

PAIGNTON NEIGHBOURHOOD FORUM

- Blatchcombe
- Clifton with Maidenway
- Goodrington, Roselands & Hookhills
- Paignton Town
- Preston



5 August 2019

By email to: planning@torbay.gov.uk
Torbay Council
Planning Department (FAO Case Officer Miss Emily Elliot)
Tor Hill House
Castle Circus
Torquay
TQ2 5QW

Dear Miss Elliot

Planning Application P/2019/0478.
Proposed demolition of nine disused farm buildings and construction of new vehicular access, Little Blagdon Farm, Totnes Road, Paignton TQ4 7PW.

This letter is in addition to our objection letter to you of 6 June 2019.

No doubt you will be aware the Council's consultation on the housing land supply position in Torbay closed yesterday.

Please see attached the joint response of all 3 Neighbourhood Plan Forums which shows why there is already a supply of housing land in excess of the NPPF and adopted Local Plan requirement.

Yours sincerely

Chairman, Paignton Neighbourhood Forum

Enclosure:

Joint Forum response dated 3 August 2019

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Torbay Housing Land Supply 2019-2024

1. Introduction

- 1.1 These are the views of all 3 Neighbourhood Plan Forums on the Draft Land Supply Statement published by Council officers for technical comment by 4 August 2019.
- 1.2 We find the draft does not take sufficiently into account the following:
- The requirement The assessment finds a not less than 3 year supply to be identified against the 5 year requirement given the 100% coverage of Torbay by the Neighbourhood Plans recently approved.
 - The supply of deliverable dwellings exceeds 3.28 years shown in the draft.
 - Review of the Local Plan housing trajectory is about to formally commence.
- 1.3 In conclusion our finding is that more than a sufficient supply exists until the required Local Plan Review has been completed for the following reasons:

2. Five year requirement

a) Local Plan

- 2.1 We agree the Local Plan is less than 5 years old since adoption and is the appropriate starting point for the assessment as stated (para. 3.1).
- 2.2 However, four of the five assessment years (80%) go beyond the Review required by December 2020 which the draft confirms is about to commence (2nd para. 7.3).
- 2.3 We note the draft states it is not the purpose of the assessment to consider the validity of the Local Plan trajectory (3.2).
- 2.4 Nevertheless it is already clear the Review will have to address the substantial mismatch that now exists between the provision of jobs and additional homes required by the strategic policies of the adopted Local Plan since 2012.
- 2.5 The draft assessment shows 2,719 additional homes have been built since the Local Plan start date of 2012 (para. 3.6). In comparison there has been no net job growth since 2012 as confirmed by the Office of National Statistics (ONS/NOMIS).
- 2.6 Continuation of this fundamental mismatch does not accord with the NPPF requirement to achieve sustainable development and adopted Local Plan and no benefit is resulting that outweighs the harm being caused.

2.7 As net job growth has not been achieved, use of the trajectory steps in the assessment from 400 through to 583 dwellings per annum does not accord with the adopted strategy of the Local Plan.

2.8 The Local Plan already allows the housing trajectory to be adjusted downward in this event (LP para 7.5.15). Such action will accord fully with the Local Plan Inspectors Report which stated (para. 41):

"Detailed monitoring and review are important considerations in the development plan process and the Council is committed to regular reviews of the Plan. There will be ample opportunity to increase housing numbers if justified by jobs growth. Alternatively it may be necessary to reduce housing numbers over the plan period if the Council's job growth strategy is less successful than hoped. At the present it is regarded as sensible and pragmatic to plan for 8,900 additional dwellings over the plan period."

2.9 For the draft assessment period in this instance it is therefore appropriate and justified to treat all parts of the assessment with extreme caution pending the Review outcome which the draft confirms will commence in two months time (para 7.3).

b) Neighbourhood Plan requirement.

2.10 The draft notes all parts of the Local Plan area now have in place recently approved Neighbourhood Plans which have been formally examined and approved in accordance with statutory requirements (para. 5.4).

2.11 The Brixham Peninsular and Torquay Neighbourhood Plans contain site allocations for development in their areas. The Paignton Neighbourhood Plan found no need to allocate further land following a comprehensive assessment and includes specific policies that expressly support allocations that meet the identified housing requirement.

2.12 The Paignton Neighbourhood Plan also now includes the requirement for job-led growth and housing provision being kept in balance in response to the imbalance referred to in paragraph 2.5 above (PNP Part 6 and Policy PNP1-Area Wide).

2.13 NPPF14 supports Neighbourhood Plans taking priority in decision taking provided they are less than 2 years old and the Local Plan area has at least a 3 year supply of deliverable housing sites measured against the 5 year housing requirement.

2.14 It is noted the draft concludes that even before Review of the Local Plan trajectory there is judged to be a 3.23 year supply for the assessment period (para 6.2).

2.15 This meets the requirement of NPPF14 and will shortly be overtaken by the Review outcome than can be expected will reduce the 5 year requirement significantly.

3. Supply position

3.1 Our response to the request for technical comment on the draft so far produced is as follows:

3.2 Lists A and B introduce a site delivery size of 10 or more dwellings that does not match site size thresholds in the adopted Local Plan or previous supply assessments.

3.3 This has the effect of underestimating the deliverable supply available from smaller sites with consent that sit between the adopted Local Plan 'Windfall' threshold of 5 dwellings

or less and 10 or more defined in Lists A and B as detailed further in paragraph 3.7 to 3.11 below.

- 3.4 Both Lists also exclude sites where the Council has stated its intention to achieve delivery within the 5 year assessment period.
- 3.5 Examples are redevelopment of Crossways in Paignton Town Centre shown for 150 dwellings in the adopted Local Plan and Preston Down Road where the Council has obtained Land Release Fund grant from Government on a Bid promise to deliver release of unallocated land for 150 dwellings by 2020.
- 3.6 These two locations alone total 300 dwellings that adds 15% to the supply shown in the draft (300/1,967).
- 3.7 List C does not identify the sites of 6-9 dwellings considered to be deliverable over the assessment period but confirms they are sites with planning permission which the NPPF allows to be included unless it can be demonstrated they will not be delivered.
- 3.8 Only 81 dwellings have been included for the entire 5 year period (List C showing 40 not started plus 41 under construction).
- 3.9 Over the last 2 years alone planning permission has been granted for 121 dwellings on sites across the assessment area that will each deliver from 6 to 9 dwellings (an average of 61 dwellings per annum).
- 3.10 In sharp contrast the draft includes only 81 dwellings for the entire 5 year period. No adequate detail has been provided to justify including only 16 per annum (List C 81/5 = 16 pa).
- 3.11 Omission of 224 dwellings (rounded) is significant (5×61 less $5 \times 16 = 305 - 81 = 224$).
- 3.12 List D similarly underestimates the deliverable supply from the approved Local Plan 'Windfall' allowance of 130 dwellings per annum by restricting the supply artificially to 100 per annum.
- 3.13 As evidenced in Table 3 below account has already been taken of non delivery of 'Windfall' sites actually granted planning consent in the allowance permitted. Instead the permitted allowance of 650 dwellings (5×130) has been capped at only 500 (5×100). The omission of 150 is significant.

Table 3.1 Windfalls (of 5 or less dwellings)

Year	Local Plan allowance	Actual consents
2012/13	130	150
2013/14	130	167
2014/15	130	175
2015/16	130	142
2016/17	130	136
2017/18	130	151
2018/19	130	158
Total	910	1,079

Source: Torbay Council planning consents granted

- 3.14 As the housing trajectory Review is about to commence the following comparison is made at this stage:
- 3.15 In the very unlikely event that the present housing trajectory remains as high, inclusion of the above omissions increases the supply to not less than 4.4 years as shown in Table 3.2 below:

Table 3.2 Supply draft with the omissions included

Lists A+B	1,386
Omitted from Lists A+B (para. 3.6)	300
Lists C+D	581
Omitted from Lists C+D (para. 3.11 & 3.13)	374
Draft supply including the above omissions	2,641
Requirement shown in draft (para 4.1)	599 p.a.
Years supply @ 599 p.a. = 2,641 / 599	4.4 yrs minimum

4. Conclusion

- 4.1 Continued use of the existing Local Plan housing trajectory is no longer justifiable. A supply of at least 3 years exists that meets the requirement of NPPF14 for the purpose of decision taking as allowed for by the NPPF pending the Local Plan Review about to commence.



Chair of Torquay
Neighbourhood Forum



Chair of Paignton
Neighbourhood Forum



Chair of Brixham
Neighbourhood Forum

3 August 2019

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