

CSM and PDR planning statement

8 October 2018

This statement provides a local planning authority view of the position regarding planning policy and housing land supply in relation to the proposal contained in the report to Council.

The Torbay Local Plan 2012-2030 is a locally sustainable plan for growth which is within environmental limits. The Local Plan identifies land for the delivery of around 8,900 new homes over the plan period of 2012-2030, equating to around 495 homes per year. The overall level of housing and jobs growth, together with the locations of new development, represent a balanced and sustainable approach to growth. This strategy was subject to scrutiny by the community/stakeholders prior to being examined then approved by the Government's Planning Inspectorate. The Local Plan was then adopted by Council in December 2015.

The proposal contained in this report is in relation to two sites which fall within areas either allocated or identified for new development within the Torbay Local Plan. They will be dealt with in turn:

Little Blagdon Farm, Collaton St. Mary

This site lies within an area which is allocated within the Torbay Local Plan to be brought forward for development, as specified in Policy SS2 (Future Growth Areas) and SDP3.3 (Totnes Road/Collaton St Mary). This area is also subject of an adopted Supplementary Planning Document, which supports the delivery of this policy, the Collaton St. Mary Masterplan (adopted 2016). There is a clear policy expectation in the Torbay Local Plan, augmented by the Collaton St Mary Masterplan, that this site will come forward for development.

The Paignton Neighbourhood Plan (discussed in further detail below under Preston Down Road) has been recommended by an Independent Examiner to progress to referendum subject to modifications – the Council is yet to make its decision on the recommendations. One of those modifications are (as made to Policy PNP24) that future development should be in accordance with the Collaton St. Mary Masterplan – a plan which sets out a strategy for the delivery of approximately 460 homes within the Collaton St. Mary Future Growth Area.

Preston Down Road

This site lies within an area identified in the Local Plan for a potential housing allocation. It is not part of an allocated housing site but does lie within a wider general area of Paignton agreed to be suitable for such growth. As part of the preparation of the Torbay Local Plan, the site was considered as being suitable for development as a result of a Strategic Housing Land Availability Assessment (SHLAA). A Sustainability Appraisal, which considered growth in this wider area of Paignton, also considered that the proposal would be consistent with planning for sustainable development. The

Torbay Local Plan provides for the site to be considered for allocation as a housing site either within the Paignton Neighbourhood Plan or future site allocation documents, in order to contribute to the required level of growth needed in Paignton. The Paignton Neighbourhood Plan, which has been subject to a completed Examination but the Council is yet to make its decision on whether it proceeds to referendum) does not allocate this site for development, nor indeed any other sites for housing development in Paignton. Notwithstanding this, the findings of the Examiner are that this does not detract from the housing need required by the Torbay Local Plan – the target for housing in Paignton as set out in the Local Plan remains at 4,285. The Examiner’s report finds that the Paignton Neighbourhood Plan cannot be required to make housing allocations and recommends that it meets the basic conditions and that it should proceed to Referendum subject to modifications. This means that the local planning authority would need to make further allocations for development. The local planning authority’s approach would be to allocate further sites for development through the review of the Local Plan in order to meet the shortfall in allocated housing sites created by the absence of a neighbourhood plan or site allocations document which fills this gap. Sites which have been identified for development within the Torbay Local Plan but have not been allocated or given planning permission (such as the site in question at Preston Down Road), will form a starting point for the consideration of new housing allocations which will be made as necessary through the Local Plan review. These allocations will need to be made in order to deliver development for the rest of the plan period through to 2030.

Housing land supply and NPPF

Torbay Council, as Local Planning Authority, is required to set out its position and understanding of its supply of future housing. The NPPF requires that local authorities maintain a supply of specific, deliverable sites sufficient to provide 5 years worth of housing to meet their housing requirements set out in their Local Plans (para 73 of the NPPF). The Spatial Planning team has considered the position, objectively, in great detail, and are clear that there is currently 4.2 years worth of supply and therefore Torbay is failing to adequately meet its needs for demonstrating sufficient deliverable housing sites. The Torbay Local Plan through Policy SS13, provides for a number of ways in which the local planning authority would seek to boost housing supply under this circumstance, including bringing forward sites from later in the plan period, allocating further sites for development, etc.

It is imperative that the local planning authority maintains a 5 year land supply in order to effectively deliver the strategy and policies contained in the Local Plan and (when adopted/made) Neighbourhood Plans. Neighbourhood Plans which allocate sites can benefit from having to evidence a 3 year supply of housing sites. The Paignton Neighbourhood Plan, in the form submitted to Examination, does not allocate sites and would not benefit from a 3 year period, i.e. a 5 year supply requirement would apply and without a supply the presumption in favour of development would apply to planning applications for housing. Without a 5 year housing land supply, the local authority is subject to increased risk of development occurring in locations which might not be locally palatable or being of a lower quality than that which might have otherwise been required through local policies.

The new National Planning Policy Framework sets out a national standard methodology for the calculation of housing need. The delivery rate in the adopted Local Plan is 495 dwellings per year. The objectively assessed housing needs for Torbay (taking into account local policy added targets for employment growth) is 615 per year. The need to meet the objectively assessed figure was reduced

due to environmental constraints in Torbay, which had to be justified and accepted as part of the Examination of the Torbay Local Plan. Future reviews of the Torbay Local Plan will be subject to their own Examinations and scrutiny. The new household standard methodology sets out an objectively assessed housing need of 588 dwellings per year. This figure does not add on a requirement for increased employment projections (like the figure for the Local Plan). If employment growth was added, for instance, this figure would rise further. In future, looking ahead to reviews of the Torbay Local Plan, it is highly likely due to environmental constraints, that the Council will need to work under the duty-to-cooperate with its neighbouring authorities and ask them to take at least some of its housing requirement. Neighbouring authorities also face pressure for delivering enough suitable housing land and the Council is only likely to be successful in gaining the cooperation of neighbouring authorities if it can show that it is doing all it can to accommodate housing development on suitable and sustainable sites where possible within Torbay.

General comments on delivering large housing sites

The delivery of housing on large sites takes many years and it is therefore important that work to deliver sites that might not be expected to be built out for many years begins many years in advance. This steps in this process (i.e. from start to finish) have been identified in research (NLP, 2016) as:

- *The lead in time*
- *The planning approval period*
- *The time of the first housing completion*
- *Annual build rate*
- *Site completion*

The lead in time precedes the submission of a planning application and can involve land assembly, detailed site surveys, technical planning preparation, etc. The planning approval period is the time taken to determine a planning application (in full). There is then a period of time between granting planning permission and the time taken for construction works to achieve the delivery of the first house. From then on there will be an annual build out rate (the number of homes built on site per year). For example, this might be expected to be 40-50 homes a year for a site of between 100-350 homes. This means that large sites can take a number of years to build out in full even once planning permission is granted. Research indicates that the time taken to begin delivering homes on a site (that can be counted in the Council's annual housing monitor) of between 100-499 dwellings takes on average 4 years from the moment a planning application is submitted. Then, applying a build out rate of 50 homes per year, it would take a 300 home development a further 6 years to be fully delivered (10 years in total). In order to deliver housing on large sites and deliver them within the period up to 2030, preparation leading up to the submission of development proposals must begin many years in advance.