

# DUTY TO CO-OPERATE STATEMENT

**EXMOOR NATIONAL PARK LOCAL PLAN 2011 –  
2031**

**For Submission - May 2016**

**Page intentionally left blank**

<b>Contents</b>	<b>Page</b>
Introduction .....	3
Background .....	3
Exmoor-wide Duty to Co-operate Protocol .....	5
Mechanisms for Co-operative Working .....	6
Co-operation with relevant bodies in Plan-making .....	7
Strategic Priorities for Co-operation .....	12
Monitoring .....	24
Appendix 1- Duty to Co-operate meetings and correspondence .....	25
Appendix 2 - DtC Correspondence Regarding Housing Provision.....	30

## Introduction

1. This Statement of Compliance with the Duty to Co-operate covers the Submission of the Exmoor National Park Local Plan 2011-2031 (“the Local Plan”). It sets out how Exmoor National Park Authority (ENPA) is responding to the legal duty to co-operate in preparing the Local Plan. It details how ENPA has worked collaboratively with other councils, public bodies and other organisations to identify the spatial strategy for the Local Plan and develop strategic policies.
2. The Duty to Co-operate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by Section 110 of the Localism Act 2011). It is also included within the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), specifically in terms of planning strategically across local boundaries. The duty:
  - relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and public bodies ‘engage constructively, actively and on an on-going basis’ to develop strategic policies; and
  - requires councils to consider joint approaches to plan making.
3. The NPPF provides that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their local plan is submitted for examination. The NPPF states that cooperation should be a continuous process of engagement from initial thinking through to implementation. Further guidance is given in national Planning Policy Guidance.

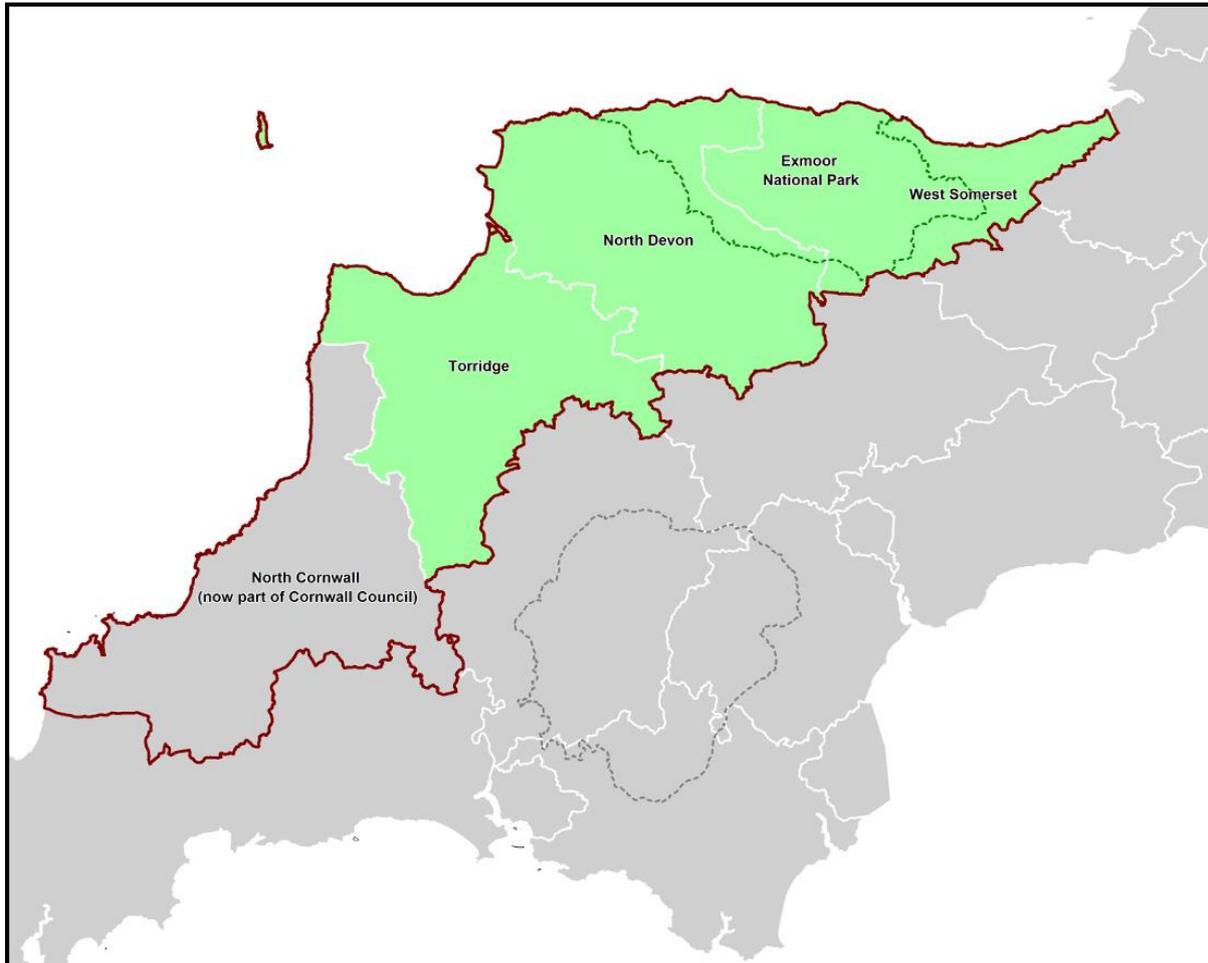
## Background

4. Exmoor National Park was designated as a National Park in 1954 and is situated within the counties of Somerset and Devon. Planning within National Parks is unusual, in that the National Park Authorities are responsible for planning policy and development management, but other functions are carried out by the District and County Councils such as housing, economic development, transport and education. Co-operative working is therefore particularly important within the National Park given the responsibilities of these different organisations, and reflecting the national status of the National Park which is given great weight in national planning policy and has *‘the highest status of protection in relation to landscape and scenic beauty’*<sup>1</sup>.

---

<sup>1</sup> National Planning Policy Framework paragraph 115

5. The total area of the National Park is 693 square kilometres (267 square miles) of which approximately two thirds lies within West Somerset District and one third within North Devon District. It has a population of around 10,000 people, with most people living in small dispersed settlements. For the purposes of strategic planning for housing, Exmoor lies within the Northern Peninsula Housing Market Area (see Figure 1).



**Figure 1 Map of Exmoor National Park within the Northern Peninsula Housing Market Area** (Map courtesy of Torridge District Council)

## Exmoor-wide Duty to Co-operate Protocol.

6. Exmoor National Park Authority has worked with neighbouring planning authorities and other relevant bodies to develop an Exmoor-wide [Duty to Co-operate Protocol](#) guiding co-operative working on strategic and cross-boundary issues affecting Exmoor. The Protocol signatories include:
- North Devon Council (neighbouring authority and within the Northern Peninsula Housing Market Area )
  - West Somerset Council (neighbouring authority and within the Northern Peninsula Housing Market Area)
  - Torrridge District Council (within the Northern Peninsula Housing Market Area and preparing a joint Local Plan with North Devon Council)
  - Mid Devon District Council (neighbouring authority)
  - Devon County Council (Highways and Education Authority)
  - Somerset County Council (Highways and Education Authority)
  - Natural England (statutory agency)
  - Environment Agency (statutory agency)
  - Devon Local Nature Partnership
  - Somerset Local Nature Partnership, and
  - Heart of the South West Local Enterprise Partnership.<sup>2</sup>
7. In addition, the following organisations are not signatories to the Protocol, but have agreed to continue to work closely with the National Park Authority in the formulation and implementation of relevant plans and policies:
- Historic England<sup>3</sup>
  - Marine Management Organisation
  - Cornwall Council (relating to the former North Cornwall Council area which was within the Northern Peninsula Housing Market Area)
8. The two Clinical Commissioning Groups (CCGs) covering the National Park – the Northern Devon CCG and West Somerset CCG were contacted regarding the Protocol but no response was received. The NPA has examined the provision of health facilities within the National Park as part of the Local Plan preparation<sup>4</sup>, and has not identified the need for specific cross-boundary working with the CCGs on these issues. ENPA will seek to engage with the CCGs as the need arises. Additional organisations are listed in the Regulations, but do not have a relevant remit to the National Park and so it was not considered necessary to include them in the Protocol. Further

---

<sup>2</sup> The LNPs and LEP are not defined by statute but are identified in the regulations as bodies that those covered by the duty 'should have regard to' when preparing local plans and other related activities

<sup>3</sup> Formerly English Heritage

<sup>4</sup> Exmoor National Park Infrastructure Delivery Plan 2015, Exmoor National Park Authority

information on the signatories and other organisations contacted is given in the Protocol.

9. The Protocol provides a framework for the signatory organisations to ensure effective co-operation throughout the planning process on strategic priorities relating to Exmoor National Park, and cross-boundary issues. It applies to a range of strategic planning policy matters, particularly preparing policy and strategy, implementation, monitoring and other cross-boundary policy issues. It forms the basis for discussing strategic priorities, evaluating options to address cross-boundary issues and agreeing outcomes wherever possible but ultimately respects the individual identities and interests of its signatory organisations.

### **Mechanisms for Co-operative Working**

10. ENPA, by virtue of its role as a National Park Authority, has long established principles of co-operation with other local authorities and organisations. This enables ENPA to discharge its responsibilities in relation to the Environment Act 1995<sup>5</sup>. Cross boundary working, and engagement with stakeholders, is embedded in the approach both to plan making and decision making and this can be illustrated by the following:
  - The National Park Authority comprises members of each of the key Local Authorities which cover the National Park area, including 2 members appointed by Devon County Council, 4 appointed by Somerset County Council, 2 from North Devon Council and 4 from West Somerset Council. Whilst members are clearly making decisions and contributing to working panels representing the National Park Authority their joint role enables strong connection with other authorities at a member/councillor level.
  - The principal plan for Exmoor, the Exmoor National Park [Partnership Plan](#)<sup>6</sup>, whilst led by ENPA, is a shared plan for a range of partners. The Plan draws together those with an interest in Exmoor with a set of goals to achieve a vision for the National Park. That vision is echoed in the draft Local Plan; this illustrates how the Local Plan for the National Park is furthering the shared vision for Exmoor.
  - Section 62 of the Environment Act 1995 makes it a duty for all relevant authorities to have regard to National Park purposes when coming to decisions or carrying out their duties. This is reflected in the signatories' commitments in the Protocol. The duty means that ENPA has long established relationships with government departments and agencies and

---

<sup>5</sup> HM Government (1995) Environment Act

<sup>6</sup> This forms the Management Plan for the National Park, as required under Section 66(1) of the Environment Act 1995

a range of other local and public bodies in delivering National Park purposes.

- ENPA works with neighbouring district councils regarding their statutory responsibilities for housing, economic development and environmental health and the two county councils in relation to their roles as education and highways authorities and public health and wellbeing to ensure that Exmoor National Park residents can benefit from the decisions made and actions taken across the area.

11. Officers from ENPA, West Somerset, North Devon and Torridge District Councils have worked together on strategic issues relating to the scale and distribution of housing across the Northern Peninsula Housing Market Area for many years prior to the Duty to Co-operate becoming a legal requirement. Since then, the officer meetings have been formalised into Duty to Co-operate meetings and have been used to discuss strategic and cross-boundary issues, commission joint evidence, and develop the Exmoor-wide Duty to Co-operate Protocol. Details of the relevant Duty to Co-operate meetings are given in **Appendix 1**.
12. In addition, ENPA officers attend meetings of the Devon Planning Officers Group involving all Devon local authorities, which provides a forum for duty to co-operate discussions and is responsible for monitoring the Devon Duty to Co-operate Protocol to ensure all strategic cross boundary issues are being addressed. ENPA officers are also involved with the Somerset Strategic Planning Conference Officers Group, which provides a similar forum for the Somerset authorities.

**Co-operation with relevant bodies in Plan-making**

13. The Protocol sets out how the prescribed bodies and other partner organisations will work together on strategic issues requiring co-operation. Table 1 provides details of the contacts that have been established with each of the prescribed bodies during the preparation of the Exmoor National Park Local Plan and their relevant inputs as the Plan has progressed.

**Table 1: Contact with Prescribed Bodies**

North Devon Council	<p>As a neighbouring planning authority and a signatory to the Duty to Co-operate Protocol, North Devon Council has been closely involved in those elements of the Local Plan that will help to deliver sustainable growth and support the continuing objectives of the National Park.</p> <p>Working with North Devon Council has been of particular significance in relation to the scale and distribution of housing</p>
---------------------	---

	<p>across the Northern Peninsula Strategic Housing Market Area, and the role and function of settlements. Joint methodologies and studies have been used for key pieces of evidence, including the Strategic Housing Market Assessments, and Strategic Housing Land Availability Assessment.</p> <p>The National Park Authority has worked with North Devon Council to ensure that a consistent approach is taken to protecting the landscape character, special qualities and setting of the National Park, and its status as a Dark Sky Reserve.</p> <p>As a formal consultee North Devon Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p>
<p>West Somerset Council</p>	<p>West Somerset Council are a neighbouring planning authority and a signatory to the Duty to Co-operate Protocol. Working with West Somerset Council has been of particular significance in relation to the scale and distribution of housing across the Northern Peninsula Strategic Housing Market Area including the role and function of settlements and the potential impact of the new Hinkley Point C nuclear power station. Joint methodologies and studies have been used for key pieces of evidence, including the Strategic Housing Market Assessments, Strategic Housing Land Availability Assessment, Quantitative Needs Assessment (Retail Study), and Strategic Flood Risk Assessment.</p> <p>The National Park Authority has worked with West Somerset Council regarding protection of the landscape character, special qualities and setting of the National Park, and its status as a Dark Sky Reserve.</p> <p>As a formal consultee West Somerset Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p>
<p>Torridge District Council</p>	<p>Torridge District Council are a signatory to the Duty to Co-operate Protocol, particularly in relation to the scale and distribution of housing across the Northern Peninsula Strategic Housing Market Area. Joint methodologies and studies have been used for key pieces of evidence, including the Strategic Housing Market Assessments, and Strategic Housing Land Availability Assessments. Torridge are producing a Joint Local Plan with North Devon and are indirectly affected by discussions regarding housing provision arising from within the National Park.</p>
<p>Mid Devon District Council</p>	<p>A small part of Mid Devon District Council borders the National Park to the south east. Officers have been involved in discussions</p>

	<p>regarding the Exmoor National Park and Mid Devon Local Plans. No strategic cross-border issues have been identified.</p> <p>As a formal consultee Mid Devon has been consulted as the Exmoor National Park Local Plan has progressed but have raised no comments.</p>
<p>Devon County Council</p>	<p>Devon County Council has a variety of responsibilities covering cross-boundary co-operation and undertake significant work with other Authorities, including the Exmoor National Park Authority, to support local plan preparation with an appropriate evidence base, in particular covering minerals, waste and infrastructure planning issues.</p> <p>Devon County Council led the preparation of a “wider Devon protocol” which forms a basis for fulfilling duty to co-operate requirements. ENPA is a signatory to the protocol.</p> <p>As a formal consultee Devon County Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p>
<p>Somerset County Council</p>	<p>Somerset County Council has a variety of responsibilities covering cross-boundary co-operation and undertake significant work with other Authorities, including the Exmoor National Park Authority, to support local plan preparation with an appropriate evidence base, in particular covering minerals, waste and infrastructure planning issues.</p> <p>Somerset County Council has produced a joint Duty to Co-operate Statement with regard to the Somerset Minerals Plan and Sand and Gravel. ENPA is a signatory to the Statement.</p> <p>Somerset County Council has supported work on ecological network mapping across Somerset, including the National Park.</p> <p>As a formal consultee Somerset County Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p>
<p>Natural England</p>	<p>Natural England has been involved in development of the environmental policies of the Local Plan, particularly in relation to biodiversity, ecological networks and green infrastructure provision. Through its statutory consultee functions, Natural England has advised on the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>ENPA works closely with Natural England on the protection and enhancement of biodiversity within the National Park, and on building coherent ecological networks across boundaries.</p>

	<p>As a formal consultee Natural England has been consulted as the Exmoor National Park Local Plan has progressed. Natural England stated in their consultation response to the pre-submission draft Local Plan that they consider it provides a positive framework for shaping and managing future development sustainably in Exmoor National Park. No specific issues were highlighted requiring changes to the Local Plan.</p>
<p>Environment Agency</p>	<p>The Environment Agency have been involved in the development of the Local Plan including through supporting preparation of a key evidence base document - the Strategic Flood Risk Assessment - and via officer comments on draft policies. The Environment Agency also advised on the designation of the Porlock Weir Coastal Change Management Area.</p> <p>As a formal consultee the Environment Agency has been consulted as the Exmoor National Park Local Plan has progressed. The Environment Agency supported many of the policies in the pre-submission draft Local Plan, and minor changes were made to wording in the Plan as a result of Environment Agency comments.</p> <p>Through its statutory consultee functions, the Environment Agency has also advised on the Sustainability Appraisal.</p>
<p>Historic England<sup>7</sup></p>	<p>ENPA has its own archaeological and listed building advisors but works closely with Historic England on planning matters affecting the historic environment. As a formal consultee Historic England has been consulted as the Exmoor National Park Local Plan has progressed. Historic England supported many of the policies in the pre-submission draft Local Plan, and stated that the historic environment appears as a balanced and integrated topic in the Draft Local Plan, the maintenance of which is key to Exmoor's sustainable future. Minor changes were made to wording in the Plan as a result of Historic England's comments.</p> <p>Through its statutory consultee functions, Historic England has also advised on the Sustainability Appraisal.</p>
<p>Devon Local Nature Partnership</p>	<p>The Devon LNP is not defined by statute but is identified in the regulations as a body that those covered by the duty 'should have regard to' when preparing local plans and other related activities. The LNP was established in 2012. Their involvement in the Local Plan development to date has been limited, however the Protocol sets out the principles for future co-operative working with the LNP, including on the environmental evidence base and to promote coherent ecological networks across boundaries.</p>

<sup>7</sup> Formerly known as English Heritage

<p>Somerset Local Nature Partnership</p>	<p>The Somerset LNP is not defined by statute but is identified in the regulations as a body that those covered by the duty ‘should have regard to’ when preparing local plans and other related activities. The LNP was established in 2012. Their involvement in the Local Plan development to date has been limited, however the Protocol sets out the principles for future co-operative working with the LNP, including on the environmental evidence base and to promote coherent ecological networks across boundaries. In particular, Somerset Wildlife Trust, (who provide the Secretariat for the LNP) have worked with Somerset County Council and Exmoor National Park Authority on ecological network mapping across the whole of the National Park, to promote coherent ecological networks across the National Park boundary.</p>
<p>Heart of the South West Local Enterprise Partnership</p>	<p>The Heart of the SW LEP is not defined by statute but is identified in the regulations as a body that those covered by the duty ‘should have regard to’ when preparing local plans and other related activities.</p> <p>The LEP has an important role in informing the strategic direction of economic policy in the area and helps to identify emerging opportunities that would support a sustainable economy in the National Park. The LEP’s Strategic Economic Plan (2014-32) highlights the exceptional quality of the environment and recognises the importance role this plays in the economy, particularly the tourism and agricultural sectors.</p> <p>The LEP is a signatory of the Protocol setting out the principles for co-operative working. ENPA prepared a joint Economic Prospectus with Dartmoor National Park Authority, setting out where joint working with the LEP may be promoted in the future. However, there are no strategic economic or development proposals within the National Park to date, requiring joint working with the LEP.</p>
<p>Marine Management Organisation</p>	<p>The Marine Management Organisation was contacted regarding the Protocol and any strategic or cross-boundary issues arising. The MMO did not feel that it was necessary to sign the Protocol, and that established ways of working are sufficient to ensure that all parties work together in an effective manner on areas of common interest.</p>
<p>Cornwall Council</p>	<p>The previous administrative area of North Cornwall made up part of the former ‘Northern Peninsula Housing Market Area’ – this is now within the Cornwall Council area. Cornwall Council were contacted regarding the Protocol and any strategic matters arising, but felt that it was not necessary to be a signatory. In preparing the Cornwall Local Plan, Cornwall Council has sought to ensure that target housing provision is adequate to meet objectively assessed needs and do not therefore envisage</p>

	circumstances in which there would be a call on adjoining authorities or other planning authorities within the former Northern Peninsula Housing Market Area. Cornwall Council will continue to co-operate with the local authorities in the Northern Peninsula Housing Market Area to share technical studies and liaise on broad strategic planning issues.
--	---

**Strategic Priorities for Co-operation**

14. The Protocol identifies a number of cross-boundary and strategic issues where co-operative working is required. This includes:
- Strategic Planning
  - Role and Function of Settlements
  - Housing Provision (including Gypsy & Travellers)
  - The Economy and Service Centres
  - Climate Change Mitigation and Adaptation
  - Flood and Coastal Risk Management
  - Biodiversity, Ecological Networks and Green Infrastructure; Natural and Historic Environment (including National Park Statutory Purposes and National Park Landscape and Setting and Biodiversity, Ecological Networks and Green Infrastructure)
  - Minerals and Waste
  - Infrastructure Provision (including Education, Transport and Health)
  - The Impact of the Hinkley Point C New Nuclear Project
  - Marine management.
15. Table 2 provides a summary of the approach taken to address these strategic priorities through co-operation with relevant organisations.

**Table 2 – Co-operation on Strategic Priorities**

Desired outcome from (Exmoor-wide DtC Protocol)	Key partners	Evidence of co-operation
<b>Strategic Priority (a) Strategic Planning</b>		
<ul style="list-style-type: none"> <li>• Where relevant, the Authority Partners will co-operate on joint technical studies and other work to provide a consistent evidence base to support their respective plans. This will include:                             <ul style="list-style-type: none"> <li>• Sharing of evidence/data and joint commissioning where appropriate;</li> <li>• Demographic forecasting and housing projections; and</li> </ul> </li> </ul>	Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Mid Devon District Council, Devon County Council, Somerset	Commissioned joint evidence base documents: <ul style="list-style-type: none"> <li>- Northern Peninsula Strategic Housing Market Assessment (NP SHMA) 2008 and Updates Jan 2015 and Dec 2015 (ENPA, NDC, TDC, WSC)</li> <li>- North Devon &amp; Torridge SHMA Update 2012 (includes the part of</li> </ul>

<b>Desired outcome from (Exmoor-wide DtC Protocol)</b>	<b>Key partners</b>	<b>Evidence of co-operation</b>
<ul style="list-style-type: none"> <li>Agreed mechanisms for on-going engagement through the plan preparation process and the provision of consultation responses.</li> <li>Agencies and other partner organisations will provide and share information and data held when requested (including regarding their own plans and strategies) to better inform plan and strategy evidence bases and studies where relevant.</li> </ul>	<p>County Council, Devon Local Nature Partnership, Somerset Local Nature Partnership, Heart of the South West LEP, Environment Agency, Historic England, Natural England, Marine Management Organisation</p>	<p>Exmoor in North Devon) (ENPA, NDC, TDC)</p> <ul style="list-style-type: none"> <li>- Strategic Housing Viability Assessment for the Northern Peninsula Housing Market Area 2008 (ENPA, NDC, TDC, WSC, DCC)</li> <li>- Quantitative Needs Assessment for Retail and Leisure 2011 (ENPA, WSC)</li> <li>- Strategic Flood Risk Assessment Level 1 2009 (ENPA, WSC, with input from EA)</li> <li>- Endorsed a joint sub-regional methodology for undertaking Strategic Housing Land Availability Assessments across the Northern Peninsula Housing Market Area 2009 (ENPA, NDC, TDC, WSC, DCC), which was used by North Devon/Torridge District Councils and Exmoor National Park Authority in the preparation of their SHLAAs</li> <li>- Gypsy and Traveller Accommodation Assessment 2015 (led by DCC, covering the whole of Exmoor National Park)</li> <li>- Devon Local Aggregate Assessment (2005-14) (DCC, NDC, TDC, ENPA)</li> <li>- Somerset Local Aggregate Assessment (2004-2013) (SCC, WSC, ENPA)</li> <li>- North Devon and Somerset Shoreline Management Plan (draft) 2010 (ENPA, NDC, TDC, WSC, SCC, DCC, EA)</li> <li>- West Somerset Rural Housing Needs Report 2015 (Rural Housing Project, ENPA, WSC, housing partners)</li> <li>- Strategic Stone Study: A Building Stone Atlas of Somerset and Exmoor 2011 (English Heritage)</li> </ul>
<b>Strategic Priority (b) Role and Function of Settlements</b>		
<ul style="list-style-type: none"> <li>The Authority Partners will seek to co-ordinate the terminology for the role and function of settlements within</li> </ul>	<p>Exmoor National Park Authority, North Devon District</p>	<p>Discussed at Duty to Co-operate officer meetings and highlighted in consultation comments.</p>

<b>Desired outcome from (Exmoor-wide DtC Protocol)</b>	<b>Key partners</b>	<b>Evidence of co-operation</b>
<p>two Authority areas, and the policy approach relating to them, to provide clarity and consistency in the adjoining plans.</p>	<p>Council, West Somerset Council</p>	<p>Changes were made to the named settlements in the Exmoor Local Plan in relation to the status of Dunster (as a Village rather than Local Service Centre) to provide consistency with West Somerset’s approach. There were also discussions regarding other settlements which cross the ENPA and WSC boundaries such as Carhampton and Monksilver, but no changes were considered to be required.</p> <p>Officer discussions were also held between ENPA and NDC regarding the status of Combe Martin within the Exmoor Local Plan, and it was agreed to continue to identify this area as ‘open countryside’ to ensure that new build development does not take place within the National Park, and NDC considered that there were better sites that could deliver housing in Combe Martin outside the National Park.</p> <p>ENPA’s response to the Publication Draft NDC/TDC Joint Plan (Aug 14) welcomed the incorporation of a wider range of settlements within the Spatial Development Strategy for Northern Devon’s Rural Area (Policy - STO7) that would allow for housing to meet communities’ needs in parishes split by the National Park boundary but where the settlement is located outside the Park (e.g. East Anstey, Molland and Brayford).</p>
<b>Strategic Priority (c) Housing Provision</b>		
<ul style="list-style-type: none"> <li>The Authority Partners will continue to work together on ensuring a co-ordinated approach to the distribution of housing across the housing market area and will undertake</li> </ul>	<p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, (North</p>	<p>A joint evidence base has been commissioned including the Northern Peninsula Strategic Housing Market Assessment and updates. A joint sub-regional methodology was also endorsed by the partner authorities for undertaking Strategic Housing Land</p>

<b>Desired outcome from (Exmoor-wide DtC Protocol)</b>	<b>Key partners</b>	<b>Evidence of co-operation</b>
<p>joint research studies where appropriate.</p> <ul style="list-style-type: none"> <li>• The Authority Partners will seek to co-operate on meeting objectively assessed needs across the Housing Market Areas, including accommodating the needs of adjoining authorities where appropriate.</li> <li>• Where needs cannot be met in a sustainable way within adjoining Authority areas, the Authority Partners will explore all other options available to meet these needs.</li> </ul>	<p>Cornwall prior to Cornwall Council becoming a unitary authority)</p>	<p>Availability and was used by North Devon/Torridge District Councils and Exmoor National Park Authority in the preparation of their SHLAAs.</p> <p>Until April 2015, NDC, WSC and ENPA jointly funded the Rural Housing Project to support delivery of affordable rural housing across the whole of North Devon and West Somerset, including Exmoor. In 2015, Joint Working Guidance was agreed to assist with the delivery local needs affordable housing on Exmoor. It focuses on the relationship between Exmoor National Park as the Local Planning Authority and West Somerset Council &amp; Taunton Deane Borough Council Housing Enabling and Development Team on behalf of the Housing Authority. It sets out the expectations and requirements of both organisations to enable them to achieve the common goal of assisting in the delivery of affordable housing in line with Local Plan policy. ENPA continues to work with NDC and WSC (as housing authorities) and Devon Communities Together through the Rural Housing Enablers to assess housing need in the National Park and to address the needs of local communities for affordable housing.</p> <p>Duty to Co-operate officer meetings have been ongoing since 2013 to discuss objectively assessed housing needs and distribution across the NP HMA.</p> <p>Discussions have highlighted the difficulties in meeting housing need within the National Park, and the need to consider options to make provision in neighbouring authorities' Local Plans. This has been followed up by</p>

Desired outcome from (Exmoor-wide DtC Protocol)	Key partners	Evidence of co-operation
		<p>formal requests from ENPA to WSC and NDC (see Appendix 2). NDC have indicated that they are able to do so, but WSC responded that they are unable to accommodate this request. A member meeting was held to discuss this further, but no resolution was reached. ENPA also formally requested that NDC consider if they are able to accommodate the housing arising from the West Somerset side of the National Park, but NDC are not able to do so and it is not felt to be sustainable. ENPA and NDC subsequently made representations to the WSC Publication Draft Local Plan (Mar 2015) and Examination in Public (Mar 2016).</p> <p>NDC are able to accommodate the market and affordable housing arising from the North Devon part of the National Park and this is included in their Proposed Main Changes to the North Devon and Torridge Local Plan consultation 2015. ENPA's response to the consultation welcomed this (Apr 2015).</p> <p>Further details on the approach to housing in the Exmoor Publication Draft Local Plan are given in the ENPA Housing Topic Paper. A joint Northern Peninsula HMA Housing Topic Paper has also been prepared to demonstrate how housing need will be met across the HMA.</p> <p>A joint evidence base was commissioned for Gypsy and Traveller provision (led by DCC), covering the whole of Exmoor National Park. The GTAA found that there are no pitch requirements within Exmoor National Park.</p>

Desired outcome from (Exmoor-wide DtC Protocol)	Key partners	Evidence of co-operation
<b>Strategic Priority (d) The Economy and Service Centres</b>		
<ul style="list-style-type: none"> <li>The Authority Partners will co-operate on strategic issues across functional economic areas including the protection of existing employment land, support for key sectors including tourism and agriculture/forestry, and any proposals for strategic retail, leisure, industrial or other economic development.</li> <li>The Authority Partners will work with the LEP to ensure that Local Plan policy framework and Strategic Economic Plan are consistent and mutually supportive.</li> </ul>	<p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Mid Devon District Council, Devon County Council, Somerset County Council, Heart of the South West LEP</p>	<p>A joint evidence base was commissioned - Quantitative Needs Assessment for Retail and Leisure 2011 (ENPA, WSC). This concluded that the larger centres outside the National Park such as Minehead are important for a wider range of retail and services, but given the dispersed rural nature of the area, local shops and services are also important and need to be retained.</p> <p>Discussion have been held at Duty to Co-operate officer meetings about policy approaches to business and employment including retail, leisure, tourism and home working. This included ENPA/WSC officer discussions regarding strategic allocations in Minehead / Alcombe for housing and employment land to ensure that the setting and special qualities of the National Park are protected.</p> <p>The Heart of the SW LEP is included as a signatory to the Duty to Co-operate Protocol. Reference was made to the HoSW LEP's Strategic Economic Plan in developing the strategic priorities for the Exmoor Local Plan. Informal officer discussions indicate there are no strategic issues arising for the Exmoor Local Plan.</p> <p>ENPA, NDC and DCC worked together to ensure a consistent cross-boundary approach to the proposed reinstatement of the heritage Lynton &amp; Barnstaple Railway which is an important tourism asset.</p>

Desired outcome from (Exmoor-wide DtC Protocol)	Key partners	Evidence of co-operation
<b>Strategic Priority (e) Climate Change Mitigation and Adaptation</b>		
<ul style="list-style-type: none"> <li>• The Partner Authorities and Agencies will work together to support climate change mitigation and adaptation measures across boundaries, including ecological networks and green infrastructure.</li> <li>• The Partner Authorities and other relevant partners will work together to avoid impacts of renewable energy schemes on the landscapes, seascapes, visual amenity and setting of the National Park.</li> </ul>	<p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Mid Devon District Council, Devon County Council, Somerset County Council, Devon Local Nature Partnership, Somerset Local Nature Partnership, Environment Agency, Natural England</p>	<p>Following the Written Ministerial Statement on Wind Energy in June 2015, NDC/TDC consulted on options for identifying suitable areas in their Local Plan, and a draft policy. ENPA responded to this supporting the use of landscape sensitivity assessment and the protection of the setting and special qualities of the National Park in the draft policy.</p> <p>The NDC/TDC Publication Draft Local Plan Proposed Main Changes (Policy ST16) supports renewable energy and heat proposals where the special qualities of nationally important landscape, biodiversity and heritage designations and their settings are conserved and enhanced. It is also recognised that the need for renewable energy does not automatically override environmental protection.</p> <p>NDC/TDC Publication Draft Local Plan Paragraph 13.614 (Kentisbury) supports small scale renewable energy schemes, but includes protection of the landscape, tranquillity, dark skies and setting of the National Park.</p>
<b>Strategic Priority (f) Flood and Coastal Risk Management</b>		
<ul style="list-style-type: none"> <li>• The Partner Authorities and Agencies will continue to work together to manage flood risk in particular with regard to strategic planning and development. Strategic Flood Risk Assessments will continue to be undertaken jointly where appropriate to inform spatial strategies and cross-border implications.</li> </ul>	<p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Devon County Council, Somerset County Council,</p>	<p>A joint evidence base was commissioned - Strategic Flood Risk Assessment Level 1 2009 (ENPA, WSC, with input from EA).</p> <p>There have been Duty to Co-operate Officer discussions on flood risk and coastal management but no strategic issues have been identified.</p>

<b>Desired outcome from (Exmoor-wide DtC Protocol)</b>	<b>Key partners</b>	<b>Evidence of co-operation</b>
<ul style="list-style-type: none"> <li>The Authority Partners and Agencies will co-operate over the North Devon and Somerset Shoreline Management Planning (SMP) process, and incorporate the policy approach set out in SMP2 for the planning and management of coastal defences.</li> </ul>	<p>Environment Agency, Natural England Marine Management Organisation</p>	<p>The Shoreline Management Plan has been used as the basis for policy in Exmoor Local Plan.</p> <p>A Coastal Change Management Area was identified for Porlock Weir based on evidence and policy decisions set out in the Shoreline Management Plan, and discussion with EA officers.</p>
<p><b>Strategic Priority (g) Natural and Historic Environment</b>  <b>(including National Park Statutory Purposes, Landscape and Setting; and Biodiversity, Ecological Networks and Green Infrastructure)</b></p>		
<ul style="list-style-type: none"> <li>The Partner Authorities and Agencies will work in partnership to ensure that Local Plans include policies to protect designated areas, including the setting of the National Park and historic designations.</li> <li>The Partner Authorities will co-operate to ensure that strategic allocations and planning proposals are consistent with National Park statutory purposes through appropriate consultation, master-planning, design, and landscaping.</li> <li>The Partner Authorities, Local Nature Partnerships and Natural England will co-operate to promote coherent ecological networks across boundaries, through joint work on ecological mapping and green infrastructure provision.</li> </ul>	<p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Mid Devon District Council, Devon County Council, Somerset County Council, Devon Local Nature Partnership, Somerset Local Nature Partnership, Environment Agency, Historic England, Natural England</p>	<p>There have been Duty to Co-operate officer discussions regarding the setting of the National Park.</p> <p>As a result of this, the NDC/TDC Local Plan includes a policy on the conservation and enhancement of the setting of the National Park and its special qualities including its dark night skies (ST14: Enhancing Environmental Assets). Reference is also made in a number of specific settlement policies to protecting and enhancing the setting and special qualities of the National Park including its dark night skies.</p> <p>The Proposed Changes to the NDC/TDC Joint Plan (April 2015) reflect Government policy changes in relation to S106 thresholds for housing. As a consequence, NDC/TDC have amended Policy ST19 (Affordable Housing on Exceptions Sites) to ensure that proposals for rural exceptions sites close to, or affecting the National Park, do not detract from its special qualities and setting.</p> <p>As a result of Duty to Co-operate discussions, WSC added reference to the proximity of the National Park to the strategic allocations at</p>

Desired outcome from (Exmoor-wide DtC Protocol)	Key partners	Evidence of co-operation
		<p>Minehead/Alcombe, and reference to Exmoor’s Dark Sky Reserve status in the justification (Publication Draft Local Plan consultation February 2015) which is supported by ENPA in their consultation response.</p> <p>Ecological network mapping (covering the whole of the National Park) was carried out by the Somerset Wildlife Trust supported by SCC and is incorporated within the Exmoor Local Plan.</p> <p>The NDC/TDC Local Plan reflects the importance of cross-boundary linkages for green infrastructure/ habitat networks.</p>
<b>Strategic Priority (h) Minerals and Waste</b>		
<ul style="list-style-type: none"> <li>The Partner Authorities and Agencies will work together to ensure that a co-ordinated strategic approach is adopted to minerals and waste and that strategic planning policies and proposals for minerals and waste are consistent with National Park purposes.</li> <li>Given the limited scope for minerals exploitation within Exmoor National Park, ENPA, Devon and Somerset County Councils will work together to co-ordinate local assessments of aggregate production.</li> </ul>	<p>Exmoor National Park Authority, Devon County Council, Somerset County Council, Environment Agency, Natural England</p>	<p>ENPA worked with DCC and SCC officers to agree proposed changes to the minerals and waste policies.</p> <p>ENPA has worked with Devon and Somerset County Councils respectively on joint evidence base studies for minerals provision through Local Aggregate Assessments (LAAs).</p> <p>ENPA is a signatory to the joint Duty to Co-operate Statement with regard to the Somerset Minerals Plan and Sand and Gravel prepared by Somerset County Council.</p> <p>The Devon-wide Duty to Co-operate Protocol, which ENPA is a signatory to, includes the requirement for co-operation between Minerals and Waste Planning Authorities in Devon in the preparation of an appropriate local, minerals and waste planning policy framework including the preparation of common evidence covering cross-boundary minerals issues which will</p>

Desired outcome from (Exmoor-wide DtC Protocol)	Key partners	Evidence of co-operation
		<p>inform the development of consistent minerals planning policy.</p> <p>The national status of the National Park means that it is not considered to be an appropriate location for major mineral extraction, reflecting national policy. The LAAs for Devon and Somerset demonstrate that there is an adequate availability of crushed rock aggregate mineral resources from outside the National Park, and consequently there is no expectation that major mineral development is required within Exmoor. DCC confirmed this in their response to the consultation draft Local Plan, and SCC did not raise any comments.</p> <p>English Heritage (now Historic England) produced an Atlas of Building Stone for Somerset and Exmoor to inform the Exmoor National Park Local Plan policy for small scale working of building or roofing stone to provide building materials to maintain the character of the local built heritage.</p> <p>The national status of the National Park also means that it is not considered to be an appropriate location for large scale waste facilities.</p> <p>ENPA has worked with Devon and Somerset County Councils and the Somerset Waste Partnership to plan for the management of waste arising from within the National Park, and provision has been made for this in the Somerset and Devon Waste Plans.</p>
<b>Strategic Priority (i) Infrastructure Provision</b>		
<ul style="list-style-type: none"> <li>The Partner Authorities and other relevant partners will engage as appropriate with relevant bodies to ensure</li> </ul>	<p>Exmoor National Park Authority, North Devon District Council, Torrridge</p>	<p>There have been Duty to Co-operate officer discussions with DCC and SCC regarding the Exmoor Route Network.</p>

<b>Desired outcome from (Exmoor-wide DtC Protocol)</b>	<b>Key partners</b>	<b>Evidence of co-operation</b>
<p>adequate and effective infrastructure provision with regard to for example, transportation, telecommunications, energy, waste water, water quality, water supply, education and health facilities for the communities of the respective authorities.</p>	<p>District Council, West Somerset Council, Devon County Council, Somerset County Council, Heart of the South West LEP, Environment Agency, Natural England</p>	<p>DCC and SCC were consulted regarding the transport and accessibility policies in the consultation draft Local Plan. Minor amendments were made to the Plan including parking standards as a result of comments from SCC.</p> <p>Infrastructure and service providers were contacted to inform the Exmoor Infrastructure Development Plan 2015. This does not identify the need for any strategic infrastructure provision on Exmoor.</p> <p>Partner organisations (DCC, SCC, NDC, WSC, ENPA, Connecting Devon and Somerset, and Defra) have worked together through the Superfast Exmoor Steering Group to ensure a consistent cross border approach to the rollout of superfast broadband through the Connecting Devon and Somerset Programme and its bid to the Rural Community Broadband Fund. ENPA is also working with the Department of Culture, Media and Sport’s Mobile Infrastructure Project to improve mobile coverage.</p> <p>Exmoor National Park Authority has worked closely with infrastructure organisations including Highway Authorities and utility companies. Working with Western Power Distribution has achieved the undergrounding of overhead lines for certain areas including Dulverton conservation area (to enhance the quality of the built heritage), Hawkcombe (to enhance the open character of the moorland landscape) and Porlock Marsh (to improve the character of the coastal landscape and seascape).</p>

Desired outcome from (Exmoor-wide DtC Protocol)	Key partners	Evidence of co-operation
		<p>The National Park Authority is working with Somerset and Devon County Councils as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors. The Somerset Public Transport Forum (including SCC, ENPA, train operating companies and bus operators) encourages transport authorities and transport providers to support the ongoing provision of public transport services, and to encourage demand-responsive community transport initiatives, particularly in those areas where regular public transport services are not available.</p>
<p><b>Strategic Priority (j) The Impact of the Hinkley Point C New Nuclear Project.</b></p>		
<ul style="list-style-type: none"> <li>The Partner Authorities will co-operate through monitoring the impact of the Hinkley Point C project on the housing market area and on the local economy, particularly in relation to tourism, working with the Heart of the South West LEP where appropriate.</li> </ul>	<p>Exmoor National Park Authority, West Somerset Council, Somerset County Council, Heart of the South West LEP</p>	<p>Discussion have been held at Duty to Co-operate officer meetings about the potential Hinkley effect on housing and employment. This has been factored into WSC's housing provision in their Draft Local Plan.</p>
<p><b>Strategic Priority (k) Marine Management</b></p>		
<ul style="list-style-type: none"> <li>ENPA, Torridge, North Devon, and West Somerset Councils and other relevant partners will liaise to ensure a consistent approach to strategic planning in relation to the coast.</li> <li>The coastal Partner Authorities will liaise with the Marine Management Organisation including having strategic input into the respective Marine Management Plan to ensure the policy framework is</li> </ul>	<p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Environment Agency, Natural England, Marine Management Organisation</p>	<p>The Marine Management Organisation was contacted regarding the Duty to Co-operate Protocol but did not consider it to be necessary for them to be a signatory as no strategic issues have been identified relating to the Exmoor Local Plan. Work on the South West Marine Spatial Plan commenced in 2016, and ENPA will work with the MMO as this is developed, to ensure appropriate linkages are made between the spatial plans and policies for the marine and terrestrial areas.</p>

<b>Desired outcome from (Exmoor-wide DtC Protocol)</b>	<b>Key partners</b>	<b>Evidence of co-operation</b>
consistent and takes account of marine planning priorities.		

## **Monitoring**

16. The preparation of the Exmoor National Park Publication Draft Local Plan has been informed by joint working on key evidence base documents, and has been the subject of detailed consultation with stakeholders throughout the various stages of plan preparation. This has helped to build a good understanding of key issues and develop good working relationships, which will be central to the successful delivery of the Local Plan. ENPA will continue to work co-operatively with local authorities and other partners, including a joint housing topic paper for the Northern Peninsula Housing Market Area and on affordable housing delivery.
17. The effective operation of the Exmoor-wide Duty to Cooperate Protocol and the outcome of co-operative working in relation to the identified strategic priorities will be monitored through officer meetings and reported in the Exmoor National Park Annual Monitoring Report.

**Appendix 1- Duty to Co-operate meetings and correspondence**

<b>DUTY TO CO-OPERATE MEETINGS</b>		
	<b>MEETING DATE</b>	<b>DISCUSSION POINTS</b>
<b>Duty to Co-operate officer meeting – ENPA with Somerset County Council</b>	14 April 2011	Meeting held to discuss cross-boundary issues between the Waste Planning Authorities of Somerset County Council, Devon County Council and Exmoor National Park Authority. The meeting covered progress to date on strategy development, the respective roles and responsibilities of both authorities and areas of joint interest. After this meeting Somerset County Council drafted text that summarised the tripartite approach being taken, which informed the preparation of the Somerset Waste Core Strategy and the Exmoor National Park Local Plan.
<b>Duty to Co-operate officer meeting - ENPA with North Devon Council</b>	11 July 2012	Meeting held to discuss cross boundary issues and progress with local plans. The meeting was primarily in relation to policy approaches to the intended reinstatement of the Lynton-Barnstaple Railway that crosses both planning authority areas.
<b>Duty to Co-operate officer meeting - ENPA with North Devon Council</b>	26 November 2012	Meeting to discuss cross-boundary issues including spatial strategy, settlement hierarchy and housing provision. Also considered respective Local Plan policy development relating to economy, environment, transport and infrastructure.
<b>Duty to Co-operate officer meeting - ENPA with West Somerset Council</b>	17 January 2013	Meeting held to discuss cross boundary issues and progress with local plans. Discussion included settlement strategy and hierarchy, housing and employment, also environment and transport strategies.
<b>Duty to Co-operate officer meeting - ENPA with West Somerset Council, North Devon and Torridge Councils</b>	11 June 2013	Discussion of plan progress and evidence base preparation. Particular focus on cross-boundary issues relating to named settlements and whether there was a consistent policy approach between the Plans.
<b>Duty to Co-operate officer meeting -</b>	11 February 2014	Meeting held to discuss WSC response to the consultation draft Exmoor National Park Local Plan. Also discussions on the Duty to Co-

**Exmoor National Park Local Plan for Submission – Duty to Co-operate Statement**

<b>ENPA with West Somerset Council</b>		operate Protocol, strategic priorities and progress with evidence base studies including SHMA updates.
<b>Duty to Co-operate officer meeting - ENPA with West Somerset Council, North Devon and Torridge Councils</b>	1 July 2014	Updates on Local Plan progress and evidence base documents. Particular focus on the Duty to Co-operate Protocol and the strategic priorities for co-operative working. Agreement on the cross-boundary approach to settlements and discussion on housing provision across the Housing Market Area.
<b>Duty to Co-operate officer meeting - ENPA with West Somerset Council</b>	10 November 2014	Informal meeting between officers to introduce new officers and site visit to demonstrate ENPA approach to housing and employment delivery.
<b>Duty to Co-operate officer meeting - ENPA with West Somerset Council, North Devon and Torridge Councils</b>	15 December 2014	Officer discussions arising from the Strategic Housing Market Assessment updates focusing on housing provision across the HMA, particularly in relation to how to accommodate housing arising from within the National Park.
<b>Duty to Co-operate correspondence between ENPA, West Somerset Council, North Devon and Torridge Councils</b>	August – Dec 2015	<p>Updated Northern Peninsula Strategic Housing Market Assessment by Housing Vision to take account of the 2012 household projections issued by ONS in February 2015.</p> <p>WSC took advice from their Inspector Brian Cook who advised that it would not be material in relation to their compliance with the Duty to Co-operate for their submitted plan, but suggested that it would be beneficial for WSC to participate in this update in order to comply with Planning Policy Guidance in using the 2012 projections as ‘the most up to date estimate of future household growth’.</p>
<b>Duty to Co-operate officer meeting – ENPA with West Somerset Council, North Devon and Torridge Councils</b>	1 Oct 2015	Officer meeting to discuss the joint Housing Topic paper for the Northern Peninsula Housing Market Area

<b>Duty to Co-operate officer meeting – ENPA with North Devon and Torridge Councils (West Somerset Council unable to attend)</b>	30 Nov 2015	Officer meeting to discuss the joint Housing Topic paper for the Northern Peninsula Housing Market Area
<b>Duty to Co-operate correspondence between ENPA, West Somerset Council, North Devon and Torridge Councils</b>	January-February 2016	Correspondence regarding the drafting and sign-off for the joint Housing Topic paper for the Northern Peninsula Housing Market Area
<b>West Somerset Local Plan Examination</b>	March 2016	ENPA and NDC made joint written representations and appeared at the hearings relating to Duty to Co-operate, objectively assessed housing need, housing provision, and the strategy approach.
<b>Duty to Co-operate officer meeting – ENPA, West Somerset, North Devon and Torridge Councils</b>	12 April 2016	Officer meeting to finalise the joint Housing Topic paper for the Northern Peninsula Housing Market Area.

<b>DUTY TO CO-OPERATE CORRESPONDENCE</b>	
<b>CONSULTATION</b>	<b>MEETING AT WHICH CONSULTATION RESPONSE CONSIDERED AND APPROVED</b>
<b>North Devon and Torridge Joint Core Strategy Pre-Publication Consultation</b>	Planning Committee meeting 6 April 2010 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the North Devon and Torridge Joint Core Strategy Pre-Publication Consultation.
<b>West Somerset Local Plan 2012-2032 Draft Preferred Strategy</b>	Planning Committee meeting 1 May 2012 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the West Somerset Local Plan 2012-2032 Draft Preferred Strategy

**Exmoor National Park Local Plan for Submission – Duty to Co-operate Statement**

<b>Devon Waste Plan</b>	Planning Committee meeting date 7 August 2012 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Devon Waste Plan
<b>Somerset Minerals Plan (Preferred Options)</b>	Planning Committee meeting 5 March 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Somerset Minerals Plan (Preferred Options)
<b>Draft North Devon and Torridge Local Plan</b>	Planning Committee meeting 5 March 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Draft North Devon and Torridge Local Plan
<b>Somerset Draft Local Aggregate Assessment</b>	Planning Committee meeting 6 August 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Somerset Draft Local Aggregate Assessment
<b>Draft West Somerset Local Plan – revised preferred strategy</b>	Planning Committee meeting 3 September 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Draft West Somerset Local Plan – revised preferred strategy
<b>Second Devon Draft Local Aggregate Assessment</b>	Planning Committee meeting date 1 October 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Second Devon Draft Local Aggregate Assessment
<b>Mid Devon Local Plan Review Options Consultation</b>	Planning Committee meeting date 1 April 2014- Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Mid Devon Local Plan Options Consultation
<b>Somerset Minerals Plan (Pre Submission) Consultation</b>	Planning Committee 6 May 2014 - Authority's Planning committee considered and approved Exmoor National Park Authority's response to the Somerset Minerals Plan (Pre Submission)
<b>ENPA letter to West Somerset Council, 13<sup>th</sup> November 2014</b>	Letter from ENPA requesting that WSC accommodate the market housing arising from the West Somerset side of the National Park within the West Somerset Local Plan
<b>West Somerset Council letter to ENPA, 25<sup>th</sup> November 2014</b>	Letter from WSC to ENPA in response to the request that WSC accommodate the market housing arising from the West Somerset side of the National Park within the West Somerset Local Plan, stating that they did not think that this would be a beneficial course of

	action for the Council as Local Planning Authority to take.
<b>ENPA letter to North Devon Council, 6<sup>th</sup> January 2015</b>	Letter from ENPA requesting that NDC accommodate the market and affordable housing arising from the North Devon side of the National Park within the Joint North Devon and Torridge Local Plan. The letter also requested that NDC consider whether it is able to accommodate the housing arising from the West Somerset side of the National Park.
<b>North Devon Council response to ENPA, 9<sup>th</sup> January 2015</b>	Informal officer response from NDC indicating that whilst NDC can assist with the objectively assessed figure for market and affordable housing arising from that part of the National Park falling within the North Devon area, this could not be reasonably extended to accommodating some or all of the housing requirement arising from the West Somerset part of the National Park.
<b>West Somerset Publication Draft Local Plan</b>	Approved via correspondence with Members and submitted 23 March 2015
<b>Mid Devon Publication Draft Local Plan</b>	Submitted under delegated powers 16 <sup>th</sup> April 2015
<b>North Devon and Torridge Joint Local Plan Proposed Changes</b>	Submitted under delegated powers 27 <sup>th</sup> April 2015
<b>Devon County Council Minerals Plan (Pre-Submission)</b>	Submitted under delegated powers 6 November 2015
<b>North Devon and Torridge Joint Local Plan Proposed Changes on Affordable Housing, Starter Homes, and Wind Energy Options consultation</b>	Submitted under delegated powers 3 December 2015
<b>West Somerset Local Plan Submission and Examination</b>	Submission of written statements relating to the Inspector's Matters under delegated powers, February 2016
<b>ENPA letter to North Devon Council, 24<sup>th</sup> March 2016</b>	Letter from ENPA with updated housing figures from the December 2015 SHMA update to take account of the 2012 household projections.
<b>North Devon Council letter to ENPA, 4<sup>th</sup> April 2016</b>	Letter from NDC confirming that the housing requirement included in the draft North Devon and Torridge Local Plan includes an allowance for the market and affordable housing arising from the North Devon side of the National Park.

**Appendix 2 - DtC Correspondence Regarding Housing Provision**



Exmoor National Park Authority  
Exmoor House, Dulverton  
Somerset TA22 9HL  
Tel: (01398) 323665 Fax: (01398) 323150  
[www.exmoor-nationalpark.gov.uk](http://www.exmoor-nationalpark.gov.uk)  
E-mail: [localplan@exmoor-nationalpark.gov.uk](mailto:localplan@exmoor-nationalpark.gov.uk)

Nick Bryant  
Planning Policy Manager  
Taunton Deane and West Somerset Councils

13<sup>th</sup> November 2014

Dear Nick

### **Duty to Co-operate: Housing Distribution in the Northern Peninsula Housing Market Area**

Thank you for meeting with us on 11<sup>th</sup> November. Having considered what was said at the meeting, we are following up the discussion with a letter to note where we are in considering housing distribution across the Northern Peninsula Housing Market Area.

We found it helpful to hear the approach to providing for and delivering housing in West Somerset district and it was mentioned that a paper to underpin West Somerset's local plan housing strategy is currently being drafted. It is clearly important for us all in the Northern Peninsula Housing Market Area to understand how the housing provision figure for the West Somerset Local Plan has been arrived at as well as the objectively assessed housing needs figure for each local planning authority area and across the housing market area as a whole. Our understanding is that the objectively assessed housing need figure for West Somerset outside the National Park was 2,400 households (set out in the West Somerset SHMA update as 2,398 2011-2031) and that, of these, 1,908 were affordable (or shared ownership). The West Somerset Local Plan pre publication draft provides for a total of 2,900 dwellings over that time period which we understand is to help deliver an increased number of affordable dwellings.

We note that the most recent final draft of the Northern Peninsula SHMA update, which sets out a number of household projection scenarios, recommends a figure of 1,443 for West Somerset district which, when adjusted for the backlog of affordable housing would total 1687. This is obviously lower than the 2,400 and 2,900 figures referred to above. The same SHMA update sets out figures for the National Park including the split between that part of Exmoor within North Devon and that part in West Somerset. Tables 6.5 and 6.6 from the report are set out as an Appendix to this letter. There are no updated figures yet available for the split between market and affordable housing. The best available data is that set out within the previous SHMA updates. For Exmoor National Park this included a figure of 267 affordable dwellings 2011-31.

We have looked at the proposed dwelling provision numbers proposed in the most recent draft of the West Somerset Local Plan, together with the recent objectively assessed housing figures and taking account of previous discussions with you, North Devon and Torridge district councils (as part of the HMA). We request that the objectively assessed figure for, at least the market housing for ENP in West Somerset be included in the total for West Somerset Local Plan. We will need to discuss what the precise figure should be but, given recent evidence, an approach based on the updated assessed housing requirement figure from the most recent

SHMA update minus the affordable need figure of 267 (ENP in West Somerset SHMA update January 2014) and minus any dwelling completions since 2011 would seem most appropriate giving a figure of around 250 dwellings to 2031.

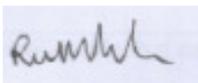
It seems to us that the effect of this request would not, in practice, change the number of dwellings that would need to be provided for in West Somerset district nor would it result in a change to the overall housing figure set out in the West Somerset Local Plan as the element referred to would be absorbed into the uplifted figure of 2,900 proposed to date. This is a technical exercise, through duty to co-operate, to consider the distribution of housing within the housing market area. It is also the case that both the areas of West Somerset outside and within Exmoor National Park are in the same Housing Authority area. We are looking to continue to deliver for the housing needs of our communities in the National Park as part of the wider housing authority area. As you know within the National Park, housing policy proposes a continued focus on the delivery of local needs affordable housing with some additional flexibility for cross subsidy where required for viability reasons. This request to include the objectively assessed figure for Exmoor National Park in West Somerset in the total housing figure for the West Somerset Local Plan would not alter the fact that there will continue to be needs led delivery within the National Park.

Indeed, this approach could be advantageous to both our planning authorities and would satisfy the need to take account of the National Park's statutory purposes and duty as well as assisting West Somerset in delivering the additional market housing required to achieve delivery of an increased number of affordable dwellings. It would clearly demonstrate an effective duty to co-operate on housing and would show that all options for housing distribution in the housing market area have been fully considered and would avoid either of us being in a position of objecting to each other's plans.

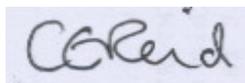
Through duty to co-operate discussions we have amended our settlement strategy to address concerns raised by West Somerset. We would welcome West Somerset's co-operation in addressing this last outstanding matter from duty to co-operate discussions. Given that we are all working to tight timescales for progressing our respective Local Plans to Publication, we would appreciate a quick response so that the matter can be resolved by the time we next meet with North Devon and Torridge District officers though depending on the outcome, there may also be implications for the duty to co-operate meeting scheduled with members in January.

We look forward to hearing from you,

Yours sincerely



Ruth McArthur  
Policy and Community Manager



Clare Reid  
Local Plan Project Manager

cc Toby Clempson, Martin Wilsher, WSC

## Appendix

### Northern Peninsula Housing Market Strategic Housing market Assessment (SHMA) Update: Final Report November 2014

**Table 6.5: 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	8,286	9,676	2,453	936
2012-based @ 2008 average household size	6,481	7,486	1,634	649
2012-based @ CLG 2011 to 2021+2008 post -2021	5,664	6,939	1,297	530
2012-based @ CLG 2008 adjusted to 2011 Census	6,858	7,502	1,655	666
2012-based @ constant household formation rates	5,597	6,787	1,448	572
<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	8,591	9,986	2,529	965
2012-based @ 2008 average household size	6,720	7,726	1,685	669
2012-based @ CLG 2011 to 2021+2008 post -2021	5,872	7,161	1,337	546
2012-based @ CLG 2008 adjusted to 2011 Census	7,110	7,742	1,706	687
2012-based @ constant household formation rates	5,803	7,004	1,493	590
<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	9,136	10,541	2,728	1,116
2012-based @ 2008 average household size	7,146	8,155	1,817	774
2012-based @ CLG 2011 to 2021+2008 post -2021	6,245	7,559	1,443	632
2012-based @ CLG 2008 adjusted to 2011 Census	7,562	8,173	1,841	794
2012-based @ constant household formation rates	6,171	7,394	1,610	682
<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.

**Table 6.6: 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**

<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	224	712	936
2012-based @ 2008 average household size	175	474	649
2012-based @ CLG 2011 to 2021+2008 post -2021	153	377	530
2012-based @ CLG 2008 adjusted to 2011 Census	185	480	665
2012-based @ constant household formation rates	151	421	572
<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	232	734	966
2012-based @ 2008 average household size	181	489	670
2012-based @ CLG 2011 to 2021+2008 post -2021	159	389	547
2012-based @ CLG 2008 adjusted to 2011 Census	192	495	687
2012-based @ constant household formation rates	157	434	591
<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	267	849	1,116
2012-based @ 2008 average household size	209	565	774
2012-based @ CLG 2011 to 2021+2008 post -2021	182	449	632
2012-based @ CLG 2008 adjusted to 2011 Census	221	572	793
2012-based @ constant household formation rates	180	502	682
<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.

D. Wyborn,  
Head of Planning and Sustainable  
Development,  
Exmoor National Park Authority,  
Exmoor House,  
Dulverton,

TA22 9HL

Our Ref        DTC/KT/MW/01  
Your Ref  
Contact        Martin Wilsher  
Extension      5334  
Date            25<sup>th</sup> November 2014

## **Duty to Co-operate: Housing Requirement**

Dear Mr. Wyborn,

I write further to discussions between Officers of the National Park and West Somerset Council regarding the Duty to Co-operate, and specifically a request made by the Park for West Somerset to meet some of its objectively assessed housing need. This request has now been followed up in a recent letter to the Planning Policy Manager dated 13 November 2014.

I understand that this request was for West Somerset Council to consider including the open-market housing element of the Somerset part of the Exmoor National Park's housing requirement for its Local Plan as part of its own. After careful consideration of the various issues and potential impact they would have on the West Somerset Local Plan to 2032, it has been concluded that this would not be a beneficial course of action for the Council as Local Planning Authority to take.

The West Somerset Strategic Housing Market Assessment Update report of 2013 produced a housing need figure for the plan period (2012 – 2032) that was very close to the long-term delivery rate in the West Somerset LPA area since the mid 1970's, of around 120 dwellings per annum. The emerging Local Plan to 2032, is seeking to plan for a housing figure that is higher than that suggested in this study.

The justification for this higher figure is partly due to the need to plan for the possible impact on the West Somerset housing market of the proposed Hinkley Point C development. As there has been no comparable type of development in terms of size, scale and, duration in the UK, in the past 20 years, it is difficult to quantify how this will translate into additional demand in the local housing market. Additionally, the planned increase is an attempt to try and address the disparity in the tenure of housing that is projected to be needed over the plan period and maximise the delivery of affordable housing.

The Objectively Assessed Need identified in the emerging West Somerset Local Plan is reliant upon a larger proportion of affordable housing than could reasonably be delivered through Section 106. As a consequence of this, West Somerset has had to approach its neighbours in Taunton Deane and Sedgemoor to see if they would be willing to assist by including a portion of the projected housing need in the form of affordable housing as part of their own future proposals for the provision of housing.

Given that the long-term trend in housing delivery based on previous completions data is virtually flat, the figure being planned for by the emerging Local Plan is challenging but aims to give comfort to an independently appointed planning inspector that the Plan will maximise the delivery of affordable housing but also takes account of Hinkley C.

Having established the justification for the housing requirements underpinning the West Somerset Local Plan as part of the preparation for the Revised Preferred Strategy (Local Development Panel – 11<sup>th</sup> April 2011), it would be inappropriate for the Council to accede to your request to consolidate the Exmoor National Park market housing requirement. Nor do we consider it feasible to increase the strategic housing target for the West Somerset Local Planning Authority area to accommodate this element of the National Park's housing requirement. This would call into question the robustness of the West Somerset Local Plan and, in-light-of the time and effort that this Council has invested over the past five years, threaten the soundness of the Development Plan as it would be questionable if housing targets on this basis could be considered either, justified or, deliverable. Furthermore, to-date, we have not seen the evidence which would justify the need for market housing needs arising in the West Somerset part of the Park needing to be exported.

The Council and its Officers will continue to liaise and participate with its equivalents from the National Park Authority on similar relevant Duty-to-Co-operate matters as required by the legislation. I am informed that there has been a successful resolution of a number of issues to date, and the efforts of the Officers involved from both Authorities in achieving this should be commended.

If you require any further information and details on the matters mentioned above, I would recommend that you contact the Council's two Planning Policy Officers who have been most closely associated with the emerging Local Plan, Toby Clempson and, Martin Wilsher.

Yours sincerely,

Cllr. K. Turner  
Portfolio Holder: Housing, Health & Wellbeing

Mike Kelly  
Planning Manager  
North Devon Council

6<sup>th</sup> January 2015

Dear Mike

### **Duty to Co-operate: Housing Distribution in the Northern Peninsula Housing Market Area**

Officers had a useful meeting on 15<sup>th</sup> December 2014 to discuss housing distribution across the Northern Peninsula Housing Market Area.

We found it useful to discuss the approach to providing for and delivering housing from each of the constituent authorities. It was collectively agreed that we would use the figures from scenario 3 in the Northern Peninsula Strategic Housing Market Assessment (NPSHMA) to base our respective housing figures on. Tables 6.5 and 6.6 from the NPSHMA report are set out as an Appendix to this letter. These figures include an identified housing need of 193 units within the North Devon part of the National Park (see Table 3 below). ENPA had previously circulated a draft housing paper setting out the approach in the National Park, with the focus on delivery of affordable housing to meet local needs. The paper highlights the constraints to housing delivery within the National Park due to the need to take account of the National Park's statutory purposes and duty.

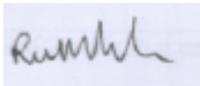
We are now writing to formally request that the objectively assessed figure of **193** units be included in the total for North Devon Local Plan.

Due to the constraints on delivery of housing within the National Park, we would also like to request that North Devon consider whether some or all of the housing requirement of **524** units from the West Somerset part of the National Park is able to be met within the North Devon Local Plan. This is in order to demonstrate an effective duty to co-operate response in relation to the strategic priority of housing, and to show that all options for housing distribution in the housing market area have been fully considered.

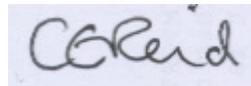
This request to include the objectively assessed figure for Exmoor National Park in the total housing figure for the North Devon Local Plan would not alter the fact that there will continue to be needs led delivery within the National Park to respond to the housing needs of our communities in the National Park as part of the wider housing authority area.

We look forward to hearing from you,

Yours sincerely



Ruth McArthur  
Policy and Community Manager



Clare Reid  
Local Plan Project Manager

cc Andrew Austin NDC, Ian Rowland Torridge District Council

## Appendix

### Northern Peninsula Housing Market Strategic Housing market Assessment (SHMA) Update: Draft Final Report November 2014

Table 6.5: 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	8,286	9,676	2,453	936
2012-based @ 2008 average household size	6,481	7,486	1,634	649
2012-based @ CLG 2011 to 2021+2008 post -2021	5,664	6,939	1,297	530
2012-based @ CLG 2008 adjusted to 2011 Census	6,858	7,502	1,655	666
2012-based @ constant household formation rates	5,597	6,787	1,448	572
<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	8,591	9,986	2,529	965
2012-based @ 2008 average household size	6,720	7,726	1,685	669
2012-based @ CLG 2011 to 2021+2008 post -2021	5,872	7,161	1,337	546
2012-based @ CLG 2008 adjusted to 2011 Census	7,110	7,742	1,706	687
2012-based @ constant household formation rates	5,803	7,004	1,493	590
<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	9,136	10,541	2,728	1,116
2012-based @ 2008 average household size	7,146	8,155	1,817	774
2012-based @ CLG 2011 to 2021+2008 post -2021	6,245	7,559	1,443	632
2012-based @ CLG 2008 adjusted to 2011 Census	7,562	8,173	1,841	794
2012-based @ constant household formation rates	6,171	7,394	1,610	682
<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.

**Table 6.6: 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	224	712	936
2012-based @ 2008 average household size	175	474	649
2012-based @ CLG 2011 to 2021+2008 post -2021	153	377	530
2012-based @ CLG 2008 adjusted to 2011 Census	185	480	665
2012-based @ constant household formation rates	151	421	572
<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	232	734	966
2012-based @ 2008 average household size	181	489	670
2012-based @ CLG 2011 to 2021+2008 post -2021	159	389	547
2012-based @ CLG 2008 adjusted to 2011 Census	192	495	687
2012-based @ constant household formation rates	157	434	591
<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	267	849	1,116
2012-based @ 2008 average household size	209	565	774
2012-based @ CLG 2011 to 2021+2008 post -2021	182	449	631
2012-based @ CLG 2008 adjusted to 2011 Census	221	572	793
2012-based @ constant household formation rates	180	502	682
<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.

**Table 3: Extract from SHMA tables highlighting housing figures for consideration by North Devon Council**

<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>
2012-based @ CLG 2011 to 2021+2008 post -2021 (Adjusted for vacant dwellings and second homes rates)	182	449	631
The backlog of affordable housing:	11	75	86
<b>Total</b>	<b>193</b>	<b>524</b>	<b>717</b>

\* Some of the figures from the most recent joint SHMA Update are subject to minor adjustments pending the final version

## Clare Reid

---

**From:** Mike Kelly <Mike.Kelly@northdevon.gov.uk>  
**Sent:** 09 January 2015 16:28  
**To:** Clare Reid  
**Cc:** David Wyborn; Ruth McArthur; Tessa Saunders; Andrew Austen; 'Ian.Rowland@torridge.gov.uk'  
**Subject:** Re: Duty to Co-operate: Housing Distribution in the Northern Peninsula Housing Market Area

Dear Clare,

Further to the e-mail exchange below I've now had opportunity to consider the points you raise in your letter of 6th. January 2015 and would advise that the request re. the accommodation of additional housing will be considered by the Joint North Devon and Torridge LDF Group on Friday 16th. January 2015 following which we will advise further. I would anticipate that whilst we can assist with the objectively assessed figure of 193 units for that park of the National Park falling within the North Devon administrative authority this offer could not be reasonably extended to accommodating some or all of the housing requirement from the West Somerset part of the Exmoor National Park. We will advise further.

Regards,

Mike Kelly  
Planning Manager NDC

>>> Mike Kelly 06/01/15 16:40 >>>

Many thanks Clare; very helpful.

Mike Kelly

>>> Clare Reid 06/01/15 16:22 >>>

Dear Mike

Please find attached a letter regarding distribution of housing across the Northern Peninsula Housing Market Area, in the light of discussions with officers under the Duty to Co-operate.

Please do not hesitate to get in touch with us if you wish to discuss further or require any clarification.

Kind regards

Clare Reid

Local Plan Project Manager

Exmoor National Park Authority

Exmoor House, Dulverton, Somerset, TA22 9HL

Tel: 01398 323665

Direct Line: 01398 322235

Fax: 01398 323150

Visit Our Website at <http://www.exmoor-nationalpark.gov.uk>

**'Enhancing the qualities that make Exmoor special'**

---

This e-mail has been scanned for all viruses by Claranet. The service is powered by MessageLabs. For more information on a proactive anti-virus service working around the clock, around the globe, visit: <http://www.claranet.co.uk>

---

This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this e-mail in error please notify North Devon Council ICT Unit. E-mail is inherently insecure without specific security measures being taken. In essence we cannot guarantee the safe and private delivery of all e-mail, both outbound and inbound, due to the complexity and nature of the networks that it may utilise. Please bear this in mind when sending critical or sensitive information. The views in this message



**EXMOOR**  
**NATIONAL PARK**

Exmoor National Park Authority  
Exmoor House, Dulverton  
Somerset TA22 9HL  
Tel: (01398) 323665 Fax: (01398) 323150  
[www.exmoor-nationalpark.gov.uk](http://www.exmoor-nationalpark.gov.uk)  
E-mail: [localplan@exmoor-nationalpark.gov.uk](mailto:localplan@exmoor-nationalpark.gov.uk)

Mike Kelly  
Planning Manager  
North Devon Council

23<sup>rd</sup> April 2015

Dear Mike

**Duty to Co-operate: Housing Distribution in the Northern Peninsula Housing Market Area**

We previously wrote to you on 6<sup>th</sup> January 2015 regarding housing distribution across the Northern Peninsula Housing Market Area.

As a result of further work undertaken on the Housing Market Assessment for Exmoor National Park Authority, we would like to revise the figure of objectively assessed need for the North Devon side of the National Park which we have formally requested be included in the total for the North Devon Local Plan, to **205** units. We note that this figure has been included in the Proposed Changes to your Publication Draft Local Plan which we welcome, and will be responding separately to the consultation.

The change to the figure has resulted from work commissioned by the National Park Authority to check the allocation of population, households and housing for 11 Census Output Areas shared between the National Park and North Devon planning authority areas. The checking resulted in a small increase in the number of houses (and hence households) falling within the National Park and a consequent small decrease in those on the North Devon planning authority side of the National Park boundary. The checking has enabled an accurate housing requirement projection to be derived for the National Park although the overall figure for North Devon district as a whole (i.e including that part in the National Park) has not changed.

A table showing the basis for this revised figure is attached. The 205 figure has been arrived at by applying the backlog of affordable housing (11 dwellings) to the unadjusted figure of 161 dwellings (recommended scenario 3) and then applying the vacant/second homes rate of 19.2%.

As we stated previously, this request to include the objectively assessed figure for Exmoor National Park in the total housing figure for the North Devon Local Plan would not alter the fact that there will continue to be needs led affordable housing delivery within the National Park to respond to the housing needs of our communities in the National Park as part of the wider housing authority area.

Yours sincerely

Ruth McArthur  
Policy and Community Manager

Clare Reid  
Local Plan Project Manager

cc --Andrew Austin NDC, Ian Rowland Torridge District Council

## Appendix

### Northern Peninsula Housing Market Strategic Housing Market Assessment (SHMA) Update: Final Report January 2015

**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)
2-012-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>
2008-based households	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>	<b>19.20%</b>	<b>19.20%</b>	<b>19.20%</b>
2008-based households	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>	<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.



Exmoor National Park Authority  
Exmoor House, Dulverton  
Somerset TA22 9HL  
Tel: (01398) 323665 Fax: (01398) 323150  
www.exmoor-nationalpark.gov.uk  
E-mail: localplan@exmoor-nationalpark.gov.uk

Mike Kelly  
Planning Manager  
North Devon Council

24<sup>th</sup> March 2016

Dear Mike

### **Duty to Co-operate: Housing Distribution in the Northern Peninsula Housing Market Area**

We previously wrote to you on 6<sup>th</sup> January and 23<sup>rd</sup> April 2015 regarding housing distribution across the Northern Peninsula Housing Market Area, and requested that North Devon Council include the objectively assessed housing need for the North Devon side of the National Park within the total housing figure for the joint North Devon and Torrington Local Plan.

Since then, as you are aware, the evidence base supporting these figures has been revised in order to take account of the 2012 based household projections, and an update to the Northern Peninsula Housing Market Assessment (jointly commissioned by the constituent Local Planning Authorities), was published in December 2015. Officers have also been working on a Joint Housing Topic Paper which sets out the objectively assessed housing need across the Northern Peninsula HMA and explains the approach to housing provision being pursued in the constituent authorities' Local Plans.

As a consequence of this updated work, we would like to revise the figure of objectively assessed need for the North Devon side of the National Park which we have formally requested be included in the total for the North Devon Local Plan, to **196** units. This is slightly below the figure of 205 previously requested.

A table showing the basis for this revised figure is attached. The 196 figure has been arrived at by taking the unadjusted figure of 150 dwellings (2012 based CLG household projections), applying the uplift for vacant dwellings (3.33%) and second homes (19.2%) then applying the backlog of affordable housing (17 dwellings).

As we stated previously, this request to include the objectively assessed figure for Exmoor National Park in the total housing figure for the North Devon Local Plan would not alter the fact that there will continue to be needs led affordable housing delivery within the National Park to respond to the housing needs of our communities in the National Park as part of the wider housing authority area.

Yours sincerely

Ruth McArthur  
Policy and Community Manager

Clare Reid  
Local Plan Project Manager

cc --Andrew Austin NDC, Ian Rowland Torrington District Council

## Appendix

### Northern Peninsula Housing Market Area Strategic Housing Market Assessment: the Implications of 2012-based Household Projections (December 2015)

**Table 5.3: 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, 2012-based projections 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 CLG household projections	241	713	954
2012-based @ 2008 average household size	188	475	663 (664)
2012-based @ CLG 2011 to 2021+2008 post -2021	165	377	542
2012-based @ CLG 2008 adjusted to 2011 Census	199	481	680 (681)
2012-based @ constant household formation rates	163	421	584
<b>2012-based CLG household projections</b>	150	402	552
<b>2. Adjusted for vacant dwellings rates of:</b>			
	<b>3.33%</b>	<b>2.78%</b>	<b>3.33% &amp; 2.78%*</b>
2008-based households	249	733	982 (983)
2012-based @ 2008 average household size	194	488	682 (684)
2012-based @ CLG 2011 to 2021+2008 post -2021	170	387	558
2012-based @ CLG 2008 adjusted to 2011 Census	206	494	700 (701)
2012-based @ constant household formation rates	168	433	601 (602)
<b>2012-based CLG household projections</b>	155	413	568 (569)
<b>3. Adjusted for vacant dwellings, second &amp; holiday homes rates of:</b>			
	<b>19.20%</b>	<b>19.20%</b>	<b>19.20%</b>
2008-based households	287	850	1,137
2012-based @ 2008 average household size	224	566	790 (791)
2012-based @ CLG 2011 to 2021+2008 post -2021	197	449	646
2012-based @ CLG 2008 adjusted to 2011 Census	237	573	811 (812)
2012-based @ constant household formation rates	194	502	696
<b>2012-based CLG household projections</b>	179	479	658
<b>4. The backlog of affordable housing:</b>			
At August 2015	17	43	60

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. The accurate total is in brackets.

Our ref: PD/AA/DtC/Exmoor  
Please ask for: Andrew Austen  
Tel: 01271 388392  
Email: andrew.austen@northdevon.gov.uk  
Date: 4 April 2016



Mrs R McArthur  
Exmoor National Park Authority  
Exmoor House  
Dulverton  
Somerset  
TA22 9HL



- 6 APR 2016

Dear Ruth,

### **Duty to Cooperate: Housing Distribution in the Northern Peninsula Housing Market Area**

Thank you for your letter dated 24 March 2016 requesting that North Devon Council includes the objectively assessed housing need for the North Devon side of the National Park within the housing provisions of the emerging joint North Devon and Torrridge Local Plan.

I can confirm that the level of planned housing provision, at 17,220 dwellings set out within Policy ST08 of the North Devon and Torrridge Local Plan, incorporates an allowance for the future housing needs arising from the North Devon side of Exmoor National Park up to 2031. In response to the level of planned housing provision, a total supply of 17, 246 dwellings has been identified.

The Schedule of Proposed Main Changes to the Publication Draft Local Plan (March 2015) included a new paragraph 4.20C (MAC/35) to clarify this position, indicating that the Plan's proposed housing provision incorporates the National Park's objectively assessed housing need (from the North Devon side of the park) under the Duty to Cooperate, amounting to the previously stated requirement for 205 dwellings.

It is recognised that the housing requirement arising from the North Devon side of the National Park is now considered to be slightly lower at 196 dwellings up to 2031 based on updated evidence and 2012-based sub-national household projections. It is considered that the revised figure could potentially be referenced within the Local Plan through a future modification to the above paragraph if considered necessary. The Northern Peninsula Housing Market Assessment published December 2015 to which you refer is an important part of the evidence base for the joint Local Plan.

It is proposed that this level of housing will be provided outside of the National Park boundary within our emerging Local Plan on behalf of Exmoor National Park Authority. In practice, the North Devon and Torrridge Local Plan has increased housing provision in the main settlements outside but still accessible to the National Park boundary where suitable sites are available and landscape constraints (especially the AONB) permit. The main



INVESTOR IN PEOPLE

settlements accommodating this additional need are North Molton, South Molton and Ilfracombe.

The Northern Peninsula Housing Market Area is a polycentric character area, within which evidence demonstrates that Torridge and North Devon districts, including the parts of Exmoor within North Devon district, have relatively high self-containment rates for both housing markets and commuting for employment, thereby forming a relatively self-contained housing market area.

It is recognised that Exmoor National Park Authority may still approve affordable homes to meet local needs as additional windfall sites in accordance with relevant policies within your emerging Local Plan.

Yours sincerely,

A handwritten signature in cursive script that reads "Andrew Austen".

Andrew Austen  
Lead Officer Planning Policy  
Planning and Development Service  
North Devon Council