellings forecast for delivery on this site are now included as non-allocation large site commitments, in accordance with the Inspectors’ advice in Paragraph 6 of their Post Hearing Advice Note.

v. There are no changes to site allocations in the Plymouth Policy Area relating to Paragraphs 5 and 6 of the Inspectors’ Post Hearing Advice Note.

vi. As a result of both sets of Proposed Main Modification changes listed in New Tables ADD6, ADD6 and ADD8, the total number of dwellings forecast for completion in the plan period on JLP site allocations has therefore decreased by 90 from 21,662 in TP3E to 21,572 in TP3J. It should be noted that changes to site allocations capacity listed in New Table ADD7 were already included in TP3E so their inclusion in TP3J does not increase supply further.

7.67 21,572 dwellings that are forecast for completion during the plan period are on JLP site allocations, equivalent to three quarters of supply. They are made up of sites with planning permission and sites yet to be committed as follows:

- 10,763 dwellings on the JLP allocations are already permitted, comprise 50% of the allocations. Of these 475 have been built (4%) and 10,288 are permitted but not yet built (96%); plus
- 10,809 dwellings from the JLP allocations yet to be committed through planning permission, equating to 50% of the supply in the plan period

7.68 16,244 dwellings (75%) of the 21,572 supply forecast to be completed in the plan period on site allocations are in the Plymouth Policy Area and 5,328 dwellings (25%) are in the Thriving Towns and Villages Policy Area. Of the 5,328 dwellings, 4,417 are at the Main Towns, and 911 are at the Smaller Towns and Key Villages.

7.69 About 64% (10,322) of the 16,244 dwellings on allocations in the Plymouth PA are in the City with the remaining 36% (5,992) on urban extensions within that part of the Plymouth Urban Fringe located in the South Hams. This does not include 1,686 dwellings on two of these urban extensions currently forecast for completion after the

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37 The JLP Councils submitted document EXC13 to the Examination which corrected TP3 (rev) paragraph 7.67 as well as Table 12a. This Addendum supersedes EXC13.
end of the plan period (all in that part of the Plymouth Urban Fringe located in the South Hams).

7.70 Appendix 7.5 in this Addendum provides the updated summary of the forecast delivery each year from JLP site allocations.

7.71 For the avoidance of doubt, the LPAs confirm that unless the JLP has allocated sites, then sites allocated in previously adopted DPDs are not carried forward, as the policies in the DPDs will be superseded by the JLP. Many sites in previous DPDs have been implemented or permitted. However, it should be noted that the JLP is not allocating sites in the Sustainable Villages category of settlements, as the JLP expects that Neighbourhood Plans will be the means to propose site allocations.

**Sustainable Villages Allowance**

7.72 In the Thriving Towns and Villages policy area, the JLP delegates site allocations for the Sustainable Villages settlement category to neighbourhood plans. The TTVPA housing trajectory therefore includes an allowance for housing supply in Sustainable Villages delivered from the potential for sites to be identified for housing development through Neighbourhood Plans at those settlements.

7.73 This is appropriate because the JLP is not allocating sites at Sustainable Villages, and so there is no double counting with other supply sources. The allowance is based on the potential for supply to come forward through this route. Table 12a in TP3 and Table 3.3 in the Submission JLP showed the forecast supply from this category as 720 dwellings during the plan period. Appendix 7.6 in the March 2017 Housing Topic Paper (TP3) provided the evidence for the potential number of new homes which could come forward through these plans over the plan period. It took account of the sustainability characteristics of the villages, their location in relation to the AONBs, and available sites identified in the Strategic Housing Land Availability Assessment (SHLAA). The forecast of the timing of delivery was cautious. To manage the risks of delivery, where delivery depends on plan making outside the JLP process, the trajectory in Table TTV2 (TP3C) forecast delivery at a rate of 80 dpa over the 9 years from 2025/26 to 2033/34. So it did not rely on delivery from this source early in the plan period. The JLP paragraph 5.157 explained the contingency measure if monitoring shows that Neighbourhood Plans are not bringing forward allocations to support Policy TTV30. It was therefore appropriate to include this supply source, and the scale of supply was justified.

7.74 In the 2017 Monitoring Point TTVPA trajectory the annual rate of supply in this supply category was reduced to 72 dpa for the 9 years from 2025/26 to 2033/34. This was due to the decision by the Newton and Noss Neighbourhood Plan Group not to propose allocating the site of 70 dwellings at Collaton Park, in the Neighbourhood Plan. That site had been included as part of the potential supply in this category in the 2016 Monitoring Point TTVPA trajectory (see TP3 Annex 7.6). Consequently the potential supply in this category was reduced from 720 down to 650 dwellings in the TTVPA 2017 Monitoring Point Trajectory (TP3G). However, the consequences of the
Inspectors’ Post Hearing Advice Note now need to be taken into account. These are assessed in Annex 1 to Appendix 7.6. As a result, the potential supply in this category is reduced from 650 (TP3G) down to 550 dwellings and this quantum is used in the latest TTVP3A 2017 Monitoring Point Trajectory (TP3L). Main Modification MM3 includes a proposed change to the bullet point about the Sustainable Villages allowance in paragraph 3.24 of the JLP to clarify the position.

Revised Topic Paper (TP3(rev)) Appendix 7.6 provided the evidence demonstrating how the allowance for housing in the settlement category of Sustainable Villages delivered through Neighbourhood Plans has been calculated. The method of calculation resulted in a forecast allowance of 650 units for the plan period³⁸. The consequences of the Inspectors’ Post Hearing Advice Note have now led the Councils to reduce the forecast allowance for the plan period down to 550 dwellings. This figure is included in the amendments to JLP Figure 3.3 and TTVP30 proposed by Main Modifications MM3 and MM34 respectively. The LPAs consider that there is sufficient, robust information about the potential to deliver to enable this amount for this supply category to be included in the trajectory. The supply forecast relies on the site-based assessment in the updated Appendix 7.6 in the Revised Topic Paper (TP3(Rev)) as amended by Annex 1 to Appendix 7.6 in this Addendum rather than the more theoretical levels which were referred to in Submission JLP Figure 5.8.

Policy TTVP30 provides the ‘hook’ enabling proposals for housing development being set out in current and future Neighbourhood Plans to be included as one of the housing supply mechanisms for the TTVP3A housing trajectory. The Sustainable Villages allowance is an appropriate approach, mindful of the ongoing development of neighbourhood plans within the JLP plan area. The allowance takes into account the potential for future provision in villages, where the JLP has not identified site allocations. The scale of the allowance was informed by the evidence in SHLAA. In determining the scale of supply, the JLP partners have been mindful of the relative availability of services and facilities in those settlements, and the need to avoid unacceptable impact on the AONBs, Dartmoor National Park and their settings. Sufficient flexibility for the JLP is provided by the assumption in the TTVP3A housing trajectory that delivery from Sustainable Villages Allowance supply category occurs later in the plan period, although it could occur sooner. The JLP indicates that the LPAs will consider undertaking informal planning studies to identify new site opportunities that can built into the next review of the JLP if monitoring shows that Neighbourhood Plans are not bringing forward allocations to support Policy TTVP30. This approach is an appropriate response to managing the risks.

The TTVP3A housing trajectory shows that delivery of this supply category starting from 2025/26 and extending to the end of the plan period. This is in order to allow for sufficient time for Neighbourhood Plans to bring forward site allocations. The rate is

³⁸ The March 2016 monitoring point TTVP3A trajectory had forecast supply of 720 dwellings (see TP3 Appendix 7.6). This included a site of 70 dwellings at Collaton Park. That site now has planning permission but it is not included as a potential site in the emerging Newton and Noss Neighbourhood Plan. So it is counted as a large site commitment in the March 2017 monitoring point TTVP3A trajectory (TP3G). To avoid double counting the 70 were deducted from the 720 dwellings Sustainable Villages allowance reducing the allowance down to 650 dwellings (see TP3G).
annualised at 61 pa in the TTVPA trajectory for the period 2025/6 to 2033/34 inclusive. That rate is the sum of the different annual rates in the South Hams and West Devon, which are also shown in the trajectory. As Neighbourhood Plan making progresses and more evidence is available about site allocations and their expected delivery, then the housing trajectories for the JLP monitoring can be updated and refined to reflect the contemporary information. The JLP includes delivery from the Neighbourhood Plan allowance in the rolling 5 year housing land supply allowance. The allowance is nil up to and including 2024/25. Consequently, this supply category does not contribute to the 5 year housing land supply at the anticipated point of plan adoption.

7.78 The JLPs emphasise that the amended March 2017 monitoring point forecast of 550 dwellings completions is not a limit on the amount of housing that might be delivered from this supply category. It is the scale of potential supply that we can currently demonstrate for the purposes of the housing supply trajectory, based on the information available at this time. It does not prejudge or predetermine which sites will be allocated. The allowance is made solely for the purpose of enabling the housing trajectory to include this as a component of forecast supply. The scale of delivery through Neighbourhood Plans could be higher than the 550 shown in Appendix 7.6, as amended by Annex 1 included in this Addendum. If dwellings that are allocated through Neighbourhood Plans are actually built before April 2025, then they will count as completions at the relevant monitoring point. They will be taken into account when assessing the cumulative number of completions since the start of the JLP plan period.

7.79 It should be noted that the JLP Councils assume that Neighbourhood Plan allocations in other settlement categories will not simply duplicate sites allocated by the JLP, but no additional allowance for supply from that source has been included in the TTVPA housing trajectory.

7.80 To avoid double counting, the windfall rate of 55 to 58 pa in the Thriving Towns and Villages PA has already been reduced by the annualised potential capacity from small sites that might be delivered through the neighbourhood plan process in the Sustainable Villages category – see Appendix 7.6, as amended by Annex 1 which provides the evidence and justifies the scale of that reduction.

Release of housing as the result of student accommodation development

7.81 The PPA housing trajectory includes an allowance for the amount of housing that the development of student accommodation releases in the housing market. This is consistent with Paragraph: 038 Reference ID: 3-038-20140306. The housing supply identified in the trajectories includes 470 dwellings from the release of HMOs in Plymouth City as the result of delivery of committed and allocated supply of purpose built student accommodation. The City Council estimates that 73 of these 470 have been achieved between April 2014 and March 2017. This approach is consistent with NPPG, and is based on robust analysis of council tax data.
7.82 The allowance for housing release takes account of recent and future student numbers, so double counting is avoided. There are two universities in the city – Plymouth University, being the largest, and the College of St Mark and St John. Student numbers have declined recently including the years since the start of the plan period. The HEIs anticipate that student numbers will stabilise in the future and are not anticipating any significant expansion of student numbers that would require additional housing.

7.83 It is therefore appropriate and reasonable to include this supply category where there is a release of accommodation to the market as the result of the provision of PBSA. HO16 (Table 4) provides evidence that there has been an ongoing and significant decline in the number of properties in Plymouth that are exclusively occupied by students, in 2014/15 there was a net reduction of 191 properties and in 2015/16 there was a net reduction of 323 properties. At the same time, Plymouth's student population decreased, as shown in Table 15 below:

Table 15 Number of Students in Plymouth Higher Education Institutes

<table>
<thead>
<tr>
<th>Academic Year</th>
<th>Plymouth’s Higher Education Institutes - cumulative student enrolments (student population)</th>
<th>% change from previous year</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010/11</td>
<td>35,515</td>
<td>n/a</td>
</tr>
<tr>
<td>2011/12</td>
<td>34,140</td>
<td>-3.87</td>
</tr>
<tr>
<td>2012/13</td>
<td>31,779</td>
<td>-6.92</td>
</tr>
<tr>
<td>2013/14</td>
<td>30,411</td>
<td>-4.30</td>
</tr>
<tr>
<td>2014/15</td>
<td>29,091</td>
<td>-4.34</td>
</tr>
<tr>
<td>2015/16</td>
<td>24,077</td>
<td>-17.24</td>
</tr>
</tbody>
</table>

This information is extrapolated from data presented in Tables 1-3 in HO16.

7.84 HO16 also provides the evidence to demonstrate that has been an increase in the number of bed spaces in Purpose Built Student Accommodation (PBSA) in Plymouth over recent years. HO16 Table 3 reports that in the last 10 years 4,051 new bed spaces in PBSA have been approved by the LPA and although a proportion (33%) of these consents have lapsed, 2,703 bed spaces in PBSA have been delivered or are in the delivery pipeline.

7.85 Based on this evidence it is therefore reasonable to assume that a number of properties that were once fully occupied by students are now available as market housing or have bed spaces available for Plymouth's non-student population as there is less demand for student housing as a result of student population decline, an increased supply of PBSA and a reduction in the number of properties with a council tax exemption owing to exclusive student occupation.

7.86 The JLP Councils have calculated the likely number of dwellings that are released to the housing market as a result of new PBSA, to inform the PPA and JLP housing
trajectory. The calculation is based on a number of assumptions that are considered to be reasonable, cautious and justified.

1. The starting point for this ‘housing release’ calculation is the number of student occupied HMOs in Plymouth, reported in HO16 as 512. Further interrogation of the HMO register showed the cumulative number of bed spaces available to students in these 512 properties was 3,796 as reported in HO16 Figure.

2. Excluding large licensed HMOs, there are 2,347 properties exclusively occupied by students, we do not have intelligence on the number of bedrooms in each of these properties, however, this it is likely to be less than 5 if it is not on the HMO register. Taking in to account the transient nature of students, the JLP Councils have made an assumption that it is possible 3 persons could reside in each student exclusive dwelling (3 being an approximate average of 5 and assuming HMOs of 5 or more persons are likely to be licensed properties). On that basis, with the exception of licensed HMOs, the total number of bed spaces in dwellings occupied by students in Plymouth is 7,041 (number of properties, excluding licensed HMOs, multiplied by estimated occupants). Using these assumptions, and taking into account the bed spaces available in large HMOs, the cumulative total number of bed spaces in student exclusive dwellings is 10,837.

3. To forecast potential housing releases, the Councils used the assumptions in 1. and 2. above to create a ratio of bed spaces per HMO in Plymouth. This is calculated by dividing the total number of bed spaces in student exclusive dwellings by the number of council tax exempt properties (10,837 / 2,859). This is the basis for the assumption that 3.79 students live in each property that is exempt from council tax.

4. In making future projections for the allowance, the JLP Councils have been informed by the city’s HEIs that over the coming years Plymouth’s student population is likely to stabilise, however, the number of bed spaces that will become available in PBSA is set to increase and improve the accommodation offer for students (HO16).

5. As of January 2017, 1,281 bed spaces in PBSA were under construction and a further 1,048 PBSA bed spaces were in the delivery pipeline. Upon their completion the supply of PBSA would increase by almost 43%.(HO16).

6. HEI’s and developers report that large scale PBSA with more than 100 bed spaces are likely to have occupancy levels of 75% whereas smaller PBSA are likely to achieve occupancy levels of 95%. This intelligence has been factored in into a) and b) below.

   a) as of April 2016, 1,202 PBSA bed spaces were under construction (HO16 - Appendix 4). Taking account of the estimated occupation rates results in a forecast that 901 bed spaces could be occupied upon completion (517 by September 2017 and 384 by September 2018 (HO16 Figure 1).

   b) a 50% non-implementation rate to planned PBSA has then been applied. This is a cautious approach that the Councils have taken to reflect a historic non-implementation rate of 33% and the recent decline in student numbers across the city, now expected to stabilise.
7. In total within the first 8 years of the plan period, the JLP Councils have used the evidence and assumptions set out above to derive a robust assessment of the release of student bed spaces in HMOs. It leads to the conclusion that this is equivalent to the release of 470 dwellings available for market housing. The forecast year of delivery of this release is indicated in Table 16.

Table 16  Forecast year of delivery of housing as the result of student accommodation development

<table>
<thead>
<tr>
<th>Time period</th>
<th>Forecast dwellings release</th>
<th>Forecast annual delivery of the release of dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 April 2014 to 31 March 2017</td>
<td>73</td>
<td>2014/15 Nil</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2015/16 16</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2016/17 57</td>
</tr>
<tr>
<td>1 April 2017 to 31 March 2022</td>
<td>397</td>
<td>2017/18 16</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2018/19 246</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2019/20 45</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2020/21 45</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2021/22 45</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>470</td>
</tr>
</tbody>
</table>

See Appendix 7.7 Table A7-1—which provides the calculations that forecast the annual delivery

7.87 Any gains from HMOs converting to flats within the plan period would not be counted in the PPA supply to avoid double counting with this 470 dwellings allowance. Monitoring will identify whether there are any changes in circumstance that might warrant reverting to counting HMO conversions to flats in the housing supply instead of the methodology proposed.

7.88 Therefore, the consequence of new purpose built student accommodation releasing dwellings in the housing market, results in a net addition to supply which can be included in the trajectory and counted towards meeting the SPT3 PPA target of 19,000.

7.89 The LPAs consider that there is sufficient, robust information about this supply category for it to be included in the trajectory. Appendix 7.7 of this topic paper provides the evidence about the methodology for the deriving the forecast of release of housing from future student accommodation.

Supply sources not included in the trajectories

7.90 For the avoidance of doubt, the JLP Councils confirm that the trajectories do not include the following categories of potential housing supply:

a) Empty Homes brought back into use- NPPF makes clear that local planning authorities should identify and bring back into residential use empty housing and buildings, in line with local housing and empty homes strategies. No specific
allowance for net additional housing supply from bringing empty homes back into use is made for this in the suite of JLP trajectories. Any future empty homes strategies and evidence relating to the means to support delivery may enable a future JLP review to take this potential supply source into account in line with national guidance.

b) No forecast of future affordable housing delivered through rural exception sites that are not already permitted. However, if rural exception sites are delivered they will be reported through the monitoring of development.

c) Large windfalls – The trajectories do not include a forecast of large sites not allocated or committed as at 2017. Over time other sites may be identified in later Strategic Housing Land Availability Assessment updates or be permitted. Development of these sites would add to housing supply. However, at this time they are unknown and so are not included in the housing trajectories’ supply.

d) Opportunity sites within the City Centre and Waterfront Growth Area. Opportunity sites are identified in the JLP as having significant potential for supporting the delivery of the Strategic Outcome and Objective for this Growth Area in Plymouth. They are however not allocated in the plan, and therefore are not shown on the proposals map, because there is insufficient evidence at the current time of their deliverability within the plan period. The LPA is supportive in principle of development of these sites if key constraints can be overcome in an acceptable way and a deliverable proposal can be identified. Each site has considerable potential to support the achievement of the plan’s vision. The LPA is hopeful that by the time of the next plan review they may be able to be included as positive allocations. They include the sites with the opportunity for residential development as part of mixed use at: The Royal Citadel; Mayflower Street West / Armada Centre; and Land to the east of Sutton Road, Coxside. These sites are not listed in the Plymouth PA housing trajectory or JLP (plan area) housing trajectory or the summaries for example in Tables 13.a – 13b in this Addendum. Consequently, at present they are not included in the trajectories and do not count towards the plan target of at least 26,700 or the Plymouth Policy Area target of 19,000.

IMPLICATIONS OF THE HOUSING WHITE PAPER FOR SUPPLY FORECASTS

7.91 Section 7 of the topic paper focuses on housing supply to meet the housing provision for the plan period. It is based on the published national planning policy and planning practice guidance, as well as lessons learnt from Local Plan examinations elsewhere and planning case law.

7.92 The evidence on which the 2016 Monitoring Point trajectories were produced by the LPAs relied on evidence and work undertaken before the Housing White Paper was published on 7 February 2017.

7.93 The topic paper provides an early opportunity to start to consider the potential implications of the White Paper proposals on future housing supply.
A. Proposals to change NPPF to:

1. make it clear that plans and individual development proposals should:
   - make efficient use of land and avoid building homes at low densities
   - address the particular scope for higher-density housing in urban locations
   - ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area
   - take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives.

2. underline particular priorities that should be pursued such as:
   - bringing brownfield land back into use
   - more homes on public sector land
   - supporting small and medium sized sites and thriving rural communities

7.94 The LPAs consider that the assessments of site capacity on sites allocated by the JLP and on the SHLAA sites that informed the Neighbourhood Plan allowance are robust and realistic. The need to make efficient use of land and at the same time take account of the character and qualities of the area have already been factored into the calculations. This includes the opportunity for higher density housing in urban locations. The plan has had full regard to the opportunities for bringing brownfield land back into use, for example continuing the long history of regenerating brownfield sites in Plymouth. The plan also continues the process of more homes on public sector land. The Thriving Towns and Villages policies demonstrate how the JLP is supporting rural communities. Site allocations include small and medium sized sites, and more are anticipated through the Neighbourhood Plan process and the forecast of delivery from small, non-garden land, windfall sites.

7.95 The White Paper includes the following proposals relating to a requirement for small site allocations:

A.55 make clear that on top of the allowance made for windfall sites, at least 10% of the sites allocated for residential development in local plans should be sites of half a hectare or less

7.96 The LPAs will have the opportunity to ascertain how many of the sites allocated in the JLP are below the threshold. As proposed in the White Paper A.55, there would be an opportunity for the LPAs to work with developers as one way to encourage the subdivision of large sites, to increase the supply of land available to small and medium-sized housebuilders.

7.97 The White Paper includes proposals to amend the NPPF regarding the mix of housing sites.

HWP A.54 “There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in
those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people. With these objectives in mind proposing a number of additional changes to the National Planning Policy Framework to: **highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing**, drawing on the knowledge of local communities;

7.98 The method for calculating the JLP allowance for housing supply from neighbourhood planning proposals already highlights the potential for delivery on small sites from this supply category (a forecast total of 191 dwellings\(^{39}\)). This had been undertaken to avoid double counting with the forecast delivery from small, non garden land windfalls. This does not preclude other small site allocations being included in neighbourhood plans.

7.99 Housing trajectories for the JLP plan area and the two Policy areas are part of the JLP evidence base and have informed the decision about the housing targets set out in JLP Policy SPT3. Those trajectories rely on assessment of the delivery of housing on sites on a year by year basis. The LPAs consider that the latest assessments made are sufficiently robust at this time and can be relied on for the housing trajectories used for plan-making purposes. The White Paper includes proposals towards building homes faster. The JLP supply forecasts are mindful of the need for timely plan preparation, proportionate evidence and the tests of soundness. The end March 2017 monitoring point trajectories include the latest evidence about lead in times, delivery rates, including having been informed by intelligence from developers and housebuilders regarding their sites.

7.100 The 2017 Autumn Budget Statement announced the Government’s intention to consult on expecting local authorities to bring forward 20% of their housing supply as small sites. This is based on the expectation that this will speed up the building of new homes and increase competition in the house building market.

7.101 **Standard Methodology for Assessing Housing Need.** The Government has consulted on changes to the NPPF to counter the negative effects of the 5 year housing land supply planning tool through ways to increase certainty. This includes a standard approach to housing need assessment and the housing delivery test, with consequential implications for assessing the 5 year housing land supply.

7.102 The JLP Councils are mindful of the recent consultation proposals by the Secretary of State (Planning for the right homes in the right places, 14 September 2017) setting out a proposed approach to calculating local need. This was accompanied by a data table showing the indicative assessment of housing need for each District based on the proposed formula 2016 to 2026. The table shows the outcome of the application of the proposed formula for assessing housing need.

\(^{39}\) Based on Appendix 7.6 (76 in the South Hams and 167 in West Devon) modified by the implications of the Inspectors’ Post Hearing Advice Note ie by subtracting 58 dwellings on small sites at settlement in the AONB (see Addendum New Table ADD14) and adding in 6 dwellings (Land at Steer Point Road, Brixham – See Addendum New Table ADD13)
7.103 Table 17 in this Addendum replicates the content of that data table for the 3 Local Authorities in the Plymouth HMA. It demonstrates that total annualised rate for the Plymouth HMA from the SHMA Part 1 OAN is higher than the combined total rate for the three authorities from the proposed standard methodology.

<table>
<thead>
<tr>
<th>City/District in Plymouth HMA</th>
<th>Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)</th>
<th>Current local assessment of housing need, based on most recent publically available document SHMA Part 1 (HO13) (dwellings per annum)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>647</td>
<td>911</td>
</tr>
<tr>
<td>South Hams</td>
<td>354</td>
<td>196</td>
</tr>
<tr>
<td>West Devon</td>
<td>318</td>
<td>258</td>
</tr>
<tr>
<td>PLYMOUTH HMA TOTAL</td>
<td>1,319</td>
<td>1,365</td>
</tr>
</tbody>
</table>

7.104 In the Councils’ response of 1 November 2017 (EXC4A) to the Inspector’s note (EXC4), the JLP Councils have had regard to Table 1 and paragraph 55 of the consultation document (“the proposed standardised method for housing need has no bearing on the examination, nor on the future 5 year land supply position and decision making post adoption of the Joint Local Plan”). The Councils were of the view that the JLP examination should progress using the current approach to establishing housing need as set out in the evidence base supporting the JLP (ie SHMA Part 1).

7.105 Government published the new National Planning Policy Framework on 24 July 2018. Paragraph 214 provides for a transitional period. It states that:

The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned.

7.106 The Plymouth and South West Devon Joint Local Plan was submitted for examination on 31 July 2017, thereby meeting the date criteria in new NPPF paragraph 214 for applying the policies in the previous NPPF. The JLP Councils therefore continue to be of the view that the JLP examination should progress using the current approach to establishing housing need as set out in the evidence base supporting the JLP (ie SHMA Part 1).
8. MAINTAINING SUPPLY

8.1 This section of the Topic Paper focuses on the evidence about how the Councils anticipate that actual and forecast housing supply in the plan period within the JLP plan area will be maintained. This is the supply identified to meet the housing need to be accommodated in the plan area as expressed in the SPT3 housing provision targets. The section provides evidence and analysis about:

- housing growth over time - delivery
- delivery from the supply categories, and
- supply performance.

8.2 The analysis in Section 8 draws on the evidence in Addendum Section 7 and the housing trajectories. This analysis also uses the context provided by the Housing Implementation Strategy set out in the JLP because NPPF paragraph 47 bullet point 5 requires LPAs to set out a Housing Implementation Strategy, which provides the approach towards maintaining housing supply.

Delivering development

8.3 The expected rate of housing delivery over the plan period is illustrated through the housing trajectories. The evidence on which the Submission JLP relied were housing trajectories for the JLP area and the two Policy Areas, using data with an end March 2016 Monitoring Point (TP3Ai, TP3Bi and TP3Ci – in the A3 format). Housing Topic Paper (March 2017 TP3) provided an audit trail of the use of this supply evidence. The actual and forecast delivery of dwellings in the plan period was summarised in JLP Table 3.3.

Updated trajectories

8.4 As explained in paragraphs 1.8 to 1.11 of the revised Topic Paper TP3(rev), the JLP Councils updated the supply evidence with end March 2017 Monitoring Point trajectories. Those trajectories were subsequently revised in April 2018 and then in October 2018 (see paragraph 7.7 of this Addendum which explains the timeline and reasons for the revisions). There is a trajectory for the JLP plan area and for the two Policy Areas set out in SPT3 which illustrates the housing development that has been built between 2014 and the 2017 Monitoring Point, and the levels of development currently anticipated over the rest of the plan period (the latest trajectories are TP3J, TP3K and TP3L). The analysis about maintaining supply in this Addendum, including the updated Appendix 4 and Appendix 6, relies on those latest 2017 Monitoring Point trajectories unless otherwise stated.\(^{40}\).

\(^{40}\) For example to provide evidence in response to specific questions from the Inspectors for the JLP examination about the 2016 Monitoring Point data, which informed the preparation of the Submission JLP.
8.5 The forecast of housing supply is analysed in the latest housing trajectories (TP3J, TP3K and TP3L). This analysis uses a suite of metrics to demonstrate actual and forecast delivery performance

1. a plan - monitor - manage approach to consider whether the plan’s policies can maintain supply. The JLP analysis is based on the annualised rates of the provision targets set out in SPT3 the “monitor” compares past completions against the relevant annual rates; and “manage” considers what has been delivered against the residue of what is left to be delivered. The trajectories demonstrate the ‘front-loading’ of development in the JLP, without being unrealistic about delivery rates.

2. 5 year housing land supply – assessing the position from current data, for each year in the plan period

3. The forecast of affordable housing supply in the plan period (see also Section 9)

**Housing Trajectories – Evidence about maintaining supply**

8.6 The evidence base provides 3 housing trajectories - one for each Policy Area and one for the JLP plan area. The trajectories provide the key evidence of the forecast delivery of housing which meets the overall Plan Area, and Policy Area housing targets to 2034.

8.7 The latest Policy Area trajectories for the two Policy Areas in TP3K and TP3L provide the following details:

- The list of the number of dwellings built or forecast to be built for each year in the plan period, for:
  - each large site
  - the aggregated total for small sites built and permitted
  - the aggregated total for forecast small site (non-garden land) windfalls.
- The plan-monitor manage table
- The 5 year housing land supply table
- The table calculating residual and ‘Sedgefield’ components (as appropriate)
- These trajectory tables are accompanied by
  - summations of completions by supply category and planning status
  - pie charts illustrating the forecast completions for the plan period by supply categories
  - bar charts of the ‘rolling’ 5 year housing land supply
  - line and bar charts illustrating the plan-monitor-manage evidence (this is reproduced in Appendix 4 of this topic paper)
  - the forecast total affordable housing supply on the large sites, and overall supply totals

8.8 The JLP area trajectory (TP3J) provides the same analytical data, but because this is calculated by summing the Policy Areas results the JLP area trajectory does not duplicate the detailed trajectories for sites listed in the Policy Area trajectories.
8.9 The detailed housing trajectories contain the latest evidence about housing supply, based on the end March 2017 housing monitoring point (see Section 7 of this topic paper).

8.10 The trajectories and the illustrative graphs use the housing provision targets recommended in Section 6 of this Addendum, and include supply from the JLP policies allocating sites for housing development or sites for mixed use where housing development is specified.

**Lead in times and delivery rates**

8.11 The housing trajectories rely on assessments of the time for development proposals to reach the point when the first dwelling is completed (lead in time) and the rate of delivery expressed either as a yearly rate or as specific number of dwelling completions in specific years.

8.12 **Lead in times**: For the purposes of the evidence for the latest housing trajectories that inform the JLP, lead in time includes the following steps, some of which run concurrently, some consecutively

- The time to prepare a planning application
- The time for planning applications to be determined (including the completion of a S106 agreement)
- If necessary, the time for the first reserved matters planning application for the housing development to be approved, following approval of an outline planning application
- Discharge of pre-commencement planning conditions
- Site acquisition and legal processes
- Site start / site works (including demolition and infrastructure)
- Dwelling construction.

8.13 Lead in does not include the time for sites to be allocated in an adopted development plan, as this is the process being undertaken through the JLP and its examination.

8.14 Lead in times vary depending on the site size and whether the application is a full application or whether it is an outline application followed by one or more reserved matters applications. Site specific issues can lead to a longer than average lead in times eg additional remediation required on a brownfield site. Nevertheless, the average times are the best guide available unless specific intelligence about a site is available. The JLP Councils have evidence about historic lead in times:

- Plymouth City – the evidence is in Plymouth SHLAA Appendix 7 (HO2G)
- South Hams and West Devon LPAs – the evidence is summarised in Appendix 11.2 of TP3(rev).

8.15 **Delivery rates**: For the purposes of the evidence for the latest housing trajectories that inform the JLP, the JLP Councils have evidence about historic delivery rates:
8.16 The Councils have benefitted from intelligence from developers, landowners and agents provided as the result of the October/November 2017 consultation on large sites in the 2017 Monitoring Point housing trajectories (see Addendum paragraphs 7.10 to 7.12). Where agreement has been reached about the trajectories, including lead in times and delivery rates, this is indicated in TP3H and TP3I. Where agreement has not been reached the Councils have had their historic information to guide the trajectories. The trajectories include updates to site capacity and/or to delivery years for 2 sites in PPA and 6 sites in TTVPA, following Statements of Common Ground and/or discussions at the Examination Hearings. Those updates were first included in the April 2018 trajectories in EXD61A; EXD61B and EXD61C, and subsequently included in trajectories in TP3J, TP3K and TP3L.

8.17 The Government has announced that the Independent Review of build out, chaired by Sir Oliver Letwin, is due to report by the time of the 2018 Autumn budget. Its terms of reference are “to explain the significant gap between housing allocations and the amount of land allocated or permissioned in areas of high housing demand, and making recommendations for closing it.” The Government has confirmed that the date of the Autumn budget is now 29 October 2018, but it will post date the latest housing trajectories for the JLP.

Demonstrating and maintaining a five-year housing land supply

8.18 The NPPF (2012) requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements. Provisions are also made for a buffer to ensure choice and competition in the market for land, and to address under-delivery against previous plan targets.

8.19 The 5 year housing land supply position is a forward looking assessment that compares future targets for the next 5 years with the forecast of delivery over the next 5 years. This Addendum considers the assessment of 5 year land supply for the preparation of the Joint Local Plan and for development management purposes.

8.20 The JLP has a provision target of at least 26,700 dwellings for the plan area for the plan period. But it also establishes the ‘policy on’ housing provision targets for the two Policy Areas in Policy SPT3 as areas where housing need will be met. Those targets are expressed as minimums. In policy terms, SPT3 seeks to ensure that any shortfall in deliverable supply within a Policy Area would need to be addressed in that Policy Area. The Policy Area targets are non-transferable. (See also paragraph 5.89 of this Addendum and proposed Main Modification MM3).
8.21 This, in policy terms, seeks to ensure that any future shortfall in deliverable supply in one Policy area does not result in compensatory releases in the other Policy Area. Therefore each policy area has a target in SPT3, and 5 year housing land supply assessments are made for each Policy Area. The Plan relies on this approach to ensure that the Spatial Strategy is delivered in line with the Vision and Strategic Objectives. This approach has been tested elsewhere at appeal. For example, the Secretary of State agreed with the Inspector regarding the Bishop Sutton appeal that “…some degree of limitation or restraint outside Bath would be appropriate for reasons of achieving a balanced, sustainable growth strategy but that permitting significant growth in excess of the current land supply situation in the Policy Areas outside Bath would undermine the principles of sustainable development set out in the CS, thereby significantly undermining the confidence of developers and residents in the plan-making process” (IR11.40 and IR11.69) 41.

8.22 The primary reason for this approach is the need for JLP policy SPT3 to support the spatial strategy and deliver the JLP vision. The JLP policy requirements for new homes and jobs have been established in the context of the policy area purposes which are explained in the plan and in the Strategy Topic Paper (TP5 – Pages 6 and 7). The policy solutions to strategic cross boundary issues include the focus of growth at Plymouth and the accommodation of unmet housing need arising from Plymouth City at Plymouth in the urban extensions in the urban fringe located in South Hams.

8.23 The JLP is the opportunity to establish a strategy to direct need within the HMA. The Strategy Topic Paper makes clear that housing trajectories and 5 year land supply forecasts are produced for the whole plan area and the two Policy Areas. It also makes clear that the JLP Councils have not included housing provision targets in Policy SPT3 based on Local Planning Authority areas and the reasons are set out on page 7. An LPA approach would weaken and devalue the JLP policy solutions to the strategic cross- boundary issues.

8.24 Housing land supply will be monitored annually for each of the Policy Areas based on the relevant annualised provision rates derived from the policy area targets. The housing trajectories will be monitored and updated on an annual basis through the Authority Monitoring Reports and also through roll-forward and further reviews of the Strategic Housing Land Availability Assessment (SHLAA). These will assess the 5 year land supply position, including whether there has been past shortfall or surplus in delivery and determine the level of buffer to apply. Annual monitoring will include monitoring applicants’ evidence which they use to demonstrate the extent to which their proposed housing development will contribute to the five year deliverable housing land supply. Over time this can be compared to delivery achieved on those developments.

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41 APP/F01114/A/14/2217216 APPEAL BY CHARLES CHURCH SEVERN VALLEY & EDWARD WARE HOMES LTD ON RESIDUAL LAND AT CAPPARDS ROAD, BISHOP SUTTON APPLICATION REF: 13/04975/OUT 12/9/2016

42 Monitoring will need to take account of contemporaneous NPPF and NPPG.
A) 5 year land supply position - for development management purposes

8.25 Monitoring of housing delivery will be undertaken, including monitoring of delivery in the two Policy Areas set out in the JLP Spatial Strategy in Policy SPT3. The interpretation of NPPF paragraph 47 when applied to local authorities who have collaborated on a JLP and set out a spatial strategy for the distribution of development based on policy areas was set out in TP5 page 8. The JLP Councils prepared the topic paper on governance (TP6(rev)) which provided further explanation about how this Policy Area approach towards the 5 year housing land supply analysis for development management will work in practice.

8.26 NPPF paragraph 49 makes clear that where a 5 year housing land supply is not demonstrated then housing supply policies in the development plan are out of date. NPPF paragraph 14 and the ‘tilted balance’ is then engaged. The local planning authority judges the weight to be given to policies in the development plan when considering housing development proposals in those circumstances and comes to a balanced assessment of the benefits and impacts of the proposal.

8.27 The calculations in a static ‘snapshot’ of the 5 year housing land supply at any one point in time are dependent on detailed information at the time of calculation.

8.28 It also reflects the judgment made over the weight afforded to elements of the JLP as it progresses through the plan making process.

B) 5 year housing land supply at point of adoption of the JLP

8.29 Plan making requires the LPAs to consider how supply can be maintained across the plan period, not just at a single point in time. Furthermore, it is essential that the JLP Councils can demonstrate a 5 year housing land supply or better at the point of plan adoption. At the time of writing this Addendum, the Councils now anticipate the point of adoption to be the end March 2019 Monitoring Point.

8.30 The latest trajectory evidence is based on evidence gathered relating to the end March 2017 monitoring point. In order to provide evidence to demonstrate whether there is a 5 year supply position at point of adoption and to demonstrate that supply is maintained across the JLP plan period in the context of Policy SPT3, the Councils have used an approach referred to as a rolling 5 year housing land supply. This method enables the Councils to forecast the supply position for every year in the plan period for each Policy Area, and for the JLP Plan area, based on current evidence. This includes the position as end March 2019.

8.31 The trajectories include tables that assess the 5 year housing land supply for every year in the plan period, assessed at the end of each monitoring point. So for example the table column for 2018/19 calculates the 5 year housing land supply position as at 31 March 2019. The 5 year supply assessment has been undertaken for each of the
Policy Areas. Appendix 6.1 in this Addendum provides more details about the methodology used to calculate the 5 year supply position. Consequently each of the latest trajectories’ documents (TP3J, TP3K and TP3L) includes its related 5 year housing land supply analysis in table form, and illustrated in a graph. The graphs are also reproduced in Appendix 6.2 of this Addendum and they also provide the evidence that the JLP maintains a supply of housing land.

8.32 Together and individually the evidence in the 3 trajectories and the related analysis demonstrates that:

- there will be more than five years of housing land supply in the JLP plan area and in each of the two Policy Areas at the point of plan adoption (at end March 2019)
- the plan can maintain five-year supply from the point of plan adoption with a buffer (either 5% or 20% as appropriate in line with the NPPF) brought forward from the end of the plan period, taking into account the site allocations and other supply components listed in Section 7 for:
  - the JLP plan area,
  - Plymouth Policy Area (Main Modification MM3 proposes inserting the 5 year supply position at the point of plan adoption in amended figure 3.4 based on applying a 20% buffer), and
  - Thriving Towns and Villages Policy Area (Main Modification MM3 proposes inserting the 5 year supply position at the point of plan adoption in amended JLP Figure 3.4 based on applying a 5% buffer)
- Past under delivery has resulted in a buffer of 20% being applied to the Plymouth Policy Area calculations in JLP Figure 3.4. For Thriving Towns and Villages Policy Area, a buffer of 5% is appropriate for the calculations in Figure 3.4, as no under delivery has occurred. Figure 3.4 uses these components to set out the five year land requirements for the two policy areas at the anticipated point of plan adoption. (Note: In future assessments of the 5 year housing land supply position, the JLP Councils will reassess which buffer level is appropriate dependent on the delivery performance).
- there is no ‘holiday’ from the 5 year land supply assessments.

8.33 The evidence demonstrates delivery of the overall Plan Area and Policy Area housing targets to 2034. Based on the supply evidence from the end March 2017 monitoring point trajectories, it also demonstrates the maintenance of the rolling 5 year supply up to March 2029. The forward looking 5 year supply position declines at the end of

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43 SPT3, as amended by proposed Main Modification MM3, clarifies the operation of the spatial strategy in relation to managing the delivery and distribution of housing in the Plan Area. The evidence reproduced in amended Figure 3.4 reports the 5 year supply analysis for the 2 Policy Areas at the anticipated point of adoption. The Addendum also provides further information to show what the position would be at the whole plan level. This evidence demonstrates that there would be more than 5 years supply at point of adoption at the whole plan level.

44 The reasons why a 20% buffer and a 5% buffer are applied to PPA and TTVPA respectively in Figure 3.4 are set out in Addendum Appendix 6.1. The correct buffer to apply in the future will depend on supply performance and metrics relating to contemporaneous Government policy and guidance.
the plan period but this is because the Framework does not require the JLP to provide a land bank at the end of 2034. The plan review is the correct mechanism for identifying provision targets and supply after 2034.

Managing the 5 year supply

8.34 Policy DEL1 makes clear that the LPAs will take a positive and strategic approach to the use of their powers in relation to planning consents, planning obligations or agreements and, for Plymouth, the Community Infrastructure Levy (CIL), in order to accelerate the delivery of development and secure developer contributions to meet the infrastructure needs of the city.

8.35 The LPAs will be proactive in managing the five-year supply. For example, within Plymouth, a Plan for Homes has been prepared and is continually under development in order to identify and bring forward new sites for development, with support from the housing delivery team in the City Council. This is linked to an integrated estates management approach and the One Public Estate programme.

8.36 Section 7 of the JLP focuses on the framework for monitoring and management. Each LPA will monitor housing delivery and set out a 5 year land supply for their area. This is to ensure that the requirements of paragraph 47 of the NPPF are being met, and is also to show how each LPA is contributing to delivering new homes as envisioned by the strategy and policies set out in the JLP, and chiefly to demonstrate that growth is taking place across the two policy areas as set out in the spatial strategy. LPA housing monitoring indicative requirements are set out as Indicator I1a in Annex 2 of the JLP.

8.37 Monitoring of the detailed delivery will be by way of more detailed indicator sets and other intelligence. Where there is a clearly identifiable need for co-ordination across a number of policies, mechanisms will be established that ensure that the evidence gathering, analysis and subsequent resource allocation can be effectively co-ordinated. Management of the plan will enable the results of monitoring to be turned into useful analysis and intelligence able to influence decision making and review. Contextual indicators will be assessed together with horizon scanning to give a full picture for decision making. The results of monitoring will be reported annually through the Authorities Monitoring Report.

Monitoring Targets

8.38 The Policy Area targets in SPT3 are the targets used to assess the 5 year housing land supply for the purposes of NPPF Paragraphs 47 and 49. Nevertheless the JLP Councils consider that there is also a role for monitoring targets to monitor delivery performance within each Local Planning Authority area. Accordingly, the JLP included monitoring targets that are listed in JLP Annex 2 (now as amended by Main Modification MM3). These monitoring targets are not to be used for NPPF paragraphs 47 and 49 purposes regarding 5 year housing land supply calculations.
and are not policy targets. They enable each LPA to understand how their administrative areas are performing in terms of delivery:

- Plymouth City 13,200
- West Devon 3,200
- South Hams 10,300 (with 5,800 in the PPA Urban Fringe and 4,500 in the TTVPA as clarified by proposed Main Modification MM3 regarding JLP Annex 2, Indicator I1a)

8.39 The evidence in the latest 2017 Monitoring Point trajectories underpins the following conclusions, demonstrating robust supply in the LPA areas, and enabling sufficient headroom in each area.

- The monitoring target for Plymouth City (LPA) is 13,200. The forecast supply 14,746 in the plan period provides sufficient headroom at nearly 12%.

- Deducting the 13,200 City monitoring target from the PPA policy target of 19,000 results in a monitoring target of 5,800 for the Plymouth Urban Fringe. Compared to the forecast supply in the plan period of 5,922 in the Fringe (all in the South Hams), leads to a headroom of 2%. The flexibility for this part of PPA comes from the further 1,686 dwellings within the urban extension allocations (1,246 of which have outline planning permission), which could come forward earlier if the market strengthens or if other PPA sites are not developed as forecast by the housing trajectories.

- The monitoring target for West Devon LPA is 3,200. The LPA is the same as the West Devon part of the TTVPA. This provides sufficient headroom at 13% above the forecast supply of 3,608 in the plan period.

- Deducting the 3,200 West Devon monitoring target from the TTVPA policy target of 7,700 results in a monitoring target of 4,500 dwellings for the South Hams part of the TTVPA. The forecast supply in the plan period of 5,701 dwellings in the South Hams part of the TTVPA results in a very healthy headroom of 27%.

- Adding the 4,500 monitoring target for the South Hams part of the TTVPA to the 5,800 monitoring target for the South Hams part of the PPA, results in the South Hams LPA monitoring target of 10,300 dwellings. With a forecast supply of 11,623 in the South Hams LPA area in the plan period this gives a headroom of nearly 13%.

8.40 For the avoidance of doubt, it is emphasised that it is the Policy Area targets in STP3 have been used for 5 year housing land supply analysis for plan-making purposes in the context of NPPF (2012) paragraph 49. The JLP Councils are consulting on proposed Main Modification MM3 which amends JLP SPT3 (which makes clear that the Policy Area housing requirements are “separate and non-transferable”) as well as the reasoned justification in JLP paragraphs 3.25 and 7.23 and in Annex 2. The LPAs will monitor housing delivery to ensure that the requirements of the NPPF are being
The Councils will monitor housing delivery post plan adoption, including delivery in the Policy Areas as well as the whole plan area. See paragraph 5.89 in this Addendum for further details:

Headroom and Flexibility

8.41 Table 3.3 in the submission JLP confirmed that about 29,800 dwellings were forecast to be delivered in the plan period. That supply forecast was based on the evidence available at the time of plan submission provided by the March 2016 Monitoring Point JLP housing trajectory. This indicated a supply ‘headroom’ of 3,100 dwellings above the SPT3 housing provision requirement of 26,700 for the Plan area. At 11.5% the JLP Councils considered that headroom would be sufficient.

8.42 Since submission, the JLP Councils have updated the evidence on housing supply. The latest evidence for the JLP plan area is provided by the 2017 Monitoring Point housing trajectory for the plan area (TP3J) and the details in the trajectories for the Plymouth Policy Area (TP3K) and the Thriving Towns and Villages Policy Area (TP3L). The plan area total supply is now forecast to deliver 29,977 dwellings in the plan period. At 3,277 dwellings above the minimum target of 26,700 it gives a headroom of 12.3%, which is higher than the 2016 Monitoring Point forecast and only 0.3 percentage points below the previous 2017 Monitoring Point forecast of 30,055.

8.43 The JLP Councils consider that a headroom of 3,277 dwellings is sufficient to enable the Council to react quickly to unforeseen changes in circumstances and to ensure that the full requirement is met during the plan period. There is sufficient headroom and flexibility in forecast supply for example to allow for a swift response if economic conditions were to strengthen faster and jobs to grow more than predicted in the Experian forecast, increasing the labour force that would need housing. The reasons for this conclusion are as follows:

- The headroom of 3,277 dwellings is 12.3% above the minimum requirement. This is a significant amount. It results in part from the considerable number of dwellings (13,132) on sites with planning permissions and the dwellings completed since 2014 (3,691). It also results from the clear policy intention demonstrated by allocating sites for development in the JLP, where scale of housing allocations that are not yet permitted is significant (10,809). The other supply categories add a further 1,964 dwellings to the forecast. The plan does not simply rely on just meeting the minimum requirement. The forecast is for supply to exceed this in the plan period.

- That amount of headroom in the forecast housing supply provides an appropriate degree of flexibility. If delivery on a site does not occur as forecast, this does not mean that supply will fall below the minimum target because other sites could come forward earlier to meet need. Even if a site is not developed, there is sufficient total capacity for the policy targets to be achieved.
The evidence demonstrates the realistic prospects of delivering above the minimum targets. Appendix 6.3 explains how supply is maintained in each of the two Policy Areas and how this provides flexibility within the related housing trajectories (for PPA see Paragraphs A6.67 to A6.71; for TTVPA see Addendum Paragraphs A6.72 to A6.77 in Appendix 6.3).

Meeting the requirement is not reliant on back-loaded supply. The evidence demonstrates that the boost to supply is forecast to occur early in the plan period. The forecast completions in the JLP Plan-Manage bar chart in Graph JLP2A shows supply peaking in 2021/22 and 2022/23 (TP3J). Nevertheless, if monitoring demonstrates that supply is not delivered as forecast there is time for the JLP Councils to react to changing circumstances, drawing on the range of actions set out in the Housing Implementation Strategy to manage housing supply in the future. Those approaches to managing supply are relevant to the different characteristics of the two Policy Areas.

The supply forecast includes a range of sites by size, type and location offering significant opportunity for the housing industry to deliver dwellings, and for the industry to react to the housing market and to changing circumstances.

The trajectories have already applied a lapse rate to small sites commitments that have not yet started because the delivery of these sites individual have not been individually assessed. The trajectories have also excluded the capacity of large sites where the Councils have assessed the individual sites with planning permission that have not started and identified those sites where the planning permissions will not or are unlikely to be built in the plan period. Details about the approach to lapse rates are set out in paragraphs 7.49 to 7.55 in this Addendum. Combined with the Housing Implementation Strategy this enables the Councils to respond to changing circumstances and appropriately mitigates the risk of non-delivery from this supply source.

This scale of headroom does not include the potential for supply from future large windfall sites. Although not forecast in the trajectory, it is reasonable to anticipate delivery from such windfall sites. This would add to supply in the plan area, increasing the amount of headroom. The plan includes policies against which to consider future windfall development. Not all such proposals will be suitable, but the fact that SPT3 housing requirements are expressed as minimums clearly indicates that additional proposals not yet identified can be considered, enabling the Councils to respond to changing circumstances consistent with the spatial strategy in the JLP.

This headroom does not include the 1,686 dwellings forecast to be built after March 2034 at Sherford and at Woolwell urban extensions. There is no JLP policy restriction to prevent those 1686 dwellings be built earlier, if the economy and housing market strengthens above the level forecast, or if other sites in the Plymouth Policy Area deliver at a later date. It would also strengthen the level of headroom in the PPA.
8.44 The LPAs conclude that this is a healthy level of forecast supply, and indicates a good level of flexibility, especially as it does not include any allowance for future large windfalls. As expressed, STP3 housing provision is a ‘minimum’ and does not preclude additional windfalls, small or large, from contributing to housing supply, subject to the JLP’s policies.

8.45 Section 7 of the JLP on delivery and monitoring emphasises that a certain degree of flexibility is built into the plan to allow for changes in circumstances that may impact on delivery. To assess the robustness of policies against more major or unforeseen circumstances, a risk assessment has been undertaken to identify the extent to which a delay or failure of a particular initiative, might have a significant impact on the delivery of the plan’s overall objectives. The plan sets out the approach taken to identify the significance and robustness of each policy.

Contingency Planning

8.46 Section 7 of the JLP addresses how the monitoring process will be used to bring forward contingency measures should these be needed during the five-year period.

8.47 House building rates vary over time (see evidence summarised in Appendix 5 of this topic paper), reflecting the economic situation, such as the impacts and challenges of economic recession and the housing market downturn after 2008.

8.48 It is prudent to ensure the partner authorities are in a position to respond quickly to changing circumstances. Positive planning measures may be required to help bring forward sites for development earlier in the plan period to ensure a five-year supply of sites can be sustained.

8.49 In TP3 (rev) the LPAs noted that the Housing White Paper’s proposed a housing delivery test. One of the steps proposed is “From November 2017, if delivery of housing falls below 95% of the authority’s annual housing requirement, we propose that the local authority should publish an action plan, setting out its understanding of the key reasons for the situation and the actions that it and other parties need to take to get home-building back on track”. Since then Government has published the revised NPPF confirming the future use of HDT and has issued the Housing Delivery Test Rulebook. However, under transitional arrangements the JLP is proceeding under NPPF 2012 so for the purposes of this Examination, the Addendum does not analyse HDT requirements and implications.

8.50 Section 7 of the JLP indicates the approach to contingency measures. In addition to the actions that characterise the proactive approach to delivery, there are also some generic set of measures that can be taken to address any contingency issue. These include:

- Identifying the reasons for under-performance.
- Discussing with partners alternative options for delivery.
- Reviewing the opportunity sites to see if replacement allocations can be brought forward.
• Reviewing the evidence base to identify alternative delivery options.
• Working with developers and landowners to review sites to improve viability or suitability.
• Working with infrastructure providers to review scheme delivery.
• Identifying additional sources of finance.
• Review targets and outcomes or delivery timescales.
• Bring forward review of the plan.

Approach to regular Monitoring and Review

8.51 JLP Section 7 gives a commitment to a regular full review of the JLP every 5 years from adoption which is anticipated by end March 2019. Where monitoring identifies issues that require a change to be made to the plan itself, the JLP makes clear that these will be collected and dealt with at the next five yearly review unless they are so significant that they precipitate an earlier urgent review. A risk based approach is being used to identify those matters that may be so significant that major deviation or delay from the target trajectory could put the overall delivery of the Plan’s objectives in jeopardy.

8.52 Paragraph 7.30 in the JLP signals that where monitoring identifies issues that can be dealt with through changes to delivery plans, a review of the JLP will not be necessary but an interim policy statement will need to be prepared and consulted upon by the LPAs concerned.

8.53 Housing delivery will be monitored annually through a framework of monitoring indicators. The LPAs also anticipate periodic review of the SHLAA. Evidence of a significant departure from the anticipated trajectory or policy would be reported through monitoring and could trigger an earlier review. The JLP partner authorities will consider what actions to take should the AMR be unable to demonstrate that a Policy Area has a continuous five-year supply (plus appropriate buffer) of developable and deliverable housing land.

8.54 Section 7 of the JLP sets out the approach to plan governance and delivery.

Circumstances in which specific management actions may be taken

8.55 Section 7 of the JLP signals the approach to corrective action if there is evidence of a departure from planned growth. In relation to housing, the latest 2017 Monitoring Point Housing Trajectories illustrated in Appendices 4.2 and 6.2, take account of contemporary information from developers and the building industry about anticipated delivery, and the JLP Councils overview of housing delivery.

45 Since the JLP was submitted, Regulations under the Neighbourhood Planning Act 2017 were laid before Parliament on 13 December 2017, and, were brought into force in 2018. As well as requiring all authorities to have up to date plans, it introduced a requirement for a review of Local Development Documents every 5 years, coming into force on 6 April 2018.
The LPAs are confident that the housing trajectories are robust, and demonstrate that a 5 year housing land supply would be achieved at the point of plan adoption. Nevertheless, the LPAs consider that it is appropriate in a Housing Implementation Strategy to identify a number of specific management actions to help bring sites forward for development in line with, or sooner than the arc currently indicated in the trajectory.

JLP Partner Authorities - Initiatives to boost and manage housing supply

A number of actions can potentially encourage sites to be brought forward. For example, these could include active engagement in:

a. Working with house builders / landowners, to identify the main causes of supply problems and where appropriate to act on feedback received.

b. Production of detailed Planning Briefs and / or area-based Supplementary Planning Documents, to increase certainty for developers on the progression of sites through the planning process.

c. Regular meetings with stakeholders about the major urban extensions.

d. As part of the preparation of Planning Briefs, indicate different development permutations to accommodate different viability scenarios.

e. Pre-application discussions with developers, landowners and their agents to increase certainty in the development management process.

f. Sensitive application of policy where issues around scheme viability have been clearly demonstrated.

gh. Prioritise public sector land.

h. Seek public sector intervention and potential funding streams through the Homes and Communities Agency
9. AFFORDABLE HOUSING – NEED, SUPPLY & PROVISION REQUIREMENTS

9.1 Section 9 of this Addendum provides the audit trail about affordable housing need, supply and provision requirements in JLP Policy SPT3. It focuses on:

   a) The evidence about affordable housing need and affordability (SHMA Part 2 (HO13A))
   b) Whether delivery of affordable housing from market led development is constrained by viability
   c) The evidence about affordable housing supply (actual and forecast) – including the 2017 Monitoring point housing trajectories Tables PPA8 and TTV8 (TP3F and TP3G) as amended by Appendix 8.1 Annex 1 in this Addendum and Tables PPA8 and TTV8 in TP3K and TP3L
   d) The percentage of affordable housing sought in DEV7 and DEV8 and the implications for forecasting supply
   e) The justification of the affordable housing provision targets in SPT3.
   f) Consideration of Affordable Housing Need for PPG paragraph 29 purposes

a) Affordable Housing Need and Affordability

Affordable Housing Need

9.2 Under S13 of the Planning and Compulsory Purchase Act 2004, LPAs must keep under review the matters which may be expected to affect the development of the area or the planning of it development. This is a legal test. The need for affordable housing is an issue in the plan area for the JLP, and is relevant to the planning of the area. The JLP therefore addresses the issue of affordable housing and how need is met in the plan area.

9.3 JLP Policy SPT2 sets out the principles of sustainable linked neighbourhoods and sustainable rural communities to guide how development and growth takes place in the Plan Area. Affordable housing is encompassed by the principle that

   Development should support the overall spatial strategy through the creation of neighbourhoods and communities which........"Have a good balance of housing types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs”.

9.4 The need for affordable housing has been a long standing issue in the plan area and the subject of previous Local Plan policies. Delivery of affordable housing has been and continues to a priority for each of the JLP Councils.
9.5 JLP Policy SPT3 sets the overall targets for the amount of affordable housing provision for the plan period and this provides the context for other JLP policies addressing affordable housing need. The housing land supply forecast in the housing trajectories will provide a significant amount of growth which will assist in delivering a supply of affordable housing to meet needs across the plan area.

**Definition of affordable housing need**

9.6 PPG Paragraph 22 (Reference ID: 2a-022-20140306) to Paragraph 29 (Reference ID: 2a-029-20140306) of the *Housing and economic development needs assessments* section of the PPG details how affordable housing need should be calculated. It defines affordable housing need as 'number of households and projected households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market'. This is the definition used in SHMA Part 2 paragraph 5.1, to assess the scale of affordable housing need in the Plymouth HMA (HO13A).

**Affordability**

9.7 ‘Affordability’ is different concept. Affordability is crucial to understanding the sustainability of the housing market. The affordability of housing in an area is measured by the ratio of market housing costs to income in that area. SHMA Part 2 Chapter 3 provides evidence about the cost and affordability of housing in the Plymouth HMA, including entry level property prices and rents. Paragraph 3.33 explains the issue about general affordability. Affordability is a particular issue in the South Hams where housing cost is the most expensive (SHMA Part 2 paragraphs 3.9 and 3.12; and further demonstrated in: the housing market gaps analysis in paragraph 3.17, Table 3 and Figures 3.11 to 3.13, Table 3 3.6 on the cost of Intermediate market ownership; and the comparison of earnings to lower quartile house prices in Figures 3.14 to 3.16).

9.8 The JLP Councils are mindful that SHMA Part 1 Sections 5.3 and 5.9 (HO13) has already considered affordability as part of the process of calculating the Objectively Assessed Need for housing. The uplifts made in response to market signals (10% in Plymouth, 25% in the South Hams and 20% in West Devon) include the response to affordability. These uplifts are significant, notably in the South Hams where affordability is a particular issue.

9.9 Affordability is relevant to affordable housing need. When calculating affordable housing need for PPG paragraphs 22 to 29, SHMA Part 2 applies an affordability test. For the baseline approach used in the report, the affordability test in the affordable housing need model is based on the cost of housing constituting no more than 35% of gross household income in each of the 3 authority areas that make up the Plymouth HMA. Appendix 8.2 Annex 1 of revised topic paper TP3(rev) provides further explanation and justification of the affordability test being based on cost of housing constituting no more than 35% of gross household income.

9.10 SHMA Part 2 does not try to judge what is affordable, but only to reflect how the market currently operates as per the PPG. It presents a policy-off assessment of the
level of affordable housing need. It is a Strategic Housing Market Assessment and as such it needs to reflect the workings of the current market.

NPPF – Understanding and meeting the need for affordable housing

9.11 Assessment of affordable housing need is also undertaken in order to provide evidence about need in response to national planning policy. This audit trail demonstrates that the preparation of the JLP and its evidence base is consistent with NPPF policy related to affordable housing. Consequently this demonstrates how the JLP meets the test of soundness: where the plan needs to be consistent with national policy (NPPF paragraph 182). The main NPPF policies relevant to affordable housing need and evidence are in paragraphs 159, 47 and 50.

9.12 NPPF paragraph 159 specifies that local planning authorities should have a clear understanding of housing needs in their area. They should:

- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which…...addresses the need for all types of housing, including affordable housing

9.13 NPPF paragraph 47 requires LPAs to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the HMA, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

9.14 NPPF Paragraph 50 requires Councils to plan for a mix of housing based on current and future demographic and market trends, as well as the needs of specific groups within the community. The size, type, tenure and range of housing required should also be identified. Where a need for affordable housing has been identified, policies should be set for meeting this need.

9.15 National Planning Practice Guidance

9.16 Government guidance is also relevant. PPG has two separate requirements related to affordable housing assessment that are particularly relevant when justifying the JLP. The PPG sets out the assessment of the Objectively Assessed Need for housing including affordable housing (PPG 2a-14 to PPG 2a-20) separately to the assessment of Affordable Housing Need (PPG 2a-22 to PPG 2a-29). The assessment of the OAN is based on population and household projections and adjusted for market signals (one of which is affordability PPG 2a-19, bullet 4). The assessment of Affordable Housing Need is a calculation of the annual need for affordable housing based on 4 elements (current need less current supply and future need less future supply).
The Evidence about Affordable Housing Need SHMA Part 2

9.17 The Strategic Housing Market Assessment Part 2 – Objectively Assessed Need for Affordable Housing (February 2017) is part of the JLP evidence base. HDH Planning and Development Ltd has prepared the SHMA Part 2 report (as sub-contractors to Peter Brett Associates LLP). It forms a component of an SHMA alongside the Part 1 Study. It is a Strategic Housing Market Assessment that focuses, principally, on the calculation of the level of affordable housing need (referred to as Affordable Need in SHMA Part 2) and the size and tenure of all dwellings required within the overall OAN calculated in Part 1 of the SHMA.

9.18 Mindful of the PPG requirements, SHMA Part 2 assesses affordable housing in:

1. Section 4 – with the breakdown of the Objectively Assessed Need by type and tenure for the purposes on NPPG paragraph 21;
2. Section 5 – with the assessment of Affordable Housing Need – for the purposes of NPPG paragraphs 22 to 29 (and Appendix 5).
3. Section 7 – Conclusions for the purposes of NPPG paragraph 29

9.19 SHMA provides the information in Section 4 because PPG paragraph 21 requires this analysis to be undertaken.

9.20 PPG paragraph 21 requires that “Once an overall housing figure has been identified, plan makers will need to break this down by tenure, household type (singles, couples and families) and household size”. Some outputs from the calculation of the OAN in SHMA Part 1 (HO13) are used within SHMA Part 2. Paragraph 1.3 of SHMA Part 2, makes clear that where the OAN is referred to in SHMA Part 2 (either as a total or when it is disaggregated) the figures are based on the modelling of the scenario which requires 1,365 homes per year across the HMA between 2014 and 2034.

9.21 Consequently, SHMA Part 2 Section 4 provides evidence that disaggregates the OAN and provides an analysis based on current and past trends of occupation of dwellings (ie the same proportion of household types occupy the same types of household (by size and tenure). This analysis does not consider households’ ability to afford housing – it is based on projections. Main results for the Plymouth HMA are:

1. The information on the ‘future requirement’ for new market housing and for new affordable housing is set out in SHMA Part 2 Table 4.3. It uses the long term balancing housing markets model. This indicates that 24.4% of all new housing required should be affordable (some 6,276 homes see table 4.3).
2. Of the 6,276 affordable homes required, some 25% should be intermediate and 75% affordable rent. This proportion of affordable as an intermediate product is similar to the level of past delivery (approx. 30%).
9.22 For PPG paragraph 21 purposes, the information in SHMA Part 2 - Chapter 4 concludes that 6,276 affordable dwellings are required in the HMA over the next 20 years from:

- 1,565 new shared ownership accommodation (SHMA Part 2 Table 4.6)
- 4,711 new Social Rent/Affordable Rent required in the HMA over the next 20 years (SHMA Part 2 Table 4.7)

9.23 For the avoidance of doubt, the 'affordable housing need' calculated for PPG 2a paragraph 29 purposes does not form a component of the OAN, as made clear in SHMA Part 1 Paragraph 6.3.2 which states:

“The robust projections, uplifted for market signals, as set out in this assessment provides for the full market demand for all housing regardless of tenure. It is important to note that affordable housing is not a direct component of an OAN assessment and therefore we do not show it within this report. Instead, Part 2 of the SHMA produced by HDH Planning and Development separately considers the requirements for affordable housing and implications for specific groups of the population, and whether any further additional uplift for affordable housing should be made to help meet the affordable housing need, over and above that already proposed within the market signals adjustment.”

9.24 As stated in SHMA Part 2 Paragraph 1.3, whilst the figure of 1,365 is referred to as the HMA-wide OAN in this report, “it is still for the Councils to determine whether this represents the actual OAN or just the Housing Target”. This is the subject of Section 5 of this topic paper. SHMA Part 1 Paragraphs 6.3.1 makes clear that the OAN (of 1,365 pa) represents the need for housing across the HMA and should be met in full within the HMA.

9.25 The JLP Councils acknowledge that SHMA Part 2 Table 4.3 based on the OAN is not the basis for assessing whether housing provision targets should be uplifted for affordable housing need reasons, for the purposes of PPG 2a Paragraph 29.

2. PPG paragraph 29 and Affordable Housing Need

9.26 For PPG paragraph 29 first sentence purposes, SHMA Part 2 Chapter 5 and Appendix 5 provides the evidence about Affordable Housing Need (AHN). It is derived by the affordable housing need model and is an unconstrained figure. That is, it is not constrained by the scale of the OAN which is calculated in SHMA Part 1, and is set in the current housing market situation.

9.27 As explained in SHMA Part 2 paragraph 1.5, the AHN is not a component of the Objectively Assessed Need, but is entirely independent, calculated using a different approach and different data sources. Its purpose is to determine whether the housing provision target needs to be uplifted above the level of the OAN. That is, a further uplift additional to uplifts made for example for market signals.
9.28 SHMA Part 2 - Appendix 5 sets out the annual affordable housing need for the Plymouth Housing Market Area and the three constituent authority areas as follows (the annual net current need where rent payable constitutes no more than at 35% of gross household income). This results are summarised in Table 18.

**Table 18 Plymouth HMA Annual affordable housing need by Local Authority**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Annual AHN</th>
<th>SHMA Part 2 sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth City</td>
<td>189 pa</td>
<td>Tables 5.10a, 5.12a, 5.14a</td>
</tr>
<tr>
<td>The South Hams</td>
<td>98 pa</td>
<td>Tables 5.10b, 5.12b, 5.14b</td>
</tr>
<tr>
<td>West Devon</td>
<td>57 pa</td>
<td>Tables 5.10c, 5.12c, 5.14c</td>
</tr>
<tr>
<td>Plymouth HMA TOTAL</td>
<td>344 pa</td>
<td>Table 5.10, 5.12, 5.14</td>
</tr>
</tbody>
</table>

3. Conclusions for the purposes of PPG paragraph 29

9.29 Following completion of the calculation of the need for affordable housing, SHMA Part 2 ends by drawing conclusions in Section 7 that compare the forecast annual rate of household need for affordable housing to the annualised growth in the number of households based on the district OAN identified in SHMA part 1 table 19. These conclusions relate to the requirement in PPG Reference ID: 2a-029-20140306 that the JLP Councils should consider whether or not the housing target in the Local Plan should be increased to assist with meeting the need for affordable housing.

**JLP Councils' endorsement of SHMA Part 2 conclusions**

9.30 The JLP Councils accept the conclusions in SHMA Part 2 derived from the baseline approach where the affordability test in the affordable housing need model is based on the cost of housing constituting no more than 35% of gross household income in each of the three areas that make up the HMA. The Councils consider that the evidence in SHMA Part 2 is up to date, robust and proportionate, and they have relied on it to develop and justify Policy SPT3 on the scale of affordable housing provision.

**b) Whether delivery of affordable housing from market lead development is constrained by viability**

9.31 Before the Councils considered the implications of SHMA Part 2 conclusions for the purposes of PPG paragraph 29, they had to assess whether the forecast supply of affordable housing would be sufficient to meet the level of affordable housing need based on the baseline approach. This depended on the scale of housing provision forecast by the housing trajectories, the amount of affordable housing already delivered since 2014, the amount permitted but not yet completed and the assumptions about the percentage of affordable housing delivered in the future on qualifying sites. The latter depends on the policy of the percentage of affordable housing sought. Policies DEV7 and DEV8 (as amended by Main Modification MM41) seek at least 30% on sites above thresholds set out in those policies.
9.32 The Plymouth and South West Devon Joint Local Plan Viability Study Final Report February 2017 (O5) included the assumption of qualifying sites providing at least 30% affordable housing when it tested the overall viability of the Joint Local Plan. Paragraph 9.1.2 of that report concludes that “overall assessment of the policy requirements within the Plymouth Policy Area and Thriving Towns and Villages Area considers that the emerging JLP policies would not adversely affect the delivery of residential and non-residential development in most parts of the Plymouth Policy Area and Thriving Towns and Villages Area”.

**JLP Councils’ endorsement of JLP Viability Study conclusions**

9.33 The JLP Councils consider that the evidence is robust and accept the conclusions in the Viability Study Final Report paragraph 9.1.2. This evidence justifies the Councils’ use of the assumption of qualifying sites providing at least 30% affordable housing when forecasting the future supply of affordable housing.

9.34 The JLP Councils have used the DEV7 and DEV8 thresholds and applied the policy of at least 30% to qualifying sites and supply categories in the housing trajectories, for sites not yet permitted. It is not necessary to test the viability of each individual site for the purposes of the forecast of affordable housing supply. The results of the overall forecast of supply from sites and categories with permission and without permission in the latest housing trajectories latest were set out in Tables PPA8 and TTV8 (TP3F and TP3G). Those tables have been amended in light of the Inspectors’ Post Hearing Advice Note (EXC15) and the relevant proposed Main Modifications, as summarised in Appendix 8.1- Annex 1 of this Addendum. Amended Tables PPA and TTV8 are set out in trajectory documents TP3K and TP3L.

9.35 The Councils have used additional information to apply a higher percentage on some sites where this is robust evidence to justify this. For example, sites in Plymouth City where the Council’s land ownership or the availability of external funding enables a higher percentage of affordable housing to be delivered.

9.36 Exceptionally, the Councils have judged whether specific qualifying sites are unlikely to deliver on-site affordable housing for viability reasons, based on site specific knowledge about site constraints and mitigation required. This resulted in a nil forecast for those sites.

9.37 The JLP Councils are mindful that the evidence in the trajectories demonstrates the percentage of affordable housing achieved on market led sites with planning permission. The percentage ranges from nil to 50%. Rates of 50% have been achieved on sites in the South Hams, consistent with policy in the adopted Affordable Housing DPD. Rates below 30% arise because of either site specific issues which can lead to off-site contributions towards affordable housing being appropriate or because of viability issues specific at the time of the consent. The Councils note that the latter occurred when economic circumstances were particularly challenging. It is not reasonable to assume that such historic circumstances will prevail across a plan period. Nor does it justify ignoring the evidence in the JLP Viability report (O5).
c. The evidence about affordable housing supply (actual and forecast) – including 2017 Monitoring point housing trajectories Tables PPA8 and TTV8

9.38 This Addendum summarises the evidence about the forecast of the likely supply of affordable housing in the plan period within the plan area delivered through development. The evidence of the forecast of delivery is set out in the JLP Councils’ latest suite of housing trajectories (Tables PPA8 and TTV8 in documents TP3K and TP3L).

9.39 Supply shown in the JLP Councils’ housing trajectories is forecast on a Policy Area basis. The purpose of this is to enable the analysis to provide evidence for the Councils to use as a ‘reality check’ when justifying the Policy Area affordable housing provision targets in SPT3.

9.40 Forecast supply in tables PPA8 and TTV8 relate only to supply of additional affordable dwellings delivered on site through development management processes. For the avoidance of doubt, the Councils confirm that those forecasts are not the ‘Future Supply’ of affordable housing which is referred to in SHMA Part 2 Table 5.9 and 5.10. Those SHMA tables relate to relets or resale of affordable housing, and not to the additional future supply from new dwellings delivered through development.

9.41 Total supply of affordable housing delivered in the plan period 2014 to 2034 through development is forecast to be 6,992 affordable dwellings (net), see Table 19A.

### Table 19A Forecast delivery of affordable housing from development in the plan period in the plan area and the policy areas

<table>
<thead>
<tr>
<th>JLP Policy Area</th>
<th>Net additional on-site affordable dwellings from development</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth Policy Area</td>
<td>4,961 (net)</td>
<td>5,818 gross – minus demolition of 857 affordable dwellings&lt;sup&gt;46&lt;/sup&gt;</td>
</tr>
<tr>
<td>Thriving Towns and Villages Policy Area</td>
<td>2,031 (net)</td>
<td></td>
</tr>
<tr>
<td>JLP TOTAL SUPPLY</td>
<td>6,992</td>
<td></td>
</tr>
</tbody>
</table>

Source: TP3K Table PPA8 and TP3L Table TTV8, and Table 19B in this Addendum

9.42 Table PPA8 in TP3K provides the evidence that 5,818 affordable dwellings are forecast to be delivered in the plan period in Plymouth Policy Area. This is a gross figure. 857 affordable dwellings are forecast to be demolished in PPA on sites delivering affordable housing in the plan period. Table 19B in this Addendum provides the evidence about the sites where those demolitions are forecast.

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<sup>46</sup> Major redevelopment schemes at Granby Green, Devon Port, North Prospect (phases 2, 3, 4, & 5) and Barne Barton involve 857 affordable dwellings being demolished and replaced by 728 affordable dwellings and by market dwellings – see Table 19B
### TABLE 19B
Site in PPA with development forecast in plan period where existing affordable housing would be demolished

<table>
<thead>
<tr>
<th>Site in PPA with development forecast in plan period where existing affordable housing would be demolished</th>
<th>Timing of affordable housing demolitions</th>
<th>No of affordable dwellings lost by demolition</th>
<th>PPA Table PPA8 Forecast delivery of affordable housing on site in JLP plan period</th>
<th>Net changes in Affordable Housing on the site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Granby Green</td>
<td>2014/15</td>
<td>-118</td>
<td>36</td>
<td>-126</td>
</tr>
<tr>
<td></td>
<td>2015/16</td>
<td>-44</td>
<td></td>
<td></td>
</tr>
<tr>
<td>North Prospect Phase 2 (Woodville Road)</td>
<td>Before 2014</td>
<td>-107</td>
<td>174</td>
<td>-18</td>
</tr>
<tr>
<td></td>
<td>2014/15</td>
<td>-85</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NORTH PROSPECT PHASE 3, WORDSWORTH ROAD/ WORDSWORTH CRESCENT</td>
<td>Demolitions occurred in 2016/17</td>
<td>-115</td>
<td>112 AH permitted/completed</td>
<td>-3</td>
</tr>
<tr>
<td>JLP Allocation (PLY58.6) North Prospect Phase 5,</td>
<td>Demolitions forecast for 2018/19</td>
<td>-73</td>
<td>77 AH not yet permitted</td>
<td>+ 4</td>
</tr>
<tr>
<td>JLP Allocation (PLY58.5) North Prospect Phase 4</td>
<td>Demolitions forecast for 2020/21</td>
<td>-89</td>
<td>103 AH not yet permitted</td>
<td>+14</td>
</tr>
<tr>
<td>JLP Allocation (PLY58.15) Savage Road, Barne Barton</td>
<td>Demolitions forecast for 2019/20 &amp; 2020/21</td>
<td>-226</td>
<td>226 AH not yet permitted</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>-857</td>
<td>728</td>
<td>-129</td>
</tr>
</tbody>
</table>

9.43 Owing to the timing of the demolitions and the delivery of regeneration at North Prospect Phase 2, it is prudent to be cautious and include these losses in the net count of affordable housing delivery for the purposes of Table 19A and the justification of the affordable housing provision targets in SPT3.

d. The percentage of affordable housing sought in DEV7 and DEV8 and the implications for supply

9.44 The evidence in the Plymouth and South West Devon Joint Local Plan Viability Study Final Report February 2017 (O5) justifies the inclusion of the 30% figure in the percentage of affordable housing sought by the JLP from qualifying sites. The percentage is expressed in terms of “at least” because if the developer wants to provide more than this percentage the LPA can consider this as part of the overall planning balance when determining the planning application. The Councils have proposed a Main Modification MM41 proposes the amendment to DEV8 in order for policy wording to be consistent with DEV7.

9.45 As explained in paragraph 9.34 of this Addendum, the Councils have applied the 30% to qualifying sites forecast for delivery in the plan period that do not yet have planning permission (exceptionally a lower rate is applied where there is evidence to justify this). See Appendix 8.2 for further details.
e. Justification of the affordable housing provision targets in SPT3.

9.46 The JLP Councils have undertaken the task of converting the evidence about annual affordable housing need for each district into JLP affordable housing provision policy targets in Policy SPT3.

9.47 The starting point is the AHN annual rates identified for each District in SHMA Part 2 (tables 5.10a, 10b and 10c- summarised in topic paper Table 18). These are based on the 18 year period 2016 to 2034. The JLP Councils have applied the same annual AHN rates to the period 2014 to 2016, for the purposes of calculating the affordable housing provision targets for the plan period. Consequently, the total net affordable housing need in the HMA over the 20 year period 2014 to 2034 is forecast to be 6,880 dwellings.

9.48 The JLP Councils then converted that total HMA need to a JLP need for affordable housing in three steps.

9.49 The first step calculated how much of the affordable housing need in the HMA should be met in the JLP area, is to exclude the need to be met in the Dartmoor National Park. In cooperation with the DNPA, the JLP Councils have made an allowance of 300 dwellings for the scale of affordable housing need from the Plymouth HMA total that are expected to be met in the Dartmoor National Park. The evidence justifying the 300 dwellings allowance is based on the total allowance of 600 dwellings based on the annual delivery rates in the South Hams and West Devon part of the Park (see supply evidence in Appendix 8.2) and the assumption of 50% of housing delivered being affordable housing47. The remaining 6,580 affordable dwellings is the therefore the scale of affordable dwellings need to be accommodated by the JLP. This is rounded to 6,600 affordable dwellings.

9.50 Affordable Housing Provision - The JLP target for affordable housing is based on meeting the need, so the Policy SPT3 target for the plan area is at least 6,600 affordable dwellings for the plan period.

9.51 Deducting the affordable dwelling provision target of at least 6,600 from the total target of at least 26,700 dwellings, implies the provision for market housing of at least 20,100 dwellings for the plan period in the JLP area.

9.52 The second step converted the scale of need in the LPA area to the scale of need in the two policy areas. This starts with the AHN for South Hams and West Devon in the JLP which is 140 pa equating to 2,800 dwellings in the plan period. However, part of the West Devon need would be met at PPA as the result of the strategic direction of 800 dwellings of the West Devon OAN to the PPA. This equates to about 263 affordable dwellings, based on 800 as a proportion of the 8,500 OAN for the South Hams and West Devon part of the JLP (rounded). Subtracting that 263 from 2,800 results in a TTVPA need for affordable housing of about 2,540 in the plan period.

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47 Dartmoor National Park Core Strategy -Policy COR15 -not less than 50% affordable on qualifying sites. 2016/17 Dartmoor AMR provides evidence that 40% of dwellings completions in 2016/17 were affordable.
9.53 The Plymouth City affordable housing need for the plan period equates to 3,780 dwellings. Adding in the 263 dwellings need directed from West Devon results in a PPA need of 4,040 affordable dwellings.

9.54 The Councils then compared the affordable housing need with supply for each Policy Area - see Table 20.

Table 20 Comparison of Policy Areas Affordable housing need and supply

<table>
<thead>
<tr>
<th>JLP Policy Area</th>
<th>Policy Area Affordable Housing Need</th>
<th>Net additional on-site affordable dwellings from development</th>
<th>Surplus/Shortfall</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plymouth Policy Area</td>
<td>4,040</td>
<td>4,961 (net)</td>
<td>+921</td>
</tr>
<tr>
<td>Thriving Towns and Villages Policy Area</td>
<td>2,540</td>
<td>2,031 (net)</td>
<td>-509</td>
</tr>
<tr>
<td>JLP TOTAL</td>
<td>6,580</td>
<td>6,992</td>
<td>+412</td>
</tr>
</tbody>
</table>

9.55 The evidence demonstrates that in the plan area supply is forecast to be more than the forecast affordable housing need. The capacity for supply in the Plymouth Policy Area provides the opportunity to provide affordable housing to accommodate that affordable housing need from TTVPA that is not forecast to be met in the TTVPA. Plymouth City Council and South Hams District Council already work together to reach agreement regarding nominations at the Sherford urban extension in the PPA which largely lies in the South Hams.

9.56 The third step was a reality check against forecast supply. In line with NPPF paragraph 154, Local Plans should be aspirational but realistic. Consequently, the LPAs consider that the affordable housing targets should not exceed the scale of affordable housing supply forecast to be delivered in the plan period in the relevant policy area. The analysis looks first at TTVPA then at PPA.

9.57 **Thriving Towns and Villages Policy Area** The additional affordable housing supply in the TTVPA is 2,031 dwellings forecast to be delivered on-site from development. The Councils consider that the evidence about forecast supply is robust and they have relied on this evidence. There is no evidence at this time to demonstrate that a higher supply of affordable housing could be delivered consistent with policy and the viability evidence. Therefore a higher policy provision requirement target cannot be justified. Setting a lower target would not be prudent, given the need for affordable housing in TTVPA. Therefore the affordable housing provision policy target in SPT3 for the Thriving Towns and Villages Policy Area for the plan period is set at the level of forecast supply, rounded to at least **2,050**.

9.58 **Plymouth Policy Area**: The SPT3 affordable housing provision target for the PPA is then calculated by subtracting the TTVPA target of 2,050 from the JLP target of 6,600. Therefore the affordable housing provision policy target in SPT3 for the

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48 This includes the amendments to forecast supply evidenced in Annex 1 to Appendix 8.1 in this Addendum
Plymouth Policy Area for the plan period is set at the level of forecast supply, rounded to at least **4,550**.

### Table 21 Comparison of Policy Areas Affordable housing need and supply

<table>
<thead>
<tr>
<th>JLP Policy Area</th>
<th>Policy Area Affordable Housing Target</th>
<th>Net additional on-site affordable dwellings from development</th>
<th>Surplus/Shortfall (rounded)</th>
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</thead>
<tbody>
<tr>
<td>Plymouth Policy Area</td>
<td>4,550</td>
<td>4,961 (net)</td>
<td>+400</td>
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<tr>
<td>Thriving Towns and Villages Policy Area</td>
<td>2050</td>
<td>2,031 (net)</td>
<td>0</td>
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<tr>
<td><strong>JLP TOTAL SUPPLY</strong></td>
<td><strong>6,580</strong></td>
<td><strong>6,992</strong></td>
<td><strong>+400</strong></td>
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</table>

**f. Consideration of Affordable Housing Need for PPG paragraph 29 purposes**

9.59 The JLP Councils reaffirm that they have considered the conclusions set out in SHMA Part 2 (HO13A), including section 7, and whether the affordable housing requirement based on the total need for affordable housing of 6,880 can be met by the overall OAN for housing identified (ie by SHMA part 1) based on the growth in households, as shown in SHMA Part 2 Table 15, and the reality check of forecast supply.

9.60 The JLP Councils have had full regard to the evidence about the need for affordable housing in the Plymouth Housing Market Area during the plan period. The SHMA Part 2 forecasts the need for 6,680 affordable dwellings between 2014 and 2034 in the HMA. This is a calculation separate from the SHMA Part 1 Objectively Assessed Need for housing calculation, and relates to a different meaning of the term ‘need’. It is a policy consideration that is considered when determining the housing requirement or target.

9.61 For the avoidance of doubt, the number of ‘households per year as identified within the full OAN calculations’ referred to in HO13A paragraphs 7.3, 7.8 and 7.15 are set out in TP3(rev) Table 22 (and against which the annual AHN is compared in SHMA Part 2 Section 7), as follows:

<table>
<thead>
<tr>
<th>Table 22</th>
<th>Dwellings(^1)</th>
<th>Occupied(^2)</th>
<th>Uplift(^3)</th>
<th>Total Hh(^4)</th>
<th>Hh pa(^5)</th>
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</thead>
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<td>16,561</td>
<td>96.7%</td>
<td>1.10</td>
<td>17,616</td>
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<tr>
<td>South Hams</td>
<td>3,139</td>
<td>85.2%</td>
<td>1.25</td>
<td>3,343</td>
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<tr>
<td>West Devon</td>
<td>4,302</td>
<td>92.1%</td>
<td>1.20</td>
<td>4,755</td>
<td>238</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>24,002</strong></td>
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</tr>
</tbody>
</table>

**Sources:**

1. Dwellings - SHMA Part 1 Table 19 (this includes allowance for vacant dwellings)
2. Occupied rate = SHMA Part 1 Table 7
3. Uplift factor – for market signals - SHMA Part 1 Table 17 (highest uplift)
The JLP Councils have considered the conclusions in SHMA Part 2 paragraphs 7.3, 7.8, and 7.15. That SHMA evidence compares the forecast of annual district AHN with the annual projected household growth in each district (that underpins the OAN) and the potential for the district OAN to achieve the affordable housing requirement.

Consistent with NPPG paragraph 29, the JLP Councils also considered the conclusions in SHMA Part 2 section 7, in the light of their more detailed evidence about forecast affordable housing supply in the Policy Area housing trajectories (Table PPA8 and TTV8 in TP3F and TP3G). Details of that consideration are set out in TP3(rev) Appendix 8.2. From the conclusions in Appendix 8.2 the Councils decided that the housing target based on the HMA OAN for housing (1,365 pa) recommended in SHMA Part 1 should not be further uplifted for affordable housing need reasons.

The JLP Councils have now considered the implications of the Inspectors' Post Hearing Advice Note EXC15, the JLP Councils' response to that Note, and the evidence set out in the amended forecast affordable housing supply in the Policy Area housing trajectories (Table PPA8 and TTV8 in TP3K and TP3L). The Councils continue to conclude that the housing target based on the HMA OAN for housing (1,365 pa) recommended in SHMA Part 1, and having deducted the 600 dwellings Dartmoor National Park allowance, should not be further uplifted for affordable housing need reasons.

Affordable housing need to be met

Preparation of the draft Joint Local Plan provides the opportunity to consider the strategic approach to meeting the affordable housing need through affordable housing provision policy. Sections 5 and 6 of this topic paper considered the ways to distribute the full OAN across the JLP plan area, mindful of the allowance made for housing need from the HMA to be accommodated in the Dartmoor National Park. Section 9 likewise considers the opportunity which the distribution of the OAN provides to assist with delivering the forecast need for affordable housing.

Affordable housing need and affordability. The scale of affordable housing need based on the baseline assessment 35% of gross income spent on housing costs is about 6,900 households in the plan period (SHMA Part 2 (HO13A)). The JLP Councils consider that 300 of this may be met in the Dartmoor National Park, effectively reducing the JLP area need to be met to 6,600. This is the starting point for justifying SPT3 targets. The ability to meet need is constrained by the ‘reality check’ from the overall JLP Viability assessment in document O5. The plan is

4 Total Households calculated by multiplying the number of dwellings by the occupied rate, then multiplying the result by the uplift factor
5 Total Households divided by the number of years in the plan period (20)
generally viable based on the JLP policy of seeking 30% of housing development on qualifying sites as affordable. Applying that percentage to qualifying sites forecast for delivery but not yet permitted and adding the result to completions and existing commitments results in the supply forecast for delivery in the plan period of about 7,000 affordable dwellings. This provides the evidence that potential forecast supply in the plan area is sufficient to deliver the forecast need for the plan area.

9.67 The forecast of affordable housing supply has therefore had regard to evidence about:
- actual delivery of affordable housing (2014 to 2017) (latest evidence in Tables PPA8 and TTV8 in TP3K and TP3L);
- commitments through planning permissions and Section 106 agreements (Table PPA1 and PPA2, and TTV1 and TTV2 in TP3K and TP3L);
- the application of JLP Policies DEV7 and DEV8 regarding the scale of affordable housing to be sought from qualifying development sites (30%), and mindful of the implications of the Inspectors’ Post Hearing Advice Note (EXC15) and the Councils’ response to that Note;
- the viability assessment where the key conclusion is that the JLP is broadly viable with the policies for 30% affordable housing sought on qualifying sites.

Conclusions: Affordable housing targets to include in SPT3

9.68 Paragraphs 9.26 to 9.67 in this Addendum sets outs the Councils’ consideration of the SHMA part 2 regarding whether there is a need for additional housing provision in South Hams district for affordable housing need reasons. The conclusion is that no additional housing provision is necessary. The 400 dwellings forecast supply above the affordable housing need in the plan area is sufficient headroom. The Councils’ approach to joint working and governance, and the operation of Devon Home Choice in this area are appropriate mechanisms to enable that need to be accommodated in South Hams district albeit in the PPA (This approach is wholly consistent with the spatial strategy for focusing growth at Plymouth. It is not double counting supply to meet need, and it means that there is no unmet housing need across the plan area.

9.69 Consequently, the evidence and this analysis demonstrates that through effective cooperation the affordable housing provision targets for the two Policy Areas are justified.

9.70 The LPAs continue to consider that higher affordable housing provision targets is not justified, as the evidence does not demonstrate that this would be deliverable in light of current supply assessments in the housing trajectories.

9.71 The LPAs continue to consider that lower targets would be deliverable, but could result in some needs not being met and in not delivering a good balance of housing

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50 Plymouth and South West Devon Joint Local Plan Viability Study February 2017 (O5)
tenures, contrary to Policy SPT2 regarding sustainable linked neighbourhoods and sustainable rural communities. Consequently the LPAs consider that lower affordable housing provision targets are not justified.

9.72 The distribution of the affordable housing targets is dependent on the distribution of housing supply. It is not directly determined by the total housing provision targets. Increasing the target is the Thriving Towns and Villages, so that more need from South Hams and West Devon is met in the Policy Area, is not justified because the evidence in the housing trajectories does not demonstrate that this is deliverable.

9.73 Furthermore, the latest evidence demonstrates that the level of affordable housing need is justified and can be met within the Joint Local Plan area. Therefore no further uplift of the SPT3 Affordable housing target above the full Objectively Assessed Need for housing is necessary.

Additional affordable housing supply

9.74 The potential to add to the affordable housing supply to 2034 includes:

a. Changes in tenure within the existing stock which will not require the construction of additional dwellings, including;
   i. Change in stock from market housing to private sector rent that is affordable
   ii. Registered Providers (RPs) purchasing existing satisfactory properties and acquiring properties via Mortgage Rescue.
   iii. Bringing empty homes back into use as affordable housing

b. Affordable housing expected to be delivered through means that are allowed for by policy but which were not fully quantified, so were not counted towards the policy housing provision total in STP3. These would be in addition to both the 29,977 total housing supply forecast for delivery in the plan period set out in TP3J – Table JLP2 (including the forecast of up to about 6,992 (net) on-site affordable housing supply – see Table 20 in this Addendum) and would come from:
   i. Rural exceptions.
   ii. Large windfalls (not allocated in Neighbourhood Plans).
   iii. Community Land Trusts
   iv. Starter Homes

c. Other 100% affordable schemes. If built, these would raise the total supply of affordable housing counted towards STP3. The products listed below are relatively new; lack of national or local evidence about actual delivery precludes identifying a specific forecast of supply at this time. The following would be additional to the supply forecast in Tables 13a and 13b
i. RSLs building more “affordable rent” housing without grant funding by raising money on the financial market and using funding generated by affordable rents.

ii. Local Authority New Build.

iii. 100% grant funding / affordable housing delivered through a range of mechanisms currently employed; e.g. the Affordable Homes Programme (replacing the National Affordable Housing Programme), Kickstart (HomeBuy Direct and NAHP).

i. Community Led Housing Schemes
10. SUSTAINABILITY APPRAISAL OF POLICY SPT3 HOUSING PROVISION

See TP3(rev)
11. HOUSING PROVISION TESTS OF SOUNDNESS SUMMARY

See TP3(rev)
APPENDICES

Appendix 1 – SHMA process – robustness and quality assurance (TP3(rev))

1.1 Scenarios - summary statistics – District level data (TP3(rev))
1.2 2016 Mid year population estimates (TP3(rev))

Appendix 2 – Duty to Cooperate – evidence

2.1 Dartmoor National Park Authority letter regarding DNP ‘allowance’
2.2 Housing completions in Dartmoor National Park by District

Appendix 3 – Distribution of housing need - Compatibility of selected distribution with Vision and Strategic Objectives (TP3(rev))

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4.1 Methodology and evidence
4.2 Illustrative graphs

Appendix 5 – Historic annual housing completions

Appendix 6 – 5 year housing land supply (5YLS)

6.1 Methodology and evidence
6.2 Rolling 5 YLS graphs (March 2017 monitoring point)
6.3 Maintaining supply in the two Policy Areas

Appendix 7 – Sources of Housing Supply (March 2017 monitoring point)

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7.2 Delivery from commitments (planning permissions) at 1 April 2017 (TP3(rev))
7.3 Lapse rates (TP3(rev))
7.4 Delivery from windfalls
7.5 Delivery from Allocations
7.6 Delivery from Sustainable Villages Allowance
7.7 Delivery from release of HMOs when Student Accommodation built (TP3(rev))
7.8 SHLAA disclaimer (TP3(rev))

Appendix 8 - Affordable Housing

8.1 Methodology for forecasting affordable housing supply
8.2 SHMA Part 2 and NPPG paragraphs 21 and 29 (TP3(rev))
   Annex 1 Note on 35% affordability threshold (TP3(rev))
8.3 SHMA Part 2 – Amplification (TP3(rev))

Appendix 9 – How has consultation informed Policy SPT3? (TP3(rev))

Appendix 10 – Compatibility Table – JLP policy & evidence base compared to NPPF (TP3(rev))

Appendix 11 – Lead in times and delivery rates used in the trajectories (TP3(rev))

1.1 Schedule of agreements with main developers of housing sites (TP3(rev))
1.2 Evidence on lead in times in South Hams and West Devon (TP3(rev))
Appendix 1

SHMA process – robustness and quality assurance

See TP3(rev)

Appendix 1.1

EXPERIAN EMPLOYMENT PROJECTIONS – KEY VARIABLES

See TP3(rev)
A2.1 Letter from Dartmoor National Park Authority dated 17 February 2017..

Dear Richard

Plymouth/South Hams/West Devon Joint Local Plan
Duty to Co-operate and Dartmoor housing need figures

I write to confirm the following on behalf of the Dartmoor National Park Authority.

The Authority’s officer team has been collaborating on the Plymouth HMA evidence base, and in fact are jointly funding the work.

As part of the Duty to Co-operate we have had regular meetings with Plymouth and the two other Councils throughout the gestation of their joint Local Plan. We have collaborated on the development of the distribution strategy that has resulted in a Dartmoor allowance of 600 homes, to be delivered in the park 2014 – 2034, covering the South Hams and West Devon parts of the National Park. The Authority has welcomed the approach to housing and concluded that the recognition of the JLP of the need to accommodate the bulk of housing delivery in the Joint Local Plan area was positive. The ‘Dartmoor Provisional Allowance’ indicated was the product of discussion, based upon our combined best available evidence at the time.

The National Park Authority will be taking forward the work on the Plymouth HMA QAN, and the Dartmoor Allowance into their own Local Plan review work, which is now underway, and will refine and confirm this housing allocation figure through continued joint work on an overarching ‘story’ for the HMA’s distribution strategy.

The Authority and Plymouth/South Hams/West Devon will work to put together a Memorandum of Understanding to confirm the above in more detail in due course.

I trust this letter sets out the close working relationship we have enjoyed thus far with Plymouth, South Hams and West Devon as part of the duty to co-operate in respect of the Plymouth JLP and Dartmoor’s own Local Plan review.

Yours sincerely

Stephen Belli
Head of Planning
Email: sbelli@dartmoor.gov.uk
Table A2.1: Number of dwellings completed in Dartmoor National Park - 2007/8 to 2016/17

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
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<th></th>
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<tbody>
<tr>
<td>South Hams &amp; West Devon</td>
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<td>34</td>
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<td>31</td>
<td>16</td>
<td>24</td>
<td>21</td>
<td>40</td>
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<td>26</td>
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<td>36</td>
<td>14</td>
<td>46</td>
<td>29</td>
<td>20</td>
<td>36</td>
<td>16</td>
<td>27</td>
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<td>56</td>
<td>34</td>
<td>53</td>
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<td>100%</td>
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</table>

Source: Data provided by Dartmoor National Park Authority
Appendix 3

Distribution of housing need - Compatibility of selected distribution with Vision and Strategic Objectives

See TP3(rev)
HOUSING TRAJECTORIES - ILLUSTRATIVE GRAPHS

Plan, Monitor and Manage housing land supply graphs illustrating the JLP Plan Area and Policy Area housing trajectories.

A4.1 The suite of three detailed housing trajectories related to the housing requirement targets in SPT3 set out the actual and forecast housing delivery in each year in the plan period. Supply sources that are included in the trajectories are set out and explained in detail in Section 7 of this Addendum51.

Methodology and evidence

A4.2 The JLP LPAs have analysed the evidence to assess how forecast housing supply performs against the policy of housing provision. One way to show supply performance is through a ‘plan-monitor-manage’ approach. This looks at supply across the whole plan period, and the performance at each monitoring point (the end of the monitoring year is 31 March). The graphs display the forecast delivery of dwellings delivered through development.

A4.3 The plan-monitor-manage tables within the housing trajectories for Plymouth Policy Area and the Thriving Towns and Villages Policy Area are the source information for the plan-monitor-manage graphs in the trajectories which are reproduced in this Appendix.

A4.4 Three sets of graphs display the forecast delivery of housing delivered through development. The graphs illustrate the housing trajectories to show how housing supply is maintained based on ‘plan-monitor-manage’ principles, for the following areas:

1. Plymouth and South West Devon Joint Local Plan – Plan Area (annualised target)
2. Plymouth Policy Area (annualised target)
3. Thriving Towns and Villages Policy Area (annualised target)

A4.5 For each area there are two graphs:

1) **Completions** (actual and forecast on an annual basis) as a bar graph compared to:

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51 Graphs in Addendum Appendix 4 are based on the trajectories set out in TP3J, TP3K and TP3L which reflect the implications of the Inspectors’ Post Hearing Advice Note and the JLP Councils’ response to the Note, and the proposed Main Modifications.
a) **Plan** – using the strategic total housing provision targets in SPT3 – which is annualised (the total provision divided by the number of years in the plan period) and shown as a line; and

b) **Manage** – the annual residual requirement taking account of past/projected completions - a steeply falling line at the end of the plan period that is below the x-axis is a good indication of ‘front-loading’ of development. All 3 areas are comfortably in this position.

2) **Monitor** – the number of completions above or below the cumulative provision for each year – shown as a line. Where the line is above the x-axis at the end of the plan period indicates a surplus for the whole plan period. All 3 areas are comfortably in this position.

A4.6 Displaying the two graphs vertically one above the other on the page allows an easy visual comparison to be made for the implications of plan, monitor and manage. The colours in the graphs for the plan, monitor and manage lines match the colours in the related rows in the trajectory spreadsheets to help the reader navigate the evidence.

A4.7 The trajectories illustrated by the graphs in this Appendix rely on housing supply evidence based on the End-March 2017 monitoring point. The detailed evidence for these trajectories is set out in documents TP3J, TP3K and TP3L, which provide the latest trajectories available to the JLP Examination. The Councils consider that it is appropriate to include these ‘Plan-Monitor-Manage’ graphs for the plan area and for each Policy Area in the Joint Local Plan. Delivery of housing supply in the plan period will be monitored. The Joint Local Plan Councils therefore commit to update the housing trajectories with supply evidence at subsequent monitoring points, and to publish those trajectories annually in the Authority Monitoring Reports.
4.2 Illustrative graphs (Based on end March 2017 Housing Trajectories)

1. Plymouth and South West Devon Joint Local Plan – Plan Area (annualised target)

SPT3 Housing Provision Target is at least 26,700 dwellings (annualised 1,335 pa)

Housing Trajectory illustrated by graphs: Plan, Monitor, Manage housing land supply

Graph 1a JLP – Plan Area – Plan / Manage

<table>
<thead>
<tr>
<th>Year</th>
<th>Past Completions</th>
<th>Projected Completions</th>
<th>JLP Provision Annual</th>
<th>Manage</th>
</tr>
</thead>
<tbody>
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<td>2014-15</td>
<td>928</td>
<td>1,103</td>
<td>1,660</td>
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<tr>
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<td>1,738</td>
<td>1,547</td>
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<td>2016-17</td>
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Graph 1b JLP – Plan Area – Monitor

Dwellings

Year
2. Plymouth Policy Area  (annualised target)

SPT3 Housing Provision Target is at least 19,000 dwellings (annualised 950 pa)

Housing Trajectory illustrated by graphs: Plan, Monitor, Manage housing land supply

**Graph 2a Plymouth Policy Area – Plan / Manage**

Dwellings

<table>
<thead>
<tr>
<th>Year</th>
<th>Past Completions</th>
<th>Projected Completions</th>
<th>JLP provision Annual</th>
<th>Manage</th>
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**Graph 2b Plymouth Policy Area – Monitor**

Dwellings

<table>
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<td>2032-33</td>
<td></td>
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<tr>
<td>2033-34</td>
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</tr>
</tbody>
</table>
3. Thriving Towns and Villages Policy Area (annualised target)

SPT3 Housing Provision Target is at least 7,700 dwellings (annualised 385 pa)
Plan, Monitor and Manage housing land supply – Housing Trajectory illustrated by graphs

Graph 3.1a Thriving Towns and Villages Policy Area – Plan / Manage

Dwellings

Graph 3.1b Thriving Towns and Villages Policy Area – Monitor

Dwellings
Appendix 5

Historic Housing Development

See TP3(rev)
A6.1 The JLP Councils’ evidence demonstrates that there is a 5 year housing land supply at the point of plan adoption based on each of the policy area housing provision targets in SPT3, and also at the JLP whole plan area level.

A6.2 Demonstrating a 5 year housing land supply is important because of NPPF paragraphs 47 and 49 policy towards maintaining housing supply. If the LPA cannot demonstrate a 5 year supply of deliverable sites then relevant policies for the supply of housing should not be considered up to date. If a development plan is out of date, then for decision taking this triggers the ‘tilted balance’ in NPPF paragraph 14.

A6.3 Demonstrating a 5 year housing land supply at the point of plan adoption is necessary when plan making. It provides the evidence that the JLP would not be out of date at the anticipated point of plan adoption.

A6.4 In Paragraph 1.12 clause k of their letter of 6 October 2017 (EXC3), which responds to the Inspectors’ letter of 4 September 2017 (EXC2), the JLP Councils explain that regarding 5 year housing land supply, that they (ie the JLP Councils) would expect to set out 5 year land supply positions at three levels:

- Firstly at the whole plan level, to demonstrate that the strategy set out for the whole area is being delivered,
- Secondly at the Policy Area level, to demonstrate that the plan requirements set out in SPT3 are being met and that the distribution of development between the two policy areas is being delivered,
- Finally, there is a need to understand how housing is being delivered within each policy area, and in particular in the Thriving Towns and Villages Policy area.

A6.5 JLP policy differentiates between the Plymouth Policy Area and the Thriving Towns and Villages Policy Area in order to achieve the spatial strategy and deliver the JLP vision and objectives. Consequently the JLP Councils concluded that when determining planning applications the assessment of 5 year housing land supply is made at the Policy Area level for NPPF paragraph 47 and 49 purposes.

A6.6 Submission JLP Figure 3.5 set out five year land supply statistics for the whole plan area and for the two Policy Areas. Those were based on a 20% buffer and an assumed point of plan adoption at March 2018. They showed a forecast supply in JLP area, PPA and TTVPA equivalent to 6.2, 5.5 and 7.3 years respectively, based on the evidence in the 2016 monitoring point trajectories for JLP (TP3Ai), PPA (TP3Bi) and TTVPA (TP3Ci).

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52 At the Examination Hearings, the JLP Councils advocated the approach that the 5 year housing land supply assessment should be made at the Policy Area level. Proposed MM3 strengthens the clarity of plan regarding to the operation of the spatial strategy in relation to managing the delivery and distribution of housing in the Plan Area.
Mindful of the ongoing JLP Examination, the JLP Councils now expect the point of adoption of the JLP to occur by end March 2019 when the 5 year housing land supply position with a 20% buffer based on 2016 Monitoring Point would have been as follows:

- TP3A1 shows a forecast supply in JLP area equivalent to 6.2 years
- TP3Bi shows a forecast supply in PPA equivalent to 5.7 years
- TP3Ci shows a forecast supply in TTVPA equivalent to 7.4 years.

Latest evidence

The results in Submission JLP Fig 3.5 have now been superseded by the evidence in the latest end March 2017 monitoring point housing trajectories for JLP, PPA and TTVPA (TP3J, TP3K and TP3L respectively). This is the latest up to date available evidence with the results summarised as follows.

1. Joint Local Plan – plan area

The calculations and the results for the anticipated end March 2019 adoption point for the JLP plan area are shown in Table JLP4 and Graph JLP3 (TP3J). This demonstrates that the housing land supply position is above 5 years, and is forecast to be as follows:

- 6.1 years at end March 2019 (20% buffer)
- 7.0 years at end March 2019 (5% buffer).

2. Plymouth Policy Area

The calculations and the results for end March 2019 adoption point for the Plymouth Policy Area are shown in Table PPA6 and Graph PPA3 (TP3K). This demonstrates that the housing land supply position is above 5 years, and is forecast to be as follows:

- 5.4 years at end March 2019 (20% buffer)
- 6.2 years at end March 2019 (5% buffer).

3. Thriving Towns and Villages Policy Area

The calculations and the results for the end March 2019 adoption point for the Thriving Towns and Villages Policy Area are shown in Table TTV6 and Graph TTV3 (TP3L). This demonstrates that the housing land supply position is well above 5 years, and is forecast to be as follows:

- 8.0 years at end March 2019 (20% buffer)
- 9.1 years at end March 2019 (5% buffer).
The relevant 5 year period from point of plan adoption

A6.12 The date of plan adoption is also important because NPPF paragraph 47 distinguishes between:

- Identifying supply in years 1 to 5 (specific deliverable sites)
- Identifying supply in years 6 to 10 (specific developable sites or broad locations of growth); and
- If possible identifying supply in years 11 to 15 (specific developable sites or broad locations of growth).

A6.13 NPPF paragraph 47 requires the Councils to identify and update annually a supply of specific deliverable\footnote{11} sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.

A6.14 Years 1 to 5 are the five years are from the last monitoring point when there is a complete set of supply data available. The latest monitoring point for the housing trajectories is end March 2017 so the forecast 5 year period (years 1 to 5) would be April 2017 to end March 2022. However, the time period for assessing the 5 year supply at the point of JLP adoption is partly within and partly beyond that timeframe. At April 2019 the 5 year period from adoption would be April 2019 to March 2024.

A6.15 As a result the forecast supply at adoption at end March 2019 would be years 3 to 7 from the latest monitoring point supply evidence.

A6.16 The JLP Councils reaffirm that the supply identified in years 1 to 5 from April 2017 in the 2017 monitoring point trajectory meet the criteria in NPPF footnote 11. They also consider that all the sites in years 6 and 7 meet the requirement of NPPF paragraph 47 3rd bullet point and footnote 12\footnote{12} for sites to be ‘developable’. There is no evidence at this time to suggest that supply in years 6 and 7 wouldn’t be ‘deliverable’ within 5 years from the relevant monitoring point but the test of being ‘deliverable’ in those years would apply at those later monitoring points when the updated supply data is available.

\footnote{11} NPPF footnote 11 To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

\footnote{12} NPPF footnote 12 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
Reasonable prospect of a 5 year housing land supply at point of JLP adoption

A6.17 The concept of ‘reasonable prospect’ of delivery on individual sites in a housing trajectory has been the focus of recent Section 78 planning appeals. The recent Court of Appeal judgement distinguishes between deliverability and delivery – Paragraph 51 states

“The NPPF and the assessment of housing land supply are concerned with deliverability”, which is an assessment of the likelihood that housing will be delivered in the five year period on that site. The assessment of housing land supply does not require certainty that the housing sites will actually be developed within that period. The planning process cannot deal in such certainties. The problem of uncertainty is managed by assessing “deliverability” over a five year period, re-assessed as the five year period rolls forward.

A6.18 Regarding the difference between delivery and deliverability, as stated in Paragraph 52

“There are many reasons why the difference may exist: the assumed production rates off large sites may be too high for the market, though that does not seem to have been an issue here; the building industry’s infrastructure, skilled labour, finance, and materials, may not be geared up to the assumed rate; and the market may not wish to build or buy houses at the assumed rate of delivery; mortgage funds may not be available for those who would wish to buy. As Mr [Paul] Tucker [Q.C.] pointed out, the local planning authority can only do so much, that is to maintain a five year supply of deliverable housing land. The market, comprising house builders, finance and purchasers, has to do the rest.”

A6.19 Mindful of that Judgement, and the conclusions in Paragraph A6.12 to A6.16, the Councils conclude that there is a reasonable prospect of the 5 year housing land supply being delivered at the point of adoption of the JLP, based on the JLP and the two Policy Areas, considered in detail below in paragraphs A6.20 to A6.38.

(1) The Joint Local Plan area

A6.20 The JLP Councils consider there is a reasonable prospect of a 5 year housing land supply in the JLP plan area at the point of plan adoption, for the following reasons:

a) The latest trajectory evidence is up to date and robust.

A6.21 This includes the evidence in the individual large site trajectories, as updated during the Examination (see Addendum paragraph 7.7). The large sites in the trajectories in TP3K and TP3L have been assessed individually, and all large sites with dwelling completions forecast for Years 1 to 5, and Years 6 and 7 from the March 2017 Monitoring Point:

- are available now or with regard to sites identified to commence delivery in Years 6 and 7 have a reasonable prospect of being available.

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55 [2017] EWCA Civ 1643 20 October 2017 Between St Modwen Developments Ltd and SoS CLG; Est Riding of Yorkshire Council; and Save Our Ferriby Action Group
• offer a suitable location for development now; and

• are achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission that have not expired as at the 2017 monitoring point are included as deliverable. Where there is clear evidence that schemes will not be implemented within five years, or later, these have been excluded.

b) The method for calculating the 5 year housing land supply is correct.

A6.22 The calculations and results at the anticipated point of adoption (by March 2019) are set out in this Addendum. As made clear in proposed Main Modification MM3, the 5 year supply assessment has been undertaken for the two policy areas, and demonstrates that supply at the anticipated point of adoption is more than 5 years in each Policy Area. The assessment has also been made at the whole plan level, and the JLP Councils conclude that:

• The correct calculation for the forecast requirement for the next 5 years, including the appropriate buffer, is as follows:
  o The annualised 1,335 JLP target (as a minimum) multiplied by 5 years (ie 6,675)
  o Where there is a shortfall of cumulative completions compared to cumulative target since the start of the plan period to the monitoring point, all the backlog is then added to the 6,675, to give a 5 year requirement before a buffer is added. Where there is a surplus, this is taken into account on a residual basis, as explained in Addendum paragraph A6.42, to give a 5 year requirement before a buffer is added.
  o The buffer is then applied to the 5 year requirement. This gives the target for the next 5 years to use in the 5 year housing land supply position calculations.
    • From the 2016 monitoring point trajectory (TP3A/Ai)
      • at end March 2019 the 5 year target (having deducted the residualised surplus) was 6,554 (ie 6,675 minus 121 which is the residual surplus relating to the 5 year forecast period) Adding the 20% buffer to the 6,554 results in ‘5 year requirement with shortfall/surplus)’ of 7,865 dwellings. Annualised (ie divided by 5), this equates to 1,573 dpa
      • In the latest 2017 monitoring point JLP housing trajectory (TP3J), no shortfall is forecast at the anticipated March 2019 adoption point. With a residualised surplus of 222 for the 5 year forecast at that point, the ‘5 year requirement with shortfall/surplus)’ as at March 2019 is 6,453 (ie 6,675 - 222) respectively. Adding the 5% and 20%

56 For the purposes of assessing the 5 year housing land supply at point of adoption, the latest trajectories assume that JLP policies with site allocations that are forecast to deliver housing in years 1 to 7 that do not have planning permission as at the 2017 monitoring point will be found sound, included in the adopted JLP, and can therefore be counted as part of supply.

121
buffers to the 6,453 results in 6,776 and 7,743 dwellings respectively, and annualised, this equates to 1,355 and 1,549 dpa respectively.

- The correct calculation of the forecast supply for the next 5 years for the plan area is as follows. This is the sum of the forecast net completions for each of the next 5 years from the relevant monitoring point: In the latest JLP housing trajectory (TP3J) the forecast is 9,466 dwellings.

The correct way to estimate the 5 year housing land supply position in the JLP plan area is as demonstrated in New Table ADD9 which assesses the 5 year housing land supply position as at the anticipated point of JLP Plan adoption (by March 2019):

NEW TABLE ADD9 Joint Local Plan – Plan Area 5YLS as at March 2019

<table>
<thead>
<tr>
<th>STEP</th>
<th>5YLS CALCULATION COMPONENTS</th>
<th>RESULTS</th>
<th>FOOTNOTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>JLP requirement</td>
<td>26,700</td>
<td>1</td>
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<tr>
<td>B</td>
<td>Annualised requirement (A/20)</td>
<td>1,335</td>
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<tr>
<td>C</td>
<td>Housing completions (net)</td>
<td>7,341</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>1 April 2014 – 31 March 2019</td>
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<td></td>
</tr>
<tr>
<td>Di</td>
<td>Shortfall/surplus against requirement since 1 April 2014 (Bx5 i.e. 1,335x5= 6675) - C</td>
<td>-666</td>
<td>4</td>
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<tr>
<td>Dii</td>
<td>Residualised surplus for next 5 years (Surplus/Remaining years) x 5 years (Di/15) x 5</td>
<td>-222</td>
<td>5</td>
</tr>
<tr>
<td>E</td>
<td>Five year requirement (Bx5 i.e. 950x5)</td>
<td>6,675</td>
<td>6</td>
</tr>
<tr>
<td>F</td>
<td>Five year requirement with shortfall/ surplus (E minus Dii the residualised surplus)</td>
<td>6,453</td>
<td>7</td>
</tr>
<tr>
<td>G</td>
<td>F with 20% buffer</td>
<td>7,743</td>
<td>8</td>
</tr>
<tr>
<td>H</td>
<td>F with 5% buffer</td>
<td>6,776</td>
<td>9</td>
</tr>
<tr>
<td>I</td>
<td>Deliverable supply 1 April 2018- 31 March 2023</td>
<td>9,466</td>
<td>10</td>
</tr>
<tr>
<td>J</td>
<td>Five year land supply position (20% buffer) (I/ (G divided by 5))</td>
<td>6.1 years</td>
<td>11</td>
</tr>
<tr>
<td>K</td>
<td>Five year land supply position (5% buffer) (I/ (H divided by 5))</td>
<td>7.0 years</td>
<td>12</td>
</tr>
</tbody>
</table>

Note: This whole plan area analysis is evidence for JLP examination purposes

This table is supported by the following footnotes
NEW TABLE ADD9 Footnotes:

1 JLP Submission Plan Policy SPT3 – JLP plan area housing requirement.

2 Calculated annualised rate based on JLP plan area requirement divided by 20 years plan period. The requirement annualised is shown in TP3J Table JLP4 in the row “Annualised target” and in TP3J Table JLP5 in column “Annualised target”.

3 TP3J Table JLP4 – first Row “No of dwellings built in this year” – for the years 2014/15 to 2018/19; and TP3J Table JLP4 row “Cumulative no of dwellings built 1/4/2014 to end this year”, column 2018/19 which shows the 7,341 cumulative completions for the period from 2014 to 2019.

4 Calculation as shown in this table. The figure of -666 ie a surplus is shown in TP3J Table JLP5 Row 2018/19 in Column “Cumulative Residual at end of year”.

5 Calculation as shown in this table. The figure of -222 is shown in TP3J Table JLP5 row 2018/19 in the column “Annualised residual x 5 years **”, and in Table JLP4 row “Annualised Residual Surplus of completions to date x 5 years ***” in column 2018/19.

6 Calculation as shown in this table.

7 Calculation as shown in this table. (Note: the residual surplus is a ‘negative’ in the equation, so that the calculation in effect subtracts the residual surplus for the 5 years from the forecast requirement for the 5 years (ie 6,675-222)). The figure of 6,453 is shown in TP3J Table JLP4 Row “5 year target as at end this year” in column 2018/19.

8 Calculation as shown in this table. The figure of 7,743 is shown in TP3J Table JLP4 Row “5 year target + 20% buffer” in column 2018/19.

9 Calculation as shown in this table. The figure of 6,776 is shown in TP3J Table JLP4 Row “5 year target + 5% buffer” in column 2018/19.

10 The figure of 9,466 is shown in TP3J Table JLP4 Row “Forecast completions for next 5 years (from end this year)” in column 2018/19. (This is the summation of the figures in TP3J Table JLP4 Row “Nos of dwellings built in this year for the years 2019/20 to 2023/24 inclusive”. (TP3K Table PPA2 Row “Total” and TP3L Table TTV2 Row “Total” are the source of the net completions in each year)

11 Calculation as shown in this table. The figure of 6.1 years is shown in TP3J Table JLP4 Row “Years of supply (with 20% buffer)” in column 2018/19.

12 Calculation as shown in this table. The figure of 7.0 years is shown in TP3J Table JLP4 Row “Years of supply (with 5% buffer)” in column 2018/19.
A6.23 For an adoption point by March 2019, the 2017 monitoring point forecast supply of 9,466 in the latest trajectory TP3J is slightly lower than the 9,674 reported in the previous trajectory TP3E.

A6.24 The supply of 9,466 dwellings includes the updated evidence about housing delivery provided during the Examination, and captured in the latest trajectories. This provides robust new evidence about lead in times, the likely date of the first completions on sites, and delivery rates. This evidence supports the number of dwellings forecast to be delivered in the 5 year period April 2019 to March 2024. Consequently, the Councils can rely on that evidence.

A6.25 In conclusion, the evidence in New Table ADD9 shows that there would be a 6.1 and 7.0 years of housing land supply at the whole plan area level at the 20% and 5% buffer levels respectively. The forecasts are realistic and robust, and they demonstrate a healthy land supply position for plan making purposes.

(2) Plymouth Policy Area and 5 year housing land supply

A6.26 The JLP Councils consider there is a reasonable prospect of a 5 year housing land supply in the Plymouth Policy Area at the anticipated point of adoption, for the following reasons:

a) **The latest trajectory evidence is up to date and robust.**

A6.27 This includes the evidence in the individual large site trajectories, as updated during the Examination (see Addendum paragraph 7.7). The large sites in the trajectory have been assessed individually, and all large sites with dwelling completions forecast for Years 1 to 5 from the March 2017 Monitoring Point:

- are available now or with regard to sites identified to commence delivery in Years 6 and 7 have a reasonable prospect of being available
- offer a suitable\(^{57}\) location for development now; and
- are achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission that have not expired as at the 2017 monitoring point are included as deliverable. Where there is clear evidence that schemes will not be implemented within five years, or later, these have been excluded.

b) **The method for calculating the 5 year housing land supply is correct.**

A6.28 The calculations and results for 2019 are set out in this updated Addendum. The JLP Councils conclude that:

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\(^{57}\) For the purposes of assessing the 5year housing land supply at point of adoption, the trajectories assume that JLP policies with site allocations that are forecast to deliver housing in years 1 to 7 that do not have planning permission as at the 2017 monitoring point will be found sound, included in the adopted JLP, and can therefore be counted as part of supply.
The correct calculation is made of the forecast requirement for the next 5 years, including the appropriate buffer. This is:

- The annualised 950 PPA target (as a minimum) multiplied by 5 years (ie 4,750)
- Where there is a shortfall of cumulative completions compared to cumulative target since the start of the plan period to the monitoring point, all the backlog is then added to the 4,750, to give a 5 year requirement before a buffer is added. Where there is a surplus, this is taken into account on a residual basis, as explained in Addendum Appendix 6.1 paragraph A6.42, to give a 5 year requirement before a buffer is added.
- The buffer is then applied to the 5 year requirement. This gives the target for the next 5 years to use in the 5 year housing land supply position calculations.

  - From the 2016 monitoring point trajectory (TP3B/Bi)
    - At end March 2019 this was 4,734 (ie 4,750 minus 16 which is the residual surplus for the 5 years) Adding the 5% and 20% buffers results in 4,970 and 5,680 dwellings respectively. Annualised, this equates to 994 dpa and 1,136 dpa respectively.
    - In the latest 2017 monitoring point PPA housing trajectory (TP3K), the forecast at March 2019 is 4,668 (ie 4,750 minus 82 residual surplus). Adding the 5% and 20% buffers results in 4,901 and 5,601 dwellings respectively, and annualised, this equates to 980 dpa and 1,120 dpa respectively.

The correct calculation is made of the forecast supply for the next 5 years. This is the sum of the forecast net completions for each of the next 5 years from the relevant monitoring point: For the PPA at end March 2019 this was:

  - 6,475 dwellings (TP3B/Bi using the 2016 Monitoring Point trajectory).
  - 6,050 dwellings (TP3K using the latest 2017 Monitoring Point trajectory).

The correct way to estimate the 5 year housing land supply position in the PPA is demonstrated as follows in New Table ADD10 which assesses the 5 year housing land supply position as at the anticipated point of JLP Plan adoption (by March 2019) using the latest 2017 Monitoring Point PPA housing trajectory (TP3K):
### NEW TABLE ADD10 Plymouth Policy Area 5YLS as at March 2019

<table>
<thead>
<tr>
<th>STEP</th>
<th>5YLS CALCULATION COMPONENTS</th>
<th>RESULTS</th>
<th>FOOTNOTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>JLP requirement</td>
<td>19,000</td>
<td>1</td>
</tr>
<tr>
<td>B</td>
<td>Annualised requirement (A/20)</td>
<td>950</td>
<td>2</td>
</tr>
<tr>
<td>C</td>
<td>Housing completions (net)</td>
<td>4,997</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>1 April 2014 – 31 March 2019</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Di</td>
<td>Shortfall/surplus against requirement since 1 April 2014 (Bx5 i.e. 950x5= 4750) - C (i.e. a surplus)</td>
<td>-247</td>
<td>4</td>
</tr>
<tr>
<td>Dii</td>
<td>Residualised surplus for next 5 years (Surplus/Remaining years) x 5 years (Di/15) x 5</td>
<td>-82</td>
<td>5</td>
</tr>
<tr>
<td>E</td>
<td>Five year requirement (Bx5 i.e. 950x5)</td>
<td>4,750</td>
<td>6</td>
</tr>
<tr>
<td>F</td>
<td>Five year requirement with shortfall/ surplus (E minus Dii the residualised surplus)</td>
<td>4,668</td>
<td>7</td>
</tr>
<tr>
<td>G</td>
<td>F with 20% buffer</td>
<td>5,601</td>
<td>8</td>
</tr>
<tr>
<td>H</td>
<td>F with 5% buffer</td>
<td>4,901</td>
<td>9</td>
</tr>
<tr>
<td>I</td>
<td>Deliverable supply 1 April 2019- 31 March 2024</td>
<td>6,050</td>
<td>10</td>
</tr>
<tr>
<td>J</td>
<td>Five year land supply position (20% buffer) (I/ (G divided by 5))</td>
<td>5.4 years</td>
<td>11</td>
</tr>
<tr>
<td>K</td>
<td>Five year land supply position (5% buffer) (I/ (H divided by 5))</td>
<td>6.2 years</td>
<td>12</td>
</tr>
</tbody>
</table>

Note: This table is the source of the information in JLP Figure 3.4 as amended by proposed Main Modification MM3, supported by the following explanatory footnotes.
### NEW TABLE ADD10 Footnotes:

1. JLP Submission Plan Policy SPT3 – PPA housing requirement.
2. Calculated annualised rate based on PPA requirement divided by 20 years plan period. The requirement annualised is shown in TP3K Table PPA6 in the row “Annualised target” and in TP3K Table PPA7 in column “Annualised target”.
3. TP3K Table PPA2 – Last Row Total completions (net) – for the years 2014/15 to 2018/19; and TP3K Table PPA6 row “Cumulative no of dwellings built 1/4/2014 to end this year”, column 2018/19 which shows the 4,997 cumulative completions for the period from 2014 to 2019.
4. Calculation as shown in this table. The figure of -247 ie a surplus is shown in TP3K Table PPA7 Row 2018/19 in Column “Cumulative Residual at end of year”.
5. Calculation as shown in this table. The figure of -82 is shown in TP3K Table PPA7 row 2018/19 in the column “Annualised residual x 5 years**”, and in Table PPA6 row “Annualised Residual Surplus of completions to date x 5 years ***” in column 2018/19.
6. Calculation as shown in this table.
7. Calculation as shown in this table. (Note: the residual surplus is a ‘negative’ in the equation, so that the calculation in effect subtracts the residual surplus for the 5 years from the forecast requirement for the 5 years (ie 4,750-82)) The figure of 4,668 is shown in TP3K Table PPA6 Row “5 year target as at end this year” in column 2018/19.
8. Calculation as shown in this table. The figure of 5,601 is shown in TP3K Table PPA6 Row “5 year target + 20% buffer” in column 2018/19.
9. Calculation as shown in this table. The figure of 4,901 is shown in TP3K Table PPA6 Row “5 year target + 5% buffer” in column 2018/19.
10. The figure of 6,050 is shown in TP3K Table PPA6 Row “Forecast completions for next 5 years (from end this year)” in column 2018/19. (This is the summation of the figures in TP3K Table PPA6 Row “Nos of dwellings built in this year for the years 2019/20 to 2023/24 inclusive”. Table PPA2 Row “Total” is the source of the net completions in each year)
11. Calculation as shown in this table. The figure of 5.4 years is shown in TP3K Table PPA6 Row “Years of supply (with 20% buffer)” in column 2018/19.
12. Calculation as shown in this table. The figure of 6.2 years is shown in TP3K Table PPA6 Row “Years of supply (with 5% buffer)” in column 2018/19.
A6.29 The latest TP3K 2017 monitoring point forecast 5 year supply of 6,050 dwellings as at the anticipated March 2019 adoption point is fractionally above the 6,040 that was forecast in TP3F but is lower than the previous 2016 Monitoring Point forecast in TP3Bi (6,475). This reflects the latest intelligence from the industry and the resultant site forecasts.

A6.30 Production of the 2017 Monitoring Point trajectories, as requested by the Inspectors in EXC2, provided a timely opportunity to update the PPA forecasts, first with data set out in TP3F and then updated in TP3K. The new trajectories benefit from the latest evidence about delivery and commitments, and from the consultation with the developers. The steps undertaken by the JLP Councils to forecast delivery are set out in Addendum paragraph 1.11.

A6.31 The supply of 6,050 dwellings includes the updated evidence about housing delivery provided during the Examination, and captured in the latest trajectories. This provides robust new evidence about lead in times, the likely date of the first completions on sites, and delivery rates. This evidence supports the number of dwellings forecast to be deliverable in the 5 year period April 2019 to March 2024. Consequently, the Councils can rely on that evidence.

A6.32 The latest forecasts provide evidence of a 5.4 years housing land supply position at the anticipated point of plan adoption, with a 20% buffer. The JLP Councils consider that applying a 20% buffer is appropriate for the Plymouth Policy Area at this time because of past under-delivery at the 2017 Monitoring Point relative to the start of the JLP plan period. It should be noted that by the adoption point, the forecasts indicate that there would no longer be a shortfall. They are realistic forecasts, given that the PPA includes the Sustainable Urban Extensions where supply delivery has only just commenced and will accelerate over the next few years, but the 5 year housing land supply calculations have not used a ‘stepped’ target.

(3) Thriving Towns and Villages Policy Area and 5 year housing land supply

A6.33 The JLP Councils consider there is a reasonable prospect of a 5 year housing land supply in the TTVPA at the point of adoption, for the following reasons:

a) The latest trajectory evidence is up to date and robust.

A6.34 This includes the evidence in the individual large site trajectories as updated during the Examination (see Addendum paragraphs 7.7 and 7.12). The large sites in the trajectory have been assessed individually, and all large sites with dwelling completions forecast for Years 1 to 5 from the March 2017 Monitoring Point:

- are available now or with regard to sites identified to commence delivery in Years 6 and 7 have a reasonable prospect of being available
offer a suitable location for development now; and

are achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission that have not expired as at the 2017 monitoring point are included as deliverable. Where there is clear evidence that schemes will not be implemented within five years, or later, these have been excluded.

b) The method for calculating the 5 year housing land supply is correct.

A6.35 The calculations and results for the anticipated point of adoption (by March 2019) are set out in this updated Housing Addendum. The JLP Councils conclude that:

- The correct calculation is made of the forecast requirement for the next 5 years, including the appropriate buffer. This is:
  - The annualised 385 TTVPRA target (as a minimum) multiplied by 5 years (ie 1,925)
  - Where there is a shortfall of cumulative completions compared to cumulative target since the start of the plan period to the monitoring point, all the backlog is then added to the 1,925, to give a 5 year requirement before a buffer is added. Where there is a surplus, this is taken into account on a residual basis, as explained in Appendix 6.1 paragraph A6.42 in this Addendum, to give a 5 year requirement before a buffer is added.
  - The buffer is then applied to the 5 year requirement. This gives the target for the next 5 years to use in the 5 year housing land supply position calculations.
    - From the 2016 monitoring point trajectory (TP3C/Ci)
      - at end March 2019 this was 1,821 (ie 1,925 minus the 104 which is the residual surplus for the 5 years). There is no shortfall to add in, Adding the 5% and 20% buffer results in 1,912 and 2,185 dwellings. Annualised, this equates to 382 dpa and 437 dpa respectively.
    - In the latest 2017 monitoring point JLP housing trajectory (TP3L), again no shortfall occurred between the start of the plan period and the 2017 monitoring point. The target for the 5 year period at the anticipated adoption date by March 2019 is 1,785 (ie 1,925 - 140) respectively. Adding the 5% and 20% buffer results in 1,874 and 2,142 dwellings, and annualised, this equates to 375 dpa and 428 dpa respectively.

For the purposes of assessing the 5 year housing land supply at point of adoption, the trajectories assume that JLP policies with site allocations that are forecast to deliver housing in years 1 to 7 that do not have planning permission as at the 2017 monitoring point will be found sound, included in the adopted JLP, and can therefore be counted as part of supply.
• The correct calculation is made of the forecast supply for the next 5 years. This is the sum of the forecast net completions for each of the next 5 years from the relevant monitoring point:
  o At end March 2019 this was 3,228 dwellings for the TTVPA (TP3C/Ci).
  o In the latest JLP housing trajectory (TP3L) the forecast is 3,416 dwellings.

• The correct way to estimate the 5 year housing land supply position in the TTVPA is demonstrated as follows in New Table ADD11 which assesses the 5 year housing land supply position as at the anticipated point of JLP Plan adoption (by March 2019) using the latest 2017 Monitoring Point TTVPA housing trajectory (TP3L):

NEW TABLE ADD11 Thriving Towns and Villages 5YLS as at March 2019

<table>
<thead>
<tr>
<th>STEP</th>
<th>5YLS calculation component</th>
<th>RESULTS</th>
<th>FOOTNOTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>JLP requirement</td>
<td>7,700</td>
<td>1</td>
</tr>
<tr>
<td>B</td>
<td>Annualised requirement</td>
<td>385</td>
<td>2</td>
</tr>
<tr>
<td>C</td>
<td>Housing completions (net)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1 April 2014- 31 March 2019</td>
<td>2,344</td>
<td>3</td>
</tr>
<tr>
<td>Di</td>
<td>Shortfall/surplus against requirement since</td>
<td>-419 (i.e. a surplus)</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>1 April 2014 (Bx5 i.e. 385x5= 1,925) - C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dii</td>
<td>Residualised surplus for next 5 years (Surplus/Remaining years) x 5 years (Di/15) x 5</td>
<td>-140</td>
<td>5</td>
</tr>
<tr>
<td>E</td>
<td>Five year requirement (Bx5 i.e. 385x5)</td>
<td>1,925</td>
<td>6</td>
</tr>
<tr>
<td>F</td>
<td>Five year requirement with shortfall/ surplus (E minus Dii the residualised surplus)</td>
<td>1,785</td>
<td>7</td>
</tr>
<tr>
<td>G</td>
<td>F with 20% buffer</td>
<td>2,142</td>
<td>8</td>
</tr>
<tr>
<td>H</td>
<td>F with 5% buffer</td>
<td>1,874</td>
<td>9</td>
</tr>
<tr>
<td>I</td>
<td>Deliverable supply 1 April 2019- 31 March 2024</td>
<td>3,416</td>
<td>10</td>
</tr>
<tr>
<td>J</td>
<td>Five year land supply position (20% buffer ) (I / (G divided by 5))</td>
<td>8.0 years</td>
<td>11</td>
</tr>
<tr>
<td>K</td>
<td>Five year land supply position (5% buffer) (I / (H divided by 5))</td>
<td>9.1 years</td>
<td>12</td>
</tr>
</tbody>
</table>

Note: This table is the source of the information in JLP Figure 3.5 as amended by proposed Main Modification MM3, supported by the following explanatory footnotes
NEW TABLE ADD11 Footnotes:

1 JLP Submission Plan Policy SPT3 – TTVPA housing requirement.

2 Calculated annualised rate based on TTVPA requirement divided by 20 years plan period. The requirement annualised is shown in TP3L Table TTVPA6 in the row “Annualised target” and in Table TTVPA7 in the column “Annualised Target”.

3 TP3L Table TTV2 – Last Row Total completions (net) – for the years 2014/15 to 2018/19; and TP3L Table TTVPA6 row “Cumulative no of dwellings built 1/4/2014 to end this year”, column 2018/19 which shows the 2,344 cumulative completions for the period from 2014 to 2019.

4 Calculation as shown in this table. The figure of -419, ie a surplus, is shown in TP3L Table TTVPA7 Row 2018/19 in Column “Cumulative Residual at end of year”.

5 Calculation as shown in this table. The figure of -140 is shown in TP3L Table TTVPA7 row 2018/19 in the column “Annualised residual x 5 years***”, and in Table TTVPA6 row “Annualised Residual Surplus of completions to date x 5 years **” in column 2018/19.

6 Calculation as shown in this table.

7 Calculation as shown in this table. (Note: the residual surplus is a ‘negative’ in the equation, so that the calculation in effect subtracts the residual surplus for the 5 years from the forecast requirement for the 5 years (ie 1,925-140)) The figure of 1,785 is shown in TP3L Table TTVPA6 Row “5 year target as at end this year” in column 2018/19.

8 Calculation as shown in this table. The figure of 2,142 is shown in TP3L Table TTVPA6 Row “5 year target + 20% buffer” in column 2018/19.

9 Calculation as shown in this table. The figure of 1,874 is shown in TP3L Table TTVPA6 Row “5 year target + 5% buffer” in column 2018/19.

10 The figure of 3,416 updates the figure shown in TP3L Table TTVPA6 Row “Forecast completions for next 5 years (from end this year)” in column 2018/19. (This is the summation of the figures in TP3L Table TTVPA6 Row “Nos of dwellings built in this year for the years 2019/20 to 2023/24 inclusive”. Table TTVPA2 Row “Total” is the source of the net completions in each year)

11 Calculation as shown in this table. The figure of 8.0 years is shown in TP3L Table TTV6 Row “Years of supply (with 20% buffer)” in column 2018/19.

12 Calculation as shown in this table. The figure of 9.1 years is shown in TP3L Table TTV6 Row “Years of supply (with 5% buffer)” in column 2018/19.
A6.36 The latest TP3L 2017 monitoring point forecast 5 year supply of 3,416 dwellings as at the anticipated March 2019 adoption point is below the 3,619 that was forecast in TP3G but above the 3,228 indicated by the 2016 monitoring point forecast in TP3C/Ci. The main reason for this is that the 2016 monitoring point data relied on very cautious assumptions about lead in times and delivery rates. Those assumptions were appropriate at that time. Production of the 2017 Monitoring Point trajectories, as requested by the Inspectors in EXC2, provided a timely opportunity to update the forecasts first with data set out in TP3G and then updated in TP3L. The new trajectories benefit from the latest evidence about delivery and commitments, and from the consultation with the developers. The steps undertaken by the JLP Councils to forecast delivery in the latest trajectories are set out in Addendum paragraph 1.11.

A6.37 The supply of 3,416 dwellings includes the updated evidence about housing delivery provided during the Examination, and captured in the latest trajectories. This provides robust new evidence about lead in times, the likely date of the first completions on sites, and delivery rates. This evidence supports the number of dwellings forecast to be delivered in the 5 year period April 2019 to March 2024. Consequently, the Councils can rely on that evidence.

A6.38 The latest forecasts provide evidence of a 9.1 years housing land supply position at the anticipated point of plan adoption, with a 5% buffer. The JLP Councils consider that applying a 5% buffer is appropriate for the Thriving Towns and Villages Policy Area at this time because there is no supply shortfall in this Policy Area at either the 2017 Monitoring Point or at the anticipated adoption point, relative to the start of the plan period. The forecasts are realistic and robust, demonstrating a very healthy land supply position for plan-making purposes.

5 year Housing Land Supply – METHODOLOGY - DETAILS

A6.39 Addendum Paragraphs A6.40 to A6.59 provide detailed explanation of the methodology used by the JLP Councils to calculate the 5 year housing land supply.

A6.40 The ‘rolling’ five year housing land supply assessments for each of the three trajectories are set out in the trajectory evidence and illustrated as graphs, the latter are reproduced Appendix 6.2. It is neither possible nor necessary to prove a 5 year supply of ‘specific deliverable’ sites for all years in the plan period. The test is for developable sites from year 6 (see paragraph A6.12). Nevertheless, using the current information in the trajectories it is possible to assess whether that supply to the end of the plan period would deliver the targets and how that supply performs against the annualised targets. This ‘rolling 5 year housing land supply” analysis provides further evidence showing how the plan maintains a supply over the plan period.

A6.41 The approach to the five year housing land supply in this topic paper is up to date. The method for calculating the rolling 5 year housing land supply over the plan period takes account of NPPF (2012), NPPG, the latest legal judgements and Secretary of State decisions on recovered appeals, as well as wider planning law requirements.
A6.42 The following methodology is used at the end of each monitoring year (the monitoring point) to assess the 5 year supply position as at the monitoring point:

- Using the housing provision targets recommended in Section 6 and the annualised rates to calculate cumulative targets to date
- Identifying the future 5 year target based on annualised rates
- Identifying cumulative supply to date since 1 April 2014
- Comparing cumulative supply to cumulative targets and identifying whether or not there is a cumulative shortfall to date, or a cumulative surplus
- If there is a cumulative shortfall then applying the ‘Sedgefield’ approach (ie all the shortfall to be added to the 5 year target) in those years where there is evidence of past under delivery
- If there cumulative surplus, then residualizing this over the rest of the plan period, and converting it to an annual residual and deducting this from the 5 year target
- Identifying if there has been persistent under delivery to determine which buffer (NPPF paragraph 47) to apply to both the future 5 year requirement (minus any 5 year residual of past ‘surplus’) and to the full ‘Sedgefield’ component of past shortfall
- Multiplying the 5 year target (with shortfall added or residual surplus deducted) by the % buffer. For the purposes of the trajectories both the 5% and 20% buffers are tested to give the for each buffer level
- Then for each buffer level:
  - Divide the total 5 year target for the monitoring point by 5 to give an annual 5 year target for the monitoring point
  - Identify the forecast 5 year supply for the next 5 years from the monitoring point.
  - Calculate the number of years of housing supply as at the monitoring point by dividing the forecast 5 year supply by the annual 5 year target (with buffer) for the monitoring point.

A6.43 The forecast of supply delivered from future completions over the next five years come from the supply sources listed in Addendum Section 7. These are based on the robust, evidenced assessments of the sites’ trajectories, including the sites allocated by the JLP.

A6.44 Addendum Section 8 on managing supply considers the use of the 5 year housing supply evidence both for plan preparation and for development management purposes.
Target

A6.45 The housing provision targets used in the housing trajectories are those set out in Policy SPT3 for the two Policy Areas. These are summed to give the overall housing Provision target for the JLP Plan area. The LPAs assume that these are the targets that will be in the adopted Joint Local Plan. Whilst the policy expresses the targets in terms of “at least”, ie they are ‘minimums’, the numeric figures set out in the policy are those used in the housing trajectories, for the purpose of calculating the 5 year housing land supply position at annual monitoring points throughout the plan period, and are as follows:

- Plymouth Policy Area                  19,000
- Thriving Towns and Villages Policy Area 7,700
- Joint Local Plan – Plan Area          26,700

Annualised housing provision

A6.46 Policy SPT3 expresses housing provision in terms of the total for the plan period, not as an annual rate. 5 year housing land supply assessment uses annualised rates, so these are calculated by dividing the housing provision targets by 20 (the number of years in the plan period).

Cumulative target to monitoring point

A6.47 The 5 year housing land supply assessment takes account of the cumulative target which is the number of years since the start of the plan period (1 April 2014) to the monitoring point multiplied by the annualised housing provision target.

Cumulative supply to monitoring point

A6.48 The 5 year housing land supply assessment takes account of how many dwellings have been built since the start of the plan period (1 April 2014).

Shortfall since the start of the plan period

A6.49 The concept of a shortfall in supply that occurs during the plan period (sometimes referred to as a backlog) or should not be confused with the concept of a backlog from ‘pent up’ need because households have not formed due to lack of suitable accommodation (see paragraphs 3.42 -3.50 in the topic paper).

A6.50 If there is a backlog then it would be appropriate to provide for a backlog within the first five years when calculating the 5 year housing land supply position (the ‘Sedgefield’ approach). This is the approach applied in the suite of housing trajectories (TP3J, TP3K and TP3L). The application of this approach is clearly shown in the Tables JLP5, PPA7, and TTV7 (Residual and Sedgefield calculations), and in Tables JLP3, PPA6, and TTV6 (Rolling 5 year housing land supply). If there is a shortfall against the JLP target, then the approach is for this to be made good in the next 5 years, consistent with NPPF policy towards boosting supply.
A6.51 The only time that a backlog needs to be considered is if the cumulative supply at a monitoring point is less than the cumulative target (i.e., the annualised requirement multiplied by the number of years between the start of the plan period and the monitoring point). As set out in the evidence in TP3L, TP3K and TP3L:

- In the JLP area, the cumulative target exceeds cumulative supply – so there is a backlog forecast up to March 2017. But thereafter, the forecast is for a surplus over the cumulative requirement.
- In the PPA, the cumulative target exceeds cumulative supply – so there is a backlog forecast up to March 2018. But thereafter, the forecast is for a surplus over the cumulative requirement.
- In the TTVPA, the cumulative supply exceeds cumulative target from 2015/6 onwards. Thereafter, the forecast is for a surplus over the cumulative requirement.
- So there is no backlog at the March 2019 Monitoring Point in the Plan Area or in either Policy Areas, nor is one forecast for the future.

Cumulative shortfall or surplus at monitoring point

A6.52 Deducting the cumulative supply from cumulative demand since the start of the plan period identifies whether there is a shortfall at a monitoring point. This is then taken into account in the 5 year housing land supply analysis.

Sedgefield or Liverpool approach towards meeting any shortfall?

A6.53 The rolling 5 year housing land supply calculations used in the trajectories do not apply a ‘Liverpool’ approach where any shortfall is addressed across the whole of the remaining plan period.

A6.54 Instead, the methodology applies the Sedgefield approach. This means that the whole shortfall at that date is added to the future 5 year requirement assuming the shortfall is to be made good in the next 5 years. The analysis in the Table of Residual and Sedgefield components set out in each trajectory provides the evidence about past over or under delivery. It is also demonstrated by the evidence in the ‘monitor’ graph where the monitor line is always above the x-axis of the graph. If there is no evidence of past under-delivery, then any ‘over delivery’ in the past is annualised and the 5 year residual is deducted from the future 5 year requirement.

A6.55 The trajectories show that for most of the plan period there isn’t a shortfall to be taken into account. Instead, there is a ‘surplus.’

A6.56 Inspectors at other Local Plan examinations have agreed that surplus from past delivery since the start of the plan period to the ‘monitoring point’ can be taken into account when calculating the forecast future housing land supply for the next 5 years.

A6.57 Not surprisingly, the amount of requirement remaining between the monitoring point and the end of the plan period, based on the annualised target multiplied by the remaining number of years (to give the initial 5 year target) is then reduced by the amount of the surplus. Otherwise, we would in effect be increasing our overall target for the plan period.
A6.58 We can calculate what this means for the 5 YLS position at any monitoring point (ie as at end March in any year). The calculations for shortfall and for the residualised surplus are set out in the Housing Trajectories (TP3J, TP3K and TP3L). The shortfall or surplus is calculated for each year. All three housing trajectories use the same method of adding in shortfalls and residualised surpluses, mindful that where there is a shortfall the residualised surplus is zero, and vice versa.

**Buffer**

A6.59 The trajectories include testing both the 5% and 20% buffers which NPPF refers to, when calculating the rolling 5 year housing land supply. The evidence shows that for both Policy Area and the JLP Plan Area that a 5 year supply can be demonstrated from the point of adoption onwards with both buffer levels. The justification for the appropriate buffer for the Plymouth Policy Area and for the Thriving Towns and Villages Policy Area which is to be expressed in JLP Figure 3.4 (proposed Main Modification MM3) is set out in Addendum paragraph A6.32 and A6.38. The choice of which buffer to use in future calculations will depend on whether there is any record of persistent under delivery.

**JLP summary: Forecast requirement and forecast supply over the next 5 years**

**Note**: Paragraphs A6.60 to A6.65 in TP3(rev) have now been superseded by Addendum Paragraphs A6.20 to A6.25 and New Table ADD9.

A6.60 TP3(rev) Paragraph deleted

A6.61 TP3(rev) Paragraph deleted

A6.62 TP3(rev) Paragraph deleted

A6.63 TP3(rev) Paragraph deleted

A6.64 TP3(rev) Paragraph deleted

A6.65 TP3(rev) Paragraph deleted
APPENDIX 6.2

Rolling 5 Year Housing Land Supply Graphs

A6.66 The graphs illustrating the rolling 5 year housing land supply for the JLP Plan area, the Plymouth Policy Area and the Thriving Towns and Villages Policy Area are shown in Appendix 6.2 of this Addendum (and in Graphs JLP3, PPA3 and TTV3 in the latest A3 format housing trajectories TP3J, TPK and TP3L) as follows:
Plymouth and South West Devon Joint Local Plan – Plan Area
(annualised target)

Rolling 5 year housing land supply

Years

Source: JLP Housing Trajectory (end March 2017 Monitoring Point with delivery forecast made in November 2017+ Post Hearing amendments) TP3J

Plan Area SPT3 Housing Provision target (at least 26,700) reached by 2030/31
Plymouth Policy Area
(annualised target)

Rolling 5 year housing land supply assessment

Years

Source: PPA Housing Trajectory (end March 2017 Monitoring Point with delivery forecast made in November 2017+ Post Hearing amendments) TP3K

Policy Area SPT3 Housing Provision target (at least 19,000) reached by 2031/32
Thriving Towns and Villages Policy Area
(annualised target)

Rolling 5 year housing land supply

Years

Source: TTVPA Housing Trajectory (end March 2017 Monitoring Point with delivery forecast made in November 2017+ Post Hearing amendments) TP3L

Policy Area SPT3 Housing Provision target (at least 7,700) reached by 2027/28
1. Maintaining Supply in the Plymouth Policy Area

A6.67 Supply over the plan period. The TP3K evidence demonstrates that supply can be maintained over the plan period. Graphs PPA2 (2a) and (2b) illustrate the ‘Plan Monitor Manage’ analysis of supply. They are based on the evidence of the combined completions totals across the policy area forecast for each year over the plan period. That evidence is set out in Table PPA2 (TP3K). The three analyses in this table demonstrate that supply is maintained. The graphs illustrate the trajectory and those analyses, whereby maintaining supply means that:

a. **Plan** The forecast supply in PPA (illustrated by the purple bars in graph PPA2A) is above the annualised target of 950 pa (the green Plan line) in every year from 2017/18 until 2029/30 with the only exception 2019/20. At 2031/32 the minimum target is met. Delivery continues after that point, albeit at a lower rate. This provides a high level of flexibility. Even if supply is not delivered as quickly as forecast, with a 9% ‘headroom’ there are still reasonable prospects that the target will be achieved by the end of the plan period, or earlier from the supply sources identified at the 2017 Monitoring Point. This does not include the 1686 dwellings in the Strategic Urban Extensions at Sherford and Woolwell that are forecast for delivery after the end of the plan period. Were the housing market to strengthen further, these sites could provide additional supply at an earlier date. This forecast headroom does not include future large windfalls (see also paragraph A6.34 bullet point 7 regarding large windfalls).

b. **Plan** The forecast future supply in PPA illustrated by the purple bars in Graph PPA2A also shows that supply is ‘front loaded’. That is, after the March 2017 Monitoring Point, there is a higher annual supply earlier in plan period notably in 2017/19 and 2021/23, compared to supply towards the end of the plan period. This is consistent with the NPPF objective to significantly boost supply. Early delivery is supported by robust evidence in TP3H, which has been informed by evidence provided by developers about their intentions regarding implementing current consents, to submit planning applications in 2018 and for swift site starts. Front-loading is another indicator of flexibility. Early delivery reduces the risk of not achieving the target by 2034. The PPA does not depend on a high percentage of supply delivery much later in the plan period.

c. **Monitor** A surplus supply position is forecast over the whole plan period in the PPA from 2018/19 onwards. A shortfall is identified in the first 4 years of the plan period due to market factors and not a lack of sufficient supply (see response to Q 3.3 vii). This is evidenced in Table PPA5 where there are separate rows for the forecast cumulative completions, and the cumulative target at each year. The forecast of delivery for each year, illustrated by the red Monitor line in Graph PPA2B, is therefore above the X axis for all years after 2018/19. See response to Q 7.6v below regarding shortfall and the 5 year supply land position.

d. **Manage** Graph PPA2A, based on Table PPA5, provides evidence that at this time supply does not need to be brought forward from later in the plan period in
the PPA. The orange Manage line is not a ‘hockey stick’ shape. In fact, it is quite the opposite. This means that at the end of the plan period the Manage line is below the X axis and curves steeply downwards. This occurs because the requirement is forecast to be met from supply delivered earlier in the plan period, and requirement is met before the end of the plan period. It is proof that supply is not back loaded. It is also evidence that there is sufficient flexibility if in future supply needs to be brought forward, were delivery of some sites not to occur when forecast.

A6.68 The plan sets out the approach to managing housing land supply.

1. JLP Paragraph 3.32 outlines the Housing Implementation Strategy whereby the LPAs will undertake proactive actions to assist developers to bring sites forward as effectively and efficiently as possible, from the supply sources already identified in the trajectory. This approach enhances the flexibility of supply. The Housing Implementation Strategy for the full range of housing describes how the JLP Councils will maintain delivery of a five-year supply of housing land to meet their housing target (NPPF para 47 4th Bullet Point). The Topic Paper on the Governance and Implementation of the JLP January 2018 identifies the mechanisms for collaborative working by the JLP Councils to undertake the proactive actions in that Strategy.

2. Ample site allocation provision is made within PPA by the site allocation policies in the JLP. This provision of 16,244 dwellings with a range of sites (locations, type and size) consistent with the JLP spatial strategy provides greater certainty of policy intention. This supply category is equivalent to 85% of target; and to 79% of supply. This overall level allocation is a major reason why forecast overall supply is sufficient. It is an effective way to manage risk. In the event that some sites don’t come forward there is sufficient provision identified. The Councils consider their forecasts to be robust but acknowledge that it is not possible to guarantee that a site will definitely be delivered.

3. At the 2017 monitoring point it is also worth noting that some 9,424 dwellings in the PPA (Table PPA4) already has planning consent. This in itself represents planning consent attained for 50% of the housing requirement in the PPA or 62% of the housing requirement when including dwellings already completed in the period 2014-17.

4. The mix of sites in the PPA in terms of the range of supply sources/categories also contributes to the flexibility of the trajectory. Figures 1a and 1b demonstrate that supply over time is not dependent on a single supply category. This mix in itself contributes to the inherent flexibility of the trajectory.

59 From the combination of commitments and JLP allocations
Figure 1a Housing supply by supply source and development status

Source TP3K – Table PPA4

Figure 1b Housing supply by development status and supply source

Source TP3K – Table PPA4
5. The JLP Councils’ forecast of housing delivery in the PPA is supported by the evidence regarding the level of agreement with the main developers and agents about the PPA site trajectories (see TP3H) agreement. This evidence identifies sites forecast for delivery in years 6-10. On some of these sites, the developers/landowners consider that delivery could come forward earlier. Whilst the JLP Councils’ PPA trajectory does not rely on this, such sites could add to flexibility of supply by coming forward earlier were other PPA sites not to deliver as forecast.

6. The JLP does not allocate contingent reserve sites to be brought forward, or trigger mechanisms to release such sites for development. The plan already allocates sufficient sites to provide ‘headroom’ at an appropriate level of confidence and degree of flexibility in the supply figures. It is not necessary to make further provision.

7. There is no general phasing policy in JLP to restrict timing of development sites coming forward. So if a site is not delivered when predicted in the trajectory, other sites currently shown later in the forecast could be brought forward to meet need, unless specific policy requirements preclude this.

8. The JLP provides the policy context for the Councils to determine windfall development proposals. The trajectory includes a forecast of delivery from small, non-garden land windfalls which adds to flexibility.

9. The PPA trajectory doesn’t include a forecast of future large windfall developments permitted after March 2017 because the JLP makes sufficient provision and therefore it is not necessary to include this supply category at this time. Nevertheless, such sites continue to come forward and it is reasonable to expect them to add to supply in the plan period. They will add to the forecast supply in PPA. Such sites would add to supply and to the level of flexibility already provided by the trajectory. Some of these may be sites that were assessed for SHLAA purposes as sites with constraints or unviable where those matters might be overcome in the future or which had been unavailable but which may come forward through future SHLAA updates and become available. The emerging Brownfield Register may be another tool to bring forward consents on qualifying opportunity sites in between plan review.

10. The commitment to review the JLP at least every 5 years from adoption is set out in JLP Paragraphs 1.22 and 7.28. Plan-making is the appropriate process for introducing changes to supply as part of the development plan. This is part of the management mechanism that enables delivery of housing supply to meet housing need, Regulations have been published to prescribe the time period for review of local development documents.

60 With regard to PY44 Woolwell, there is a link to infrastructure provision which affects timing of delivery.

61 THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) (AMENDMENT) REGULATIONS 2017

2017 No. 1244 – Regulation 4 (Amendment of Regulation 10A) “in respect of a local plan, the review must be completed every five years, starting from the date of adoption of the local plan.”
A6.69 **Maintaining supply does not mean** that the whole requirement must be delivered early in the plan period (although the PPA trajectory provides evidence demonstrating that delivery rates in PPA are forecast to rise substantially in the immediate future from that achieved in recent years and demonstrates that the plan is boosting supply). Nor does it mean the annualised figure must be delivered each year. Any supply surplus compared to cumulative targets can be taken into account when considering the 5 year housing land supply for the next 5 years.

A6.70 **Demonstrating a 5 year housing land supply is a policy approach** in NPPF paragraphs 47 and 49 for maintaining housing supply. Graph PPA3 illustrates the ‘Rolling 5 year housing land supply’ analysis for the PPA (TP3K). This is based on Table PPA6 (TP3K) and shows the 5 YLS position at every year in the trajectory. For each year over the plan period it compares forecast housing delivery against the forecast targets for the next 5 years derived from Policy SPT3, and is based on the 2017 Monitoring point evidence from Tables PPA1 and PPA2.

A6.71 This evidence demonstrates that the JLP results in a robust supply position in the PPA, with a continuous supply being maintained over the plan period. That is, both at the point of adoption, and into the future. The graph shows that there is more than 5 years land supply in this Policy Area for all forecast years from 2017/18 to the point when the minimum target is achieved in 2031/32. The point of adoption is anticipated to be at the 2019 monitoring point, where the trajectory forecasts a supply in PPA of 5.4 years based on a 20% buffer. Supply would be 6.2 years with a 5% buffer. This is a healthy supply position. It is also a sign of sufficient flexibility this early in the plan period.

### 2. Maintaining Supply in the Thriving Towns and Villages Policy Area

A6.72 **Supply over the plan period.** The TP3L evidence demonstrates that supply can be maintained over the plan period. Graphs TTV2 (2a) and (2b) illustrate the ‘Plan Monitor Manage’ analysis of supply. They are based on the evidence of the combined completions totals across the policy area forecast for each year over the plan period. That evidence is set out in Table TTV2 (TP3L). The three analyses in this table provide demonstrate that supply is maintained. The graphs illustrate the trajectory and those analyses, whereby maintaining supply means that:

a. **Plan** The forecast supply in TTVPA (illustrated by the purple bars in graph TTV2a) is above the annualised target of 385 pa (the green Plan line) in every year from 2015/16 until 2029/30. At 2027/28 the minimum target is met. Delivery continues after that point, albeit at a lower rate. This provides a high level of flexibility. Even if supply is not delivered as quickly as forecast, with a 21% ‘headroom’ there are still reasonable prospects that the target will be achieved by the end of the plan period, or earlier from the supply sources identified at the 2017 Monitoring Point.

b. **Plan** The forecast future supply in TTVPA illustrated by the purple bars in Graph TTV2a also shows that supply is ‘front loaded’. That is, after the March 2017

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62 Due in no small part to Plymouth’s record of intervention and housing delivery outcomes addressing housing need and market failings.
Monitoring Point, there is a higher annual supply earlier in plan period notably in 2020/21 and 2021/22, compared to supply towards the end of the plan period. This is consistent with the NPPF objective to significantly to boost supply. Early delivery is supported by robust evidence in TP3I, which has been informed by evidence provided by developers about their intentions to submit planning applications in 2018 and for swift site starts. Front-loading is another indicator of flexibility. Early delivery reduces the risk of not achieving the target by 2034. The TTVPA does not depend on a high percentage of supply delivery much later in the plan period.

c. **Monitor** A surplus supply position is forecast over the whole plan period in the TTVPA. There are no years since 2014 when cumulative supply was or is forecast to be less than the cumulative target. This is evidenced in Table TTV2, which shows the forecast cumulative completions, and the cumulative target at each year. The forecast of delivery for each year, illustrated by the red Monitor line in Graph TTV2b, is therefore above the X axis for all years after 2014/15. This also means there is no shortfall (backlog) at any time that would need to be met in future years. This is additional evidence that forecast supply can be maintained and the requirement delivered.

d. **Manage** Graph TTV2a, based on Table TTV2, provides evidence that at this time supply does not need to be brought forward from later in the plan period in the TTVPA. The orange Manage line is not a 'hockey stick' shape. In fact, it is quite the opposite. This means that at the end of the plan period the Manage line is below the X axis and curves steeply downwards. This occurs because the requirement is forecast to be met from supply delivered earlier in the plan period, and requirement is met before the end of the plan period. It is proof that supply is not back loaded. It is also evidence that there is sufficient flexibility if in future supply needs to be brought forward, were delivery of some sites not to occur when forecast.

A6.73 The plan set out the approach to managing housing land supply.

- JLP Paragraph 3.32 outlines the Housing Implementation Strategy whereby the LPAs will undertake proactive actions to assist developers to bring sites forward as effectively and efficiently as possible, from the supply sources already identified in the trajectory. This approach enhances the flexibility of supply. The Housing Implementation Strategy for the full range of housing describes how the JLP Councils will maintain delivery of a five-year supply of housing land to meet their housing target (NPPF para 47 4th Bullet Point). The Topic Paper on Governance and Implementation (TP6 January 2018) identifies the mechanisms for collaborative working by the JLP Councils to undertake the proactive actions in that Strategy.

- Ample site allocation provision is made within TTV Policy Area by the site allocation policies in the JLP. This provision of about 5,300 dwellings with range of sites (locations and size) consistent with the JLP spatial strategy, and to provide greater certainty of policy intention. This supply category is equivalent to 69% of target; and to 57% of supply. This overall level allocation is a major reason why forecast overall supply is sufficient. It is an effective way to manage risk. In the event that some sites don’t come forward there is sufficient provision identified. The Councils consider their forecasts to be robust but acknowledge that it is not possible to guarantee that a site will definitely be delivered.
The mix of sites in the TTVPA in terms of the range of supply sources also contributes to the flexibility of the trajectory with supply in TTVPA coming from the range of supply categories. Figures 2a and 2b demonstrates that supply is not dependent on a single supply category. This mix in itself contributes to the inherent flexibility of the trajectory.

**Figure 2a Housing supply by supply source and development status**

![Figure 2a Housing supply by supply source and development status](image)

Source TP3L – Table TTV4

**Figure 2b Housing supply by development status and by supply source**

![Figure 2b Housing supply by development status and by supply source](image)

Source TP3L – Table TTV4
The JLP does not allocate contingent reserve sites to be brought forward, or trigger mechanisms to release such sites for development. The plan already allocates sufficient sites to provide ‘headroom’ at an appropriate level of confidence and degree of flexibility in the supply figures. It is not necessary to make further provision.

There is no phasing policy in JLP to restrict timing of development sites in the Thriving Towns and Villages Policy Area coming forward. So if a site is not delivered when predicted in the trajectory, other sites currently shown later in the forecast could be brought forward to meet need. These could include sites that were forecast for delivery later in the plan period in order for the combined trajectory at a settlement to be realistic (TP3I).

The JLP provides the policy context for the Councils to determine windfall development proposals. The trajectory includes a forecast of delivery from small, non-garden land windfalls which adds to flexibility. The TTVPA trajectory doesn’t include a forecast of future large windfall developments permitted after March 2017 because the JLP makes sufficient provision and therefore it is not necessary to include this supply category at this time. Nevertheless, such sites continue to come forward and it is reasonable to expect them to add to supply in the plan period. They will add to the forecast supply in TTVPA. For example, planning application 2821/17/FUL for the conversion of Fort Bovisand, including 81 dwellings, was approved with conditions by South Hams DC Development Management Committee on 29 November 2017. Such sites add to supply and to the level of flexibility already provided by the trajectory. Some of these may be sites that were assessed for SHLAA purposes as sites with constraints or unviable where those matters might be overcome in the future or which had been unavailable but which may come forward through future SHLAA updates and become available. The emerging Brownfield Register may be another tool to bring forward consents on qualifying opportunity sites in between plan review.

The mechanism for managing supply from the Sustainable Villages Allowance supply category is set out in Submission JLP paragraph 5.157. Addendum) paragraphs 7.72 to 7.80 - explains why this approach is an appropriate way to manage supply and provides flexibility.

Commitment to review at least once every 5 years from adoption is set out in JLP Paragraphs 1.22 and 7.28. Plan-making is the appropriate process for introducing changes to supply as part of the development plan. This is part of the management mechanism that enables delivery of housing supply to meet housing need.

Maintaining supply does not mean that the whole requirement must be delivered early in the plan period (although our the trajectories provide evidence demonstrating that delivery rates in TTVPA are forecast to rise from now to a peak in 2020/21 and 2021/22 and demonstrates that the plan is boosting supply). Nor does it mean that the annualised figure must be delivered each year. Any supply surplus compared to cumulative targets can be taken into account when considering the 5 year housing land supply for the next 5 years.

Demonstrating a 5 year housing land supply is a policy approach in NPPF paragraphs 47 and 49 for maintaining housing supply. Graph TTV3 illustrates the ‘Rolling 5 year housing land supply’ analysis for the TTVPA (TP3L). This is based on Table TTV3 (TP3L) and shows the 5 YLS position at every year in the trajectory. For each year over the plan period it compares forecast housing delivery against the forecast targets for the next 5 years derived from Policy SPT3, and is based on the 2017 Monitoring point evidence from Table TTV2.
A6.76 This evidence demonstrates that the JLP results in a robust supply position in the TTVPA, with a continuous supply being maintained over the plan period. That is, both at the point of adoption, and into the future. The graph shows that there is more than 5 years land supply in this Policy Area for all forecast years from 2014/15 to the point when the minimum target is achieved in 2027/28. The point of adoption is anticipated to be at the 2019 monitoring point, where the trajectory forecasts a supply in TTVPA of 8.0 years based on a 20% buffer. Supply would be 9.1 years with a 5% buffer. This is a very healthy supply position. It is also a sign of considerable flexibility this early in the plan period.

A6.77 The evidence in TP3L demonstrates there is no backlog of supply delivery in TTVPA at any time after the 2017 monitoring point. So it is not necessary to consider whether to apply a ‘Sedgefield’ or ‘Liverpool’ approach to resolving a backlog.
Appendix 7.1

SOURCES OF HOUSING SUPPLY (2017 Monitoring Point)

Delivery from completions 2014-2017

A7.1 Completions are dwellings built 1 April 2014 to 31 March 2017. The three Local Planning Authorities have drawn on their monitoring of development over these years. The authorities capture and record information in different ways but when compiled this enables the net completions data to be provided, which can be compared against the net housing provision targets.

A7.2 In the Plymouth Policy Area trajectories, the completions for the individual sites are shown as gross (ie without demolitions having been deducted) but the summary table below the site lists has a separate line for demolitions. Consequently this is deducted from the completions to give the net total forecast supply for each year which is used for the Plan-Monitor-Manage table and calculations, and for the rolling 5 year housing land supply table and calculations.

A7.3 In the Thriving Towns and Villages Policy Area, the completions for the individual large sites and for the aggregated small sites are net completions (ie demolitions have already been deducted. Therefore there is no separate row for demolitions in the summary table for this Policy Area.

A7.4 Small sites, including small conversions for the Plymouth Policy Area and the Thriving Towns and Villages Policy Area are listed in the tables in Appendix 7.1a and Appendix 7.1b respectively and the summations for small sites commitments and completions are included in the separate trajectories (March 2017 Monitoring Point) for the two Policy Areas. (TP3E, TPF3F and TP3G). The latest trajectories (TP3J, TP3K and TP3L) also include this information.
Appendix 7.1a

Plymouth City Small sites – Dwelling Completions 2014/15 to 2016/17

See TP3(rev)

Appendix 7.1b

South Hams Small sites - Dwelling Completions 2014/15, 2015/16, and 2016/17

See TP3(Rev)

Appendix 7.1b

West Devon Dwelling Completions 2014/15, 2015/16 and 2016/17

See TP3(rev)
Appendix 7.2

Delivery from commitments (planning permissions) as at 1 April 2017

A7.5 Information about commitments from planning permissions that had not lapsed on large sites as at 1 April 2017 is set out on the housing trajectories for the Plymouth Policy Area and for the Thriving Towns and Villages Policy Area.

A7.6 The trajectories forecast the delivery of those commitments, informed by analysis in the SHELAA, as well as contemporary information from the development management process (eg the discharge of conditions; as well as further information from the developers and house-builders.

A7.7 Commitments are listed for each large in the Plymouth PA trajectory, with a global total of the small sites in PPA shown on the trajectory. The table in Appendix 7.2a lists the small site commitments in Plymouth City.

A7.8 Commitments are listed for each large site in the Thriving Towns and Villages PA, with a global total of the small sites in the South Hams and in West Devon shown on the trajectory. The tables in Appendix 7.2b and c list the small site commitments in South Hams LPA and in West Devon LPA respectively.

A7.9 The forecast of commitments takes account of the application of lapsed rates, for each Policy Area, to those sites where development had not started. The lapsed rate is 10% for Plymouth PA (see Appendix 7.3a) and 15% for the Thriving Towns and Villages PA (see Appendix 7.3b). These are applied to small sites.

Appendix 7.2a

Schedule Plymouth City Small Site Commitments at End March 2017
(sites with 4 units or less)
See TP3(rev)

Appendix 7.2b

Schedule South Hams Small Site Commitments at End March 2017
(sites with 9 units or less)
See TP3(rev)

Appendix 7.2c

Schedule of West Devon Small Site Commitments at End March 2017
(sites with 9 units or less)
See TP3(rev)
Appendix 7.3a

Plymouth City Lapse rates

See TP3(rev)

Appendix 7.3b

Lapse Rates – Thriving Towns and Villages Policy Area

See TP3(rev)
Delivery from windfalls

A7.21 The following tables provide evidence of the forecast of housing supply from small windfall development in the future (sites not permitted as at 2016). This uses historic evidence from which to calculate an annualised rate of delivery.

A7.22 In The Thriving Towns and Villages Policy Area, the historic rate of 48 per year is moderated:

- First by discounting a limited number of agricultural workers dwellings and some certificates of lawful use recorded in South Hams, to ensure consistency with the West Devon data (which brings the rate down to about 40 pa)

- And then by discounting the potential supply on small sites that may be delivered through the Neighbourhood Plan Allowance supply category (as amended by Appendix 7.6 Annex 1 in this Addendum), in order to avoid overlap.
<table>
<thead>
<tr>
<th>Year</th>
<th>Total demolitions recorded in delivery of dwellings table</th>
<th>Of this total the Number of demolitions that were under 5 dwellings</th>
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<tr>
<td>2006/07</td>
<td>113</td>
<td>1</td>
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<tr>
<td>2007/08</td>
<td>13</td>
<td>1</td>
</tr>
<tr>
<td>2008/09</td>
<td>94</td>
<td>0</td>
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<tr>
<td>2009/10</td>
<td>141</td>
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<td>6</td>
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<td>2015/16</td>
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<td>2016/17</td>
<td>143</td>
<td>2</td>
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<tr>
<td></td>
<td>1080</td>
<td>23</td>
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Annual average demolitions = 2.1 pa  Average Windfall Allowance (43) minus average demolitions under 5 (2.1) = 40.9 Dwellings
South Hams and West Devon development on small windfall sites

<table>
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<tr>
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<td>South Hams</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Windfall Completions on sites less than 10 dwellings:*</td>
<td>111</td>
<td>65</td>
<td>70</td>
<td>86</td>
<td>63</td>
<td>63</td>
<td>434</td>
<td>72</td>
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<td></td>
</tr>
<tr>
<td>Number of windfall completions that are Garden Development:</td>
<td>30</td>
<td>23</td>
<td>15</td>
<td>18</td>
<td>16</td>
<td>15</td>
<td>117</td>
<td>20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Windfalls Excluding Garden development:</td>
<td><strong>(81)</strong></td>
<td><strong>50#</strong></td>
<td><strong>42</strong></td>
<td><strong>55</strong></td>
<td><strong>44</strong></td>
<td><strong>47</strong></td>
<td><strong>286</strong></td>
<td><strong>48</strong></td>
<td>-1</td>
<td>45 to 47 pa</td>
</tr>
<tr>
<td>West Devon</td>
<td></td>
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<td></td>
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<tr>
<td>Windfall Completions on sites less than 10 dwellings:*</td>
<td>42</td>
<td>28</td>
<td>33</td>
<td>26£</td>
<td>51$</td>
<td>53</td>
<td>233</td>
<td>39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of windfall completions that are Garden Development:</td>
<td>13</td>
<td>21</td>
<td>7</td>
<td>12</td>
<td>25</td>
<td>5</td>
<td>78</td>
<td>17</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Windfalls Excluding Garden development:</td>
<td><strong>29</strong></td>
<td><strong>9</strong></td>
<td><strong>6</strong></td>
<td><strong>14</strong></td>
<td><strong>26</strong></td>
<td><strong>48</strong></td>
<td><strong>132</strong></td>
<td><strong>22</strong></td>
<td>-10</td>
<td>10 to 11 pa</td>
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<tr>
<td>Thriving Towns and Village Total Windfalls Excluding Garden development:</td>
<td><strong>79</strong></td>
<td><strong>51</strong></td>
<td><strong>61</strong></td>
<td><strong>58</strong></td>
<td><strong>83</strong></td>
<td><strong>96</strong></td>
<td><strong>418</strong></td>
<td><strong>70</strong></td>
<td>-11</td>
<td>55 to 58 dpa</td>
</tr>
</tbody>
</table>

Notes:
- * Includes conversions on sites of less than 10 dwellings
- $ Excludes dwellings at Brook Lane (recorded as small site, but part of large site development)
- # Likely that some of the completions recorded in 2011/12 occurred in 2010/11 so 2011/12 total reduced to 50 (figure in bracket is recorded total)
- £ West Devon excludes some agricultural dwellings
- @ see Appendix 7.6 Annex 1 for the amended explanation about reducing the small windfalls forecast to avoid overlapping and double counting with the Sustainable Villages allowance supply category forecast
Appendix 7.5

**Delivery from Allocations**

A7.23 The potential for delivery of housing supply from individual site allocations is recorded in the housing trajectories for the two Policy Areas.

**Plymouth and South West Devon Joint Local Plan Allocations – Net Number of dwellings forecast to be delivered in the plan period**

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<td>100</td>
<td>145</td>
<td>129</td>
<td>630</td>
<td>723</td>
<td>752</td>
<td>823</td>
<td>1,157</td>
<td>1,640</td>
<td>1,058</td>
<td>1,101</td>
<td>1,134</td>
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<td>937</td>
<td>871</td>
<td>901</td>
<td>869</td>
<td>702</td>
<td>672</td>
<td>16,244</td>
</tr>
<tr>
<td>Thriving Towns and Villages PA</td>
<td>0</td>
<td>46</td>
<td>55</td>
<td>185</td>
<td>184</td>
<td>349</td>
<td>584</td>
<td>606</td>
<td>470</td>
<td>440</td>
<td>443</td>
<td>486</td>
<td>432</td>
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<td>270</td>
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<td>85</td>
<td>55</td>
<td>40</td>
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<td>5,328</td>
</tr>
<tr>
<td>TOTAL</td>
<td>100</td>
<td>191</td>
<td>184</td>
<td>815</td>
<td>907</td>
<td>1,101</td>
<td>1,407</td>
<td>1,763</td>
<td>2,110</td>
<td>1,498</td>
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<td>986</td>
<td>924</td>
<td>742</td>
<td>687</td>
<td>21,572</td>
</tr>
</tbody>
</table>

Source: TP3K and TP3L

*The Plymouth Policy Area total of 16,244 excludes 1,686 dwellings forecast to be completed after end March 2034. 16,244 is net of 464 demolitions (98 in 2018/19; 113 in 2019/20; and 253 in 2020/21)

A7.24 It is emphasised that the allocations are grouped together in the trajectories, to assist the reader. Some allocations now have planning permission.

A7.25 For the avoidance of doubt, the counts of commitments and completions in the main tables for the trajectory (the Summary used for Plan-Monitor Manage, and the Rolling 5 year housing land supply) do not include allocations. The allocations have a separate row.

A7.26 In each of the housing trajectories, the summary table with the Housing supply categories clearly shows how many dwellings have been permitted or built on site allocations.
Appendix 7.6

Delivery from Neighbourhood Plans Allowance

See TP3(rev)
IMPLICATIONS OF THE INSPECTORS’ POST HEARING ADVICE NOTE FOR THE CALCULATION OF THE SUSTAINABLE VILLAGES ALLOWANCE AND THE FORECAST OF SMALL WINDFALLS

JLP Figure 5.8

1. Submission JLP Figure 5.8 indicates levels of potential new housing in individual Sustainable Villages that are capable of coming forward through neighbourhood plans. The list of settlements in Figure 5.8 includes settlements that are wholly or partly in the Areas of Outstanding Natural Beauty (AONBs).

Inspectors’ Post Hearing Note and JLP Councils response

2. Figure 5.8 was discussed at the Examination hearings in February/March 2018. The Inspectors Post Hearing Advice Note (EXC15) was published on 15 August 2018. Paragraph 7 of the Note states that unless clear evidence is available now, settlements within the AONBs should be removed from Figure 5.8 and this should be set out as a MM (Main Modification).

3. The JLP Councils’ response to the Post Hearing Advice Note is set out in their letter of 23 August 2018 (document EXC16). This confirms that the Councils accept the changes to the JLP that have been set out in the Note. The Councils propose a Main Modification to the JLP which excludes AONB villages from the list in Table 5.8 because no further evidence is available now. This proposes the removal of 37 settlements that are wholly or partly in the AONBs from the list of settlements with indicative number of dwellings in JLP Table 5.8.

4. As a consequence of that response, it then became necessary for the JLP Councils to consider whether further changes to the Plan were needed. In particular, any consequential changes to the following aspects of housing supply:
   - the forecast of housing supply relating to the Sustainable Villages Allowance and the Small Sites Windfall Allowance that are included in the housing trajectory for the Thriving Towns and Villages Policy Area; and
   - the forecast of affordable housing delivery.

Appendix 7.6 – Change to the forecast delivery from the Sustainable Villages allowance

5. Appendix 7.6 in the Housing Topic Paper (TP3) provided the evidence of the forecast potential to deliver 720 dwellings in the plan period through the Neighbourhood Plans process. That forecast was revised in Appendix 7.6 in the Revised Housing Topic Paper (TP3 (Rev)) which provided the evidence of the forecast potential to deliver 650 dwellings in the plan period through the
Neighbourhood Plans process. That was the source of the 650 dwellings Sustainable Villages (Neighbourhood Plan) Allowance supply category shown in Table 12c in TP3(rev) and in TTVP trajectory TP3G. Appendix 7.6 included the potential for supply from sites at settlements wholly or partly in the AONBs, as part of the 650 dwellings total in this supply category.

6. The JLP Councils consider that, for the purposes of forecasting supply as part of the JLP evidence base, removing the AONB settlements from Table 5.8 would impact on the justification of the scale of delivery in this supply category for the following reasons:

a) without an indicative number in Table 5.8 to guide Neighbourhood Plan Groups, there is potentially a greater risk that fewer Neighbourhood Plans for settlements in the AONB would chose to allocate housing sites or make other provision to accommodate housing growth such as identifying or extending settlement boundaries, Whilst removing the AONB settlements from Table 5.8 does not prevent Neighbourhood Plan Groups from allocating sites, it does increase the burden of proof on the NPGs to justify the scale of housing growth proposed in their plan. This could be regarded as a disincentive to plan-making at the Neighbourhood Plan level; and

b) removing the indicative number for settlements also removes the reason used in TP3(rev) Appendix 7.6 to broadly limit the total scale of housing growth at individual settlements that was being counted towards the Allowance. It removes the basis for assessing what is reasonable if supply at an AONB settlement were to continue to be included in the count. Moreover, without the threshold level to confirm that the forecast supply potential at individual settlements is reasonable, the robustness of the justification for the scale of this allowance would then be considerably diminished.

7. For these reasons the JLP Councils conclude that it would not be prudent to continue to include potential housing supply from those AONB settlements in the Sustainable Villages allowance, unless there is specific site evidence to support forecast supply delivery for individual AONB settlements this category. Specific site evidence would come from:

- Neighbourhood Plan proposals (eg allocations or settlement boundary changes that can accommodate growth) for Plans that are at more advanced stages (eg Regulation 14 or later); supported by evidence about:
  - The Neighbourhood Plan’s site identification and selection process
  - delivery potential (eg SHLAA and/or other sources of owner or developer interest)
  - planning applications – including any sites with decision notices demonstrating that the site has received permission.
Impact on the Sustainable Villages Allowance

A. Deletion of sites that had been counted in Appendix 7.6

8. Deleting settlements that are in the AONB from Table 5.8 and omitting large sites at those settlements that that had been counted as potential large sites supply in TP3(rev) Appendix 7.6 and which do not have site specific evidence to support forecast supply would remove 4 sites totalling 95 dwellings from the Sustainable Villages Allowance. These 4 sites are listed in New Table ADD12.
## LARGE SITES AT SETTLEMENTS IN AONBS THAT WERE IN TP3(rev) APPENDIX7.6 BUT ARE TO BE EXCLUDED FROM THE SUSTAINABLE VILLAGES (NEIGHBOURHOOD PLAN) ALLOWANCE CALCULATION

<table>
<thead>
<tr>
<th>Village</th>
<th>% of settlements in AONB</th>
<th>Neighbourhood Plan-stage completed</th>
<th>SHELAA Reference</th>
<th>Notes</th>
<th>Yield (before sieves applied)</th>
<th>AONB</th>
<th>Landscape Impact</th>
<th>OK?</th>
<th>Exclude quantum : cumulative count for Settlement is well above minimum*</th>
<th>Supply Potential - Quantum counted in Neighbourhood Plan Allowance supply in JLP Trajectory</th>
<th>Supply potential to be discounted from windfall supply in JLP Trajectory</th>
<th>Large sites counted in SVNPA now to be discounted as they are at AONB settlements &amp; not meeting criteria in Annex 1 Para7</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aveton Gifford</td>
<td>90</td>
<td>Reg 7 Area Designation</td>
<td>SH_02_04_16 Land North of Village Centre, Aveton Gifford</td>
<td>Residential subject to landscape impact, flood risk and the provision of pedestrian access to village. 2.1ha</td>
<td>30+</td>
<td>Site is in setting of AONB but settlement is in AONB</td>
<td></td>
<td>Yes</td>
<td>Locally significant views of northern section from immediate east. Fine subject to low density (&lt;20dph) and mitigation (design &amp; landscaping.</td>
<td>30</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>Bigbury</td>
<td>100</td>
<td>Reg 7 Area Designation</td>
<td>SH_05_13_16, Fields 5227 and 6131 Chapel Farm, St Ann's Chapel, Bigbury, TQ7 4HQ</td>
<td>Limited extent of site suitable due to landscape impact and topography. 2.82ha</td>
<td>50</td>
<td>Yes</td>
<td>15</td>
<td>Maybe, reduce</td>
<td>Southern extents of site only. Low-density small scale development. Significant landscaping required</td>
<td>15</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td>Brixton</td>
<td>50</td>
<td>Reg 15</td>
<td>SH_07_10_14/16, Land to the south of The Crescent, Brixton</td>
<td>Subject to suitable access could provide for a modestly scaled residential development. 1.16ha</td>
<td>20</td>
<td>Yes</td>
<td>20</td>
<td>Yes</td>
<td>Probably the best option in Brixton. Reasonable well contained. Low density.</td>
<td>20</td>
<td>20</td>
<td>20</td>
</tr>
<tr>
<td>Stoke Gabriel</td>
<td>100</td>
<td>Reg 7 Area Designation</td>
<td>SH_52_09_16, Field at Crowley Lane, Stoke Gabriel</td>
<td>Limited constraints. Potential for residential or employment uses subject to the provision of a pedestrian link to the village. 1.29ha</td>
<td>30</td>
<td>Yes</td>
<td>30</td>
<td>Yes</td>
<td>No principle issue but concern over quantum of development at Stoke Gabriel if these sites and permitted were to be built out.</td>
<td>30</td>
<td>30</td>
<td>30</td>
</tr>
</tbody>
</table>

**TOTAL** 95
B. Addition of new sites and additional capacity not previously counted in Appendix 7.6 for the Sustainable Villages (Neighbourhood Plan) Allowance

9. There is sufficient robust evidence to **justify adding 50 dwellings to the Sustainable Villages Allowance** based on the additional potential supply capacity from the following five sites listed in New Table ADD13:

NEW TABLE ADD13

<table>
<thead>
<tr>
<th>Site</th>
<th>Additional Site capacity</th>
<th>Source: Neighbourhood Plans</th>
<th>Additional evidence to support justification for inclusion in the NPA allowance in the 2017 Monitoring Point trajectory</th>
<th>No of affordable dwellings</th>
</tr>
</thead>
</table>
| Land at Steer Point Road, Brixton | 6 | Brixton Neighbourhood Plan 27 June 2018 Reg 15 Submission of Plan proposals to LPA Dev9. The land identified on Dev Map 2, in the ownership of South Hams District Council, is allocated for Affordable Housing for local people in perpetuity BPNP Group Response to SHDC Consultation Responses to Reg 14 First Draft Brixton Parish Neighbourhood Plan - April 2018 “Since Regulation 14, the BPN Plan has been updated to include land owned and put forward by SHDC for the provision of community housing. It is anticipated that it might deliver the required number of dwellings for Brixton as a ‘sustainable village’.” (Note- this post dates TP3(rev) so this site was not included in Appendix 7.6) | The Neighbourhood Plan proposes allocating the site for affordable-led housing. This site is owned by South Hams DC. It lies within the existing development boundary in the adopted South Hams LP (and within the draft settlement boundary consulted on by the JLP Councils). The District Council as land owner anticipates that the site capacity will be of the order of 6 dwellings (5 of which would be affordable). For JLP trajectory purposes, it is therefore now reasonable to count this site towards the Sustainable Villages allowance because:  
  - clearly Neighbourhood Plan preparation has taken this site into account and identifies it as a development allocation proposal at Reg 15 stage, for meeting local housing need in Brixton;  
  - the JLP does not allocate this site because it does not allocate sites in Sustainable Villages. So there is no double counting with the JLP allocations already included in the housing trajectory in TP3G or in TP3L; and | +5 |
<table>
<thead>
<tr>
<th>Location</th>
<th>Change</th>
<th>Planning Application</th>
<th>Neighbourhood Plan</th>
<th>Neighbourhood Plan Details</th>
<th>JLP Allocation</th>
<th>Counting Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Portlemore Lane, Malborough (‘Land adjacent to Malborough Park’) SH_33_09_14</td>
<td>+10</td>
<td>0549/17/OPA</td>
<td>18 April 2017 Reg 17 Submission of plan proposal to Examination</td>
<td>The Neighbourhood Plan proposes allocating the site for housing (50 dwellings). Outline Planning Application 0549/17/OPA for the erection of circa 50 dwellings was granted conditional approval on 20 December 2017. The reserved matters planning application 1780/18/ARM for the scale, appearance, landscaping and layout of 50no. dwellings was validated on 25 May 2018 and is pending decision. For JLP trajectory purposes, it is therefore now reasonable to count this site towards the Sustainable Villages (Neighbourhood Plan) allowance based on 50 dws (ie a net +10 above the forecast in TP3(rev) Appendix 7.6) because: clearly Neighbourhood Plan preparation has taken this site into account and identifies it as a development allocation proposal at Reg 17. the JLP does not allocate this site because it does not allocate sites in Sustainable Villages. So there is no double counting with the JLP allocations already included in the housing trajectory in TP3G or in TP3L; and net +3 additional to the count in TP3(rev) Table TTV8 Total no of affordable dws = 16</td>
<td>38</td>
<td>-10</td>
</tr>
</tbody>
</table>
| Land at Parsonage Farm, Newton Ferrers SH_37_02_13, | +12  
(Note: site capacity is now 12 dws. 10 dws were previously counted in Appendix 7.6 as a ‘small site’ – see also the site deletion in New Table ADD14)) | Newton and Noss Neighbourhood Plan  
19 July 2018 Reg 18 A - Plan ‘Made’  
25 July 2018 Reg 19 & 20 – Decision Statement published  
“4.4 It is proposed to retain the existing Settlement Boundaries, subject to the modifications for the Newton Ferrers Boundary set out below:  
• ……  
• to extend the Boundary around the field to the north of Parsonage Farm (see B on the map on page 13)  
4.5 The field north of Parsonage Farm was granted outline permission for 6 four bedroom homes and 6 small ‘Affordable Homes’ in June 2017.... “ | The Neighbourhood Plan has extended the settlement boundary at Newton Ferrers to include this site. This is a positive change. Being within the settlement boundary means that the site is not part of the countryside, and it is subject to Policy N3P-1 a) Development will be permitted within the settlement boundaries shown on the Proposals Map............ The policy would enable the land to be considered for development.  
Outline Planning Application 3139/16/OPA on this site was granted conditional approval for 12 dwellings (including 6 affordable units for the over 55s) on 22 February 2018 (decision notice date).  
For JLP housing trajectory purposes, it is therefore now reasonable for to count this site towards the Sustainable Villages (Neighbourhood Plan) allowance because:  
• although this site is not allocated by the Neighbourhood Plan, that Plan has extended the settlement boundary at Brixton to include the site in order to provide for growth. Clearly Neighbourhood Plan preparation has made provision for the land to be considered for growth even if the recent planning permission on this site were to expire;  
Net + 3 additional to the count in TP3(rev) Table TTV8  
Total no affordable dws = 6 |
| Land at Holywell Farm (land to rear of Holywell Stores) St Ann’s Chapel (‘part of Site 4’) | 13 | Bigbury Parish Neighbourhood Plan. This plan is approaching Reg 14 stage. Extracts from the published BPNP Note on potential sites for future housing state that: “The Neighbourhood Plan Steering Group initially looked at all the sites in Bigbury Parish which had come forward following South Hams Council’s ‘Call for Sites’. These included 6 around St Ann’s Chapel, 2 either side of Houghton Farmhouse, 2 on the outskirts of Bigbury Village, 2 on the outskirts of Bigbury on Sea and 1 at Challaborough…..” “St Ann’s Chapel is the only village regarded as being sustainable and all sites, other than those around St Ann’s | This site was included in the assessment of potential sites TP3 Appendix 7.6 (see site SH_05_09_14/16), but the site supply was counted as NIL so did not contribute to the forecast of 650 dws supply from the Sustainable Villages (Neighbourhood Plan) Allowance category. SHLAA (HO4 A) had assessed the site as limited constraint - there could be potential for residential and possibly B1 employment uses. But the assessment in Appendix 7.6 of the landscape impact of site SH_05_09_14, states that the impact is “Too significant; open coastal landscape, far reaching expansive views, skyline development.” Since that analysis for TP3 (and TP3(rev)), work has progressed for Neighbourhood Planning purposes. Through the process of site identification, Site 4 – Land at Holywell Far, St Ann’s Chapel (in the parish of Bigbury) for a | +8 |
Chapel, were considered unsuitable due to this and other issues...."

“South Hams DC asked the Steering Group as part of their neighbourhood plan to look for a site suitable for 10-12 dwellings. The Steering Group looked more closely at all of the sites around St Ann’s Chapel, including that shown orange on the plan, to see which site would be best in terms of:

- access by vehicles and impact in particular on the dangerous junction at St Ann’s Chapel,
- safe routes for pedestrians (particularly children) to the facilities we have at St Ann’s Chapel,
- impact on the landscape and ecology including loss of important Devon hedgerows, and
- impact on outlook, important views or other types of residential amenity.”

The analysis of each site is set out in detail in the note (and accompanied by the Site Analysis Matrix).

The conclusion in that Note is as follows:

“The Steering Group having looked carefully at the six sites available around community-led housing scheme has emerged as the ‘best site’. It has been the subject of community consultation, and has received community support.

Furthermore, the Minutes of the Bigbury Parish Neighbourhood plan Steering Group meeting of 31 July 2018 provides evidence that:

- “a meeting had been held with Roger English, AONB Unit to discuss the proposed development on Site 4. Mr English had no objections to the proposed development subject to providing appropriate landscaping and ensuring that the proposed development was carried out in a manner which fitted in well with its setting.
- Heads of Terms for the land option agreement had been agreed with the landowners and Solicitors had been appointed to prepare the Agreement. SHDC and the management consultants, Arcadis were in the process of appointing consultants. Most of those previously appointed would be retained. Valerie Scott has been appointed as the Planning Consultant. An initial meeting had been arranged for Wednesday, 1st August 2018 which Valerie Scott would be attending. Amongst other matters the Architects will be asked to prepare a revised layout for further discussion with the landowners and for discussion with the local community. The local community event will hopefully be arranged for a date towards the end of September 2018.”
St Ann's Chapel considered that **part of Site 4**, ie that part to the rear of The Holywell Stores, would be the best site. A Neighbourhood Plan community event was held on 17 June 2017 to discuss the options for new housing to meet local needs. This was attended by over 50 people. All of the sites referred to above were discussed and people entitled to vote which was most of those in the hall were then given voting slips to put in a ballot box before they left.

The community voted overwhelmingly in favour of Site 4.

**Minutes of Bigbury Parish Council 12 June 2018 on Site 4 reported that**

"Valerie Scott said that there had been a number of discussions with the land owners, who had now agreed to go ahead with the proposal based on a scheme of 13 dwellings which would include the landowner being provided with two serviced sites to include the provision capable of accommodating two three bedroom dwellings. SHDC would pay for the cost of the foundations and the landowner would pay for the rest of the construction costs. This means that we can now move forward with updating the design concept and then having consultations with the local community and further consultations with SHDC Planning and Design Officers."

Further advice from South Hams DC indicates that the anticipated site capacity could be of the order of 13 dwellings, of which 8 would be affordable.

For JLP housing trajectory purposes, it is therefore now reasonable to count this site towards the Sustainable Villages (Neighbourhood Plan) allowance because:

- The site has emerged through a site identification and assessment process, and there is evidence that there are reasonable prospects of the site being proposed to be allocated for housing development in the Neighbourhood Plan, and reasonable prospects of delivery;
| **West of School Road, Stoke Fleming**<br>This is allocation site RA22 in the South Hams Rural Areas Site Allocations DPD and it is also SHLAA site SH_51_12_13 | **19**<br>Stoke Fleming Neighbourhood Plan: <br>**30 Jan 2018** Reg 15 Submission of Plan proposals to LPA <br>**2 Feb to 3 Apr 2018** - Reg 16 – Publicising a plan proposal <br>**3 May 2018** Submission of Plan proposal to examination<br>The Submission Neighbourhood Plan states: **Paragraph 8.3.4** “……….The Joint Local Plan sets out the amount of development in terms of housing required from rural communities such as Stoke Fleming. That requirement can be fully met through development of site H3 and the allocated site RA22 on School Road……..<br>**Appendix B** ……..Site SH 51 02 08/13 Field 0048, School Road, …….This site was considered suitable for development in the pre-submission draft of the Plan | **The Neighbourhood Plan takes account of this site in its consideration of housing supply because:**<br>a) it is currently allocated as Site Allocation RA22 in the adopted 2011 South Hams Rural Areas Site Allocations DPD (ie is currently part of the Development Plan); and<br>b) outline planning application 1554/17/OPA for 19 dwellings (13 age restricted dwellings and 6 affordable dwellings) was granted conditional approval on 8 May 2017). Since the Neighbourhood Plan was submitted for examination the Reserved Matters application 1109/18/ARM for 19 dwellings (13 age restricted dwellings and 6 affordable dwellings) was granted conditional approval on 27 July 2018.)<br>**Appendix 7.6 had assessed this site as ‘limited potential’ due to landscape constraint and significant impact on landscape, although in the SHLAA (HO4D) the site was assessed as limited constraints – potential for 20 dwellings). Those** |
however since its inclusion planning permission has been granted for housing and care provision at School Road (Site SH_51_12_13) in view of the representations made by the community against further development in School Road and that the housing requirement of this plan and the Joint Local Plan will be met by site H4, it was agreed to remove this site from the plan.

(JLP Councils’ emphasis)

assessments have been superseded by the decision to grant planning permission for residential development for 19 dwellings.

For JLP housing trajectory purposes, it is therefore now reasonable to count this site towards the Sustainable Villages (Neighbourhood Plan) allowance because:

- although this site is not allocated by the Neighbourhood Plan, clearly Neighbourhood Plan preparation has taken allocation RA22 into account when assessing the need to allocate further sites for housing;
- the JLP does not allocate this site because it does not allocate sites in Sustainable Villages. So there is no double counting with the JLP allocations already included in the housing trajectory in TP3G or in TP3L; and
- planning permission has been granted on this site. That permission post dates the end March 2017 Monitoring Point. So there is no double-counting with the large site commitments already included in the housing trajectory in TP3G or in TP3L.

| TOTAL | 60 | +25 (net) |
10. Three of the five sites in New Table ADD13 were not listed in TP3(Rev) App 7.6, so there is no double counting for the total supply forecast in the trajectory. Two of the sites were listed but the site capacity has been amended as follows:

- The site on land at Parsonage Farm, Newton Ferrers was included but at 10 units it was considered to be a small site (and this led to a reduction of 10 dwellings in the TTVPA small windfall allowance). The site is now counted as 12 dwellings based on the site capacity evidenced by the recent planning permission. To avoid double counting, the 12 are counted as included in New Table ADD13 but the previous count of 10 dws from this site then has to be subtracted from this supply category in New Table ADD14.

- 40 of the 650 dwellings in this supply category counted in TP3G related to the site on Land adjacent to Malborough Park, Malborough. Malborough is in the AONB. However, not only is the site proposed for allocation in the Malborough Neighbourhood Plan, now submitted for Examination (Reg 17), but the application for 50 dwellings on this site was granted outline planning permission on 20 December 2017. A planning application for Reserved Matters for 50 dwellings has since been validated and a decision is pending. Based on this evidence, it is therefore reasonable for a supply of 50 dwellings relating to this large site to be included in the Neighbourhood Plan Allowance. This adds a further 10 dwellings to this supply category.

11. New Table ADD14 lists eight sites which were in TP3 (rev) Appendix 7.6. These are small sites at settlements in the AONB where their inclusion in the supply forecast cannot be justified in the absence of clear evidence relating to the AONB settlements, for the purposes of the housing trajectory. It also includes one site that should be excluded from the discount relating to small sites windfalls, as it is now a ‘large site’. The combined supply of these eight sites is 58 dwellings, comprising the following:

C1: Seven sites are in the South Hams LPA area (with a combined supply of 51 dwellings); plus

C2 One site is in the West Devon LPA area with a site capacity of 7 dwellings.

12. Spread across the 14 years forecast for future small windfalls, this results in the following changes that are included in Annex 7.4 in this Addendum

- South Hams reduction of 4 dpa in the discount from future small windfalls made in TP3L compared to the discount made in TP3G (reducing the discount from 5 to 1dpa). This results in the small windfalls ranging from 45 to 47 dpa across the 14 years where this supply category is forecast to deliver dwellings
- West Devon reduction of less than 0.5 dpa in the discount from future small windfalls made in TP3L compared to the discount made in TP3G (overall the discount remains broadly at 10dpa). This results in the small windfalls ranging from 10 to 11 dpa across the 14 years where this supply category is forecast to deliver dwellings.
### SMALL SITES AT SETTLEMENTS IN AONBS THAT WERE IN TP3 (rev) APPENDIX 7.6 BUT ARE TO BE EXCLUDED FROM THE SUSTAINABLE VILLAGES (NEIGHBOURHOOD PLAN) ALLOWANCE CALCULATION

<table>
<thead>
<tr>
<th>Village</th>
<th>% of settlements in AONB</th>
<th>Neighbourhood Plan stage completed</th>
<th>SHELAA Reference</th>
<th>Notes</th>
<th>Yield (before sieves applied)</th>
<th>AONB</th>
<th>Landscape Impact</th>
<th>OK?</th>
<th>Yield (reduced; omits sites not OK for AONB reasons; &amp; omits commitments at 31/3/16)</th>
<th>Exclude quantum: cumulative count for Settlement is well above minimum</th>
<th>Supply Potential - Quantum counted in Neighbourhood Plan Allowance supply in JLP Trajectory (TP3G)</th>
<th>Supply potential to be discounted from windfall supply in JLP Trajectory</th>
<th>Small sites in SVNPA now to be discounted as they are at AONB settlements &amp; not meeting criteria in Annex 1 Para 7 (but to be restored to small windfalls count)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diptford</td>
<td>100</td>
<td>N/A</td>
<td>SH_17_02_08/13, Glebe, Diptford</td>
<td>Development potential subject to heritage and landscape impact 0.23 Ha</td>
<td>5</td>
<td>Yes</td>
<td>Potential subject to access. Attractive area, would need high quality low density and sensitive design.</td>
<td>Yes</td>
<td>5</td>
<td>5</td>
<td>5</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Holbeton</td>
<td>100</td>
<td>No</td>
<td>SH_25_01_13, The Dartmoor Union Public House, Holbeton, Devon</td>
<td>Limited constraints. 0.19 Ha</td>
<td>3</td>
<td>Yes</td>
<td>Fine – Conservation Area though</td>
<td>Yes</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Kingswear</td>
<td>100</td>
<td>Reg 7 Area Designation</td>
<td>SH_30_01_08/13, Land off Brixham Road, Waterhead Brake, Kingswear</td>
<td>Constraints relating to topography, access and trees. Potential for some development.</td>
<td>5 AH</td>
<td>Yes</td>
<td>No principle landscape issues but topography, access, TPO trees – very unlikely, unwise to count in this exercise.</td>
<td>Yes</td>
<td>5 AH</td>
<td>5</td>
<td>5</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Loddiswell</td>
<td>100</td>
<td>Reg 7 Area Designation</td>
<td>SH_32_02_08/13, School Playing Fields, Loddiswell</td>
<td>Potential subject to the relocation of the school playing field.</td>
<td>10 AH</td>
<td>Yes</td>
<td>Potential, but unsure where playing field could be relocated.</td>
<td>Yes</td>
<td>10 AH</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Strete</td>
<td>100</td>
<td>Reg 7 Area Designation</td>
<td>SH_54_01_08/13, Village Centre Site, Strete</td>
<td>Potential for residential development on part of site subject to landscape and heritage constraints. 2.49 Ha</td>
<td>50</td>
<td>Yes</td>
<td>? Conservation impact. Unsure on landscape impact; within built pattern of village. Potential for very small-scale infill.</td>
<td>Yes, reduce</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Wembury</td>
<td>100</td>
<td>Reg 7 Area Designation</td>
<td>SH_58_02_08/14, Land at Manor Farm, Down Thomas</td>
<td>Limited potential due to landscape constraint</td>
<td>8</td>
<td>Yes</td>
<td>Fine? Attractive area but limited wider views. Would need careful design and access</td>
<td>Yes</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>Newton Ferrers</td>
<td></td>
<td></td>
<td>Parsonage Farm, Newton Ferrers</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>10</td>
<td>10</td>
</tr>
</tbody>
</table>

CI SOUTH HAMS

SUBTOTAL 51
<table>
<thead>
<tr>
<th>Village</th>
<th>% of settlements in AONB</th>
<th>Neighbourhood Plan-stage completed</th>
<th>SHELAA Reference</th>
<th>Notes</th>
<th>Yield (before sieves applied)</th>
<th>AONB</th>
<th>Landscape OK</th>
<th>Yield (reduced; omits sites not OK for AONB reasons; &amp; omits commitments at 31/3/16)</th>
<th>Exclude quantum; cumulative count for Settlement is well above minimum*</th>
<th>Supply Potential - Quantum counted in Neighbourhood Plan Allowance supply in JLP Trajectory</th>
<th>Supply potential to be discounted from windfall supply in JLP Trajectory</th>
<th>Small sites in SVNPA now to be discounted as they are at AONB settlements &amp; not meeting criteria in Annex 1 Para7 (but to be restored to small windfalls count)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bere Ferrers</td>
<td></td>
<td>Reg 14 Pre submission consultation and publicity</td>
<td>WD_48_09_08/13, Land rear of Trevethan Park, Bere Ferrers</td>
<td>3.5ha. Limited potential due to sensitivity of AONB and limited range of local facilities. West and south of site developable for 15.</td>
<td>7</td>
<td>Yes</td>
<td>Western extents only. Current application for 7, no landscape objection - 0788/16/OPA</td>
<td>7</td>
<td>7</td>
<td>7</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>C2 WEST DEVON</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>SUBTOTAL</td>
<td></td>
<td></td>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Summary of the adjustments made to the Sustainable Villages) supply in TTVPA

13. Consequential to the Inspectors Post Hearing Advice Note, the potential Sustainable Villages (Neighbourhood Plan) Allowance supply in the TTV Policy Area is therefore adjusted as follows in New Table ADD15:

**NEW TABLE ADD15**

<table>
<thead>
<tr>
<th>Reason for change</th>
<th>Change in supply</th>
<th>Change in No. of Dwellings in the supply forecast</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>A 4 AONB large sites identified in New Table ADD12 which are no longer counted</td>
<td>Subtract 95 dwellings</td>
<td></td>
<td>-95</td>
</tr>
<tr>
<td>B New sites plus additional capacity identified in New Table ADD13 not previously counted in Appendix 7.6*</td>
<td>Add 60 dwellings</td>
<td></td>
<td>+60</td>
</tr>
<tr>
<td>Ci 7 AONB small sites identified in New Table ADD14 which are no longer counted for this supply category**</td>
<td>Subtract 51 dwellings</td>
<td></td>
<td>-51</td>
</tr>
<tr>
<td>South Hams Sub total</td>
<td></td>
<td></td>
<td>-86</td>
</tr>
<tr>
<td>Cii 1 AONB small site identified in New Table ADD14 which is no longer counted for this supply category</td>
<td>Subtract 7 dwellings</td>
<td></td>
<td>-7</td>
</tr>
<tr>
<td>West Devon Sub total</td>
<td></td>
<td></td>
<td>-7</td>
</tr>
<tr>
<td>TOTAL NET CHANGE IN THE SUSTAINABLE VILLAGES SUPPLY IN THE TTVPA</td>
<td></td>
<td></td>
<td>-93</td>
</tr>
</tbody>
</table>

Note: * includes addition of 12 dws at Parsonage Farm, Newton Ferrers
** includes subtraction of 10 dws at Parsonage Farm, Newton Ferrers

14. The net change is rounded to minus 100 dwellings. Consequently the total forecast supply related to the Sustainable Villages allowance for the purposes of the TTVPA housing trajectory is reduced by 100, from the 650 dwellings in TP3(rev) down to 550 dwellings.

15. CONCLUSION: On the basis of the evidence in this Addendum, the JLP Councils conclude that including 550 dwellings as the Sustainable Villages allowance in the latest trajectory in TP3L is justified.
Impact on the TTVPA Small Windfalls Forecast

16. In addition, deleting settlements that are in the AONB from Table 5.8 results in the need to omit those small sites at those AONB settlements that that had been counted as potential small sites supply in TP3(rev) Appendix 7.6 where they do not have robust site specific evidence to support forecast supply. This would remove 7 sites totalling 48 dwellings from the Sustainable Villages Allowance. Of these 48, 41 dwellings are in the South Hams LPA area and 7 dwellings are in West Devon LPA area. These are 7 of the 8 sites listed in New Table ADD14.

17. However, the methodology in TP3(rev) which was used to forecast supply from future Small Windfalls (non-garden land) had discounted those 48 units as well as 195 units from non-AONB small sites (see TP3 (rev) Appendix 7.6 pages 269 and 273) to avoid double counting the potential for small sites being delivered through Neighbourhood Plans. So those 48 units can now be added back into the TTVPA small windfalls forecast.

18. Furthermore, in TP3 and TP3(rev), with a potential capacity of 10 dwellings, the site on land at Parsonage Farm, Newton Ferrers (see New Table ADD14) was considered to be a small site, and as a consequence 10 dwellings were discounted from the TTVPA small windfalls forecast. Now counted as 12 dwellings (ie a large site) based on the site capacity evidenced by the recent planning permission, the previous discount related to this site of 10 dwellings in the small windfalls forecast is no longer necessary. So those 10 dwellings can be added back into the TTVPA small windfalls forecast.

19. Of the 4 new sites in New Table ADD12 being counted towards the Sustainable Villages Allowance, one site on the Land at Steer Point Road, Brixton has a potential capacity of 6 dwellings. It is therefore a small site for the purposes of the trajectories. Therefore 6 dwellings now need to be deducted from the TTVPA small windfalls forecast.

20. As a result of these changes, 52 dwellings (ie 48 +10 - 6) are added to the 744 dwellings in the TTVPA small windfall forecast that was shown in TP3G. Consequently the forecast from this supply category in the TTV Policy Area rises to 796 dwellings. Of the 796 dwellings, 641 relate to the South Hams LPA area and 155 relate to the West Devon LPA area.

21. CONCLUSION: On the basis of the evidence in this Addendum, the JLP Councils conclude that including 796 dwellings as the small windfalls (non-garden land) forecast in the latest trajectory in TP3L is justified.

22. For the avoidance of doubt, the JLP Councils emphasise that deletion of those settlements from JLP Table 5.8 proposed by MM35 does not preclude development appropriate to the AONB. Nor does it prevent Neighbourhood Plans for those settlements proposing development appropriate to the AONB. The advantages that can be achieved from neighbourhood plans guiding development remain. As set out in the change to paragraph 5.157 proposed in Main Modification MM34, the JLP Councils further emphasise that commitments and completions prior to end March 2017 within the remaining sustainable villages in Table 5.8 are not considered to make a contribution to the indicative housing
figures in Table 5.8 (as revised by proposed Main Modification MM35), as these have already been counted within the JLP housing supply figures.

**Impact on the forecast of Affordable Housing**

23. The JLP Councils consider that the Inspectors' Post Hearing Advice Note also has consequential impacts on the forecast of affordable housing. These are considered in Annex 1 to Appendix 8.1 in this Addendum.
Appendix 7.7

Delivery from Student Accommodation Release – Plymouth
See TP3(rev)

Appendix 7.8

SHLAA disclaimer
See TP3(rev)
A8.1 The methodology for calculating the forecast affordable housing supply in the plan period is based on

- Commitments from planning permissions as at 31 March 2017 and completions 2014 to 2017
- Applying the 30% policy to qualifying sites ie sites of 11 or more (unless in exceptional circumstances the LPAs consider that an off site contribution is appropriate) – The rate is applied to qualifying sites that are:
  - JLP allocations; or
  - The Neighbourhood Plan allowance
- The 30% is not applied to small windfalls (they are below the threshold) or to the release of dwellings resulting from Student accommodation development

A8.2 The housing trajectories record the forecast of total affordable housing delivery, notably those on the individual large sites as well as totals for small sites and Neighbourhood Plan allowance.
## Impact of the Inspectors Post Hearing Advice Note on Affordable Housing forecasts

1. The JLP Councils consider that the Inspectors Post Hearing Advice Note also has the consequential impacts on the forecast of on-site affordable housing. These are set out in New Tables ADD16A and ADD16B

### NEW TABLE ADD16A CHANGE TO TTVPA AFFORDABLE HOUSING FORECAST

<table>
<thead>
<tr>
<th>Reason for change</th>
<th>Change in site capacity</th>
<th>Change in No. of Affordable Dwellings in the supply forecast</th>
<th>Change in No. of Affordable Dwellings Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Consequential to Table 5.8 Changes</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AONB large sites identified in New Table ADD12 which are no longer counted</td>
<td>-95</td>
<td>-29</td>
<td></td>
</tr>
<tr>
<td>New sites plus additional capacity identified in New Table ADD13 <strong>not previously counted in Appendix 7.6</strong></td>
<td>+60</td>
<td>+25</td>
<td></td>
</tr>
<tr>
<td>AONB small sites identified in New Table ADD14** which are no longer counted for this supply category</td>
<td>-58</td>
<td>-14</td>
<td></td>
</tr>
<tr>
<td><strong>1 Sub total</strong></td>
<td></td>
<td>-18</td>
<td></td>
</tr>
<tr>
<td><strong>Consequential to TTVPA Site Allocation Changes</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TTV6 Noss-on-Dart. DARTMOUTH</td>
<td>+26</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>TTV13 Quayside Kingsbridge</td>
<td>-40</td>
<td>-13</td>
<td></td>
</tr>
<tr>
<td>TTV22 Plymouth Road, TAVISTOCK (assumption of 15% of capacity increase, as site is mixed use including employment)</td>
<td>+50</td>
<td>+8</td>
<td></td>
</tr>
<tr>
<td>New TTV site replacing TTV29.4+TTV29.5 Dartington Estate (Foxhole and Higher Barton), DARTINGTON</td>
<td>-30</td>
<td>-9</td>
<td></td>
</tr>
<tr>
<td>TTV29.23- Stokenham Deletion of allocation</td>
<td>-20</td>
<td>-6</td>
<td></td>
</tr>
<tr>
<td><strong>2 Sub total</strong></td>
<td></td>
<td>-20</td>
<td></td>
</tr>
<tr>
<td><strong>3 Correction (TTV11.8 Woodland Road Ivybridge omitted in error from TP3G Table TTV8)</strong></td>
<td></td>
<td>+22</td>
<td>+22</td>
</tr>
<tr>
<td><strong>4 Total change compared to TP3G forecast (1+2+3)</strong></td>
<td></td>
<td></td>
<td>-16</td>
</tr>
</tbody>
</table>

Note: * site capacity includes addition of 12 dws at Parsonage Farm, Newton Ferrers
2. The consequence is that the forecast of net additional on-site affordable dwellings in the plan period is reduced by 16, from the 2,047 shown in TP3G Table TTV8 down to **2,031**. Using the same approach to affordable housing, including rounding to the nearest 50, that was set out in TP3(rev) paragraph 9.57, the evidence continues to justify the policy target of 2,050 affordable dwellings for the Thriving Towns and Villages Policy Allowance in JLP Policy SPT3.

### NEW TABLE ADD16B CHANGE TO PPA AFFORDABLE HOUSING FORECAST

<table>
<thead>
<tr>
<th>Reason for change</th>
<th>Change in site capacity</th>
<th>Change in No. of Affordable Dwellings in the supply forecast</th>
<th>Change in No. of Affordable Dwellings Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLY25 Sugar House, Sutton Harbour</td>
<td>+10</td>
<td>+3</td>
<td></td>
</tr>
<tr>
<td>PLY59.12 Fields to north of St Budeaux A38 junction</td>
<td>-26</td>
<td>-8</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL CHANGE COMPARED TO TP3F FORECAST</strong></td>
<td></td>
<td></td>
<td><strong>-5</strong></td>
</tr>
</tbody>
</table>

3. The consequence is that the forecast of gross additional on-site affordable dwellings in the plan period is reduced by 5, from the 5,823 shown in TP3F Table PPA8 down to **5,818** in TP3K. Deducting the forecast 857 demolitions, results in the forecast of net additional on-site affordable dwellings in the plan period being reduced by 5, from the 4,966 down to **4,961**. Using the same approach to affordable housing that was set out in TP3(rev) paragraph 9.58, the evidence continues to justify the policy target of 4,550 affordable dwellings for the Plymouth Policy Allowance in JLP Policy SPT3.
AFFORDABLE HOUSING SHMA PART 2 AND NPPG PARAGRAPHS 21 AND 29
See TP3(REV) as amended by EXC13

Note provided by HDH Planning and Development Ltd 15th December 2017
See TP3(rev)

How has consultation informed development of Policy SPT3?
See TP3(rev)
Appendix 10
Compatibility Table SPT3 (Submission) and National Planning Policy Framework and Evidence Base

See TP3(rev)

Appendix 11.1

LARGE SITE HOUSING TRAJECTORIES – AGREEMENT WITH AGENTS AND DEVELOPERS

See Documents TP3H and TP3I

Appendix 11.2

TABLE 11.1 - THRIVING TOWNS AND VILLAGES POLICY AREA – EVIDENCE ABOUT HISTORIC LEAD IN TIMES BY APPLICATION TYPE AND SITE SIZE

See TP3(rev)