



Torbay Local Plan Evidence Study

Final Summary Report

On behalf of **Torbay Council**



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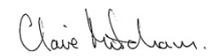
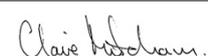
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Appendix A

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1 Introduction

- 1.1.1 Peter Brett Associates has been commissioned to review the approach to housing provision in Torbay and to make recommendations for how this should be taken forward within the emerging Local Plan. The Council needs a clear approach to making provision for housing in the Local Plan for the period 2012 to 2032 which is based on sound evidence, is justified, and is demonstrably deliverable. This approach to housing provision has to be part of a coherent strategy by which the Local Plan can contribute to the achievement of the objectives the Council and the community have for Torbay.
- 1.1.2 The study reported here integrates two basic requirements of evidence based plan making:
- It identifies the requirement for housing in Torbay during the plan period
 - It assesses the potential supply of housing in Torbay during the plan period.
- 1.1.3 These two have to be brought together in making a good and sound plan, and that is what this report seeks to assist with, once the evidence has been summarised.

1.2 Background

- 1.2.1 A draft of the Torbay Local Plan covering the period 2012 to 2032 was consulted upon in November 2012. Its key theme is about 'planning for success'; being ambitious and proactive in considering what changes need to take place to ensure a thriving economy, cohesive communities, and enough housing to support these so that the area functions in a sustainable way. It sought to provide:
- 15,000 additional jobs to 2032 (750 per annum)
 - 8,000 – 10,000 new homes provided at a rate of 400 per annum (2,000 over the first 5 year period).
- 1.2.2 The consultation on the Local Plan has brought forward strong representations, with the main themes being:
- Creating 15,000 new jobs is too ambitious and this number cannot be delivered
 - 8,000 – 10,000 new homes is too many to provide and cannot be accommodated
 - Developers, professional respondents and Teignbridge District Council considered that the level of housing provided was too low, citing the Draft Regional Spatial Strategy requirement for the area of 15,000 new homes up to 2026.
- 1.2.3 As part of the neighbourhood planning process, local neighbourhood fora have been established for Torquay, Paignton and Brixham. These have been considering possible change in their areas and the accommodation of needed development, with the help of considerable resources from the Princes Foundation. This work has identified a number of possible development sites in each neighbourhood area, though not all of these have been fully endorsed by the respective neighbourhood fora, and neither are all of the sites necessarily deliverable.
- 1.2.4 The neighbourhood planning process is intended to inform the preparation of the Local Plan and to assist in the delivery of the Local Plan. The ongoing work of the neighbourhood fora has assisted PBA with the identification of the possible supply of housing in each of the three areas, but the sites suggested by the local fora have been assessed in this study in the same

way as sites being identified by any other route, because they have to stand the same form and degree of scrutiny in preparing the Local Plan.

1.3 Approach

- 1.3.1 The preparation of the evidence leading to proposals for the Local Plan has been undertaken in two main parts. The first part of the work by Peter Brett Associates has been to identify the housing requirement for the plan period by an objective assessment. This has considered likely demographic change and corroborated figures from this approach with the number of people who would need to be available to fill the jobs which an examination of economic potential suggests could be achieved in the area. Within this part of the work, which is summarised in **Section 2** and reported fully at **Appendix A**, an assessment has also been undertaken of the rate at which the market would be likely to be able to bring forward new housing if it was wanted by the plan and if sites were available.
- 1.3.2 The second part of the work has examined the housing supply, with the identification of land which could be developed for housing or a mix of use. Sites have been identified within Torquay, Paignton and Brixham, and also beyond the existing boundaries of these urban areas. This part of the work, effectively an Update of the SHLAA carried out by Baker Associates¹ in 2008, is summarised at **Section 3** and reported fully at **Appendix B**.
- 1.3.3 Having objectively assessed both the housing requirement (including the likely level of job creation), the housing supply that is likely to come forward from within the urban area, and the potential from greenfield sites beyond the urban edge, the remainder of the project has been to draw together these strands of evidence in order to present ideas for how the Local Plan should be presented. This is set out in the section that follows.
- 1.3.4 The work has been undertaken by the consultants in discussion with Council's planning officers and officers from the Torbay Development Agency. Two workshops have been held with elected members. Two workshops have also been held with representatives of the development industry, for the explicit purpose of seeking views on market conditions in Torbay, on the deliverability of certain types of land, and on the rate at which new dwellings are likely to be able to be provided and taken up. There has not been a process of community engagement specifically for this project, though the continuing work of the Princes Foundation with the Neighbourhood Fora has fed into the study.

¹ Baker Associates is now part of Peter Brett Associates.

2 Housing Requirement

2.1 Background

2.1.1 Torbay Council has considered the housing requirement previously and comprehensively analysed a range of recent projections in its Housing Topic Paper (September 2012). This study builds on this work and examines additional information such as the components of change, and the 2011 based interim household projections. It takes account of the 2011 Census data, and uses this as baseline information which sets the population and households at 2011. The updated 2011 Strategic Housing Market Assessment (SHMA) provides a robust assessment of need, and specifically affordable housing need and has been used within this study.

2.2 Approach / Method

2.2.1 The evidence report on the housing requirement uses the demographic evidence that exists and examines the broad economic potential in terms of likely job growth projections across the economic sectors in Torbay to understand what the objectively assessed need in terms of the housing requirement might be. This is then tested against what might be achieved in terms of deliverability and market capacity as well as the need identified in the SHMA in order to assist the Council in setting the housing provision to be included in the Local Plan.

2.2.2 The demographic led approach uses recently published population and household data from ONS and DCLG to examine four demographic projection scenarios to consider what the population would be at 2032 and then translate this using assumptions on average household size at 2032 into the number of new homes that would be required over the plan period. The scenarios tested are:

- Long term population growth trend (1991– 2010) projection (D1);
- 2010 based population projection (D2);
- 2011 based interim population projection extrapolated (D3); and
- 2011 based interim household projection extrapolated (D4).

2.2.3 The economic led approach considers what changes have taken place in the economy of Torbay recently and what opportunity for growth there is in the future. The study uses the recent economic projections to set out three employment led scenarios which present different levels of job growth for the plan period. Using assumptions about the proportion of economically active people with a reduction in unemployment rates together with projected information about the proportion of working age population in 2032, a calculation is made of what population would be likely to be required by each jobs growth scenario. Using the same average household size assumption as in the demographic projection scenarios, these populations figures can be translated into the number of new homes that would be required for the plan period under the scenarios.

2.2.4 Two of the economic or job growth scenarios examined are the existing work of other agencies and one scenario has been developed by PBA for this project. The three scenarios are therefore:

- Oxford Economic Projections March 2013 (E1);
- South West Observatory Projections by Experian August 2011 (E2); and

- PBA bespoke adjusted projection March 2013 (E3)

2.2.5 A further contribution to the evidence on the amount of housing required is the 2011 SHMA update. This provides an objectively assessment of the need for affordable housing in Torbay. This has been analysed and supported with more recent information on need from the Council and in relation to tenure and size from the 2011 Census. The SHMA demonstrates that there is a need of 3,359 affordable homes for the period 2011- 2016.

2.3 Key findings

- 2.3.1 The different demographic led projections indicate that a range of between 8,900 and 11,200 new homes would be required for the plan period. The lower figure is based on the long term growth trend and is the minimum figure that could credibly be taken as the demographic requirement. Though 2011 based household projections were published by DCLG as recently as 9 April 2013, these interim projections only go to 2021 and do not cover the whole of the plan period.
- 2.3.2 The employment led projections undertaken elsewhere and looked at for the study vary very considerably, from 2000 jobs over the plan period to 17,000 jobs. The lower of these is too pessimistic given the Council's strategy whilst the higher is not credible. The scenario developed specifically for this project indicate that over the plan period there could be a net addition of 5,300 jobs. This level of job growth would require the development of 12,278 new homes.
- 2.3.3 The market capacity of Torbay can be inferred from an analysis of completions which demonstrates that annual average rates of between 450 and 500 dwellings per year have been achieved during various periods between 1981 and 2012. Exploring the same issue with those involved in delivering housing suggests that whilst this level has not been achieved over the last two years there is every indication that the market will pick up in the medium term. At these average levels of annual completion the market could deliver between 9,000 and 10,000 homes in Torbay between 2011 and 2032.
- 2.3.4 The SHMA update 2011 provides a robust objective assessment of the need for affordable housing and identifies a five year requirement for 3,359 homes. The amount of affordable housing delivered as part of the overall housing provision depends both on the Council's policy and site by site viability considerations. If past performance is taken as an indicator of what to expect in the future, around 100 units of affordable housing would be delivered from an annual overall supply of 4-500 dwellings.

3 Housing Supply

3.1 Background

- 3.1.1 Councils are required by the NPPF to prepare a Strategic Housing Land Availability Assessment (SHLAA) for their area. A SHLAA for Plymouth was produced in 2008 by Baker Associates on behalf of the Council and is now being reviewed and brought up to date.
- 3.1.2 A SHLAA identifies suitable and available land from which residential development would be deliverable in order to provide a stock of sites which may come forward for housing within a specified period. The SHLAA is not a policy document or part of the development plan, but provides evidence which the local authority may use in presenting its plan.

3.2 Approach / Method

- 3.2.1 The 2008 SHLAA followed closely the Practice Guidance issued by DCLG in 2007. The Update has continued with this methodology and reviewed all of the sites which were identified previously together with those which have been brought forward more recently.
- 3.2.2 The SHLAA Update considered all 339 sites originally included within the 2008 SHLAA. A further 215 sites were brought forward from various sources including the Council's records of pre-application consultations, pending applications, land promoted to the local plan process and sites identified by the community as part of the Neighbourhood Plan process.
- 3.2.3 The status of all of the sites was assessed at a base date of 1 April 2013. This is the Council's reference for annual reporting and adopting this date ensures consistency. However, at May 2013 and the completion of this study, the 2012/13 figures have not been fully assessed. This SHLAA Update therefore adopts assumed figures based on the most up to date evidence available for completions in 2012/13 and planning permission levels as at 1 April 2013. The figures can be updated to a consistent base once the annual monitoring work is completed.
- 3.2.4 In order to consider the suitability of a site for development the consultant team reviewed the relevant national and Council policies and also the practical implications of development on existing and future residents.
- 3.2.5 The availability of sites for development was considered and where-ever possible the intentions of land owners ascertained in order to ensure that sites are genuinely available for development.
- 3.2.6 Finally, achievability was considered in conjunction with a panel of developers and local agents and consultants experienced in the delivery of development within the area.
- 3.2.7 An anticipated yield for dwellings for each site was arrived at through the application of combination of density multipliers with experience and market knowledge of what types of development might come forward.
- 3.2.8 Sites which might deliver 5 or less dwellings have not been examined and recorded individually through the SHLAA but are counted towards potential supply through an allowance for windfall development.
- 3.2.9 As well as specific site opportunities, the 2008 SHLAA identified a range of 'broad locations' beyond the existing urban areas. These locations have been assessed as part of this update. Within the broad locations some specific sites have been identified as available, whereas other parts of the broad locations do not yet have this status.

3.3 Key findings

- 3.3.1 The SHLAA findings indicate that there is planning permission for approximately 2,265 dwellings on land within Torbay on a range of sites from individual units to large greenfield sites such as Scotts Meadow and sites at Yalberton.
- 3.3.2 In addition approximately 82 sites have been identified which are considered to provide opportunities to deliver housing within the plan period (2012-2032). These may provide for up to 2,562 dwellings coming forward on sites which are generally within the urban area of the three settlements of Torquay, Paignton and Brixham.
- 3.3.3 There is a group of specific sites which also may provide opportunities for the delivery of dwellings within the urban area, but which are constrained by a planning policy such as the protection of employment land or holiday accommodation. In all other aspects it is considered that these sites might be deliverable, but the Council would need to consider carefully the policy approach to these sites before they can be considered deliverable in the context of the SHLAA guidance and NPPF. These sites might provide for up to 906 dwellings.
- 3.3.4 The council own a number of car parks across the administrative area and there is understood to be a review of all car parks underway. Up to 600 dwellings could be accommodated on existing car parks in a sustainable manner if the Council were minded to release these sites for residential use. The use of car parks for housing must be considered alongside the management of parking spaces to meet transport and economic objectives and a strategy brought forward for these sites which may involve retention or development, or in some cases higher utilisation of part of the land and the redevelopment of the rest. Individual site studies should be undertaken in the context of a parking strategy and the need to identify development land in the urban areas.
- 3.3.5 The SHLAA has sought to identify sites which would yield 6 or more dwellings. The development of smaller sites will continue to bring forward housing. The number of homes that could be provided in the plan period from this source – small windfalls – is estimated on the basis of past completions to be 2,210. This figure takes account of changes in planning policy and also avoids the double counting of dwellings from small sites which already have planning permission.
- 3.3.6 There are a number of sites brought forward to the SHLAA which are greenfield sites outside of the urban area which in the context of the current Local Plan would not be acceptable for development. However, some of these sites may provide suitable locations for development as part of a sustainable pattern of development if the requirement is there, and all of the sites put before the SHLAA have been assessed.
- 3.3.7 In the 2008 SHLAA 16 broad locations for development were identified following the exclusion of areas subject to critical restrictive designations such as SSSI and through assessment of the form, character and value of the landscape. These areas have been re-assessed and a yield estimated for specified greenfield sites within these broad locations.
- 3.3.8 This review has resulted in the identification of greenfield land to accommodate approximately 2,658 dwellings. However, this figure relates only to those sites which are considered to be available for development and this does not equate to all of the land within the broad locations identified in 2008.
- 3.3.9 It remains a job for the Local Plan to decide which sites should come forward and when.

4 Proposals for the Local Plan

- 4.1.1 This section brings together the results from the assessment of the housing requirement and the potential housing supply, and considers the way the Local Plan should proceed in order to address the Council's objectives as far as possible whilst being capable of being found sound. The report makes recommendations for what we consider to be the most appropriate way forward for the Plan, according to the various possibilities that have been considered.
- 4.1.2 The headline evidence is that there is a defensible figure for the housing requirement that is considerably less than the figures previously proposed by the emerging Regional Strategy, but which is higher than some respondents to the earlier consultation on the Local Plan regard as acceptable. At the same time, there is potentially a supply of acceptable and deliverable development opportunities that could enable this identified requirement to be met, though issues of market capacity may affect the timing of provision and there is some uncertainty over areas of development land that would be needed to reach the requirement in the later stages of the plan.
- 4.1.3 The Local Plan has to set out what is the housing requirement according to an 'objective assessment'. This is national planning policy. This report provides evidence enabling the Council to identify a housing requirement figure for Torbay for the plan period. It is a requirement of national planning policy too that the Local Plan seeks to meet the objectively assessed requirement as far as is consistent with the policies set out in the Framework (NPPF para 47 point 1).
- 4.1.4 However by the same Policy Framework, the Local Plan has to be deliverable. The consequence of these various requirements is that the provision for housing made in the plan may be different from the identified requirement, but if it is there has to be a very clear justification for this difference. A planning authority adopting this position could expect its work to be closely scrutinised and its plan to be the subject of considerable objection. The difference between the provision and the requirement may be explained in terms of the amount of development possible from environmentally acceptable locations; that can be provided with infrastructure needed to make the development work; or that the market can provide and assimilate. The Council's aspiration that in Torbay the building of homes should follow the growth in jobs will also be an important consideration in the Council's decision about making the provision.
- 4.1.5 Where a local planning authority does not propose in its Local Plan to meet the housing requirement in full, the national policy position following the introduction of the statutory 'duty to cooperate' is that it should look to other planning authorities to address the unmet requirement, and whether the relevant planning authorities do so becomes in turn part of the test of the soundness of their plans when they are submitted for Examination. Torbay Council is in discussion about the relationship between its Local Plan and that of Teignbridge District Council. Assisting with the management of this relationship has not been part of the Council's instruction to PBA for this project.

4.2 Evidence

- 4.2.1 The study has produced a number of pieces of evidence.
- 4.2.2 On the objective assessment of the housing requirement, having regard to predicted demographic change and the achievable growth in the number of jobs in Torbay, our finding is that the housing requirement for the plan period could be identified somewhere between 9,600 and 12,300 dwellings. The lower figure reflects a poor and pessimistic performance in job creation, whereas the higher figure is consistent with the potentially achievable job growth provided there is a very committed and positive approach to economic development by the

Council and its partners. In selecting a housing requirement figure therefore, the Council has to be clear what it is assuming in terms of job growth and how the housing requirement reflects a corroborative combination of demographic and economic scenarios. On the supply of housing, our review of the SHLAA has identified that:

- The number of dwellings estimated to be already completed in 2012/13 that count towards the plan period provision is 350 (*Note: This is an estimate and needs to be updated once the monitoring for 2013 is completed*).
- There is a total of 2,265 dwellings already under construction or with planning permission as at 1st April 2013 which it is reasonable to expect will be delivered
- Within the urban areas the number of dwellings that could be provided from identified sites that could be allocated is between 2,562 and 4,067 dwellings, with the upper figure assuming that 599 dwellings come forward on public car parks within the urban areas and assuming 906 dwellings coming forward from sites which have some constraints, such as a permission for employment use or some use as open space.

4.2.3 It is reasonable to expect and therefore to count 130 dwellings to come forward each year from windfalls on small sites (less than 6 dwellings), providing for a total of 2,210 dwellings for the plan period when allowance is made for the effect of possible double counting with sites with planning permission at the beginning of the plan period.

4.2.4 This is a total of up to 8,892 dwellings, though a figure of 8140 might be a wiser estimate (taking half of the less confident provision). The Council for instance has to take a view on the use of car parks. If it wishes to see some housing provision from this source whilst retaining the level of car parking there will need to be a site by site investigation of the car parks to find design and development solutions to make the best use of the land within an overall strategy.

4.2.5 Any level of provision beyond this will require the use of land beyond the present settlement boundaries – greenfield sites. The assessment of the potential supply from greenfield sites has concluded that:

- The number of dwellings that the Council can be confident will come forward within the first half of the plan period, because there is already interest and activity in the promotion of the relevant sites, and because in general terms the development would be acceptable if the need is there, is approximately 1020 dwellings.
- Our estimate of the number of dwellings that could be acceptable and which could come forward over a longer period, and hence in the second half of the plan period, given more time for promotional work, land assembly and infrastructure planning, and hence be counted towards the provision in the second half of the plan, is 2100 dwellings. This is from sites in the Collaton St Mary / Totnes Road and White Rock areas and small sites on the urban edge. Achieving the delivery of this supply will depend to some degree on proactive work by the Council and so to count this supply towards the provision made, if the Council were minded to do it, would require the demonstration of this commitment by the Council.

4.2.6 The second category of greenfield sites needs further comment. The figure given is the estimated capacity of sites that are assessed to be suitable and which have an interested landowner or developer behind them. Realising this supply in a satisfactory way – with the right relationship between different pieces of land and with their setting, and with the provision of the necessary infrastructure as well as contributions from the development towards that infrastructure – will all need considerable effort from the planning authority working with the landholders and stakeholders. When this is done it is entirely likely that other land will be brought into each scheme and the development capacity that can be assumed from these

areas will increase. Until this work has been advanced it would be inappropriate for planning permissions to be given for sites in these areas and for piecemeal development to take place.

- 4.2.7 The plan should therefore proceed on the basis that the development from this land is neither deliverable nor needed in the early part of the plan, but is part of the overall provision made in the plan and will be promoted and developed in the later part of the plan. The Local Plan should therefore proceed on the basis that these are 'broad locations' for development in the later part of the plan period, but not until then, and specifically not until a comprehensive approach has been set out.
- 4.2.8 The third element of evidence relates to market demand, or how the housebuilding and development industry is likely to act in the coming years taking account of the market into which it can sell or rent accommodation on the one hand, and the supply of land for which planning permission can be obtained on the other. The findings on these matters are that subject to the supply of suitable sites and the number of outlets at any time, the market capacity in the short to medium period is around 400-450 dwellings per year, though it has been rather lower in recent years and has been considerably higher at the peak of the market. The significance of this evidence is that it goes directly to the part of the soundness test that requires a plan to be deliverable. It cannot be expected that a plan will be judged to be deliverable if it relies upon buyers and renters of new property taking up dwellings at a significantly higher rate than seems likely in reality.

4.3 Deliberations

- 4.3.1 The Council has to move from evidence to policy for its Local Plan, with the Local Plan delivering the Council's objectives whilst being able to be found sound. A number of significant issues have to be faced in finding a way forward in relation to housing provision. These are discussed here.
- 4.3.2 First, and as noted already, provision for anything other than the objectively assessed housing requirement places a high onus of justification on the Council. The figure from this study that combines credible demographic scenarios with what appears to be reasonable as the achievable level of job growth is the most defensible figure. If the Council presented a lower figure as the housing requirement it would be implicitly planning for a level of job growth less than appears to be achievable, and hence be obliged to agree that it was intentionally restricting that growth, or be open to the charge that its approach to housing is completely inconsistent with its approach to jobs.
- 4.3.3 Second, the Council is expected to seek to meet the assessed affordable housing need. Whilst this is evidently impossible (on the basis of the SHMA assessment over the next five years) because the affordable housing need far exceeds the total amount of housing that can realistically be expected to be delivered, the Council will need to demonstrate that it has had regard to this need. It should show what contribution will be made to the affordable housing need from the overall level of housing provision made in the plan and be able to justify its approach having regard to the relevant factors. Basing the level of housing provision on the housing requirement of 12,300 ought to provide for at least 3000 affordable homes during the plan period. This is noted to be less than the assessed need for the first five years of the plan period, though this need would not continue at the same rate for the remainder of the plan period.
- 4.3.4 The third issue is that delivering housing at a rate consistent with an average annual figure taken from the corroborated plan period requirement of 12,300 may well not be possible at present with the state of the housing market.
- 4.3.5 The fourth consideration is that the Council cannot be entirely confident that the amount of housing consistent with the higher level of the requirement range set out could be shown to be available and deliverable within the plan period. This level of provision will require housing to come forward from greenfield sites that could be acceptable and are in the hands of

apparently willing owners or developers, but which would only really satisfactorily contribute to the creation of proper places over the long term if they are developed in a coherent way together with other land and infrastructure as comprehensively planned schemes. The Council may well seek to achieve such development, but cannot be certain of the product of such initiatives at the moment. Taking such an approach to the provision in the Local Plan is consistent with the principles of the Framework, with less certainty required over provision to be made in the later stages of the plan period.

- 4.3.6 The fifth consideration is that to some degree there is a relationship to the number of jobs which are added into the local economy in the assessment of the housing requirement. There is an aspiration amongst the Council to relate the rate at which housing is created to the rate at which jobs are created. This is entirely reasonable. Indeed it may happen as a consequence of the market – people may not wish to or be able to buy or rent homes unless they have jobs. Making this relationship stick through planning mechanisms however is quite difficult. A number of possibilities can be looked at.
- 4.3.7 One way to make the link would appear to be to require all development providing more than a set threshold of housing to also include employment opportunities. This approach of mixed development would reduce the capacity of sites to provide housing, meaning that more greenfield land was required to meet whatever provision target was set. It would also reduce the viability and hence deliverability of residential development, something which would have to be compensated for with more sites or reflected in the overall level of provision. Providing employment accommodation within a development site is not the same thing as creating jobs in any case.
- 4.3.8 The Council has already proposed (in the draft plan) a policy whereby development for housing is only allowed provided 1.5 jobs come forward for every one house. This policy has been borrowed from the plan of another local authority in the South West. Whilst part of this plan was found sound (with the housing numbers policies remitted following legal challenge), it is evident that this policy was not fully considered in the Examination, but benefitted from the support of the developer with most to gain from the policy. The Council in that case has never been convincing about the policy and we are doubtful that an adequate mechanism could be found in Torbay. The greatest risk of promoting such a policy is simply that an Inspector would be persuaded that such a policy would inhibit the delivery of housing, putting the soundness of the plan at risk.
- 4.3.9 The third possibility is that the plan is set up on the basis that as more jobs come forward, more housing is provided. The mechanism for this would have to be that:
- The plan identified the housing requirement, and separately a level of provision to be made which was linked to the total number of jobs ('full time equivalent jobs' perhaps) that were present
 - A supply of acceptable sites was identified in the SHLAA well in excess of the level of provision made in the plan explicitly related to an 'expected' level of job growth
 - Policies would be included in the plan which dealt with the thresholds of housing provision related to job numbers, the order of preference (in terms of categories of supply) under which additional housing provision would come forward, and the 'triggers' for additional development according to changes in the job numbers
 - The monitoring arrangements for understanding the change in job numbers would be set out, including the necessary definitions, the sources of information and the verification process.
- 4.3.10 It would be essential that the matters covered in the consultation on the Local Plan included the way in which additional sites from the SHLAA would be able to gain planning permission,

so that the process was not unduly delayed by further consultation requirements when a change was made.

- 4.3.11 It must be noted that this arrangement would have to be set up on a 'ratchet' basis – homes could not be removed if the job numbers fell.

4.4 Recommendations

- 4.4.1 We attach high priority to the Council putting forward a Local Plan capable of and likely to be found sound. We also appreciate the Council's wish to nurture economic growth and to meet housing needs whilst being prudent in the use of land, particularly land that has not been developed previously, and to provide stewardship of Torbay's environmental resources and distinctive character.
- 4.4.2 Our recommendation is that the Council identify 12,300 dwellings as the objectively assessed housing requirement and that it sets 12,300 dwellings as the level of provision to be made within Torbay for the plan period. We do not believe that the requirement can be demonstrated to be significantly higher, and nor could the Council demonstrate a supply of dwellings above this figure at the present time. In order to achieve this level of provision, development sites will still need to be identified for the later part of the plan period, with the broad locations of Collaton St Mary and White Rock as the likely source of these.
- 4.4.3 We do not believe that the Local Plan should be based on a significantly lower level of provision, around 9,000 say, with more to come forward if a greater level of jobs were to materialise. This would be to suggest that the Council did not believe and was not committed to its own figures for the number of jobs to be created within the district (if the jobs figures proposed in this report are accepted).
- 4.4.4 Two problems arise in reconciling this proposal with some parts of the evidence:
- This level of provision for the plan period implies average annual completion rates somewhat higher than seem likely for the next few years
 - Some of the possible supply from greenfield sites cannot be treated as available now, in the terms of the Framework.
- 4.4.5 Our suggested way to bring all of this together is to adopt variable delivery rates for the plan period. Whatever figures are adopted as the basis for taking the plan forward these will inevitably be looked at again in subsequent reviews of the plan, taking into account what has happened and the circumstances at the time. Currently however, and in round terms, the plan provision could be based on average annual rates for different parts of the plan period as follows:
- 450 for 2012-2017
 - 550 for 2017-2022
 - 650 for 2022-2027
 - 800 for 2027-2032.
- 4.4.6 This approach has a number of consequences and advantages:
- The Council does not find itself with the requirement for a five year supply that it cannot meet – by setting the level of provision for that period above what appears to be deliverable - leading to permissions being granted on appeal that may disrupt its spatial strategy without necessarily increasing the number of dwellings being built.

- This approach provides time for the proper pro-active planning of the 'broad locations' for development, as this supply is needed in the later part of the plan.
- Whilst there is no explicit link made between the creation of dwellings and the growth in the number of jobs, this lower rate of provision in the earlier part of the plan period is consistent with the Council's view that jobs should lead homes.

4.4.7 These proposals do not rely on provision from within Teignbridge to help to meet the housing requirement within Torbay. However joint working should continue, as is required by the Duty to Cooperate. It might be that housing in Teignbridge very close to the administrative boundary could be identified that would assist in achieving higher delivery rates in Torbay in the earlier part of the plan period. There certainly should be continued cooperation over the location and number of dwellings and in relation to the location and number of jobs.

4.4.8 We have not suggested – as some Planning Inspectors are proposing as a means of condoning plans which do not address their objectively assessed need – that the Local Plan contains a policy scheduling a review in a few year's time and lowers the housing provision made now by this approach. The Local Plan needs to be found sound on the basis of what it contains, not what it 'commits' to do in the future. It is important to note of course that whilst the plan is being made for the period up to 2032, it is not intended to remain unchanged for 20 years. It should be reviewed regularly, and when it is, the evidence on the job situation, the housing requirement, and the supply of development land will all be looked at afresh. It is entirely likely too that planning policy will have changed again.

Appendix A

Requirement Assessment

This report is separately bound.

Appendix B

SHLAA Update 2013

This report is separately bound.

