



Strategic Planning & Infrastructure Services  
Plymouth City Council  
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SENT BY E-MAIL AND POST

4<sup>th</sup> March 2015

Dear Sir / Madam

### **THE PLYMOUTH PLAN 2011 – 2031 PART 1 CONSULTATION DRAFT**

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 Plan.

**Strategic Objective 5 – Delivering a growing city** at Bullet Point (4) refers to *"identify locations for new homes to meet Plymouth's objectively assessed housing needs (OAHN) in full and ensuring that at least 5 years supply of deliverable sites for housing is always available"*. **Policy 23 – Delivering sufficient land for new homes to meet Plymouth's housing need** sets out a provision to meet the full OAHN for Plymouth of at least 22,766 new dwellings built by 2031 (1,138 dwellings per annum) of which at least 7,242 will be affordable homes.

However it is noted that the supporting text refers to the total housing requirement figure as a provisional number only pending an up-date of the SHMAA Report. Therefore at this time the HBF is not expressing an opinion on the full OAHN for the Plymouth HMA. The HBF will undertake a detailed analysis of the most up to date version of the SHMAA submitted as supporting evidence during the later stages of preparation of the Plymouth Plan.

**Policy 23** also contains reference to a *"Plan for Homes"* but no further explanation of this document is given. Is this a DPD or an SPD? Further clarification from the Council would be appreciated.

**Strategic Objective 8 – Delivering on effective spatial strategy** sets out in:-

- Bullet Point (1) a proposed step change in economic and housing delivery ;
- Bullet Point (2) a priority to meeting housing needs within the city's own boundaries ;
- Bullet Point (3) housing needs met outside city boundaries in the most sustainable locations on its north eastern or eastern fringes.

This spatial strategy is explained in detail in **Policy 42 - Defining the spatial distribution of housing in Plymouth** which confirms that 15,500 new homes will be built within the city's administrative area and broadly distributed in :-

- the South (defined as Derriford and Northern Corridor Growth Area) – 7,900 new homes ;
- the North (defined as city centre and Waterfront Growth Area) - 4,300 new homes ;
- and the East - 2,930 new homes.

However this broad distribution does not add up to the total of 15,500 perhaps the Council should consider percentages rather than numbers. The supporting text explains that allocated sites will be identified in Part 2 of the Plymouth Plan.

**Policy 42** also gives "*priority to development on previously developed sites*". This proposed prioritising of previously developed land is contrary to the NPPF. The core planning principle set out in Paragraph 14 of the NPPF is to "*encourage the effective use of land by re-using land that has been previously developed (brownfield land)*" such encouragement is not setting out a principle of prioritising brownfield before greenfield land. Similarly Paragraph 111 of the NPPF states that "*Local Planning Authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land*" again there is no reference to prioritising the use of brownfield land. The Council's proposal to prioritisation relates back to previous national policies which are now inconsistent with current national policy. In Paragraph 17 of his determination of the Planning Appeal at Burgess Farm in Worsley Manchester (APP/U4230/A/11/215743) dated July 2012 (4 months after the introduction of the NPPF) the Secretary of State confirms that "*national planning policy in the Framework encourages the use of previously developed land but does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet identified needs*".

**Policy 42** confirms that the shortfall in housing provision against OAHN of 22,766 dwellings will be met on the urban fringe. **Policy 43 - Principles for development in Plymouth's urban fringe** states that Plymouth Council will work pro-actively with its neighbour authority of South Hams District Council to develop a spatial plan for Plymouth's urban fringe within Plymouth's Principle Urban Area (PUA) which will meet the city's housing needs.

However as only 5,180 dwellings will be planned for at the Sherford new community in South Hams 2,086 of unmet housing needs must be delivered in other urban fringe locations.

There must be certainty that the full OAHN of Plymouth city will be met over the plan period as any uncertainties on this issue could render the Plymouth Plan unsound. The proposals set out under **Policy 43** prompt the question of whether or not Plymouth and South Hams Council's should have prepared a joint plan? The Council states that resolution of these matters will be achieved by on-going discussions under the Duty to Co-operate and on-going work for the site allocations in Part 2 of the Plymouth Plan. However these important issues should be resolved before submission of the Plymouth Plan for examination in particular the Council should have regard to Paragraphs 178 – 181 of the NPPF concerning "*Planning strategically across local boundaries*".

The non-resolution of this issue has implications for the successful implementation of **Policy 1 - Delivering a welcoming city** in particular :-

- Bullet Point (2) - "*each young person has access to ... the housing ... opportunities they need to be able to remain in Plymouth*";
- Bullet Point (3) - "*each citizen ... has the home they need*".

**Policy 2 – Delivering a city of sustainable linked neighbourhoods** Bullet Point (3) refers to "*good balance of housing types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs*" which is expanded upon by **Policy 18 - Meeting Local Housing Needs** in :-

- Bullet Point (9) - on sites of 10 or more at least 30% affordable housing will be provided ;
- Bullet point (13) - 20% lifetime homes provision on sites of 5 or more units ;
- Bullet point (14) - 4% wheelchair user homes on sites of 25 or more units.

However for Bullet Point (4) to comply with House of Commons Written Statement on Support for Small Scale Developers, Custom and Self Builders dated 28<sup>th</sup> November 2014 the wording should be changed to more than 10 dwellings rather than 10 or more. It will also be necessary to review Bullet Points (13) and (14) for consistency with the outcomes of the Government's Housing Standards Review when published.

Similarly for consistency with the outcomes of the Housing Standards Review the Council may wish to re-consider :-

- **Policy 28 - Reducing carbon emissions & adapting to climate change** Bullet Points (3), (8) (2) and (8) (3) ;
- **Policy 32 - Place shaping & the quality of the built environment** Bullet Point (5).

**Policy 33 - Safeguarding environmental quality function & amenity** in Bullet Point (6) refers to Building for Life criteria however Building for Life is now superseded by Building for Life 12 the reference should be up dated. This illustrates that best practice guidance such as Building for Life may regularly change therefore the Council should re-consider whether or not specific reference to such documents in policies contained in the Plymouth Plan is appropriate.

Whilst the inclusion of **Policy 50 - Approach to planning obligations, Community Infrastructure & development viability** is acceptable this policy should not negate the Council's responsibility to undertake whole plan viability testing as part of the process of preparing the Plymouth Plan.

It is hoped that these comments are of assistance to the Council in preparing the next stages of the Plymouth 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**



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