

Written Statement by Exmoor National Park Authority and North Devon Council (Representor No. 5)

Matter 2: Strategic Housing Market Areas and the Objectively Assessed Housing Need

Issue 1. Subject to the caveat set out within it, Framework paragraph 47 requires the objectively assessed needs for market and affordable housing in the housing market area to be met in full. The West Somerset local planning authority area is smaller than the administrative area of the District and appears to comprise more than one HMA. Has the Council met the requirement of Framework paragraph 47 in addressing the needs of the HMA and if not, in what way(s) has it failed to do so and how can this be corrected?

Issue 2. The most recent information made available by the Council on the OAHN is included within the papers to the Local Development Panel on 25 November 2015. This continues to argue that the 2900 dwellings being planned for is above the OAHN. Is this analysis robust and, if not, in what way is it deficient and what are the implications for the OAHN?

Summary for Matter 2, Issues 1 and 2

As set out in our response to Matter 1, Exmoor National Park Authority (ENPA) wrote to West Somerset Council (WSC) requesting that they consider accommodating the market housing requirement arising from the National Park (the actual figures have varied, but based on the latest December 2015 Northern Peninsula Strategic Housing Market Area update (EB21) this is 186 dwellings).

The reason for this request is that the Local Plan strategy in the National Park is to focus on needs-led delivery of affordable housing to address the main identified housing need of the National Park's local communities, and being mindful of National Park statutory purposes including the need to conserve the natural beauty, wildlife and cultural heritage of the National Park. Information and the context on National Park statutory purposes and duty, national policy in relation to National Parks, and landscape sensitivity are included in paragraphs A.1 to D1 of Appendix 1 of the ENPA and North Devon Council statement on **Matter 1**. A summary of the constraints to housing development in Exmoor National Park is set out in Appendix 1, while the Landscape Sensitivity Study and Strategic Housing Land Availability Assessment (SHLAA) are included at Appendix 2 and Appendix 3. The capacity for housing development in the National Park is very limited and it is important that the market housing requirement can be distributed elsewhere outside the National Park, within the housing market area, to safeguard the limited sites available for delivery of needed affordable housing in the long term. In Exmoor National Park, inclusion of a general housing target would be inconsistent with National Park purposes, national guidance on National Parks and undermine the ability to deliver local need affordable housing through a rural exceptions approach.

WSC's response in their letter dated 13 November 2014 and also in their Duty to Cooperate Statement December 2014 (SD17 page 8 para B) indicates that they view this request as an uplift to the figure of 2,900 dwellings set out in their Local Plan, which they feel would not be deliverable. However, ENPA's view has always been that the National Park market housing figure could be included within the West Somerset Local Plan 2,900 housing provision figure, given WSC's strategy to include an uplift in the numbers of open market housing in order to deliver more affordable housing. The December 2015 Northern Peninsula Strategic Housing Market Assessment (SHMA) figures support this position given the much lower figure of demographic need (1,302 dwellings). In considering the issues raised, ENPA and North Devon Council (NDC) have analysed the most recent 2012 household figures (EB21). Using the demographic baseline figure derived from the 2012 CLG household projections as the starting point for the Objectively Assessed Housing Need (OAHN), even with the adjustments for vacant/second homes, affordable housing backlog (207 dwellings), and economic uplift, there is still scope within the 2,900 proposed housing provision figure to accommodate the 186 market houses arising from within the West Somerset housing authority area of the National Park.

ENPA is therefore not seeking an uplift in the West Somerset Local Plan provision figure but acknowledgement that the housing being planned for in the West Somerset Local Plan can incorporate the market housing requirement for the West Somerset housing authority area of the National Park derived from the Northern Peninsula SHMA. We ask that the Inspector recommends that the third bullet point of the justification to policy SC2 Housing Provision, and paragraphs 43-55 (particularly paragraph 53) of the WSC Strategy and Housing Topic Paper are amended to include a reference that the 2,900 housing provision figure in the West Somerset Local Plan includes the open market housing figure for the whole West Somerset housing authority area (in effect the market housing figure for the whole of West Somerset including the part within Exmoor National Park).

There will continue to be delivery of local need affordable housing within the National Park. While the policy remains the provision of affordable housing to meet local needs, sites may, where essential for viability reasons, include some market housing to cross-subsidise the affordable housing, consistent with the approach set out in the NPPF¹, in which case the market housing element could be counted against the West Somerset housing requirement. It is simply an issue of how those figures are shown to be distributed.

1. Introduction

- 1.1. West Somerset sits within the Northern Peninsula Housing Market Area (HMA) along with Exmoor National Park Authority, North Devon Council, and Torridge District Council, known as the 'partner authorities'. As shown on Figure 1, the Northern Peninsula HMA originally included the former North Cornwall District Council area, which now forms part of a wider Cornwall Housing Market Area.

¹ Department of Communities and Local Government (2012) NPPF. London, para 54.

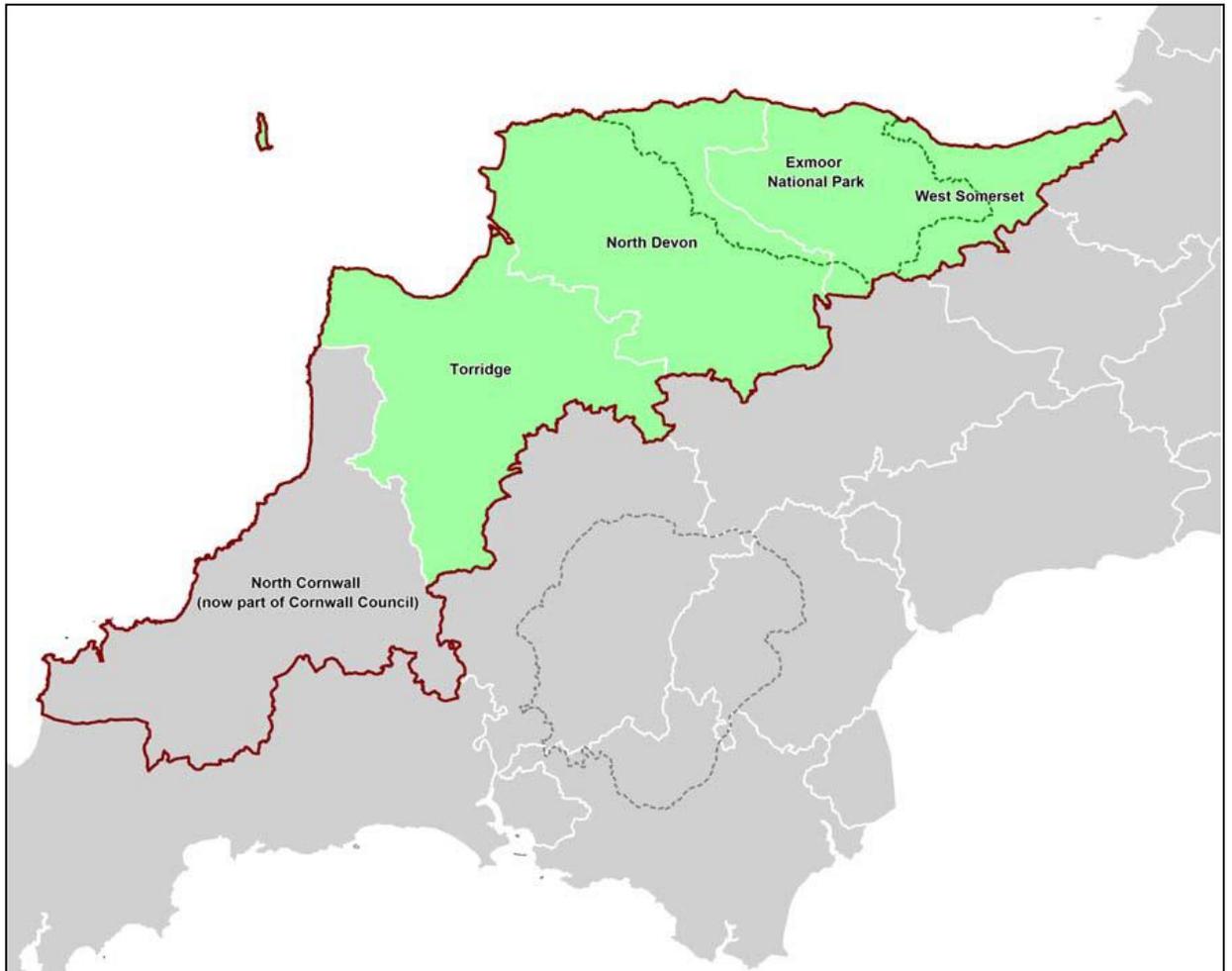


Figure 1 Map showing the Northern Peninsula Housing Market Area

1.2. The partner authorities have worked together under the Duty to Co-operate, including commissioning joint evidence base documents. This has culminated in an agreement to prepare a joint housing topic paper for the whole Northern Peninsula HMA. It outlines joint working through Duty to Co-operate on housing across the HMA to date and additional explanation of the approach being taken in setting out a positive strategy for the provision and delivery of housing in the HMA. It is additional to housing topic papers prepared by the local planning authorities which contain the detail for each plan area and which provide additional evidence and explanation to underpin the housing strategies in the 'partner authorities' respective plans: Exmoor National Park Local Plan to 2031; North Devon and Torridge Local Plan to 2031; and the West Somerset Local Plan to 2032.

2. Joint Housing Topic Paper for the Northern Peninsula HMA

2.1. The Joint Housing Topic Paper, although well advanced, has not yet been finalised or signed off by the LPAs. However, to provide some context to the approach to housing delivery across the Northern Peninsula HMA, a Statement of Common Ground has been prepared (Appendix 4). It includes a list of the joint work on SHMAs and the subsequent updates, sets out the OAHN for each of the planning authority areas, and cumulatively across it,

including evidence on the level of affordable housing need and planned provision for future delivery against housing projections.

3. Identification of the OAHN

- 3.1. The starting point for the four Northern Peninsula HMA local planning authorities has been the joint commissioning of a Northern Peninsula Strategic Housing Market Area Assessment (SHMAA) published in 2008 (EB1). Divergent timetables for the preparation of individual local plans has meant that since the completion of the 2008 SHMAA it has been necessary for the individual partner authorities to commission individual updates. However, more recently in the light of the NPPF and updated 2012-based household projections, joint updates of the Northern Peninsula SHMA have been completed. The intention was to ensure that each of the partner authorities had a consistent, up-to-date and national policy / guidance compliant basis for a 'demographic starting point' to arrive at an Objectively Assessed Need for housing and from which to derive an associated housing provision figure for their local planning authority area. All the SHMA reports have been produced by the same consultant, Housing Vision, to a consistent methodology, enabling comparison and aggregation across the NP HMA as a whole. The SHMA reports objectively assess housing need in the Northern Peninsula HMA. For ease of reference, Table 1 is included in 'the Statement of Common Ground' which lists each of the SHMA reports (Appendix 4).
- 3.2. National Planning Practice Guidance is that DCLG household projections should provide the starting point estimate of overall housing need. It considers that the 2012-2037 Household Projections published in February 2015, are the most up-to-date estimate of future household growth.² For this reason, a joint SHMA update assessing the implications of the 2012 based household projections for the Northern Peninsula area (and by local planning authority area) was published in December 2015 (as referred to in the correspondence between the Inspector and West Somerset Council ED1, ED1a and ED2) (EB21). These latest figures show reasonable consistency with the previous update in January 2015 (EB3), however they are significantly below the demographic figure for WSC in their 2013 SHMA (EB2). Table 1 below shows the comparison between the SHMA figures.

² CLG NPPG Paragraph: 016 Reference ID: 2a-016-20150227

Table 1. The impact on housing requirements of household projection scenarios for West Somerset 2011-2031

Scenario	West Somerset LPA	West Somerset DC
2008 NP SHMA (EB1)		3,888
2013 West Somerset LPA SHMA Update (EB2)	2,398 ³	-
2012-based population projections (Scenario 3 NP SHMA Update - Jan 2015) (EB21)	1,297 ⁴	1,674 ⁵
2012-based CLG Household Projections (EB21)	1,302 ⁶	1,704 ⁷
Variation of 2012-based household projections from 2012 Population Projections	+5	+30

3.3. Additionally, a review was commissioned by West Somerset District Council of the whole of the WSC area to explain the different projections and to help understand more fully the basis for identifying an OAHN (EB22). It concludes that “The 2008-based projections cannot now be used for setting OAHN as the evidence base on which they relied has been superseded by the findings of the 2011 Census”. It notes that the January 2015 Update for the Northern Peninsula HMA (EB3) recommended the application of household projections Scenario 3, which identified a growth of 1,674 households in the West Somerset Council area over the period 2011-2031. The October [sic] 2015 Northern Peninsula HMA Update Report (EB21) assessed the impact of applying 2012-based household projections and identified a growth of 1,704 households over the period 2011-2031, a difference of only 30 households when compared with Scenario 3 (2012-based population projections).⁸

3.4. The West Somerset Council review [EB22] concludes that the 2012-based household projections provide the soundest technical base available for assessing OAHN. They provide no grounds for increasing the assessment of OAHN beyond the 30 households which are additional to those identified from

³ WSC (January 2015) West Somerset Local Plan to 2032: Strategy & Housing Topic Paper para 45.

⁴ Housing Vision (December 2015) Northern Peninsula HMA SHMA: Understanding the Implications of 2012-based Housing Projections, Table 5.2

⁵ Housing Vision (November 2015) Understanding Changes in Population and Household Projections: West Somerset Council: Draft Report 2, Scenario 3, Table 2

⁶ Housing Vision (December 2015) Northern Peninsula HMA SHMA: Understanding the Implications of 2012-based Housing Projections, Table 5.2

⁷ Housing Vision (November 2015) Understanding Changes in Population and Household Projections: West Somerset Council: Draft Report 2, Table 2

⁸ Housing Vision (November 2015) Understanding Changes in Population and Household Projections: WSC Draft Report 2, paras 1.41 to 1.42. [The report applies to the larger West Somerset Council area, the 1,704 households includes 402 from the West Somerset housing authority area in Exmoor National Park. For the smaller West Somerset LPA area, the equivalent baseline figure has dropped from 2,398 (2013 West Somerset Update (EB2) to 1,302 (2012 household projections) (EB21).

the previous Scenario 3 based on 2012-based population projections⁹. The December 2015 report (EB21) notes that the 2012-based household projections. "...may be overstating the current rate of household growth. Whilst recent rates of international immigration are close to those projected in Components of Population Change, recent rates of internal migration suggest that those projected in Components of Population Change may be overestimates (see Table 3.2 in particular). In these areas, the 2012-based projections include an effective 'margin' which might take account of increased net internal migration resulting from economic recovery".¹⁰

- 3.5. The November 2015 WSC report (EB22) continues that while there are no grounds for increasing the assessment of OAHN beyond the 30 households. A number of factors, in particular the level of inward migration among older adults and the housing market impact of Hinkley Point C, introduce a degree of uncertainty concerning the effect of future trends, the direction of which would be to increase OAHN, should the assessment of OAHN derived from applying either the 2012-based household or population projections be reduced¹¹ [from the baseline figure of 1,302 households 2011-2031 for the West Somerset LPA area]. The report to the WSC Development Panel on the Update of the Implications of Recent Statistical Projections on the OAHN, analyses the latest figures and concludes that, although the demographic figure is reduced, it would not be prudent for WSC to reduce its 2,900 housing provision figure.¹² The 1,302 figure provides scope for accommodating the 186 market dwellings arising in the West Somerset part of the National Park within the 2,900 that is planned for.
- 3.6. Once the demographic figure has been identified, guidance is that adjustments should be made to reflect levels of vacant and second homes, and also to take account of any affordable housing backlog.¹³ Table 2 of the Statement of Common Ground (Appendix 4) sets out how this is calculated for each of the partner authorities within the Northern Peninsula HMA.
- 3.7. Changes to national guidance recommend an approach combining housing and economic development needs assessments and advises on the purpose of, and approach to, assessing the need for housing and economic development.¹⁴ The Statement of Common Ground (Appendix 4) and Table 2 below set out how the implications of economic growth on housing

⁹ Housing Vision (November 2015) Understanding Changes in Population and Household Projections: West Somerset Council Draft Report 2, Paras 1.43 to 1.44.

¹⁰ Housing Vision (December 2015) Northern Peninsula HMA SHMA: the Implications of 2012-based Household Projections. Final Report, para 5.12.

¹¹ Housing Vision (November 2015) Understanding Changes in Population and Household projections: West Somerset Council Draft Report 2, para 1.46.

¹² <http://www.westsomersetonline.gov.uk/Council--Democracy/Council-Meetings/Local-Development-Panel-Meetings/Local-Development-Panel--25-November-2015>

¹³ PAS and Peter Brett Associates (July 2015) Objectively Assessed Need and Housing Targets Technical Advice Note. Second Edition.

<http://www.pas.gov.uk/documents/332612/6549918/OANupdatedadvicenote/f1bfb748-11fc-4d93-834c-a32c0d2c984d>

¹⁴ CLG PPG Paragraph: 001 Reference ID: 2a-001-20140306

requirements have been taken into account in calculating the OAHN. It includes an additional 450 dwellings in the West Somerset LPA area which could be generated as a consequence of the construction of a new nuclear power station at Hinkley Point.

Table 2 Objectively Assessed Need for Housing across Northern Peninsula HMA

LPA	Unadjusted Demographic Requirement ¹⁵	Uplifted Requirement incorporating vacant dwellings, second & holiday homes	Backlog of affordable dwellings	Requirement based upon Economic Growth	Total OAHN
North Devon	5,232	5,769	589	-	-
Torridge	6,727	7,328	235	-	-
North Devon and Torridge	11,959	13,097	824	2,668 ¹⁶	16,589 ¹⁷
West Somerset	1,302	1,448	207	450	2,105
Exmoor NPA	552 ¹⁸	658	60	-	718
Total	13,813	15,203	1,091	3,118	19,412

Source: Northern Peninsula Strategic Housing Market Assessment Update, Housing Vision (December 2015) and Northern Devon Housing and Employment Study, GL Hearn (April 2014)

4. Accommodating the Exmoor National Park Housing Figures

4.1. Based on the 2012 household projections, the housing figures have been assessed, taking account of national policy and guidance, to provide confidence in the approach both within the National Park and as part of the Northern Peninsula HMA. Table 3 below sets out the OAHN for the National Park, showing the breakdown between the North Devon and West Somerset

¹⁵ Based on 2012 based household projections. Figures from based upon the Subnational Household Projections in England, CLG, <https://www.gov.uk/government/collections/household-projections#2012-based-projections>

¹⁶ Economic uplift available only as a combined figure for North Devon and Torridge LPAs.

¹⁷ Derived from Northern Devon Housing and Employment Study – Final Report, GL Hearn, April 2014.

¹⁸ Figure consists of 338 affordable dwellings and 214 market dwellings

housing authority areas. It shows how the market housing figure has been derived that ENPA is requesting be accommodated within the West Somerset Local Plan housing provision figure. North Devon Council has indicated that it is able to accommodate the market and affordable housing arising from the North Devon part of the National Park within the overall housing provision figure included in the emerging North Devon and Torridge Local Plan.

Table 3 Exmoor National Park Objectively Assessed Housing Need (OAHN) 2011-2031¹⁹

	North Devon in ENP	West Somerset in ENP	Whole ENP	Notes
Unadjusted Demographic Baseline Figure	150	402	552	¹ Figure ENPA are requesting be included within West Somerset Local Plan housing provision figure. ² Figure for N.Devon in ENP to be included in N.Devon/Torridge Local Plan and met outside National Park. ³ OAHN for ENP 2011-31. ⁴ Revised affordable housing figure for W. Somerset in ENP proposed to be included as an estimate of need in the ENP Local Plan.
Affordable Housing Element	92	246	338	
Market Housing Element	58	156	214	
Affordable Housing backlog	17	43	60	
Market housing plus uplift	69	186 ¹	255	
Total Figure with vacant/second homes uplift (19.2%) plus affordable housing backlog	196 ²	522	718 ³	
Affordable Housing plus Uplift and backlog	127	336 ⁴	463	

¹⁹ Housing Vision (December 2015) Northern Peninsula HMA SHMA: the Implications of 2012-based Household Projections. Table 5.3 (EB21)

5 HOUSING PROVISION

5.1 Table 4 below (see also Appendix 4: Statement of Common Ground – Table 3) sets out the unadjusted demographic housing figure, total OAHN, planned housing requirement housing delivery and the identified housing supply for the LPAs in the Northern Peninsula HMA. The table demonstrates that there is sufficient housing being planned within the constituent Local Plans of the Northern Peninsula HMA to meet the full OAHN. Across the Northern Peninsula HMA, the total plan provision is overproviding or raising housing numbers above the demographic minimum against demographic led household projections.

Table 4. Housing Provision across Northern Peninsula HMA

LPA	Unadjusted Demographic Figure	Total OAHN ²⁰	Planned Housing Requirement	Housing Delivered 2011-2015	Identified Housing Supply ²¹
North Devon	5,232	-	-	974 ²²	8,768
Torrige	6,727	-	-	1,092	8,478
North Devon and Torrige ²³	11,959	16,589	17,220 ²⁴	2,066	17,246
West Somerset	1302	2,105	2,900	306 ²⁵	2,900
Exmoor National Park*	552	718	336 ²⁶	96 ²⁷	345 ²⁸
Total	13,813	19,412	20,456	2,468	20,491

²⁰ Figures derived from Table 3

²¹ Figures from emerging Local Plans

⁸ There are 7 affordable dwellings and 9 open market completions 2011/12 to 2014/15 within the North Devon part of Exmoor National Park. These have not been included in the figure of 974.

²³ Combined total of North Devon and Torrige in rows above.

²⁴ Incorporating total OAHN, allowance for 196 dwellings arising from the OAHN for the part of Exmoor National Park residing within North Devon and uplift to deliver additional housing for additional workforce arising from uplift in employment land provision contained within the Local Plan.

²⁵ Completions over period 2012-2015

²⁶ Affordable housing element of total for West Somerset Housing Authority area in the National Park 2011-31 as an estimate of need only. Unadjusted affordable figure for ENP in W Somerset is 246

²⁷ Total completions of 96 dwellings (53 affordable and 43 open market completions 2011/12 to 2014/15) of which 80 are in West Somerset part of the National Park (46 affordable and 34 open market completions) with 16 in the North Devon part of the National Park (7 affordable and 9 open market completions).

²⁸ Total identified housing supply from developable SHLAA sites have total capacity of 249 dwellings, with a further 96 completions (2011-2015).

Appendices

Appendix 1: Constraints to Housing Development in the National Park

Appendix 2: Exmoor National Park Landscape Sensitivity Study 2013

Appendix 3: Exmoor National Park Authority Strategic Housing Land Availability Assessment 2014

Appendix 4: Statement of Common Ground

Appendix 5: National Park Context - National Guidance and Past Approaches to Housing Provision

Appendix 1: Constraints to Housing Development in the National Park

A.1.1 Physical constraints such as topography, flood risk, heritage assets, wildlife and wildlife site designations, heritage coast as well as the sensitivity of Exmoor's landscape affect the capacity of Exmoor's settlements to absorb more housing development:

- i. Topography and flood risk. As many of Exmoor Settlements are within steep confined valleys and this means there are very few level potential housing sites. It also significantly influences flood risk as many of the National Park's watercourses flow through these valleys and, after rainfall, water levels and the speed of flow rise rapidly. Settlements are also, therefore, often at risk of flooding.
- ii. The built environment consists of a range of dispersed farmsteads, hamlets and villages as well as the slightly larger settlements of Dulverton, Lynton and Lynmouth and Porlock (all of which have a parish population of less than 1,500). Its settlements, sites and features are of particular cultural and historic interest with a high number of listed buildings while the preservation of archaeological sites and historic features and the diverse nature of the historic resource are of unusually high quality. These resources are also fragile, vulnerable to insensitive change and, ultimately irreplaceable.
- iii. Many important rare species and habitats. Around 28% of the National Park is designated as internationally or nationally important habitat - Special Areas of Conservation and/or Sites of Special Scientific Interest. Additional areas are identified as locally important for wildlife or are Section 3 land.
- iv. A significant 45 km long stretch of undeveloped coast.²⁹
- v. A limited capacity for new housing on greenfield sites within the National Park without detriment to landscape character demonstrated by an assessment of the landscape sensitivity of the National Park settlements to housing development.³⁰ The finite existing stock of suitable land and buildings is therefore an important component of future supply, to minimise the level of greenfield housing development within the National Park and ensure that, in the longer term beyond the plan period, there will still be some suitable housing sites in settlements to help meet the needs of National Park communities.

²⁹ Land use Consultants (July 2006) Review and Evaluation of Heritage Coasts in England, The Countryside Agency. Cheltenham

³⁰ Bryan, P (2013) Exmoor National Park Landscape Sensitivity Study, Dulverton: ENPA – updated in 2015 to account for Porlock Weir (capacity for 326 units on greenfield sites in settlements).

Appendix 2: Exmoor National Park Landscape Sensitivity Study 2013

Appendix 3: Exmoor National Park Authority Strategic Housing Land Availability Assessment 2014

Appendix 4: Statement of Common Ground

Northern Peninsula Housing Market Area

Statement of Common Ground North Devon Council, Torrridge District Council, Exmoor National Park Authority and West Somerset Council – February 2016

- 1.1 The Northern Peninsula Housing Market Area (HMA), includes four local planning authority areas: North Devon Council, Torrridge and West Somerset District Councils and Exmoor National Park Authority.
- 1.2 The Northern Peninsula HMA is considered to be a polycentric housing market character area. The HMA is the only polycentric character area in the south west. It is characterised by its high self-containment, a number of distinct housing sub-markets and its poor accessibility to other housing market areas.
- 1.3 The local planning authorities within the Northern Peninsula Housing Market Area have worked together over an extended period in order to establish evidence of housing need. In doing so, the partner authorities have commissioned a range of reports in relation to housing need (Table 1) which are summarised below. The most recent update to assess the implications of the 2012 household projections which were published in March 2015, was completed in December 2015.

Table 1. Summary of Strategic Housing Market Assessment Reports

Ref. No.	Title	Date	Constituent local planning authorities	Comments
SHMA 1	Northern Peninsula Strategic Housing Market Assessment (NP SHMA), Housing Vision	2008	ENPA, WSC, NDC, TDC, (former) North Cornwall District Council, DCC involvement	Original joint SHMA
SHMA 2	North Devon & Torrridge SHMA Update, Housing Vision	December 2012	ENPA, NDC, TDC	Update to comply with NPPF requirements. Includes the part of Exmoor in North Devon
SHMA 3 (EB2)	SHMA West Somerset Update, Housing Vision	Nov 2013	WSC	Update to comply with NPPF requirements
SHMA 4	SHMA Update: Exmoor National Park in West Somerset, Housing Vision	Jan 2014	ENPA	To cover the West Somerset part of the National Park not included in the North Devon & Torrridge update 2012. Includes a breakdown of affordable and market

				housing numbers and an assessment of need against tenure, age etc
SHMA 5	Northern Peninsula Strategic Housing Market Assessment Update, Housing Vision	Jan 2015	ENPA, NDC, TDC, WSC	Takes account of the 2012 sub-national population projections (ONS)
SHMA 6	SHMA Update: Exmoor National Park, Housing Vision	Mar 2015	ENPA	Provides a further breakdown of figures for the National Park from the Northern Peninsula Jan 2015 Update
SHMA 7	Northern Peninsula Strategic Housing Market Assessment Update, Housing Vision	Dec 2015	ENPA, NDC, TDC, WSC	Takes account of the 2012 household projections (DCLG)
SHMA 8	SHMA Update - Exmoor National Park: Implications of 2012-based Household Projections	Dec 2015	ENPA	Provides figures for the National Park as a whole. Takes account of the 2012 household projections (DCLG)

- 1.4 The four partner authorities have worked together under the Duty to Co-operate, including commissioning joint evidence base documents. This has culminated in an agreement to prepare a joint housing topic paper for the whole Northern Peninsula HMA. It outlines joint working through Duty to Co-operate on housing across the HMA to date and additional explanation of the approach being taken in setting out a positive strategy for the provision and delivery of housing in the HMA. It is additional to housing topic papers prepared by separate local planning authorities which contain the detail for each plan area and which provide additional evidence and explanation to underpin the housing strategies in the partner authorities' respective plans: Exmoor National Park Local Plan to 2031; North Devon and Torrington Local Plan to 2031; and the West Somerset Local Plan to 2032.
- 1.5 The Joint Housing Topic Paper has not yet been finalised or signed off by the LPAs. The draft, however, sets out the Objectively Assessed Housing Need (OAHN) for each of the planning authority areas, and cumulatively across it, including evidence on the level of affordable housing need and planned provision for future delivery against housing projections.

Table 2. Objectively Assessed Need for Housing across Northern Peninsula HMA

LPA	Unadjusted Demographic Requirement¹	Uplifted Requirement incorporating vacant dwellings, second & holiday homes	Backlog of affordable dwellings	Requirement based upon Economic Growth	Total OAHN
North Devon	5,232	5,769	589	-	-
Torrige	6,727	7,328	235	-	-
North Devon and Torrige	11,959	13,097	824	2,668 ²	16,589 ³
West Somerset	1,302	1,448	207	450	2,105
Exmoor NPA	552 ⁴	658	60	-	718
Total	13,813	15,203	1,091	3,118	19,412

Source: Northern Peninsula Strategic Housing Market Assessment Update, Housing Vision (December 2015) and Northern Devon Housing and Employment Study, GL Hearn (April 2014)

HOUSING PROVISION

1.6 Table 3 below sets out the calculated demographic baseline figure for each of the local planning authority areas in the HMA and, based on the same approach for each LPA area, applying the appropriate uplift for vacant, second and holiday homes⁵, the affordable housing backlog and economic uplift to arrive at an OAHN. It also sets out the planned housing requirement proposed in individual local plans across the HMA, housing delivered since 2011 and the identified housing supply for North Devon/Torrige and Exmoor National Park.

¹ Based upon 2012-based household projections with figures from 2015 Northern Peninsula SHMA Update based upon the Subnational Household Projections in England, CLG, <https://www.gov.uk/government/collections/household-projections#2012-based-projections>

² Economic uplift only available as a combined figure for North Devon and Torrige LPAs.

³ Derived from Northern Devon Housing and Employment Study – Final Report, GL Hearn, April 2014 – identified future housing requirement for North Devon and Torrige of 16,785 discounted by 196 dwellings to exclude future housing associated to Exmoor National Park and align to the local planning authority geographies of North Devon and Torrige.

⁴ This figure consists of 338 affordable dwellings and 214 market dwellings

⁵ Uplifts applied to reflect vacant and second/holiday homes are derived from the Northern Peninsula HMA SHMA: The Implications of 2012 based Household Projections (December 2015) by Housing Vision and are: North Devon LPA 10.26%, Torrige LPA 8.94%, West Somerset 11.22% and Exmoor NPA 19.2%.

The planned housing requirement differs from the OAHN through additional housing growth to balance additional economic growth, as well as incorporating an increase of 196 homes for North Devon and Torridge to meet the projected needs of the North Devon part of Exmoor National Park.

- 1.7 North Devon Council has indicated that it is able to accommodate the market and affordable housing arising from the North Devon part of the National Park within the emerging North Devon and Torridge Local Plan as part of this increased housing requirement. There is no unmet need arising from neighbouring local planning authorities outside but adjoining the Northern Peninsula HMA.

Table 3. Housing Provision across Northern Peninsula HMA

LPA	Unadjusted Demographic Figure	Total OAHN ⁶	Planned Housing Requirement	Housing Delivered 2011-2015	Identified Housing Supply ⁷
North Devon	5,232	-	-	974 ⁸	8,768
Torridge	6,727	-	-	1,092	8,478
North Devon and Torridge ⁹	11,959	16,589	17,220 ¹⁰	2,066	17,246
West Somerset	1302	2,105	2,900	306 ¹¹	2,900
Exmoor National Park	552	718	336 ¹²	96 ¹³	345 ¹⁴
Total	13,813	19,412	20,456	2,468	20,491

- 1.8 Overall, Table 3 demonstrates that the identified supply across the Northern Peninsula HMA exceeds the planned housing requirement by 35 dwellings.

⁶ Figures derived from Table 2

⁷ Figures from emerging Local Plans

⁸ There are 7 affordable dwellings and 9 open market completions 2011/12 to 2014/15 within the North Devon part of Exmoor National Park. These have not been included in the figure of 974.

⁹ Combined total of North Devon and Torridge in rows above.

¹⁰ Incorporating total OAHN, allowance for 196 dwellings arising from the OAHN for the part of Exmoor National Park residing within North Devon and uplift to deliver additional housing for additional workforce arising from uplift in employment land provision contained within the Local Plan.

¹¹ Completions over period 2012-2015

¹² Affordable housing element of total for West Somerset Housing Authority area in the National Park 2011-31 as an estimate of need only. Unadjusted affordable figure for ENP in W Somerset is 246

¹³ Total completions of 96 dwellings (53 affordable and 43 open market completions 2011/12 to 2014/15) of which 80 are in West Somerset part of the National Park (46 affordable and 34 open market completions) with 16 in the North Devon part of the National Park (7 affordable and 9 open market completions).

¹⁴ Total identified housing supply from developable SHLAA sites have total capacity of 249 dwellings, with a further 96 windfall completions (2011-2015).

**Signatories to the Northern Peninsula Housing Market Area
Statement of Common Ground**

Exmoor National Park Authority

Signature: *N M Stone*
Name: *N M STONE*
Position: *CHIEF EXECUTIVE*
Date: *16-2-16*

North Devon Council

Signature: 

Name: Mike Kelly

Position: Chief Planning Officer

Date: 16 February 2016

Torridge District Council

Signature: 

Name: *David Green*

Position: *Planning Manager*

Date: *18/2/16*

West Somerset District Council

Signature:

Name:

Position:

Date:

Appendix 5: National Park Context - National Guidance and Past Approaches to Housing Provision

- A.5.1 Context on the National Park statutory purposes and duty, national policy in relation to National Parks, housing in rural areas is set out in Appendix 1 of the ENPA and North Devon Council statement on **Matter 1**.
- A.5.2 National guidance on whether housing and economic needs override constraints on the use of land, such as Green Belt reiterates that the NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.
- A.5.3 The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.³¹
- A.5.4 It also provides guidance on whether local planning authorities have to meet in full housing needs identified in needs assessments. It states that local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.³²
- A.5.5 The NPPF recognises the special circumstances in delivering housing within National Parks, which are given “*the highest status of protection in relation to landscape and scenic beauty [and] great weight to the conservation of wildlife and cultural heritage*”.³³ The purposes of National Parks and duties of relevant bodies set out in the Environment Act 1995 (sections 61 and 62) carry great weight and in themselves provide the context for interpreting policy.
- A.5.6 The NPPF refers to the Vision and Circular for the English National Parks and the Broads (2010) which sets out policy guidance specifically for the English National Parks for all those whose decisions or actions might affect

³¹ CLG, NPPG Paragraph: 044 Reference ID: 3-044-20141006

³² CLG, NPPG Paragraph: 045 Reference ID: 3-045-20141006

³³ Department of Communities and Local Government (March 2012) National Planning Policy Framework, London: CLG, paragraph 115.

them.³⁴ “The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services”. National Park Authorities are expected to “include policies that pro-actively respond to local housing needs” in their Local Plans, and to prioritise affordable housing for local needs.³⁵ It notes the importance of affordable housing in rural areas, including for the sustainability of National Parks and their communities recognising that high external demand for housing in National Parks has driven up house prices. The Circular recognises that Authorities have an important role to play as planning authorities in the delivery of affordable housing though they are neither housing authorities nor housing providers.³⁶ This is reflected in past approaches to housing provision in Exmoor National Park.

- A.5.7 It has consistently been recognised that National Parks are not suitable locations for unrestricted housing development. Previous strategic plans focused on the need for affordable housing in rural areas to meet the needs of local communities only.³⁷ Rates of new housing building within the National Park consistently exceeded Structure Plan housing provision figures.³⁸
- A.5.8 The strategic approach to housing in the Joint Structure Plan and subsequently the draft South West Regional Spatial Strategy (RSS) was to meet local needs for housing in the National Park.³⁹ The draft RSS provided for an estimated provision against local needs only and did not set housing targets for the Exmoor National Park enshrining a needs led approach to only provide housing where need was demonstrated and where it did not otherwise conflict with Park purposes.⁴⁰
- A.5.9 The 2005 Local Plan provided a focus on affordable housing to meet local needs and delivered through a needs led ‘rural exceptions’ to prioritise the needs of local communities.⁴¹ A principle underpinning the approach was that the level of housing development should be compatible with the conservation and enhancement of Exmoor.

³⁴ Ibid. Footnote 25 of paragraph 115.

³⁵ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular 2010, London: DEFRA, para 78.

³⁶ Ibid.

³⁷ GOSW (2001) Regional Planning Guidance for the South West: RPG10, paras. 7.9 to 7.16 and Policy HO3.

³⁸ Exmoor National Park Authority (2005) Exmoor National Park Local Plan 2001-11, Dulverton: ENPA. Para. 4.6, Table 4.1.

³⁹ Somerset County Council and Exmoor National Park Authority (2000) Somerset and Exmoor National Park Joint Structure Plan Review 1991-2011, Somerset County Council and Exmoor National Park Authority Policy 33: Provision for Housing. Taunton: SCC and ENPA. South West Regional Assembly (2006) Draft Regional Spatial Strategy for the South West 2006-26, Taunton: SWRA, Policy SD4, para. 3.5.3, Development Policy C, para. 4.5.3 and Table 4.1.

⁴⁰ South West Regional Assembly (2006) Draft Regional Spatial Strategy for the South West 2006-26, Taunton: SWRA, para.4.5.3 and Table 4.1

⁴¹ Exmoor National Park Authority (2005) Exmoor National Park Local Plan 2001-11, Dulverton: ENPA. Chapter 4 pp 64-83.

