



Torbay Housing Land Supply 2017/2022

1. Introduction

1.1 These are the views of all 3 Neighbourhood Forums on the Draft Land Supply Statement published by Council officers for comment by noon on 5 March 2018.

1.2 We do not agree with the Draft for the following reasons:

- The requirement identified for the 5 year period has not followed the advice contained in National Planning Practice Guidance (PPG). As a result, the requirement specified of 2,822 dwellings has been over stated;
- The supply of land identified for the 5 year period has excluded sites able to be included. As a result, the supply identified of 2,232 has been under stated.

1.3 In consequence, we do not agree there is only a 3.9 year land supply in Torbay. It is our finding there is a not less than 6.1 years land supply for the following reasons.

2. The Requirement

2.1 We have considered the validity of each part of the calculation in the Draft:

a) Local Plan trajectory

2.2 To ensure there is a sustainable balance of development in Torbay there are two trajectories required to be met in each 5 year period, a housing trajectory and a net job growth trajectory as summarised below (Table 2.1):

Table 2.1: The Local Plan trajectories

Period	Net Job growth each year Policy SS1	Net Homes each year Policy SS13
2012/17	275-300	400
2017/22	275-300	495
2022/30	275-300	555
Total	5,000-5,500	8,900

(Source: Adopted Torbay Local Plan Dec 2015)

2.3 The Draft only takes into account the housing trajectory. There is also a requirement in the Local Plan to review the soundness of the trajectory in 2020/21, which falls within the 5 year period of 2017/2022 covered by the Draft.

2.4 National Guidance makes it clear that an up to date Local Plan should be used as the starting point for calculating the 5 year supply and given considerable weight “*unless significant new evidence comes to light*” (PPG Para 030 Ref ID 3-30-2014-0306).

2.5 Two pieces of “*significant new evidence*” have “*come to light*” which have not been taken in account in the Draft:

- Net job growth required by the Local Plan has not occurred. The opposite has occurred with 2,000 job losses compared to the start of the Local Plan period and 3,000 job losses compared to the forecast position by 2017, even though additional dwellings have been approved and built and the new South Devon Highway completed in 2015 (Source ONS/NOMIS job information confirms Torbay at 59,000 in 2012 falling to 57,000 in 2016).
- At the same time, dwellings vacant for 6 months or more have increased significantly, with no more recent evidence that shows the situation has improved. (Source: Paignton Neighbourhood Plan Supporting Evidence Document 3 page 17).

2.6 These two pieces of “*new evidence*” call sharply into question it being rational in the Draft for continuing with the move from 400 dwellings per annum for 2012/2017 to the next step up of 495 dwellings per annum for 2017/2022 (Table 2.1 above).

2.7 Nevertheless, for the purpose of evidencing the robustness of our assessment we have not adjusted the trajectory shown in the Draft of 495 for the period 2017/2022. However, it is

relevant to note the increase of 475 over the 5 year period for 2017/2022 ($95 \times 5 = 475$) is significant and is more than the equivalent of adding a further year supply to the previous rate for 2012/2017.

b) Addition for past under delivery

2.8 We accept the figure given in the Draft for dwellings built in the period 2012/2017 and the figure of 222 as the shortfall when compared with the target of 2,000. We also agree there is no evidence of persistent under delivery and it is correct to apply the addition of 5%, not 20%.

2.9 However, we do not agree it is rational to require the catch-up to be achieved over the next 5 years of 2017/2022. To do so perpetuates, and makes worse, the imbalance which now exists between job growth and housing growth. This is not sustainable development and conflicts fundamentally with the intent of the Local Plan and requirement of the National Planning Policy Framework (NPPF).

2.10 Until review of the Local Plan has been completed in 2020/21, the catch-up needs to be spread over the remaining 13 year life of the Local Plan, not concentrated into the next 5 years.

2.11 This produces the following Table in place of the Draft:

Table 2.2 Supply requirement for 2017/2022

Five Year Supply					
Year	1	2	3	4	5
	17/18	18/19	19/20	20/21	21/22
Target	495	495	495	495	495
Target + 5%	520	520	520	520	520
Target + 5% + Undersupply (annualised over rest of plan period)	537	537	537	537	537
Cumulative Target	537	1074	1611	2148	2685

3. The Supply

3.1 We have reviewed each of the parts used in the Draft:

c) Site availability

3.2 We do not accept the assumption made in the Draft that underperformance in housing completions and inactivity on sites is occurring due to a shortage of supply. It is clear from market signals that the lack of job growth is the principal issue. Without an income by prospective occupants neither home rental nor purchase are possible, which in turn affects build out rates.

3.3 There is clarity in the PPG, NPPF and Court decisions referred to in the Draft that sites are able to be included where they are capable of being delivered within the 5 year period. A certainty that they will be delivered is not the criteria as implied in the Draft.

3.4 A major failing of the Draft is the absence of any account taken of the 3 Neighbourhood Plans formally submitted to the Council in 2017 which identify land for more than 8,200 dwellings compared with the claimed shortfall in the Draft of 590 dwellings (2,822 required less 2,232 supply). While not all sites in the Neighbourhood Plans are presented as deliverable in the next 5 years, their total exclusion from consideration is a major and irrational omission.

3.5 Taking account of the Neighbourhood Plans, a supply of 2,640 has been identified for the period covered in the Draft from 2017/2022. Apart from the Future Growth Area at Edginswell, this retains all other sites shown in the Draft.

d) Windfall allowance

3.6 The evidence clearly shows that since the start of the Local Plan period in 2012, the approved allowance of 130 per annum has been exceeded significantly by permissions granted.

Table 3.1 Windfalls (of 5 or less dwellings)

Year	Local Plan approved allowance	Actual
2012/13	130	150
2013/14	130	167
2014/15	130	175
2015/16	130	142
2016/17	130	136
Total	650	770

Source: Torbay Council planning consents granted.

3.7 We do not accept there is justification for this to be reduced from 130 approved in the adopted Local Plan to 100 per annum as shown in the Draft. To do so artificially suppresses the supply available.

4. Conclusion

4.1 For the period 2017/2022 it is our finding that there is a requirement, at most, for 2,685 dwellings and site availability, at least, of 3,290 as shown in Appendix 1.

4.2 At the resulting rate of 537 per annum (Table 2.2 above), this represents at least a 6.1 year supply (3,290 / 537). Even at the higher rate of 564 in the Draft, the supply still provides for at least 5.8 years (3,290 / 564)

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4 March 2018

Attachment

Appendix 1 - Torbay 2016/17: 5 year housing land supply spreadsheet