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Plymouth City Council  
Ballard House  
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Plymouth  
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SENT BY E-MAIL AND POST

12<sup>th</sup> August 2016

Dear Sir / Madam

## **THE PLYMOUTH & SOUTH WEST DEVON JOINT LOCAL PLAN (AT PLYMOUTH) CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments and in due course attend the Examination Hearings Sessions for the Plymouth & South West Joint Local Plan.

This "At Plymouth" consultation by Plymouth City Council is being undertaken separately but simultaneously with the "Thriving Towns & Villages" consultation by South Hams and West Devon District Councils in order to inform the Plymouth & South West Devon Joint Local Plan. The HBF is submitting responses to both consultations which the Councils should consider together.

### **Duty to Co-operate**

Under S110 of the Localism Act 2011 which introduced S33A into the 2004 Act the Councils must co-operate with other prescribed bodies to maximise the effectiveness of plan making. The Duty to Co-operate requires the Councils to "*engage constructively, actively and on an on-going basis*". The high level principles associated with the Duty are set out in the National Planning Policy Framework (NPPF) (paras 156, 178 – 181). In addition there are 23 paragraphs in the National Planning Practice Guidance (NPPG)

concerning the Duty. When determining if the Duty has been satisfied it is important to consider the outcomes arising from the process and the influence of these outcomes on the Joint Local Plan. A required outcome of co-operation is the delivery of full objectively assessed housing needs (OAHN) for market and affordable housing in the housing market area (HMA) as set out in the NPPF (para 47) including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (para 182 NPPF).

The HBF commends Plymouth City Council, South Hams District Council and West Devon District Council for coming together to prepare a Joint Local Plan for Plymouth & South West Devon. Indeed in the previous consultation on the Plymouth Plan the HBF suggested a Joint Plan as the most appropriate way forward. Although it has been determined that Plymouth & South West Devon is its own HMA and that full OAHN can be met within the three Councils administrative areas without recourse to other neighbouring authorities Plymouth & South West Devon is not isolated. The HMA abuts six other neighbouring authorities of Cornwall Council, Torridge District Council, Mid Devon District Council, Teignbridge District Council, Torbay Council and Dartmoor National Park Authority. The Councils also acknowledge the important inter relationships with adjoining HMAs. Therefore when the Joint Local Plan is submitted for examination a Statement of Co-operation should set out the Councils compliance in meeting the requirements of the Duty in relation to all these neighbouring authorities beyond the Plymouth & South West Devon HMA in particular on the strategic matter of meeting OAHN in the Dartmoor National Park which lies within the Plymouth & South West Devon HMA but outside the Joint Local Plan.

At the pre-submission consultation stage of the Joint Local Plan the HBF may submit further comments on the Councils compliance with the Duty to Co-operate.

### **Plan Period**

The HBF is supportive of the extended plan period from 2031 to 2034 so that post adoption of the Joint Local Plan the preferred 15 year time horizon set out in the NPPF (para 157) is achieved.

### **OAHN and Housing Requirement**

The OAHN for the Plymouth & South West Devon HMA is set out in the Plymouth & South West Joint Local Plan OAHN Report by Peter Brett Associates (PBA) dated June 2016. The recommendation is 30,300 dwellings (1,515 dwellings per annum) for the period 2014 – 2034. This calculation is based on :-

- bespoke Devon County Council population / household model ;
- 10 years migration trend ;
- conversion allowance for vacancy rates / second homes ;
- economic modelling and ;

- an uplift for market signals in particular affordability using the recommendations for a standard methodology on the calculation of OAHN set out in the recently published Local Plans Experts Group (LPEG) Report.

At this time there is no separate assessment of affordable housing needs so the OAHN may have been under-estimated. As set out in the NPPG an increase in the total housing included in a Plan should be considered where it could help to deliver the required number of affordable homes (ID : 2a-029-20140306).

It is also noted that the proposed housing requirement ignores unmet needs from the preceding plan periods. The Annual Monitoring Reports for each respective Council show deficits against planned housing targets set out in the previously adopted Local Plans. As currently proposed these unmet housing needs are wiped out by the Councils re-setting the starting position in 2011 in the new Joint Local Plan.

Moreover in the context of the NPPF's requirement to significantly boost housing supply (para 47) it is disappointing that the proposed housing requirements in this consultation are reducing housing provision both in comparison to existing adopted Plans and previous consultations in the case of Plymouth reducing from 22,766 dwellings (1,138 dwellings per annum) between 20011 – 2031 to 21,000 dwellings (1,050 dwellings per annum) between 2014 - 2034.

Furthermore the Councils should consider if there are any implications arising from the publication of the 2014 SNHP. As set out in the NPPG (ID 2a-016-20140306) a re-assessment of OAHN is only necessary if a meaningful change has been identified by these projections.

The housing requirement should be expressed as a minimum in the Joint Local Plan so that full housing needs are planned for in accordance with the NPPF.

The proposed distribution of housing across the Joint Local Plan area is currently proposed as :-

- 21,000 dwellings in Plymouth city and its urban fringe ;
- 8,700 dwellings in towns and villages of South Hams and West Devon ;
- 600 dwellings in Dartmoor National Park (outside the Joint Local Plan area).

It is understood that at Plymouth housing will be distributed :-

- within the city itself in three growth areas of :-
  - the South (defined as Derriford and Northern Corridor Growth Area) ;
  - the North (defined as city centre and Waterfront Growth Area) ;
  - the East ;

- the Sherford new community in South Hams.

The Councils should provide evidence to justify this proposed distribution between firstly Plymouth (21,000 dwellings), South Hams and West Devon (8,700 dwellings) then secondly between Plymouth city and its urban fringe.

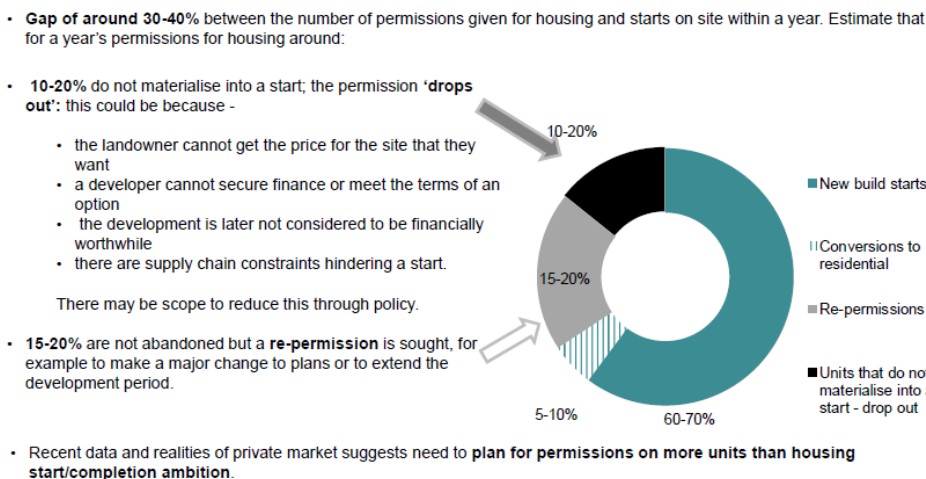
At the pre-submission stage of the Joint Local Plan the HBF may make further comments on OAHN, housing requirements and the distribution of housing.

## Housing Land Supply (HLS)

The proposed 30,300 dwellings is a minimum housing requirement therefore it should not be treated as a ceiling. The Joint Local Plan should identify a HLS including contingencies over the plan period which is flexible enough to respond to changing circumstances. Any proposed settlement boundaries should be contiguous with existing consents and proposed allocations and should not be drawn too tightly. The DCLG presentation slide from HBF Planning Conference September 2015 (see below) illustrates 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “*the need to plan for permissions on more units than the housing start / completions ambition*”. Whilst it is acknowledged that this presentation slide shows generic percentages across England it provides an indication to the Councils of the level of contingency needed.



In recent years there has been a 30-40% gap between permissions and housing starts



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

The LPEG Report also recommends that “*the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites*”

*equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF” (para 11.4 of the LPEG Report).*

The Councils should also provide further information and justification for the proposal to “ring fence” the housing requirement and HLS for Plymouth and its urban fringe.

At pre-submission consultation stage the HBF may submit further comments on HLS.

## **Conclusions**

It is hoped that these comments are of assistance to Plymouth City Council in preparing the next stages of the Plymouth & South West Devon Joint Local Plan. In the meantime if the Council requires any further information or assistance please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**