

# Housing Topic Paper

EXMOOR NATIONAL PARK LOCAL PLAN 2011 – 2031  
JUNE 2015

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## Summary

This housing topic paper provides additional evidence and explanation to underpin the housing strategy in the Publication Draft of the Exmoor National Park Local Plan. It includes information on the context of the National Park including:

- National Parks statutory purposes and duty, and a summary of national policy and guidance on housing and National Parks. National Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them.
- Exmoor's population and local housing market. Exmoor has an aged population and high external demand, predominantly from people in older age groups. There is a disparity between local incomes and house prices/rents creating an 'affordability gap' and a consequent need for local need affordable housing. New local needs housing has tended to be occupied by families and working age people in younger age groups.
- Evidence on landscape sensitivity, and the capacity of greenfield sites in settlements.

The paper draws on the Northern Peninsula Strategic Housing Market Area (SHMA) and subsequent updates including a jointly commissioned Northern Peninsula SHMA Update published in January 2015 by Northern Peninsula Housing Market Area (HMA) local planning authorities of North Devon, Torridge and West Somerset District Councils and Exmoor National Park Authority, to objectively assess housing need in the HMA.

The SHMA Update has reviewed and appraised the implications of the ONS 2012 Subnational Population Projections using more recently released data relevant to the projection of housing numbers. It provides disaggregated projected future housing requirements for the four local planning authorities (Appendix 1) and for the constituent housing authority areas within the National Park 2011-2031 (Appendix 2). An additional Exmoor National Park Update reviews housing and population evidence including the projected level of affordable housing need.

The housing figures have been assessed, taking account of national policy and guidance, to provide confidence in the approach both within the National Park and as part of the Northern Peninsula HMA. The recommended scenario of Table 6.3 of the 2015 Joint SHMA Update (Appendix 1) has been taken as the starting point for calculations. Table 3.5 summarises the range of figures for the National Park as a whole.

<b>Table 3.5 Exmoor National Park Objectively Assessed Need (OAN) 2011-31</b>
The OAN range for Exmoor National Park is 664 -744 dwellings. The <b>Preferred OAN is 685 dwellings</b> 2011-2031 of which: <ul style="list-style-type: none"><li>• <b>205</b> are for North Devon in the National Park (131 affordable and 74 market dwellings)</li><li>• <b>480</b> are for West Somerset in the National Park (306 affordable and 174 market dwellings)</li></ul>

The paper provides explanation of the approach being taken in setting out a positive strategy for the provision and delivery of housing in Exmoor National Park including:

- an outline of the position on duty to cooperate as regards housing, reflecting agreement that the 205 units arising in the North Devon housing authority area of the National Park will be met in the North Devon area outside the National Park.
- realistic constraints, and
- the positive approach to the future delivery of affordable housing in the National Park with an estimated need for 306 units of local need affordable housing 2011-31.

## 1. Introduction and Role of Housing Topic Paper

1.1 This housing topic paper provides additional evidence and explanation to underpin the housing strategy in the Publication Draft of the Exmoor National Park Local Plan. It sets out the objectively assessed need (OAN) for Exmoor National Park, and for the two constituent housing authority areas within it, including evidence on the level of affordable housing need. The paper also provides additional explanation of the approach being taken in setting out a positive strategy for the provision and delivery of housing in Exmoor National Park (ENP) including an outline of the position on duty to cooperate as regards housing, realistic constraints, past delivery of housing, and the approach to future delivery.

## 2. National and Local Context

### 2.1 National Park Statutory Purposes and Duty

2.1.1 The statutory purposes of National Parks are set out under the National Parks and Access to the Countryside Act 1949, as amended by the Environment Act 1995, and are:

- to conserve and enhance the natural beauty, wildlife and cultural heritage (of the National Parks); and
- to promote opportunities for the understanding and enjoyment of the special qualities (of the National Parks) by the public.

2.1.2 The National Park Authority's primary responsibility is to deliver the statutory purposes. In pursuing National Park purposes, National Park Authorities have a duty to *"seek to foster the economic and social well-being of local communities within the National Park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park"*. Within the Parks, conserving and enhancing the landscape, biodiversity, cultural heritage, dark skies and natural resources, and promoting public understanding and enjoyment of these should lie at the very heart of developing a strong economy and sustaining thriving local communities.<sup>1</sup>

2.1.3 Section 62 of the Environment Act also requires all relevant authorities to *"have regard to the statutory purposes in exercising or performing any functions in the National Park and; if it appears that there is a conflict between those purposes, to attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area"*, known as the 'Sandford Principle'.

### 2.2 National Policy

2.2.1 The NPPF states that local planning authorities should *'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.'*<sup>2</sup> Paragraph 14 also states that Local Plans should meet objectively assessed needs unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
- Specific policies in the Framework indicate development should be restricted. Footnote 9 of paragraph 14 sets out examples which include within National Parks.

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<sup>1</sup> DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: DEFRA.

<sup>2</sup> DCLG (2012) National Planning Policy Framework, London: DCLG, Para. 47.

- 2.2.2 In October 2014, a statement was issued by the Government on whether *housing and economic needs override constraints on the use of land such as green belt. It applied to National Parks and other areas where the NPPF indicates that development should be restricted and reiterated that the National Planning Policy Framework should be read as a whole and that need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest (SSSIs), local green space, areas of outstanding natural beauty (AONBs), heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.”*
- 2.2.3 *The clarification also addressed the question of whether local planning authorities have to meet in full housing needs identified in needs assessments. It stated that a Strategic Housing Market Assessment should be prepared to assess full housing needs. It went to state that “However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need”.*<sup>3</sup>
- 2.2.4 The NPPF-sets out twelve core principles: planning should take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.<sup>4</sup>
- 2.2.5 The NPPF recognises the special circumstances in delivering housing within National Parks, which are given “*the highest status of protection in relation to landscape and scenic beauty...[and] great weight to the conservation of wildlife and cultural heritage*”.<sup>5</sup> The purposes of National Parks and duties of relevant bodies set out in the Environment Act 1995 (sections 61 and 62) carry great weight and in themselves provide the context for interpreting policy.
- 2.2.6 The NPPF refers to the Vision and Circular for the English National Parks and the Broads (2010) which sets out policy guidance specifically for the English National Parks for all those whose decisions or actions might affect them.<sup>6</sup> “*The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services*”. National Park Authorities are expected to “*include policies that pro-actively respond to local housing needs*” in their Local Plans, and to prioritise affordable housing for local needs.<sup>7</sup> It notes the importance of affordable housing in rural areas, including for the sustainability of National Parks and their communities recognising that high external demand for housing in National

<sup>3</sup> DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>.

<sup>4</sup> Department of Communities and Local Government (March 2012) National Planning Policy Framework, London: CLG, paragraph 17.

<sup>5</sup> Department of Communities and Local Government (March 2012) National Planning Policy Framework, London: CLG, paragraph 115.

<sup>6</sup> Ibid. Footnote 25 of paragraph 115.

<sup>7</sup> DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular 2010, London: DEFRA, para 78.

Parks has driven up house prices and that this, combined with relatively low wages means that much of the stock is now beyond the reach of many local households. This can affect the social and economic diversity of rural communities and may, undermine social support networks and the viability of rural businesses, which are key components of sustainable rural communities. The Circular recognises that Authorities have an important role to play as planning authorities in the delivery of affordable housing though they are neither housing authorities nor housing providers.<sup>8</sup>

- 2.2.7 Public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the NPPF.<sup>9</sup>
- 2.2.8 National guidance for the delivery of housing in rural areas is that local planning authorities should respond to local circumstances and plan for housing development to reflect local needs, particularly for affordable housing, including through exception sites where appropriate.<sup>10</sup> It acknowledges that housing supply and affordability are issues in rural areas, recognising the role of housing in supporting the broader sustainability of rural settlements to ensure the viable use of local services and facilities to maintain thriving communities.<sup>11</sup>

### **2.3 Exmoor National Park Context**

- 2.3.1 Exmoor was designated as a National Park in 1954.<sup>12</sup> Approximately two thirds lies within West Somerset and one third in North Devon. It has a resident population of 10,273 people; a fall of 600 between 2001 and 2011.<sup>13</sup> Approximately three-quarters of the population are within the West Somerset area of the National Park, and a quarter within North Devon. A total of 42 parishes are within (or partly within) the National Park with most of the population living in small dispersed settlements.
- 2.3.2 Exmoor National Park is one of the few upland areas in southern England. It provides a unique landscape of moorland, woodland, valleys, farmland and coast. Its remoteness, topography and climate have helped to maintain a large extent of well preserved, semi-natural upland landscapes and undeveloped coastline.

#### Population and the Local Housing Market

- 2.3.3 The National Park is characterised by an aging population with a higher than average proportion in older age groups and a below average proportion in all age groups under 45. Exmoor's housing market continues to be under considerable pressure from external demand as the high quality environment of the National Park makes it an attractive place for people to move to the area to retire or own a second home. Between 2008 and 2011, the 45 to 64 age group moved in greatest numbers while the 16 to 44 age group were leaving the area.<sup>14</sup> The Strategic Housing Market Area Assessment provides evidence on the extent to which people move from other parts

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<sup>8</sup> DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular 2010, London: DEFRA.

<sup>9</sup> CLG (2012) National Planning Policy Framework, London: CLG, paragraphs 178-179.

<sup>10</sup> Ibid. Paragraph 54.

<sup>11</sup> NPPG Paragraph: 001 Reference ID: 50-001-20140306 Revision date: 06 03 2014

<sup>12</sup> H.M. Government; National Parks and Access to the Countryside Act 1949: Exmoor National Park (Designation) Order 1954 (HLG 92/176); H.M.S.O. 1956

<sup>13</sup> Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales (webpage).

<sup>14</sup> Housing Vision, (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, page 78.

of the UK<sup>15</sup> including the South East, London, East Anglia and the Midlands<sup>16</sup> and from people who work in neighbouring areas and who can afford to buy a house on Exmoor and commute out to work.<sup>17</sup>

#### 2.3.4 Analysis of Exmoor's population shows that:

- a) a high proportion (29%) is aged 65 or above. The proportion of over 65s is the same as West Somerset District which has the highest average age in England.<sup>18</sup> The number in this age group indicates that the National Park will continue to have a well above average older population in the next 10 years. Table 2.1 below sets out the proportion of each age group in the National Park and compares it to the average for the South West region and England as a whole.<sup>19</sup>
- b) the proportion of the population aged 45 to 64 is 35%.<sup>20</sup>
- c) 64% of Exmoor's population is therefore aged 45 or above - the average for England is 42%.
- d) 16% are aged 25-44 compared to an average of 28%.<sup>21</sup>
- e) 21% are children and young people aged 24 and under compared to an average of 31%.
- f) The proportion of households with one person, and particularly two people, is higher than average. Nearly 20% of households are over 65s living alone and the number of households with dependent children is lower than average.<sup>22</sup>

<b>Table 2.1 Population Structure in Exmoor National Park</b>								
<b>Age Bands</b>	<b>West Somerset ENP</b>		<b>North Devon ENP</b>		<b>Exmoor National Park</b>		<b>South West</b>	<b>England</b>
	<b>No</b>	<b>%</b>	<b>No</b>	<b>%</b>	<b>No</b>	<b>%</b>	<b>%</b>	<b>%</b>
Age 0 to 15	958	12.3	340	13.1	1,297	12.5	17.6	18.9
Age 16 to 17	163	2.1	51	2.0	214	2.1	2.4	2.5
Age 18 to 24	452	5.8	144	5.5	596	5.7	8.9	9.4
Age 25 to 44	1,162	14.9	468	18.1	1,630	15.7	24.6	27.5
Age 45 to 64	2,705	34.7	916	35.3	3,621	34.8	26.9	25.4
Age 65 plus	2,360	30.3	675	26.0	3,035	29.2	19.6	16.3
All Categories: Age Structure.	7,800	100	2,594	100.0	10,393	100.0	100.0	100.0

<sup>15</sup> Housing Vision (2008) Northern Peninsula Strategic Housing Market Area Assessment and Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset.

<sup>16</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, para 2.50 and Table 2.23 and Exmoor National Park Authority (2000) Residential Occupancy Survey, Dulverton. ENPA.

<sup>17</sup> Housing Vision (2008) Northern Peninsula SHMA and Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset.

<sup>18</sup> Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: ENPA, paragraph 2.2 and Table 2.1.

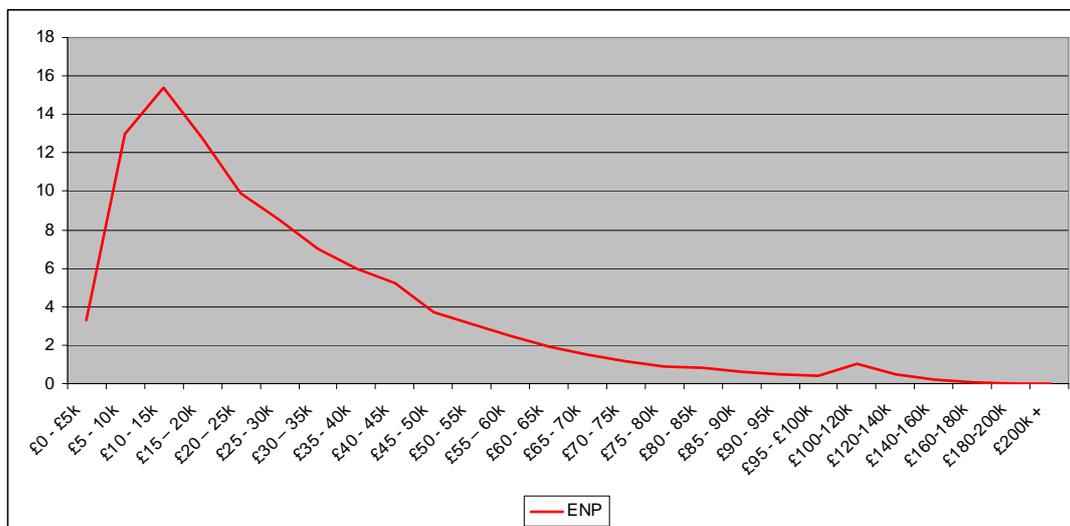
<sup>19</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset and Housing Vision (March 2015) Exmoor National Park SHMA Update.

<sup>20</sup> Ibid.

<sup>21</sup> Ibid.

<sup>22</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset and Housing Vision (March 2015) Exmoor National Park SHMA Update. Paras 2.3 to 2.4 & Table 2.1.

- 2.3.5 Internal migration (people moving into the area from other parts of the UK) is the most significant component of projected population change for Exmoor National Park. It is projected that there will be a net increase of people overall as a result of people moving into the area contrasting with a net loss due to natural change.<sup>23</sup> Between 2011 and 2035, it is predicted that there will be declines in those aged 35 to 64 but the proportion of people aged over 65 and the number of single households will increase including as a result of retired people continuing to become more aged.<sup>24</sup> The age imbalance is therefore likely to become more acute.
- 2.3.6 Analysis of the existing housing stock shows that there is a predominance of larger, detached homes (47%) and fewer more modest (and more affordable) one and two bedroom dwellings<sup>25</sup> and terraces and flats (27%).<sup>26</sup> Nearly 90% of the total stock are houses (of which almost half are detached).
- 2.3.7 There is a high proportion (over a quarter) of self-employed people reflecting the nature of the economy which is dominated by small-scale businesses particularly in the tourism and land management sectors.<sup>27</sup> There are high levels of low paid, seasonal and part time jobs.<sup>28</sup>
- 2.3.8 Average gross household income within the National Park is between £28,000 and £29,000 but many people are on lower incomes.<sup>29</sup> 45% of households in the West Somerset part of the National Park are dependent on incomes of £20,000 or less (see Figure 2.1) substantially lower than the national average. Self-employment has average earnings 14% lower than employee-employment equivalents.<sup>30</sup> Comparing rental levels and house prices with income levels and the availability of mortgages within the National Park demonstrates the magnitude of the problem.



**Fig 2.1: Gross Household Income, Exmoor National Park in West Somerset, Income Bands by percentages, September 2013<sup>31</sup>**

<sup>23</sup> Housing Vision (2015) Exmoor National Park SHMA Update, Dulverton: ENPA.  
<sup>24</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset,  
<sup>25</sup> Housing Vision (2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: ENPA Table 3.1.  
<sup>26</sup> Office for National Statistics 2011 Census.  
<sup>27</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Para. 2.11.  
<sup>28</sup> Nathaniel Lichfield and Partners (2009) Exmoor National Park Employment Land Review.  
<sup>29</sup> DEFRA Rural Statistics Unit (2010) National Parks: Economic Comparison.<sup>30</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Para. 2.11.  
<sup>30</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Para. 2.11.  
<sup>31</sup> Housing Vision SHMA Update: ENP in West Somerset (2013) (Source: Paycheck Data, CACI, September 2013)

2.3.9 Exmoor's house prices are substantially higher than regional and national averages.<sup>32</sup> Asking prices in the National Park rose by over 300% 1998 to 2012.<sup>33</sup> In 2013, the average Exmoor asking price was £325,000. For smaller properties (the bottom 25%), houses prices were also high at an average of nearly £80,000.<sup>34</sup> The disparity between average house prices and average annual household incomes is high at a ratio of 14.1 while the equivalent for average lower quartile house prices and average lower quartile household income is 11:1. Consequently, the majority of properties is well beyond the means of many local people in housing need, especially first-time buyers and families needing larger accommodation.

<b>Table 2.2 Affordability of Rents compared with Local Incomes<sup>35</sup></b>			
<b>No. Bedrooms</b>	<b>Average Rent (£/month)</b>	<b>Rent as % of gross income</b>	
		<b>£16,000 p.a.</b>	<b>£28,000 p.a.</b>
<b>Private Rental Sector</b>			
1	405	30.4	17.4
2	495	37.1	21.2
3	690	51.8	29.6
4	805	60.4	34.5
<b>Social Rental Sector</b>			
1	244	18.3	10.5
2	287	21.5	12.3
3	326	24.5	14
4	390	29.3	16.7
<b>Affordable Rentals</b>			
1	324	24.3	13.9
2	396	29.7	17
3	552	41.4	23.7
4	644	48.3	27.6

Affordable
Borderline
Unaffordable

<sup>32</sup> Exmoor National Park Authority (2013) Annual House Price Survey 2013. Median Average House Price.

<sup>33</sup> Exmoor National Park Authority (2012) House Price Survey 2012, Table 1. Surveys carried out since 1998. For those since 2004: <http://www.exmoor-nationalpark.gov.uk>.

<sup>34</sup> Exmoor National Park Authority (2013) Annual House Price Survey 2013. Median Average House Price.

<sup>35</sup> Nathaniel Lichfield and Partners (2012) Assessment of Housing and Affordable Housing Needs, Dulverton: ENPA.

- 2.3.10 Based on 25% of gross income being spent on rent considered as affordable, private market rents in Exmoor are unaffordable for many households on an average income of £28,000 and for all households on a lower quartile income (£16,000). This is particularly the case for those families requiring larger (3-4 bed) housing.<sup>36</sup> In 2012, social rental levels on Exmoor were affordable to households on average income. However, for households on lower quartile incomes, only one and two bed housing was affordable. National changes to offset reductions in public housing grants have led to the introduction of 'Affordable Rents' to be charged by Registered Providers (RPs) and pegged at up to 80% of local open market rents. On Exmoor, 'Affordable Rents' are higher (and therefore less affordable) than social rents. On average incomes, 80% rents on average incomes, anything larger than three bedroom housing was unaffordable.<sup>37</sup> Larger properties were unaffordable. For households on lower quartile incomes, rents for one bedroom properties were borderline affordable - larger housing was unaffordable.<sup>38</sup>
- 2.3.11 There is an 'affordability gap' between income and National Park house prices and rental levels. Housing, including at the lower end of the market, is beyond the reach of many households especially first-time buyers and families needing larger accommodation.<sup>39</sup>
- 2.3.12 Around 66% of Exmoor's housing is owned, nearly half outright, about 33% is rented. 14% of households are social rented. 16% is in the private rented sector much of it for holiday letting purposes and 3.2% are rent free.<sup>40</sup> The proportion of the housing stock in shared ownership or social rented tenures (i.e. affordable housing) is below the regional and national average.<sup>41</sup>
- 2.3.13 A high proportion (19%) of all housing is second/holiday or empty homes.<sup>42</sup> This adds pressure to the limited housing stock and further exacerbates affordability issues and the ability (or otherwise) to meet the housing needs of local communities.
- 2.3.14 The 'Right to Buy' of Council properties, introduced in 1981 had a significant impact on Exmoor's affordable housing stock.<sup>43</sup> Concerted efforts on affordable housing have only just begun to make up for the number of Exmoor's affordable homes lost through Right-to-Buy.
- 2.3.15 As a designated 'rural area', all new Registered Provider (RP) properties built in the National Park after April 1996 were excluded from 'Right-to-Buy'. However, recent national changes have enabled RPs to sell affordable homes on the open market to help fund new affordable housing. In most cases this has been former council housing which has, to date, funded new schemes outside the National Park. It has not applied to local need affordable homes subject to a local needs tie) The loss of existing affordable homes results in a reduction in affordable housing available to those in housing need. Suitable housing sites on Exmoor are few and finite and the delivery of new schemes is complex. It is therefore important to retain the National Park's affordable housing stock for the longer term.

<sup>36</sup> Nathaniel Lichfield and Partners (2012), Assessment of Housing and Affordable Housing Needs, paragraph 2.30.

<sup>37</sup> Nathaniel Lichfield and Partners (2012), Assessment of Housing and Affordable Housing Needs (Table 2.3 and paragraphs 2.30-2.31), Exmoor National Park Authority, Dulverton.

<sup>38</sup> Nathaniel Lichfield and Partners (2012) Assessment of Housing and Affordable Housing Needs, Table 2.3 and para 2.31

<sup>39</sup> Exmoor National Park Annual Monitoring Report 2012/13

<sup>40</sup> Housing Vision (2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: Exmoor National Park Authority, Table 3.2.

<sup>41</sup>Ibid

<sup>42</sup> Office for National Statistics (2013) 2011 Census: Key Statistics for National Parks in England and Wales, Percentage of households with no usual residents. [online]: Available: <http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-for-national-parks-in-england-and-wales/index.html>

<sup>43</sup> Figures supplied by Magna West Somerset and North Devon Homes Housing Associations to whom West Somerset and North Devon local authority housing stock was transferred.

- 2.3.16 Between 1992 and 2000 most dwellings approved and built in the National Park were larger, generally three bedroom houses.<sup>44</sup> New local need affordable housing completed since 2005, has tended to be more modest in size with the majority having two bedrooms.
- 2.3.17 Table 2.3 shows that a targeted approach to providing for local needs affordable housing has resulted in occupancy by households with a high proportion of children, young people and working age adults<sup>45</sup> - the reverse of the age profile for those older households who tend to move to open market homes in the National Park. Provision of local need housing provides an opportunity for those with a local connection who cannot afford to buy open market housing, including younger/working age people and families, to remain living in the National Park helping to achieve a more balanced community.

<b>Table 2.3 Age Range of Occupants of Local Needs Affordable Housing in Exmoor National Park</b>	
<b>Occupancy at January 2012 and September 2013</b>	
<b>Age Range</b>	<b>Number of Occupants</b>
0-9	47
10-19	20
20-29	56
30-39	34
40-49	15
50-59	8
60-69	8
70-79	2
80+	1
Age not known	4
<b>Total Number Housed</b>	<b>195</b>

### Landscape Sensitivity

- 2.3.18 An assessment of the landscape sensitivity of the National Park settlements to housing development demonstrated the limited capacity for new housing on greenfield sites within the National Park without detriment to landscape character.<sup>46</sup> The finite existing stock of accommodation, buildings and previously developed land/buildings is therefore an important component of future supply, to minimise the level of greenfield housing development within the National Park and ensure that, in the longer term beyond the plan period, there will still be some suitable housing sites in settlements to help meet the needs of National Park communities.

<sup>44</sup> Exmoor National Park Authority (2000) Residential Occupancy Survey, Dulverton: Exmoor National Park Authority.

<sup>45</sup> Exmoor National Park, West Somerset and North Devon Rural Housing Project (2012 and 2013) Age Range of Occupiers of Local Need Affordable Housing in Exmoor National Park (based on age provided at time of occupation and projected forward).

<sup>46</sup> Bryan, P (2013) Exmoor National Park Landscape Sensitivity Study, Dulverton: ENPA (capacity for 333 units).

## Past Approaches to Housing Provision

- 2.3.19 It has consistently been recognised that National Parks are not suitable locations for unrestricted housing development. Previous strategic plans focused on the need for affordable housing in rural areas to meet the needs of local communities only.<sup>47</sup> Prior to the adoption of the 1997 Exmoor National Park Local Plan, rates of new house building/conversions within the National Park consistently exceeded Structure Plan housing provision figures but had very little impact in helping provide housing to satisfy local needs and house prices continued to rise.<sup>48</sup>
- 2.3.20 The strategic approach to housing in the Joint Structure Plan and subsequently the draft South West Regional Spatial Strategy (RSS) was therefore to help meet local needs for housing in the National Park.<sup>49</sup> The draft RSS provided for an estimated provision against local needs only and did not set housing targets for the Exmoor National Park enshrining a needs led approach to only provide housing where need was demonstrated and where it did not otherwise conflict with Park purposes.<sup>50</sup>
- 2.3.21 The approach in previous Park-wide Local Plans was to encourage affordable housing.<sup>51</sup> Within the context of restraint necessary in a National Park, the 2005 Plan provided a clear focus that, exceptionally, new affordable housing to meet local need and delivered through a needs led 'exceptions' approach would be considered to ensure that the needs of local communities were prioritised.<sup>52</sup> An important principle underpinning the approach was that the level of housing development should be compatible with the conservation and enhancement of Exmoor making maximum use of existing accommodation and buildings to reduce the need for greenfield development.
- 2.3.22 This focused approach resulted the number of new affordable homes completed in the National Park outstripping the number of open market homes for the first time in 2011/12 and showing that the policies were having the intended effect.<sup>53</sup>

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<sup>47</sup> GOSW (2001) Regional Planning Guidance for the South West: RPG10, paras. 7.9 to 7.16 and Policy HO3.

<sup>48</sup> Exmoor National Park Authority (2005) Exmoor National Park Local Plan 2001-11, Dulverton: ENPA. Para. 4.6, able 4.1.

<sup>49</sup> Somerset County Council and Exmoor National Park Authority (2000) Somerset and Exmoor National Park Joint Structure Plan Review 1991-2011, Somerset County Council and Exmoor National Park Authority Policy 33: Provision for Housing. Taunton: SCC and ENPA. South West Regional Assembly (2006) Draft Regional Spatial Strategy for the South West 2006-26, Taunton: SWRA, Policy SD4, para. 3.5.3, Development Policy C, para. 4.5.3 and Table 4.1.

<sup>50</sup> South West Regional Assembly (2006) Draft Regional Spatial Strategy for the South West 2006-26, Taunton: SWRA, para. 4.5.3 and Table 4.1.

<sup>51</sup> Exmoor National Park Authority (1997) Exmoor National Park Local Plan 1991-2001, Dulverton: ENPA.

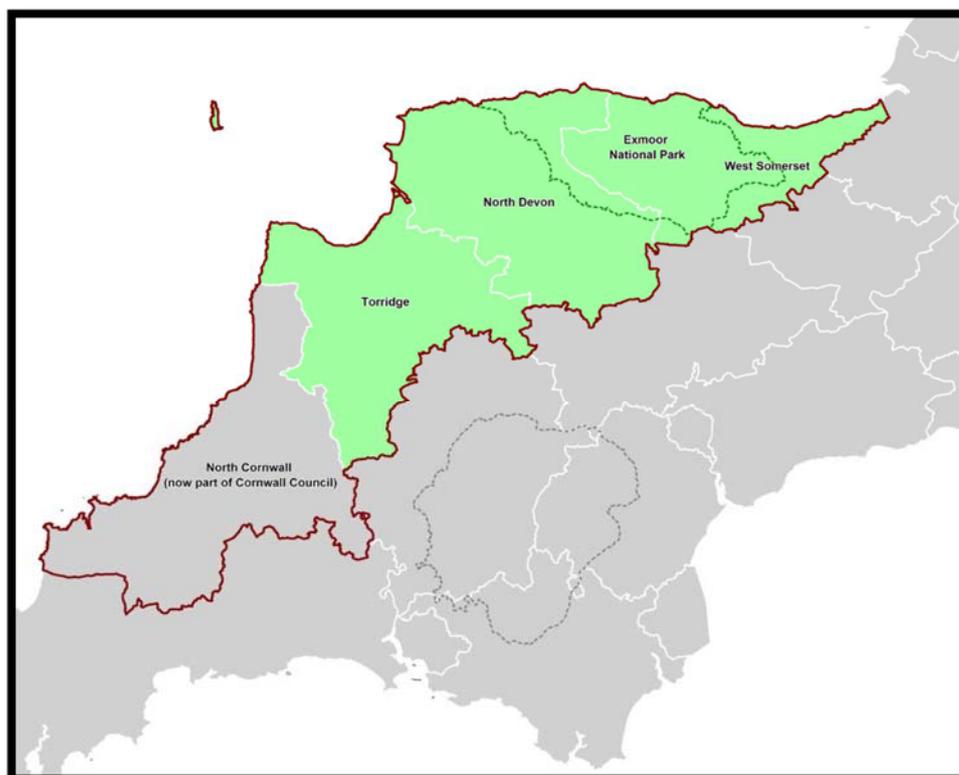
<sup>52</sup> Exmoor National Park Authority (2005) Exmoor National Park Local Plan 2001-11, Dulverton: ENPA. Chapter 4 pp 64-83.

<sup>53</sup> Exmoor National Park Authority (2012) Annual Monitoring Report 2011-2012, Dulverton: ENPA, chart 6.2 and para. 6.31.

### 3. Objectively Assessed Need for Exmoor National Park

#### 3.1 Strategic Housing Market Area Assessments

- 3.1.1 Consistent with the NPPF, four Northern Peninsula Housing Market Area (HMA) local planning authorities, North Devon Council, Torrridge District Council, West Somerset District Council and Exmoor National Park Authority, jointly commissioned a joint Northern Peninsula Strategic Housing Market Area (SHMA) Update to objectively assess housing need in the Northern Peninsula HMA.<sup>54</sup> The Update, published in January 2015, provides disaggregated figures for each local planning authority area and for the constituent housing authority areas within the National Park (Appendices 1 and 2).



**Map 3.1 Exmoor National Park within the Northern Peninsula Housing Market Area**

*(Map courtesy of Torrridge District Council)*

- 3.1.2 The 2015 update is supplementary to the Northern Peninsula SHMA completed in December 2008. The 2008 SHMA set out comprehensive evidence on the housing market area, including the identification of sub market areas and analysis on housing mix and tenure. Housing projections for the Exmoor National Park Authority were subsumed within the relevant local authority areas.
- 3.1.3 The 2008 SHMA was also subject to a series of updates for North Devon, Torrridge and West Somerset District Councils and the Exmoor National Park Authority between 2012 and 2014.<sup>55</sup> These updates were commissioned to provide evidence in response to publication of the NPPF and as the implications of the abolition of strategic plans (Regional Spatial Strategies and Structure Plans) became apparent. Given the different stages of development plan preparation at that time, the updates

<sup>54</sup> Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.

<sup>55</sup> Housing Vision (2012) Strategic Housing Market Assessment: North Devon and Torrridge Update, Final Report. Housing Vision (2013) Strategic Housing Market Assessment: West Somerset Update, Final Report. Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report.

were undertaken separately by the HMA partner authorities though prepared by the same consultant responsible for the 2008 SHMA. As the 2012 North Devon and Torridge Update had included the part of the National Park in North Devon, the 2014 Exmoor National Park update was commissioned to provide projections for that part of the National Park.

- 3.1.4 The joint 2015 SHMA Update provides a comprehensive review and appraisal of the implications of the ONS 2012 Subnational Population Projections on the future housing requirements across the local planning authority areas of the Northern Peninsula Housing Market Area using more recently released data relevant to the projection of housing numbers namely:
- CLG 2012-based Subnational Population Projections<sup>56</sup> which underpin CLG Household Projections; and
  - 2011 Census Origin-Destination data relating to commuting and home moves.
- 3.1.5 Since publication of the Joint 2015 SHMA Update, the Department for Communities and Local Government 2012-based household projections have been published for each local authority area although not specifically for the National Park. In terms of overall household numbers, they indicate that the two local authority areas which include Exmoor National Park will have a very similar, albeit slightly lower level of growth than the recommended scenario in the Joint 2015 SHMA Update.
- 3.1.6 The 2015 SHMA Update has disaggregated the projected future housing requirements for each local planning authority area of North Devon, Torridge and West Somerset and Exmoor National Park 2011-2031 (Table 6.2 of the Update in Appendix 1). Table 6.3 shows the impact on housing requirements of household projection scenarios for Exmoor National Park and the constituent housing authority areas within it for 2011-2031 (Appendix 2).
- 3.1.7 An additional Update for Exmoor National Park, published in March 2015,<sup>57</sup> was commissioned to provide further information relevant to its National Park status, and:
- to update the 2008 SHMA information on the National Park's housing and population / household change including housing stock and tenure to provide information specific to, and for the whole of, the National Park. The 2012 North Devon and Torridge update had provided information for the 'Exmoor and Downland Fringe' sub market area which included areas outside the National Park while the 2013 West Somerset Update was for the area of West Somerset outside the National Park;
  - based on the January 2015 Update and reviewing the West Somerset in Exmoor National Park 2014 update, to assess the data and arrive at an affordable need figure (see below).
  - to analyse the objectively assessed need against external demand (see paragraphs 4.4.4 – 4.4.6). The projected affordable need is referred to in setting out an OAN for Exmoor National Park in Tables 3.2 to 3.5. Information on the ENP housing stock and the effects of external migration are set out elsewhere in this paper.

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<sup>56</sup> ONS 2012-based Subnational Population Projections for England, ONS, <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/stb-2012-based-snpp.html>

<sup>57</sup> Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park. Final Report, Dulverton: Exmoor National Park Authority.

### 3.2 Analysis of the Objectively Assessed Need for Exmoor National Park

3.2.1 Exmoor National Park Authority has assessed the housing figures, taking account of national policy and guidance, to provide confidence in the approach both within the National Park and as part of the Northern Peninsula HMA. The recommended scenario of Table 6.3 of the 2015 Joint Northern Peninsula HMA SHMA Update (shaded row in Table 3.1) has been taken as the starting point for calculations.<sup>58</sup>

<b>Table 3.1 The Impact on Housing Requirements of Household Projection Scenarios, Exmoor National Park and North Devon and West Somerset in Exmoor National Park, 2011-2031 (Extract from Table 6.3 Northern Peninsula SHMA Update)<sup>59</sup></b>			
<b>Household projection scenarios</b>	<b>North Devon in the Exmoor National Park</b>	<b>West Somerset in the Exmoor National Park</b>	<b>Exmoor NPA 2011-2031</b>
<b>1. Unadjusted</b>			
2008-based households	235	712	947
2012-based @ 2008 average household size	184	474	658
<b>2012-based @ CLG 2011 to 2021+2008 post -2021</b>	<b>161</b>	<b>377</b>	<b>538 (537)</b>
2012-based @ CLG 2008 adjusted to 2011 Census	194	480	674 (675)
2012-based @ constant household formation rates	159	421	580 (579)
<b>2. Adjusted for vacant dwellings rates of:</b>	<b>3.68%</b>	<b>3.10%</b>	<b>3.68% &amp; 3.10%*</b>
<b>3. Adjusted for vacant dwellings and second homes rates:</b>	<b>19.20%</b>	<b>19.20%</b>	<b>19.20%</b>
<b>4. The backlog of affordable housing:</b>	<b>11</b>	<b>75</b>	<b>86</b>

Note: \* the vacancy rates for the North Devon and West Somerset areas have been applied to those areas of the Exmoor National Park within each Council area. The effect of disaggregating then summing the Exmoor National Park figures has created variations of 1 -2 in the totals for each scenario when compared with the previous Table (Table 6.2 Appendix 1).

3.2.2 Planning Advisory Service (PAS) Guidance advises that the objectively assessed needs produced by the above assessment may be a single figure or it may be a minimum-maximum range which if possible should include a preferred figure.

<sup>58</sup> Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA)

<sup>59</sup> 2015 Joint SHMA Update

3.2.3 How the affordable housing backlog and uplifts are applied to the unadjusted figure affects the final OAN figure since different approaches result in a range of outcomes. Table 3.2 below sets out the figures for the whole of Exmoor National Park as well as for the constituent housing authority areas of North Devon and West Somerset within it. The lower and higher end range is presented to reflect the differences in how uplifts are applied to the unadjusted figure. The 'no usual residents' (vacant/second/holiday homes) uplift is of particular significance in the National Park given the high levels of second home ownership and is therefore 19.2%.

<b>Table 3.2 Exmoor National Park OAN 2011-31</b>			
	<b>North Devon in ENP</b>	<b>West Somerset in ENP</b>	<b>Whole ENP*</b>
Unadjusted Figure <sup>i</sup>	161	377	538 (537)
Affordable housing backlog <sup>ii</sup>	11	75	86
Unadjusted Figure plus affordable housing backlog <sup>iii</sup>	172	452	624
Objectively Assessed Need with uplifts – Top End of Range <sup>iv</sup>	205	539	744
Objectively Assessed Need with uplifts – Bottom End of Range <sup>v</sup>	184	480	664

\* **Please note:** that the effect of disaggregating Exmoor National Park figures for North Devon and West Somerset then summing them has created variations of 1-2 in the totals for each Scenario when compared with the National Park total (which is placed in brackets in the final column where appropriate).

#### Disaggregating Affordable and Market Housing

3.2.4 From the Exmoor National Park Update (March 2015), it is possible, to arrive at an updated and disaggregated figure for affordable need and therefore market demand for the two housing authority areas within the National Park and for the area within the National Park as a whole.<sup>60</sup> The unadjusted figures include both affordable and market housing. Arriving at an unadjusted market housing figure is achieved by subtracting the affordable housing figure from the unadjusted total figure.

#### North Devon Housing Authority Area in Exmoor National Park

3.2.5 For North Devon in the National Park the breakdown between the market and affordable housing element of the figures is set out in Table 3.3 below.

<b>Table 3.3 North Devon in Exmoor National Park</b>			
	<b>Affordable Housing</b>	<b>Market Housing</b>	<b>North Devon in ENP Total</b>
Unadjusted Figure <sup>vi</sup>	99	62	161
Unadjusted Figure plus affordable housing backlog <sup>vii</sup>	110	62	172
Objectively Assessed Need with uplifts – Top End of Range <sup>viii</sup>	131	74	205
Objectively Assessed Need with uplifts – Bottom End of Range <sup>ix</sup>	110	74	184

<sup>60</sup> Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park. Final Report, Dulverton: Exmoor National Park Authority.

## West Somerset Housing Authority Area in Exmoor National Park

3.2.6 For West Somerset in the National Park, the breakdown between the market and affordable housing element of the figures is set out in Table 3.4 below.

<b>Table 3.4 West Somerset in Exmoor National Park</b>			
	<b>Affordable Housing</b>	<b>Market Housing</b>	<b>West Somerset in ENP Total</b>
Unadjusted Figure <sup>x</sup>	231	146	377
Unadjusted Figure plus affordable housing backlog <sup>xi</sup>	306	146	452
Objectively Assessed Need with uplifts – Top End of Range <sup>xii</sup>	365	174	539
Objectively Assessed Need with uplifts – Bottom End of Range <sup>xiii</sup>	<b>306</b>	<b>174</b>	<b>480</b>

## Future Employment and Housing in Exmoor

3.2.7 Analysis of an Employment Land Study produced for Exmoor National Park in terms of the implications for housing shows that it expects a low number of jobs to be created in the National Park by 2026.<sup>61</sup> It recommends that no employment allocations are necessary. The study does not predict where new jobs will be created. As a consequence and since a flexible approach without allocations is proposed in the Local Plan, it is considered that no additional housing development should be planned for purely as a result of employment growth.

3.2.8 The Employment Land Study recommends that the relationships between jobs in Exmoor and workers that live in the surrounding areas should be considered therefore evidence from the Census will be used to monitor changes in commuting patterns into and out of the National Park. Although the level of economic activity and overall development is low, monitoring will help inform whether there is a need to review the Plan at an earlier stage since the Employment Study runs to 2026 just short of the end of the Local Plan period to 2031.

3.2.9 In addition to affordable housing need and future employment, account has also been taken of past delivery rates (paragraphs 4.13 to 4.19). These indicate that demographic housing projections from the 2015 SHMA Update and Exmoor National Park SHMA Update should form the basis for the OAN for Exmoor National Park over the plan period.

<sup>61</sup> Nathaniel Lichfield and Partners (2009) Exmoor National Park Employment Land Review.

### Objectively Assessed Need for Exmoor National Park

3.2.10 Evidence from the most up to date figures available on housing need from the 2015 Northern Peninsula and Exmoor National Park SHMA Updates has been analysed. Table 3.5 summarises the range of figures for the National Park as a whole. It sets out a precautionary high end figure for the North Devon housing authority area in the National Park. Paragraphs 4.3.3 to 4.3.4 on duty to co-operate explain that the housing need figure of 205 arising in the North Devon housing authority area of the National Park is included as part of the housing requirement figure in the North Devon and Torridge Local Plan to be met outside the National Park). Based on the most up to date evidence on affordable (and thereby market need) the West Somerset housing authority area of the National Park has an OAN of 480 units of which **306** are affordable need dwellings.

**Table 3.5 Exmoor National Park Objectively Assessed Need (OAN) 2011-31**

The OAN range for Exmoor National Park is 664 -744 dwellings. The **Preferred OAN is 685 dwellings** 2011-2031 of which:

- **205** are for North Devon in the National Park (131 affordable and 74 market dwellings)
- **480** are for West Somerset in the National Park (306 affordable and 174 market dwellings)

## 4. Exmoor National Park Housing Strategy and 'Housing Requirement'

4.1 This section of the Topic Paper:

- Examines housing supply in the National Park setting out constraints to development and potential future housing land supply including evidence from the Exmoor National Park Strategic Housing Land Availability Assessment (SHLAA);
- analyses past completion rates to help inform the future delivery of housing; and
- in the context of National Park designation and evidence sets out the Exmoor National Park housing strategy considering the OAN, duty to cooperate and an appropriate approach to a housing requirement to inform the delivery of housing over the plan period.

### Housing Land Supply

#### Constraints to Housing Development

- 4.2 Physical constraints such as topography, flood risk, heritage assets, wildlife site designations, heritage coast as well as the sensitivity of Exmoor's landscape affect the capacity of Exmoor's settlements to absorb more housing development.
- 4.3 The topography and geology of Exmoor significantly influence flood risk. Many of the National Park's watercourses flow through steep confined valleys, and after rainfall river and stream levels and the speed of water flow rise rapidly. Most settlements on Exmoor are located in valley bottoms which, as they are low-lying, are often at risk of flooding. This is a key constraint for new development.
- 4.4 Exmoor's settlements, sites and features are of rich cultural and historic interest. The National Park's built environment consists of a range of dispersed farmsteads, hamlets and villages as well as the slightly larger settlements of Dulverton, Lynton and Lynmouth and Porlock all of which have a parish population of less than 1,500 people). There is a high number of listed buildings. The quality of preservation of archaeological sites and historic features and the diverse nature of the historic resource within the National Park gives it special significance. However, these resources are also fragile, vulnerable to insensitive change and, ultimately irreplaceable.
- 4.5 Exmoor has many important rare species and habitats. Around 28% of the National Park is designated as internationally or nationally important habitat - Special Areas of Conservation and/or Sites of Special Scientific Interest. Additional areas are identified as locally important for wildlife or are Section 3 land.
- 4.6 The Landscape Sensitivity Study for Exmoor National Park sets out the landscape capacity for new build housing on greenfield sites in each settlement named in the 2005 adopted Local Plan.<sup>62</sup> It demonstrates the limited capacity for new housing on greenfield sites within the National Park without causing detriment to landscape character. The existing stock of accommodation, buildings and previously developed land/buildings is therefore an important component of future supply, to minimise the level of greenfield housing development within the National Park and ensure that, in the longer term beyond the plan period, there will still be some suitable housing sites in settlements to help meet the needs of National Park communities.
- 4.7 In the context that land within a National Park is recognised as being nationally important, greenfield land in and around existing named settlements was assessed in terms of its landscape sensitivity to new build housing. It found that the total capacity of all named settlements over the longer term (beyond the period of the Local Plan) was **333** units. Although there may be additional opportunities in some settlements

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<sup>62</sup> Bryan, Paul (2013) Exmoor National Park Landscape Sensitivity Study. Exmoor National Park Authority

over and above the 333 units on greenfield land, including through the appropriate reuse or redevelopment of existing buildings, the study provides a guide to the overall limit to future housing development in the National Park and shows that suitable housing land is a finite resource.

### **Future Housing Land Supply - Exmoor National Park Strategic Housing Land Availability Assessment**

- 4.8 The National Park has a good record of past delivery aided by public/national grant funding for affordable housing. To inform future supply, ENPA officers have assessed the supply of housing land in the National Park based on realistic assumptions about the availability and suitability of land to meet the identified need for housing over the plan period, and taking account of constraints including those outlined above.
- 4.9 This assessment has included the preparation of a SHLAA for the National Park to identify and assess land and buildings with the potential to deliver future housing development.<sup>63</sup> The SHLAA assessment provides a theoretical total number of dwellings that could be delivered.
- 4.10 The SHLAA, completed in 2014, involved a thorough examination and consideration of all possible sites which might be able to provide land for housing consistent with the methodology agreed with partners in the housing market area. It took account of the landscape sensitivity study in considering housing sites in and adjacent to settlements. Given the scarcity of suitable housing land it even assessed a number of sites identified by the Landscape Sensitivity Study as lying within 'high sensitivity' areas to look at whether there was some potential to use at least part of the site without adversely affecting the National Park's natural beauty wildlife or cultural heritage. In some cases sites/parts of sites assessed as being of high landscape sensitivity were considered to have some potential for housing but only where very careful siting, scale and design would be achieved.
- 4.11 The potential for the re-use of existing buildings was also examined as part of the supply - as a key means of delivering housing and reducing the need for the use of greenfield land. The SHLAA supply therefore includes existing buildings although the extent to which those buildings in settlements will contribute to the need for affordable housing is currently in question given recent changes to national guidance and Section 106 thresholds. The SHLAA supply within the National Park is **249** units on deliverable sites.
- 4.12 Sites from both North Devon and West Somerset housing authority areas in the National Park form part of the SHLAA supply. The Panel considered that there was potential for a further 228 units to be accommodated on 'suitable' sites, but they were not available and therefore could not form part of the SHLAA supply.

### Past Housing Delivery

- 4.13 The following section analyses past completions to help inform the future delivery of housing in the National Park.
- 4.14 Since adoption of the Local Plan in March 2005, 277 dwellings have been delivered within the National Park, with an average annual completion rate of 31 dwellings. The figures for open market dwellings reflect the fact that housing completions for market dwellings followed permissions granted prior to the adoption of the Local Plan in 2005 as well as market housing permitted in line with policy through conversions or as agriculturally tied dwellings.

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<sup>63</sup> Exmoor National Park Authority (2014) Strategic Housing Land Availability Assessment, Dulverton: ENPA.

4.15 The delivery of affordable housing has increased since 2005/06 - a total of 83 affordable units were completed between 2005/06 and 2013/14 (Table 4.1). This is an average annual delivery rate of 9 dwellings per annum. The percentage of total housing provision being affordable has varied year by year. The average annual delivery rate of affordable housing has been 29 dwellings per annum 2011/12 to 2013/14.

Year	Market	Affordable	Total
2005/6	38	3	41
2006/7	57	8	65
2007/8	18	11	29
2008/9	19	1	20
2009/10	13	11	24
2010/11	12	0	12
2011/12	16	26	42
2012/13	15	3	18
2013/14	6	20	26
<b>Total</b>	<b>194</b>	<b>83</b>	<b>277</b>

4.16 The uplift in delivery of affordable housing since the adoption of the 2005 Local Plan has demonstrated the effect of the Plan policies. In 2011/12 and again in 2013/14, the number of new affordable homes completed in the National Park outstripped the number of open market homes, showing that the policies were having the intended effect (Figure 4.1). There remains a need for further local need affordable housing.

4.17 Conversions have formed an important element of housing supply (40% of overall supply since 2005/6). There has also been a high proportion of development on previously developed land reflecting the high proportion on housing through the reuse of existing buildings. This is important in the National Park given landscape sensitivity and the limited capacity for greenfield development.



**Figure 4.1 Housing Completions 2005/6 to 2013/14<sup>64</sup>**

<sup>64</sup> Exmoor National Park Authority (2014). Annual Monitoring Report 2013/14. Other exceptions - include staff accommodation, ancillary annex (independent dwelling), agricultural/rural workers dwellings where the occupancy is restricted in some way.

4.18 The number of affordable homes delivered in the National Park reflects a concerted effort on the part of the National Park Authority, Rural Housing Project, Housing Authorities, Housing Providers, landowners and local communities. While the number of completions has made an important contribution to addressing the affordable housing needs in Exmoor's communities, it is the case that most affordable housing delivered was achieved as a result of Homes and Community Agency grant funding to registered housing providers at a level which enabled the delivery of 100% affordable housing on rural exceptions sites. Section 5 of this Topic Paper addresses the future delivery of housing in the National Park including changes in the way in which affordable housing has been funded and delivered and the implications for the future delivery of affordable housing.

## **4.2 Housing Strategy and Housing Requirement**

- 4.2.1 Existing planning policies set out in the adopted Exmoor National Park Local Plan focus on the delivery of housing to meet the needs of local communities, the principal need being for local affordable housing. This long standing approach recognises that opportunities for housing development are limited. In conserving and enhancing the National Park, consistent with National Park statutory purposes, the National Park Authority has a duty to further the local socio-economic well-being of Exmoor's local communities. Priority is therefore given to addressing the housing needs of National Park communities rather than meeting the external demand for market housing.
- 4.2.2 The spatial strategy of the Publication Draft Local Plan spatial strategy identifies settlements considered to be the most suitable for accommodating development and where new development will be acceptable in principle, including new build housing to address local needs. It encourages the reuse of buildings and land that has been previously developed. The settlement hierarchy includes the three Local Service Centres (Dulverton, Lynton and Lynmouth and Porlock) which, although small in population, act as service centres. A number of Villages are also identified. In addition, new local need affordable housing may be permitted through the change of use of existing buildings or new build through self /custom build, in smaller hamlets which have a village hall, shop or public house. The rest of the National Park is classified as 'open countryside' where new build housing would not be permitted.
- 4.2.3 Although the National Park planning policies adopted in 2005 have enabled a significant number of new local need affordable homes to be delivered, there remains a backlog of affordable need (86).<sup>65</sup> The Exmoor National Park SHMA Update provides affordable need housing projections for the National Park over the plan period.<sup>66</sup>
- 4.2.4 The West Somerset in Exmoor National Park SHMA Update 2014 notes that "in a National Park, population considerations flow from National Park purposes rather than specifically driving policy. To this end, National Park purposes will support a justifiable and transparent deviation away from the ONS (and other) projections..."<sup>67</sup> It also notes that the "challenge arising from housing projections may be that, in many instances, the scale of the identified affordable housing need may be such that it might exceed the level of new housing that can be accommodated within the National Park. In arriving at an overall housing figure for the National Park as an estimate of overall housing provision, it will be essential for the National Park Authority to consider the appropriateness of the projections for its area to ensure that policies are consistent with achieving statutory National Park purposes and, in so doing, the social and economic well-being of local communities. Co-operation with neighbouring authorities will be needed in planning for and to meet the housing requirement across

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<sup>65</sup> Housing Vision (January 2015) Northern Peninsula SHMA Update: Final Report.

<sup>66</sup> Housing Vision (March 2015) SHMA Update: Exmoor National Park: Final Report.

<sup>67</sup> Housing Vision (2014) SHMA: ENP in West Somerset Update paragraph 2.34.

the Housing Market Area where development cannot be met within the National Park because of a lack of physical capacity or because to do so would cause harm to the National Park”.<sup>68</sup>

- 4.2.5 A clarification of national policy states that need alone is not the only factor to be considered. Objectively assessed need should not be met if adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, or where specific policies indicate development should be restricted such as within a National Park.<sup>69</sup> Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty.<sup>70</sup> The NPPF refers to the National Parks and the Broads Vision and Circular as providing further guidance.<sup>71</sup> It is clear that National Parks are not suitable locations for unrestricted housing and general housing targets are therefore not provided.<sup>72</sup>
- 4.2.6 Given the degree to which the evidence shows that delivery of housing is constrained by highly sensitive landscapes and the potential for landscape harm, topography, wildlife designations, heritage assets and land at risk of flooding, it is considered that a housing figure for the Exmoor National Park should be included in the Exmoor National Park Publication draft Local Plan as **‘an estimate of local housing need’** only. Derived from the most recent SHMA Updates<sup>73</sup>, and taking account of the precautionary figure of 205 units included in the housing requirement figure in the North Devon and Torridge Local Plan, the **estimate of local affordable housing need in the National Park 2011-2031** to be included in the Exmoor National Park Local Plan is **306 units**.<sup>74</sup>
- 4.2.7 This positive approach to housing will help to ensure that the housing needs of local National Park communities are addressed as far as is possible within the context of the conservation of the National Park. Underpinning the strategy is the ability to work without a Local Plan Housing target; with estimates of housing provision and through a needs led rural exceptions approach across the National Park. This approach will be to deliver locally needed affordable homes up to the point at which the National Park would be harmed. This reflects, and is consistent with National Park purposes and the duty to local communities, the sensitivity and capacity of the National Park landscape and other constraints to the delivery of housing, and is appropriate to the rural and remote nature of the area and the small size of Exmoor’s settlements.
- 4.2.8 The approach is also consistent with and national policy and guidance and the rural exceptions approach set out in the National Planning Policy Framework (NPPF) which states that *“In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs”*.<sup>75</sup>

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<sup>68</sup> Housing Vision (2014) SHMA: ENP in West Somerset Update, paragraph 5.31.

<sup>69</sup> CLG (2012) National Planning Policy Framework, footnote 9 of para 14 and 47 and [online]. Available: <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>

<sup>70</sup> Ibid Para. 115

<sup>71</sup> NPPG Paragraph: 001 Reference ID: 50-001-20140306 Revision date: 06 03 2014 and footnote to para 115 of NPPF.

<sup>72</sup> DEFRA (2012) English National Parks and the Broads UK Government Vision and Circular 2010, London: DEFRA, paragraph 78.

<sup>73</sup> Housing Vision (January 2015) Northern Peninsula SHMA Update: Final Report and Housing Vision (March 2015) SHMA Update: Exmoor National Park: Final Report.

<sup>74</sup> ENP AMR Reports 2011/12 and 2013/14. 44 completions on the West Somerset side of the National Park minus affordable housing completions since 2011 which for the period 2011/12 to 2013/14 and at the time of drafting is 44.

<sup>75</sup> CLG (2012) National Planning Policy Framework, London CLG, Para 54.

- 4.2.9 A rural exceptions site is defined in the NPPF as “*small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding.*”<sup>76</sup>
- 4.2.10 Applying the ‘rural exceptions site’ approach – that local need affordable housing may be permitted, where new housing would not normally be allowed – has the effect of reducing the value of land and buildings to a more reasonable level so that local communities and housing providers can acquire sites and buildings for affordable housing. It thereby ensures the delivery of the maximum number of affordable homes on a given site making the best use of the scarce and finite supply of suitable housing land. The change to the definition of exception sites in the NPPF that local planning authorities may consider small numbers of market homes to facilitate significant additional local needs affordable housing is reflected in the Exmoor National Park Publication draft Local Plan policies which require 100% affordable housing. There is some flexibility to deliver principal residence housing – that is housing that must be lived in as a ‘principal home’ where essential for the delivery of affordable local need housing.
- 4.2.11 Table 3.5 sets out the preferred OAN for Exmoor National Park of 685 dwellings 2011-31. The 205 units arising in the North Devon housing authority area of the National Park are to be met outside the National Park (see paragraphs 4.3.3 to 4.3.4). It is projected that there will be 480 units arising in the West Somerset housing authority area of the National Park 2011-31. The Publication draft of the Exmoor National Park Local Plan includes an estimate of need of 306 local need affordable units over the plan period.
- 4.2.12 Given the limited and finite housing land, including the SHLAA deliverable supply of 249 dwellings, the known constraints to housing delivery including landscape sensitivity, it is not considered possible nor appropriate to plan for and include a figure in the Exmoor National Park Local Plan for the 174 market dwellings element of the OAN arising in the West Somerset housing authority area of the National Park 2011-2031. It is considered that to do so would be inconsistent with National Park purposes and contrary to guidance in the National Parks and the Broads Vision and Circular. Further it would result in the finite supply of suitable housing sites being further reduced, undermining the rural exceptions approach, pushing up the hope value of sites and adversely affecting viability thereby increasing pressure for more market and consequently delivery of fewer affordable dwellings.

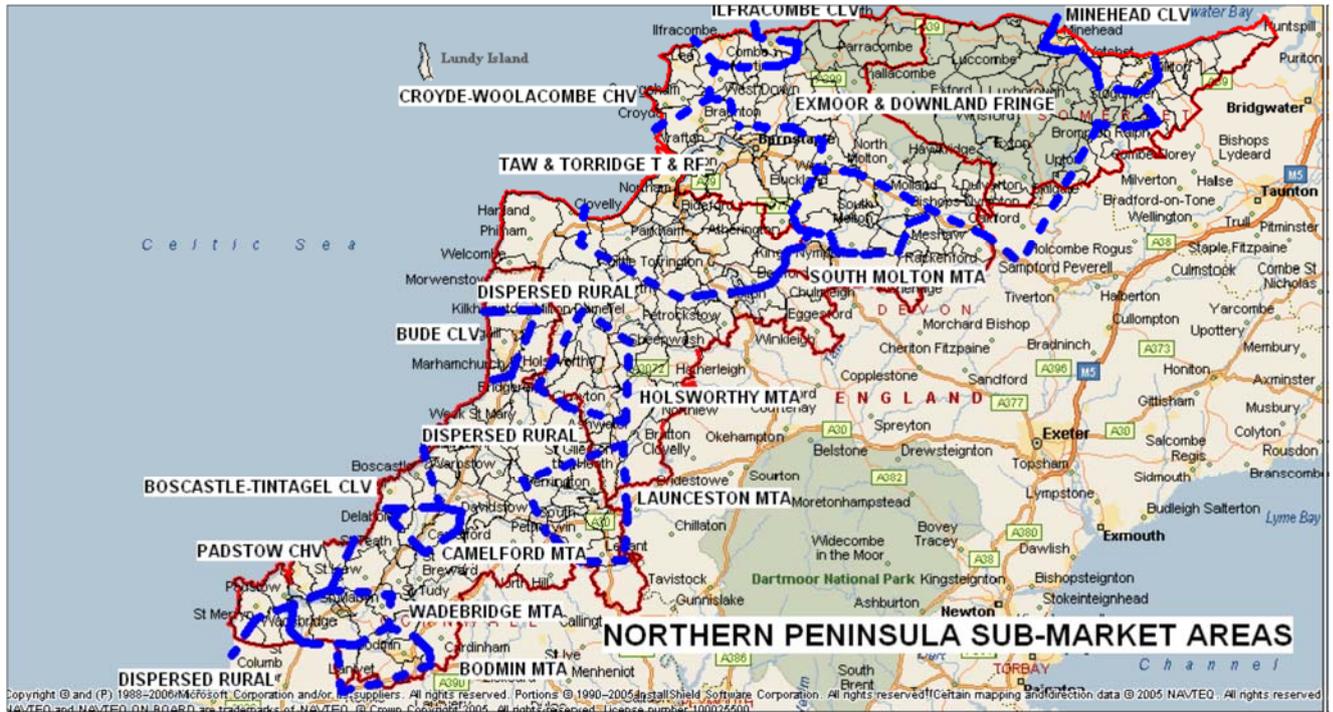
### **4.3 Duty to Co-operate**

- 4.3.1 The OAN for Exmoor National Park ranges from 664 to 744 dwellings with a preferred OAN figure of 685. This is far in excess of the capacity of the National Park to accommodate additional housing (given the landscape sensitivity study long term capacity of 333 together with other constraints) and implies a much higher delivery rate than has previously been achieved in the National Park. As a consequence, Exmoor National Park Authority has worked with neighbouring authorities through Duty to Co-operate to examine how housing needs can be met across the Northern Peninsula HMA, with a focus on local affordable housing within the National Park. This has included joint working to commission and agree the 2008 Strategic Housing Market Assessment (SHMA), and a 2015 update of it, to objectively assess the housing needs of the area. An Exmoor National Park Duty to Cooperate protocol has been drafted and finalised after longstanding discussions with partners including both

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<sup>76</sup> Ibid, Glossary.

neighbouring district councils.<sup>77</sup> Map 4.1 below shows the extent of the Northern Peninsula Housing Market Area and the 'Exmoor and Downland Fringe Sub-Market Area' which includes both the area within Exmoor National Park and adjoining areas outside the National Park.



**Map 4.1: Sub-Market areas in the Northern Peninsula HMA. Northern Peninsula SHMA 2008**

- 4.3.2 Table 3.5 of this Topic Paper sets out the overall OAN range and how the total figure is broken down between the two housing authority areas within the National Park.
- 4.3.3 Discussions through duty to co-operate with North Devon/Torrige officers have resulted in a housing requirement figure of 205 dwellings arising in the North Devon housing authority area of the National Park 2011-31 to be met in the North Devon area outside the National Park. This is included in the Proposed Changes to the Publication Draft North Devon and Torrige Local Plan (March 2015). North Devon Council has taken the view that the additional housing should be located close to and accessible to the National Park’s boundaries and that community aspirations for growth identified by Ilfracombe, South Molton and local centres complement this objective.<sup>78</sup> As the higher end OAN figure, this is a precautionary approach. A proportion of the total figure of 205 will be affordable housing. It does not take into account housing completions.
- 4.3.4 205 dwelling units to be met in North Devon outside the National Park have therefore been subtracted from the total OAN for the National Park leaving a figure of 480 dwellings arising in the West Somerset housing authority area of the National Park.

<sup>77</sup> Exmoor National Park Authority (2015) Duty to Cooperate Protocol

<sup>78</sup> Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.

- 4.3.5 In seeking to address the affordable housing needs of Exmoor's communities, an estimate of need of affordable dwellings is proposed for the National Park of **306** dwellings 2011-31 included in the Publication Draft Exmoor National Park Local Plan (June 2015). This takes into account that the North Devon element of 205 of the total OAN is being met outside the National Park. The 306 figure is the affordable element of the total OAN arising in the West Somerset area of the National Park only (Table 3.5).
- 4.3.6 Alongside discussions with North Devon and Torridge Councils, discussions have taken place with West Somerset Council as a neighbouring authority and one of the two housing authorities for the National Park.
- 4.3.7 In order to increase the delivery of affordable housing for local communities, West Somerset Council has proposed a figure of 2,900 additional homes in its Publication Draft Local Plan (January 2015). Meetings with West Somerset Council have taken place over a long period with discussions on housing distribution dating back to January 2013. Discussion and explanation of constraints on housing land supply in the National Park have explored whether some or all of the objectively assessed need for West Somerset in Exmoor National Park might be included as part of the housing target in the West Somerset Local Plan to be delivered outside the National Park. This culminated in the National Park Authority writing to West Somerset Council in November 2014 to request that the objectively assessed figure for, at least the market housing for ENP in West Somerset, be included in the total housing figure in the West Somerset Local Plan. The letter noted that it would be necessary to discuss a precise figure but indicated that an approach based on the updated assessed housing requirement figure from the most recent SHMA update (minus the affordable need figure) would seem most appropriate. The National Park Authority's view was that this would not, in practice, change the number of dwellings that would need to be provided for in West Somerset district nor would it result in a change to the overall housing figure set out in the West Somerset Local Plan as the element referred to would form part of the proposed uplifted figure of 2,900. However, after careful consideration of the various issues and potential impact they would have on the West Somerset Local Plan to 2032, West Somerset Council responded that "this would not be a beneficial course of action for the Council as Local Planning Authority to take".<sup>79</sup>
- 4.3.8 The SHMA Update published in January 2015 showed a decrease of almost 1,000 dwellings in terms of the baseline (unadjusted) demographic housing projections for West Somerset outside the National Park. Further discussions and a written representation from Exmoor National Park Authority (and North Devon Officers) to the West Somerset Publication Draft Local Plan in early 2015 sought to clarify whether, in the light of this reduction, the overall 2,900 figure proposed for the West Somerset Local Plan would be sufficient to include the open market housing figure for the West Somerset housing authority area (in effect the market housing figure for the whole of West Somerset including the National Park). It was not the intention of the NPA to seek an increase in the 2,900 housing figure proposed in the West Somerset Publication Draft Local Plan, or a change in strategy, but, given the most recent SHMA Update, to clarify whether there was now scope within the overall figure to accommodate/apply the market housing arising from within the National Park. It was suggested that this would help in the justification of the higher figures being proposed, while assisting in addressing National Park needs through allowing the redistribution of the market housing to the parts of West Somerset outside the National Park (but still within the functional Housing Market Area and same Housing Authority Area). The outcome of this suggestion is awaited as part of the examination into the West Somerset Publication Draft Local Plan.

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<sup>79</sup> Letter from Cllr Keith Turner West Somerset Council to Exmoor National Park Authority, 25 November 2015

- 4.3.9 In the requests to both North Devon and West Somerset Councils, the National Park Authority sought to clarify the approach in the National Park that the Publication Draft Local Plan would include policies to support the delivery of affordable housing within the National Park to address local needs. This approach also includes the potential flexibility for some cross-subsidy from market ('Principal Residence') housing to deliver affordable housing where needed (and where able to be accommodated without detriment to the National Park. The Exmoor National Park Publication Draft Local Plan would not include targets for housing (in accordance with the Government's approach to National Parks).<sup>80</sup>
- 4.3.10 In exploring all options for the distribution of the objectively assessed need for housing, a further request was made to North Devon Council to explore whether there was potential to incorporate a higher housing figure in the North Devon and Torridge Local Plan to reflect the OAN for market housing arising in the West Somerset housing authority area of the National Park. An officer response has indicated that while North Devon Council can assist with the objectively assessed figure for that part of the National Park falling within the North Devon administrative authority, this could not be reasonably extended to accommodating some, or all, of the housing requirement from the West Somerset part of the Exmoor National Park. The principles of co-operative working across Exmoor, including on housing, are set out in the Exmoor National Park Duty to Cooperate Statement.<sup>81</sup>

#### **4.4 Meeting the OAN in the Northern Peninsula HMA**

- 4.4.1 The Strategic Housing Market Assessment Update (2015) provides a full assessment of the housing needs in the Torridge, North Devon, West Somerset and Exmoor National Park local planning authority areas of the Northern Peninsula HMA. The best available and most up to date data, as well as strategic housing land availability assessments have been used to establish realistic assumptions about the availability and suitability of land to meet the identified need for housing over the plan period.
- 4.4.2 The NPA has proposed an approach to address locally arising affordable need against an estimate of need of 306 dwellings. This is appropriate in an area designated as a National Park and it reflects local circumstances and local needs, particularly for affordable housing.
- 4.4.3 Taking into account the component of the OAN arising in the North Devon part of the National Park that is included in the North Devon and Torridge Local Plan (2015) and the 306 affordable homes arising in the West Somerset housing authority area of the National Park to be included as an estimate of need in the Exmoor National Park Local Plan, leaves a figure for market housing, arising in the West Somerset housing authority area of the National Park of 174 dwellings 2011-31. This market housing figure includes a 19.2% uplift to take account of 'no usual residents' (vacant, second/holiday homes).
- 4.4.4 Given Exmoor's designation as a National Park subject to statutory purposes and the NPA duty to further the socio-economic well-being of local communities, additional work in the form of an Exmoor National Park Update was undertaken to assess the extent to which projections for increases in new housing were driven by external rather than locally arising demand.<sup>82</sup> The assessment is based on the demographic housing projections in the January 2015 Northern Peninsula SHMA Update (namely the CLG 2012-based Subnational Population Projections and the 2011 Census Origin-Destination data relating to commuting and home moves). It

<sup>80</sup> DEFRA (2010) National Parks and the Broads Vision and Circular, London: DEFRA and cross referred to in CLG (2012) NPPF paragraph 115.

<sup>81</sup> Exmoor National Park (2015) Duty to Cooperate Statement.

<sup>82</sup> Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park. Final Report, Dulverton: Exmoor National Park Authority.

provides additional information on the effect of in-migration (though does not replace the OAN for the National Park) and is helpful in considering the market housing element of the OAN.

- 4.4.5 The Exmoor National Park SHMA Update (March 2015) examined the impact on the National Park area of the projected effects of Internal Migration (within the UK) which consistently show a net gain of population. It modelled the effect of excluding net internal migration providing only for population change and replacement within the National Park. This resulted in a reduction of 656 households over the period 2011-2031.<sup>83</sup>
- 4.4.6 The update concluded that “the consequences for the recommended ‘recession effect’ scenario are dramatic implying a loss of 119 households in the period 2011-2031, and an equivalent fall in the requirement for housing”. In short, the projections changed from an unadjusted figure for the whole National Park of an additional requirement of 537 houses to a fall of 119.<sup>84</sup> Purely in terms of numbers, no new housing would be required - instead there would be 119 fewer households in the National Park overall compared to the figure in 2011. Appendix 3 summarises the outcome of excluding net internal migration on the projections in Table 6.3 in Appendix 2 from the 2015 SHMA Update.
- 4.4.7 In the National Park, given the statutory conservation purpose and the local socio-economic duty to National Park communities, providing for market housing driven by high external demand is not appropriate. The NPA has taken account of constraints which indicate that development should be restricted and that the ability of the NPA to meet the full need for housing over the plan period is restrained.
- 4.4.8 As well as the estimate of need in the Exmoor National Park Local Plan of 306, it is relevant to also consider the housing requirements proposed in the North Devon and Torridge Local Plan and the West Somerset Local Plan. In this context, the OAN market dwelling figure of 174 is a small proportion of the overall level of housing development proposed in the Northern Peninsula HMA over 20 years to 2031. The figure will, in reality, be less than 174, once completions are taken into account. Additionally, the housing requirement in both Plans propose to at least meet the baseline demographic housing projections across the HMA. A joint Northern Peninsula HMA Housing Topic Paper is being prepared by the four local planning authorities and it will set out the distribution of the objectively assessed need across the Northern Peninsula HMA.

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<sup>83</sup> Ibid, paragraph 5.10

<sup>84</sup> Ibid, paragraph 5.11

## 5. The Delivery of Affordable Housing in Exmoor National Park

- 5.1 Feedback from the community ‘Your Future Exmoor’ events demonstrated widespread support for housing that is affordable to local people.<sup>85</sup> The National Park Authority, through being based on Exmoor, working at a local level and in partnership with others, including the District Housing Authorities, has a good understanding of the needs of the area having hosted the Rural Housing Project (RHP) since 2002.
- 5.2 Housing Authority waiting lists have been replaced with a housing register which may not record local connection or may define it differently from planning policies. Households to bid for affordable housing as it becomes available. As with the former waiting lists, there remains an issue with rural households registering on the system. The RHP collected and assessed more accurate and detailed information on housing need, carrying out parish housing need surveys including in the National Park to provide up to date and detailed estimates of the number, size, type and tenure of homes that are needed locally. They consistently reveal that there is a local need, albeit often small, in some cases fewer than three households, for affordable housing in settlements.<sup>86</sup>
- 5.3 Surveys carried out between 2002 and 2008 identified 262 households in affordable need in the parishes within and split by the National Park boundary while a Parkwide ‘snapshot’ survey to estimate housing need, identified 127 households with a local connection.<sup>87</sup> Based on analysis of the data and affordable housing completions, the estimate of housing need for the whole of Exmoor National Park at September 2013 was 90 units.<sup>88</sup> This reduction indicates, despite newly arising households that the strategy, enabling the delivery, through rural exceptions, of 83 affordable homes 2005/06 to 2012/13 has helped to address need in the National Park.
- 5.4 This figure of 90 units should be considered as part of the 306 affordable households identified for the West Somerset housing authority area in the National Park. This estimate is helpful in framing the Local Plan housing strategy to 2031. Parish Surveys may ultimately show a different figure for the remaining Local Plan period.
- 5.5 The approach is to provide positively for housing, working through a rural exceptions approach (and without a target) to deliver local needed affordable housing. The method of assessing local housing need by household, developed by the RHP will continue to inform a needs led approach providing data by need on parish as housing needs change and additional need arises. Proposals in the National Park will only be permitted on a needs led basis where there is evidence of an identified local affordable need (or where proposals for specialist, ‘rural worker’ or ‘extended family’ dwellings are consistent with Plan policies) up to the point at which the National Park would be harmed. As well as new provision, some identified need is likely to be met through re-lets of existing affordable housing.
- 5.6 Workers who do not meet residency requirements in terms of local connection, but who can demonstrate they need to live close to their place of work can qualify to occupy a local needs affordable home. Affordable housing without occupancy ties may become available for other households including those working locally. This will help to meet wider local housing needs which may not be met through the provision of affordable housing. Workers who are not in affordable need may rent or purchase an existing market home or, where delivered, a ‘principal residence’ home. Local Plan policies make provision for the proven essential needs of ‘rural workers to live in the open countryside’ and for staff accommodation for hotels and guest houses.

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<sup>85</sup> Exmoor National Park Authority ‘Your Future Exmoor’ Feedback Reports (2010). <http://www.exmoornationalpark.gov.uk>

<sup>86</sup> <http://www.exmoor-nationalpark.gov.uk>

<sup>87</sup> 2008 ENP Parkwide LDF survey of affordable housing need carried out by the RHP.

<sup>88</sup> Exmoor National Park, West Somerset and North Devon Rural Housing Project: Households in Affordable Housing Need in Exmoor National Park

- 5.7 The SHLAA provides evidence of 249 deliverable sites. Analysis showed the distribution of deliverable sites by parish in settlements across the National Park against identified need and included existing buildings. Making the best use of existing buildings is an important principle underpinning the Local Plan strategy. The impact of the change to S106 thresholds for affordable housing /vacant buildings credit is not yet known. However, since housing developments within the National Park are small scale, the change to S106 thresholds is likely to have an impact on the scope to deliver affordable housing through the reuse of existing buildings putting further pressure on greenfield sites. Consistent with a rural exceptions site approach, housing sites are not allocated. Where affordable need arises, other suitable local need housing sites may come forward. The SHLAA will be updated during the plan period.
- 5.8 The NPPF has changed the definition of exception sites to allow, at the authority's discretion, for small numbers of market homes where essential to enable the delivery of significant additional local needs affordable housing. In response to the current reductions in national affordable housing grant, the policies in this plan therefore provide for some flexibility on exception sites to consider principal residence housing where it is essential to enable delivery of affordable housing.
- 5.9 Such housing may include specialist housing for Exmoor's communities to address the needs of older people and/or other vulnerable members of the community who require care and assistance. This approach recognises that Exmoor has a higher proportion of older age groups than average, and takes into account that 1,160 or a quarter of all households with no dependent children include one or more persons with a long term health problem or disability.<sup>89</sup> The Exmoor National Park in West Somerset SHMA Update assessed the requirement for different types of specialised housing for older households based on the projected growth in pensioner households available at that time. Based on an estimated 2011 requirement of 138 specialised units of accommodation, the projected specialised housing requirement of older households for the West Somerset housing authority area in the National Park, was for an additional 69 homes 2011-2031. Of these, 29 were for designated housing (usually incorporating a range of features such as full adaptation), 14 sheltered (or supported) housing with additional personal support to residents and 26 extra care housing (high-level support and care needs). This figure was included within the ENP in West Somerset net overall housing figure and was not additional to it.<sup>90</sup> More up to date evidence has since been produced through the 2015 SHMA Update informing an OAN for Exmoor National Park.<sup>91</sup> Nevertheless, it indicates the potential need/demand for such housing over the plan period as part of the overall OAN.
- 5.10 Local Plan policies seek to provide for the housing needs of those who need care and assistance. This includes the ability to extend and/or sub divide housing to create smaller and more manageable units, and potentially enable a relative to live close by to provide support. In delivering affordable housing, specialist housing for those who require care or assistance may be required. The Plan also make provision for 'extended family' dwellings'.
- 5.11 Any principal residence housing which may be permitted in accordance with policies in this plan, including to deliver local need affordable housing, the re-use of buildings as dwellings, through subdivision, 'extended family dwellings' or for rural worker dwellings for example may also, indirectly, contribute to the OAN. It is inappropriate to identify a figure for such housing in a National Park and the National Parks Circular is clear that

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<sup>89</sup> Office for National Statistics (2011) Census 2011. London: The Stationery Office.

<sup>90</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, para. 5.32 and Table 5.15.

<sup>91</sup> Housing Vision (2015) Northern Peninsula Strategic Housing Market Assessment Update, Final Report.

National Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them.

- 5.12 Allowing an element of market ('Principal Residence') housing as a response to the reduction in levels of public housing grant available to registered providers and where essential to deliver the affordable housing on exceptions sites will result in additional units set against the housing supply identified in the SHLAA. This would use up the finite supply of suitable housing land at a faster rate – land with the potential to accommodate future local needs affordable housing both in and beyond the period of this Local Plan.
- 5.13 A viability study was produced for the National Park to inform the approach to housing. It assessed different variables including different sized housing schemes and showed that affordable housing on exceptions sites are viable<sup>92</sup> As set out in this topic paper, local needs affordable homes have been successfully delivered in the National Park, but it is recognised that, current national housing grants which made such delivery possible are not currently sufficient. Viability in such cases is judged on a case by case basis, as the circumstances for each housing site differs. There are rural exceptions sites outside the National Park where more units of affordable housing have been achieved than market cross subsidy homes. The National Park Authority will ensure robust assessments based on an 'open book' approach are used to inform viability of affordable housing to ensure that development costs and land values are reasonable, commensurate with a rural exception site approach. The number of any market ('Principal Residence') homes which may be permitted will be the minimum number needed to deliver the affordable housing.
- 5.14 In considering the local plan, the focus is necessarily on the provision of new housing. It is nevertheless relevant to consider new housing as part of the existing stock. The special measures necessary in protected landscapes together with experience of the ways in which housing providers and others such as local housing trusts can contribute to the local need for affordable housing suggest that affordable homes do not always need to be newly built. Existing locally tied affordable housing will be occupied in perpetuity by those with a local connection. However, for those affordable homes, including former local authority housing not subject to a local needs occupancy tie, there is the potential to exercise a 'local preference' when they become available for re-letting and this approach has been applied in the area by some Registered Housing Providers. Additionally, where viable, it is theoretically possible that both the number and proportion of affordable homes may be increased by buying suitable existing open market homes including creating new units through subdivision. This would be compatible with National Park purposes and landscape conservation as it would reduce the overall number of households in housing need and the number of new build homes and conversions needed. The purchase of existing properties would benefit places where there is no capacity to build new homes. Since planning permission is unlikely to be required, housing providers and authorities would exercise their own discretion about the eligibility of occupants. The National Park Authority will continue to work with housing partners over the plan period to further explore the potential for such approaches and the benefits that they might bring over time.
- 5.15 The constraints on public financing at the time of drafting, national changes to the rules over the sale of homes by housing associations to fund new affordable homes together with proposals for an extension of the right to buy for housing association tenants are recognised. Additionally, as those working to deliver affordable housing have become increasingly aware of challenges in the way in which affordable housing is funded, delivered and managed, the NPA and its partners have been exploring innovative ways to fund and deliver needed affordable housing in the National Park. The NPA was successful in being a custom build joint vanguard in 2014/15 with Dartmoor

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<sup>92</sup> Nathaniel Lichfield and Partners. (2012) Exmoor National Park Viability Study.

National Park Authority. A register has been set up and a number of households have come forward with an interest of pursuing self/custom build local housing in the National Park. Other initiatives are being explored including the use of existing assets and developing community initiatives such as community land trusts.

- 5.16 Delivery will be monitored and reported. This will enable the National Park Authority to openly review the effectiveness of policy; taking into account changing circumstances in housing finance and delivery and the capacity to accommodate development in order to secure the necessary amounts of locally needed affordable housing. It will also bring forward Supplementary Planning Documents and legal agreements to provide a comprehensive framework within which local and affordable and housing can be secured in perpetuity.

## Appendices

### APPENDIX 1

**Table 6.2: the impact on housing requirements of household projection scenarios, North Devon, Torridge and West Somerset Local Planning Authorities and the Exmoor National Park Authority, 2011-2031**

Household projection scenarios	North Devon LPA 2011-2031	Torridge LPA 2011-2031	West Somerset LPA 2011-2031	Exmoor NPA 2011-2031
<b>1. Unadjusted</b>				
2008-based households	8,275	9,676	2,453	947
2012-based @ 2008 average household size	6,473	7,486	1,634	658
2012-based @ CLG 2011 to 2021+2008 post - 2021	5,656	6,939	1,297	537
2012-based @ CLG 2008 adjusted to 2011 Census	6,849	7,502	1,655	675
2012-based @ constant household formation rates	5,589	6,787	1,448	579
<b>2. Adjusted for vacant dwellings rates of:</b>	<b>3.68%</b>	<b>3.20%</b>	<b>3.10%</b>	<b>3.68% &amp; 3.10%*</b>
2008-based households	8,580	9,986	2,529	978
2012-based @ 2008 average household size	6,711	7,726	1,685	678
2012-based @ CLG 2011 to 2021+2008 post - 2021	5,864	7,161	1,337	554
2012-based @ CLG 2008 adjusted to 2011 Census	7,101	7,742	1,706	696
2012-based @ constant household formation rates	5,795	7,004	1,493	597

<b>Household projection scenarios</b>	<b>North Devon LPA 2011-2031</b>	<b>Torrige LPA 2011-2031</b>	<b>West Somerset LPA 2011-2031</b>	<b>Exmoor NPA 2011-2031</b>
<b>3. Adjusted for vacant dwellings and second homes rates of:</b>	<b>10.26%</b>	<b>8.94%</b>	<b>11.22%</b>	<b>19.20%</b>
2008-based households	9,124	10,541	2,728	1,129
2012-based @ 2008 average household size	7,137	8,155	1,817	784
2012-based @ CLG 2011 to 2021+2008 post - 2021	6,236	7,559	1,443	640
2012-based @ CLG 2008 adjusted to 2011 Census	7,552	8,173	1,841	805
2012-based @ constant household formation rates	6,162	7,394	1,610	690
<b>4. The backlog of affordable housing:</b>	<b>410</b>	<b>201</b>	<b>244</b>	<b>86</b>

Note: \* the vacancy rates for the North Devon and West Somerset areas have been applied to those areas of the Exmoor National Park within each Council area.

## APPENDIX 2

**Table 6.3: the impact on housing requirements of household projection scenarios, the Exmoor National Park Authority and North Devon and West Somerset Councils in the Exmoor National Park, 2011-2031**

Household projection scenarios	North Devon in the Exmoor National Park	West Somerset in the Exmoor National Park	Exmoor NPA 2011-2031
<b>1. Unadjusted</b>			
2008-based households	235	712	947
2012-based @ 2008 average household size	184	474	658
2012-based @ CLG 2011 to 2021+2008 post -2021	161	377	538 (537)
2012-based @ CLG 2008 adjusted to 2011 Census	194	480	674 (675)
2012-based @ constant household formation rates	159	421	580 (579)
<b>2. Adjusted for vacant dwellings rates of:</b>			
2008-based households	3.68%	3.10%	3.68% & 3.10%*
2012-based @ 2008 average household size	244	734	978
2012-based @ 2008 average household size	191	489	679 (678)
2012-based @ CLG 2011 to 2021+2008 post -2021	167	389	556 (554)
2012-based @ CLG 2008 adjusted to 2011 Census	201	495	696
2012-based @ constant household formation rates	165	434	599 (597)
<b>3. Adjusted for vacant dwellings and second homes rates of:</b>			
2008-based households	19.20%	19.20%	19.20%
2012-based @ 2008 average household size	280	849	1,129
2012-based @ 2008 average household size	219	565	784
2012-based @ CLG 2011 to 2021+2008 post -2021	192	449	641 (640)
2012-based @ CLG 2008 adjusted to 2011 Census	231	572	803 (805)
2012-based @ constant household formation rates	190	502	691 (690)
<b>4. The backlog of affordable housing:</b>			
	11	75	86

Note: \* the vacancy rates for the North Devon and West Somerset areas have been applied to those areas of the Exmoor National Park within each Council area.

The effect of disaggregating then summing the Exmoor National Park figures has created variations of 1 -2 in the totals for each scenario when compared with the previous table.

### APPENDIX 3

**Table 5.2: the housing requirements based on household projection scenarios for the Exmoor National Park Authority and North Devon and West Somerset Councils in the Exmoor National Park, 2011-2031 showing the effect of excluding net migration (recommended Scenario highlighted)**

Household projection scenarios	North Devon in the Exmoor National Park	West Somerset in the Exmoor National Park	Exmoor NPA 2011-2031
<b>1. Unadjusted</b>			
2008-based households	85	206	291
2012-based @ 2008 average household size	34	-32	2
2012-based @ CLG 2011 to 2021+2008 post -2021	11	-129	-118 (-119)
2012-based @ CLG 2008 adjusted to 2011 Census	44	-26	18 (19)
2012-based @ constant household formation rates	9	-85	-76 (-77)
<b>2. Adjusted for vacant dwellings rates of:</b>	<b>3.68%</b>	<b>3.10%</b>	<b>3.68% &amp; 3.10%*</b>
2008-based households	94	228	322
2012-based @ 2008 average household size	41	-17	23 (-22)
2012-based @ CLG 2011 to 2021+2008 post -2021	17	-117	-100 (-102)
2012-based @ CLG 2008 adjusted to 2011 Census	51	-11	40
2012-based @ constant household formation rates	15	-72	-57 (-59)
<b>3. Adjusted for vacant dwellings and second homes rates of:</b>	<b>19.20%</b>	<b>19.20%</b>	<b>19.20%</b>
2008-based households	130	343	473
2012-based @ 2008 average household size	69	59	128
2012-based @ CLG 2011 to 2021+2008 post -2021	42	-57	-15 (-16)
2012-based @ CLG 2008 adjusted to 2011 Census	81	66	147 (149)
2012-based @ constant household formation rates	40	-4	35 (34)
<b>4. The backlog of affordable housing:</b>	<b>11</b>	<b>75</b>	<b>86</b>

**Please note:** that the effect of disaggregating Exmoor National Park figures for North Devon and West Somerset then summing them has created variations of 1-2 in the totals for each Scenario when compared with the National Park total (which is placed in brackets in the final column where appropriate).

## END NOTES

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<sup>i</sup> Unadjusted figure for recommended scenario of the January 2015 Northern Peninsula SHMA Update (2012-based @ CLG 2011 to 2021+2008 post -2021) for the local housing authority area in the National Park or the whole of Exmoor National Park. The figure is for both affordable need and market demand and does not include the backlog of affordable housing nor any uplift to take account of vacant or second homes.

<sup>ii</sup> Affordable housing backlog (from Table 6.3 of the 2015 Northern Peninsula SHMA Update (see Appendix 2 and also the final row of Table 3.1 of this Topic Paper).

<sup>iii</sup> Affordable housing backlog added to the unadjusted figure

<sup>iv</sup> Affordable housing backlog added to the unadjusted figure first then multiplied by 19.2% uplift for 'no usual residents' (vacant and second/holiday homes). This figure will be highest because it applies a vacant and second home uplift to all housing including affordable (since the unadjusted figure includes both affordable and market housing) as well as to the affordable housing backlog.

<sup>v</sup> This is the result of applying the 19.2% uplift for vacant and second homes to the market housing component of the unadjusted figure and then adding the affordable housing component plus the affordable housing backlog.

<sup>vi</sup> Unadjusted figure derived from recommended scenario of the January 2015 Northern Peninsula SHMA Update (2012-based @ CLG 2011 to 2021+2008 post -2021) for the North Devon housing authority area in the National Park. Based on evidence in the March 2015 Exmoor National Park SHMA Update which identifies the proportion and therefore number of households in affordable need and hence enables the proportion and the number of open market households to be calculated. It does not include the backlog of affordable housing nor any uplift to take account of vacant or second/holiday homes.

<sup>vii</sup> This is the figure for recommended scenario of the January 2015 Northern Peninsula SHMA Update (2012-based @ CLG 2011 to 2021+2008 post -2021) for the North Devon housing authority area in the National Park including the affordable housing backlog. The row includes the disaggregated figures for both affordable need and market demand. The total and affordable housing columns include the backlog of affordable housing. No uplift has been applied to take account of vacant homes or second home ownership.

<sup>viii</sup> Affordable housing backlog added to the unadjusted figure first then multiplied by 19.2% uplift for 'no usual residents' (vacant and second/holiday homes). This figure will be highest because it applies a vacant and second home uplift to all housing including affordable (since the unadjusted figure includes both affordable and market housing) as well as to the affordable housing backlog.

<sup>ix</sup> This is the result of applying the 19.2% uplift for vacant and second homes to the market housing component of the unadjusted figure and then adding the affordable housing component plus the affordable housing backlog for the North Devon housing authority area in the National Park.

<sup>x</sup> Unadjusted figure derived from recommended scenario of the January 2015 Northern Peninsula SHMA Update (2012-based @ CLG 2011 to 2021+2008 post -2021) for the West Somerset housing authority area in the National Park. Based on evidence in the March 2015 Exmoor National Park SHMA Update which identifies the proportion and therefore number of households in affordable need and hence enables the proportion and the number of open market households to be calculated. It does not include the backlog of affordable housing nor any uplift to take account of vacant or second/holiday homes.

<sup>xi</sup> This is the figure for recommended scenario of the January 2015 Northern Peninsula SHMA Update (2012-based @ CLG 2011 to 2021+2008 post -2021) for the West Somerset housing authority area in the National Park including the affordable housing backlog. The row includes the disaggregated figures for both affordable need and market demand. The total and affordable housing columns include the backlog of affordable housing. No uplift has been applied to take account of vacant homes or second home ownership.

<sup>xii</sup> This is the affordable housing backlog added to the unadjusted figure first then multiplied by 19.2% uplift for 'no usual residents' for vacant and second/holiday homes for the West Somerset housing authority area in the National Park. This figure will be highest because it applies a vacant and second home uplift to all housing including affordable (since the unadjusted figure includes both affordable and market housing) as well as the affordable housing backlog.

<sup>xiii</sup> This is the result of applying the 19.2% uplift for vacant and second homes to the market housing component of the unadjusted figure and then adding the affordable housing component plus the affordable housing backlog for the West Somerset housing authority area in the National Park. Adding the 19.2% adjustment to the affordable and backlog of affordable housing components is considered to be inappropriate as the occupancy of affordable housing is controlled and will not become second or holiday homes rather than permanently occupied housing. It is important in the National Park where the duty is to local socio-economic well-being and where the 'no usual' residents uplift is high at 19.2%. This includes a 3.10% uplift for vacant homes based on market vacancy rates.