



Response to the Inspectors request (20th February 2018) for further comments regarding the West Devon SHLAA in relation to the distribution of housing sites to the Thriving Towns and Villages Policy Area, and particularly to West Devon.

1. Introduction

- 1.1. On 20th February 2018 the Inspectors invited participants in the hearings under Matter 8f to produce additional written information relating to the West Devon SHLAA. The Matter 8f session will focus on the West Devon SHLAA following comments made by the Councils in the Matter 3 hearing session about there being a limited amount of suitable, achievable and deliverable housing sites within that area to meet the identified objectively assessed needs.
- 1.2. The Councils are therefore submitting the following note to the Inspectors, in order to provide further information on the SHLAA and site selection process as they relate to West Devon, and to clarify comments which were made by the Councils at Matter 3. It is hoped that these clarifications will assist the Inspectors by providing further context to the discussions and giving further explanation about the JLP strategy for achieving sustainable development through the choice of housing sites in West Devon.

2. Summary of how the distribution strategy was devised

- 2.1. The detail of how the Councils set out their distribution strategy is set out in the Distribution of Development Topic Paper (TP1), the revised Housing Topic Paper (TP3(rev)) and the Strategy Topic Paper (TP5). This was summarised in the Councils Matter Statement 3 (CS3).
- 2.2. The plans distribution strategy was driven by three main principles set out in TP1 (see pages 9,10):
 - The Joint Local Plan should facilitate and promote economic growth and regeneration in the HMA to meet the national agenda to boost growth, and should do so by focusing growth in those parts of the Joint Local Plan area most able to support these aims.
 - The Strategy should strive to guide development to locations which will contribute to the creation of sustainable settlements.

- The Strategy should drive growth in locations that avoid harm to the AONB, the high quality natural environment of the HMA, and the historic environment, consistent with legislation and national policy.

2.3. It was not driven by the availability of sites in any part of the plan area.

2.4. A range of options for distribution across the plan area were considered, one of which would have included meeting West Devon's needs fully within West Devon. This was the 'Dispersal Alternative' set out in TPI – p30/31 and p47/48. However, our conclusion was that this was not the most appropriate strategy for the HMA. For example, although it might meet the demands / desires of people to live in rural areas, there are significant infrastructure challenges, and the overall growth potential of the area is likely to be constrained because of a lack of critical mass in key locations (i.e. Plymouth) where economic growth will be driven from (see the table on p30/31). Such a strategy would therefore not satisfy the 3 drivers set out above.

2.5. The SA of the Dispersal strategy is set out in SUB9E pages 10/11.

2.6. The reasons for selection of the Preferred Strategy are set out in SUB9E pages 12/13.

3. **Summary of how a figure was derived for West Devon as part of the preferred distribution strategy.**

3.1. It may help to clarify the separate processes the Councils went through to arrive at the distribution of development to West Devon. This was not a linear process – separate lines of inquiry were pursued and were brought together through the plan formulation to arrive at a final strategy for the JLP. These processes were:

- Setting out the Objectively Assessed Need for housing for the HMA (SHMA Part 1) and from this setting out the requirement for new homes to be met by the Joint Local Plan as a whole plan figure (Housing Topic Paper).
- Developing the strategy for the distribution of development across the whole plan area (Distribution of Development Topic Paper (TPI) and Strategy Topic Paper (TP5), as the starting point for assessing sites to include to meet the need in full.
- Using the SHLAAs for Plymouth, South Hams and West Devon as starting point for searching for sites to meet the plan requirement, and assessing sites through the site selection process summarised in EXC3D.
- Undertaking the 'reality check' to ascertain whether sufficient sites were available through this process to meet the need for new homes in full at the whole plan level (TP3(rev)).
- Understanding the objectively assessed need for new homes at the LPA level (from SHMNA Part 1) but not aiming to use these OANs as the starting point for distributing development (TP3(rev)).

- Finalising the distribution of development across the plan area, understanding the relationship with the OAN, and the sites to be allocated to meet needs in full at the whole plan level. (Strategy Topic Paper (TPI) and Housing Topic Paper (TP3(rev)))
- Setting out the Policy Areas, and their requirements as separate and non-transferable, as policy areas to deliver the distribution strategy.

3.2. The detail of each of these processes is set out in the JLP evidence base as referenced and so is not repeated here. There are, however, some key principles which it may be helpful to clarify to assist discussions:

4. There is no requirement to either set out needs, or address needs, at the LPA level in a Joint Local Plan:

4.1. The Government are clearly encouraging LPAs to produce Joint Local Plans, and in doing so seem to be indicating that plan makers should be able to move away from having to consider evidence of need and supply at LPA level when a joint plan is being prepared. This approach seems clear from the new Local Planning Regulations, from the Housing White Paper, and from statements in the DCLG consultation document “Planning for the Right Homes in the Right Places”. We have already given the Inspectors references to these documents which support the approach we are taking to housing need and supply in the Joint Local Plan.

4.2. As we have set out in the Strategy Topic Paper (TP5), the Distribution of Development Topic Paper (TPI), the Governance Topic Paper (TP6) and our Hearing Statement for Matter 3 (CS3), it is clear that national policy supports the principle that Joint Local Plans can assess their Objectively Assessed Need for new homes at the HMA level, and then distribute that need within the plan area without having to follow LPA boundaries. This approach is supported by proposals in the DCLG consultation document “Building the Right Homes in the Right Places”, and was supported by the South Worcestershire Inspector in paragraph 43 of his report. It is for the JLP Councils to set out how they are distributing development across the plan area to meet sustainability principles.

4.3. The Objectively Assessed Need for homes in Plymouth and South West Devon has been undertaken at the HMA level. The LPA “OAN” figures are available because LPA are the statistical building blocks for gathering and analysing information, and also enable the LPAs to understand needs in their areas. There is no requirement in national policy for us to seek to meet LPA needs within each LPA when a Joint Local Plan is being prepared – in fact the PPG makes clear that housing requirements and 5 year supplies of land can be expressed across the whole plan level when a Joint Local Plan is being prepared, the approach being taken to be set out clearly in the plan. (010 Reference ID: 2a-010-20140306) and even when individual LPAs are preparing plans the Duty to Cooperate is a clear mechanism for neighbouring LPAs to meet needs. This approach was endorsed by the South Worcestershire Inspector in paragraph 43 of his report.

4.4. The JLP therefore sets out a strategy which can be understood at 2 levels:

- The Housing Market Area – which it must be remembered has been identified as “a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.” as set out in the PPG ref 010 Reference ID: 2a-010-20140306. IE it is a coherent area which shares characteristics of demand for housing. We do not identify sub market areas, and West Devon is not therefore identified as a sub area or a separate HMA in the SHMA Part I.
- Sustainable Communities – our guiding principle is the creation of sustainable communities as set out in SPT2 and the Distribution of Development Topic Paper (TPI), and this is focused around our settlements, particularly Plymouth and the Main Towns. We have not used LPA OAN as the starting point for meeting needs.

5. Our Strategy is Driven by our Understanding of the Sustainability Characteristics of Settlements across the Plan Area:

- 5.1. We have thoroughly assessed different distribution strategies in the Distribution of Development Topic Paper (TPI), to arrive at a sustainable strategy which focuses development at Plymouth and the Main Towns of South Hams and West Devon. Our supply of sites for housing including sites allocated for housing have been chosen to fit with this strategy – ie not simply guided by sites which the SHLAA has assessed as being suitable, available and achievable. The SHLAA may have assessed some sites as being suitable, achievable, achievable, but if they did not ‘fit’ with the strategy they would not have been selected. Having said this, it should be noted that of the qualifying sites rejected at Regulation 18 stage only one was identified as suitable, available and achievable in the SHLAA (WD_15_43_13/16 – Wonnacotts, Okehampton). This site was not allocated because of current concerns about deliverability, with no developer currently promoting the site. See EXC3D Table 4.
- 5.2. Additionally, EXC3D Table 6 shows the sites that were dismissed in the lead in to the Regulation 18 consultation. Of these, 9 sites had been assessed as suitable, available and achievable in the SHLAA. However, these sites were assessed as being less favourable, given that lack of evidence that the sites would come forward for development during the plan period, and/or that constraints identified would be satisfactorily overcome.
- 5.3. Furthermore, of the omission sites that were put forward at Reg 19 stage but which had not been put forward at Reg 18 stage, one site is identified in the SHLAA as being suitable, available and achievable. This is WD_45_12_08/13, Site north of St Andrews Road and Newtake Road, Tavistock. See EXC3D Table 7.
- 5.4. If the strategy had been unable to find sufficient sites to meet needs in full at the whole plan level we would have needed to adjust the strategy to provide a larger choice of sites – in the event, we did not need to do this because we could meet our needs in full.
- 5.5. The Main Towns, their size, function and spatial relationship largely define the distribution strategy. The extent of services and facilities within the main towns benefit not only the immediate communities, but the population of the wider policy area, as

the hinterlands for the main towns are extensive. It should also be noted that the number of persons per hectare across South Hams is 0.9, in West Devon it is 0.5 (ONS 2011).

5.6. Para 5.8 – 5.10 in the JLP provides a description of the hierarchy and the role and function of the settlements in each tier of the hierarchy.

6. The Specific Characteristics of West Devon Are Important in Understanding the Strategy:

6.1. In terms of West Devon, the distribution strategy has the following key characteristics:

- There are 6 Main Towns in the Thriving Towns and Villages Policy Area, of which 2 are located in West Devon: Tavistock (which has close links to Plymouth) and Okehampton (which has acknowledged links to Exeter). These Main Towns are the main focus for growth in the TTVPA, as set out in the Distribution of Development Topic Paper. They deliver 4,471 homes against the JLP requirement, which is 76.2% of the TTV housing provision across 6 settlements, or broadly 12.6% each. It therefore follows that as there are twice as many Main Towns in South Hams as West Devon, that there are more opportunities for accommodating new homes in sustainable locations in South Hams as there are in West Devon. It should also be acknowledged that Tavistock and Okehampton are geographically close and related to Dartmoor NP, and in the case of Tavistock the AONB and World Heritage Site.
- There are 10 Smaller Towns and Key Villages included in the settlement hierarchy in the TTVPA, and under the distribution strategy these settlements are able to support development “to meet locally identified needs and to sustain limited services and amenities” (TTVI). The Smaller Towns and Key Villages deliver 970 homes against the JLP requirements, which is 15.7% of the TTV housing provision across 9 settlements, or broadly 1.75% each. Of the 10 Smaller Towns and Key Villages, 4 are found in West Devon (Bere Alston, Hatherleigh, Lifton and North Tawton) – again showing that there are more sustainable settlements capable of accommodating development in sustainable locations in South Hams than there are in West Devon.
- There are 69 Sustainable Villages identified throughout the TTV policy area, based on a sustainable village assessment. (19 in West Devon, 50 in South Hams) Sustainable villages are identified to provide a minimum of 720 dwellings against the JLP requirements, which is 11.7% of the overall supply for the TTV across 69 settlements, or broadly 0.17% per settlement.
- West Devon also has a number of constraints on development, including a World Heritage Site, Area of Outstanding Natural Beauty, and Dartmoor National Park.
- Finally, there is a strong relationship between Plymouth and Tavistock, with significant amounts of commuting taking place. (See paragraph 3.104 of the JLP Matter 3 Hearing Statement)

6.2. The distribution of development is therefore a consequence of the wider range of sustainable locations which fit with the strategy which are available in South Hams. The distribution of sites and therefore of housing numbers across the TTVPA, and between the TTVPA and the PPA was not driven by the Councils attempting to match the distribution of development to the OANs for each LPA - it is a consequence of the pattern of sustainable settlements across the plan area, and the availability of sites in these settlements which could be brought forwards to meet needs at the whole plan level.

7. The JLP Strategy Does Not Harm West Devon

7.1. It has been suggested that the JLP distribution strategy harms West Devon on two counts: the amount of new housing does not address affordability issues in West Devon, and that because a smaller increase in labour supply is created, economic development in West Devon is harmed.

7.2. However, we consider that the distribution of development represents a sustainable strategy which takes into account a range of factors and should be understood at the whole plan level. The sustainability characteristics of the settlements included in the strategy is summarised below, and it should be clear that affordability and labour supply are just two of the considerations that should be part of a sustainable pattern of development. Nevertheless, the following points may be helpful to the Inspectors:

7.3. Affordability is addressed at the Whole Plan Level:

- Affordability is addressed as part of the calculation of OAN, and therefore is applied as part of the HMA need, not at LPA level. It is the effect of the very significant uplift across the housing market area which is expected to address this, not at LPA level, and it should be remembered as set out above that the Housing Market Area is a coherent geographical area where it is appropriate to understand and address housing issues
- Robust evidence (SHMA Part 1 (HO13)) demonstrates that affordability is an issue in the Plymouth Housing Market Area (paragraph 6.1.6) and this justifies the significant upward revision to the demographic projections resulting in the Objective Assessment of Need (OAN) for housing in the HMA recommended in paragraph 6.2.2. Many factors are relevant to preparation of the JLP and its strategy. Affordability as defined by PPG ID: 2a-019-20140306 (4th bullet point) is only one of those factors. The Joint Local Plan enables cross boundary needs to be addressed at sustainable locations and the increase in planned housing supply in the JLP is expected to improve affordability in the Housing Market Area, as policy SPT3 on the housing requirement derives from the OAN. The NPPG therefore clearly requires that affordability should be considered as part of the assessment of housing need. It does not say that affordability uplifts must therefore be applied precisely where they arise – only that they are assessed as part of the OAN for the HMA, and can lead to an uplift of the whole OAN.
- In relation to West Devon it is important to note that early delivery in the Core Strategy plan period led to a substantial boost to housing supply resulting in the

cumulative requirement to date being met (see EXD3). Affordability issues have not therefore been driven by previous undersupply in West Devon.

- It has been noted that there are strong commuting links between West Devon and Plymouth. Additional homes in Plymouth provide the opportunity for people to choose to live in Plymouth, where property prices are lower and where greater numbers of jobs are more accessible by sustainable modes of transport. The JLP allocates significant numbers of new homes to Woolwell – which is only 1.5 miles from West Devon.

7.4. Accommodating labour supply to support economic growth:

- The increase in labour supply provided by housing growth at the whole plan level is sufficient to support projected increases in jobs at the whole plan level. The JLP then distributes housing and B use class employment development across the JLP area according to the distribution strategy, as set out in the Distribution of Development Topic Paper (TPI)
- Therefore, the strategy provides employment opportunities focused in the same settlements that housing sites are located. These settlements represent a sustainable distribution of growth across the HMA. Therefore, the strategy results in a sustainable balance of housing and employment in the Main Towns and in the Smaller Towns and Larger Villages. It does not harm any area through an over provision of housing or under provision of employment.
- There are already significant numbers of people commuting from Tavistock and other West Devon villages to Plymouth. There is nothing to suggest that these commuting patterns will not continue, so it would therefore follow that providing a larger labour supply in West Devon would simply result in more commuting trips to Plymouth, rather than encouraging businesses to locate in West Devon.
- Providing more homes in Plymouth potentially places people where the jobs are, and provides the opportunity to access those jobs by sustainable modes of transport. Very significant transport investment is taking place on Plymouth's northern corridor which will result in much better public transport facilities. This should be set against acknowledged concerns regarding the capacity of the A386 between Tavistock and Plymouth to accommodate significantly more traffic, most of which would involve private car trips.
- Far from harming West Devon, the strategy therefore provides the opportunity to create a more sustainable pattern of development where Tavistock is able to provide additional employment for those choosing to work in the town, but also responding to the clear desire of many Tavistock residents to access employment opportunities in Plymouth.

8. The Sustainability of the Main Towns and the Smaller Towns and Key Villages.

- 8.1. 2,625 new homes are allocated across all settlements in the hierarchy in West Devon. Over 40% of housing allocations in all of the Main Towns are found in Tavistock and

Okehampton, despite West Devon only having 2 out of the 6 Main Towns in the TTVPA. Nearly 40% of housing allocations in the Smaller Towns and Key Villages are found in West Devon, slightly higher than would be commensurate with the 4 out of 9 settlements in that tier in West Devon. Sustainable villages are slightly different, the number not being generated by allocations, but by capacity informed by the sustainable villages assessment. West Devon contributes 19 of the 69 sustainable villages, just under 30%, although these villages have been identified as having capacity to meet nearly 50% of the figure identified for all sustainable villages (340 out of 720). **This shows that West Devon is already contributing a higher proportion of the housing need than would be commensurate with the number of settlements it has within the wider TTV policy area.**

8.2. West Devon is also providing 112,800sqm of employment floorspace.

8.3. This should be set against significant landscape constraints which affect the main towns in West Devon that are likely to restrict growth over and above what has already been allocated, including the World Heritage Site, Area of Outstanding Natural Beauty & Dartmoor National Park. It is considered that the Main Towns are still providing a significant boost in the supply of new homes and jobs, that in turn will support the sustainability of the towns themselves and their supporting hinterlands.