



WRITTEN STATEMENT


INVITATION TO COMMENT:
2014-based household projections: England

EXMOOR NATIONAL PARK LOCAL PLAN 2011 – 2031
EXAMINATION
September 2016

If you have any queries or questions relating to this document please get in touch with the Policy & Community Team using the contact details below:

 Exmoor National Park Authority
Exmoor House
Dulverton
Somerset
TA22 9HL

 localplan@exmoor-nationalpark.gov.uk

 01398 32366

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1 Introduction

- 1.1 The Inspector has invited written comments on the implications of the 2014-based household projections: England, 2014 to 2039. This written statement sets out Exmoor National Park Authority's position on the implications of the new projections for the Exmoor National Park Local Plan 2011 to 2031. It relates to questions 3.1 and 3.2 of Hearing Session 3 of the Exmoor National Park Local Plan Examination.
- 1.2 The Department for Communities and Local Government (DCLG) released the 2014-based sub-national household projections (SNHP) on 12 July 2016. They provide a new trend-based projection of household formation across local authorities in England. There are no figures specifically for the area of Exmoor National Park.
- 1.3 The new publication supersedes the 2012-based SNHP which have been used as a demographic starting point for objectively housing assessed need (OAHN) since their release in March 2015.
- 1.4 At the time of the Inspector's invitation, West Somerset, North Devon and Torridge Councils which, together with Exmoor National Park Authority (ENPA) make up the Northern Peninsula Housing Market Area (NP HMA), had local plans which were subject to examination. The Inspector's report for the West Somerset Local Plan has since been published.

2 Review of the Implications of the 2014-based Projections

- 2.1 In order to come to a view on the implications of the most recent household projections, all the NP HMA authorities were asked if they wished, jointly, to commission an updated housing report on the 2014 projections. North Devon, Torridge and ENPA have since worked together to achieve this.
- 2.2 To provide updated evidence for local plans, the commission has sought revised demographic housing projections for the whole of the NP HMA –both for the constituent council and the local planning authority (LPA) areas. The study has also taken account of updated housing completions data for 2015/16 (in effect updating Table 8 on page 26 of [CE7](#) see Appendix 1).
- 2.3 The NP HMA SHMA report on the implications of the 2014-based household projections is enclosed with this statement. It sets out revised demographic housing projections by LPA area, including for Exmoor National Park and the constituent housing authority areas within it (Tables 2.3 and 2.4 of the report are replicated in Appendix 3).¹ In view of the special circumstances of the National Park, the report then provides an updated assessment of affordable

¹ Tables 2.3 and 2.4 Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need Report, Housing Vision, September 2016, pages 38-39.

housing need for Exmoor National Park.² The study has also analysed the data to provide explanations for the reasons for changes since the 2012 projections.

3 The Implications of the 2014-Based Projections for Exmoor National Park

3.1 The report concludes that *'Household and housing projections based on the 2014-based Subnational Household Projections imply significant reductions when compared with the application of 2012-based household projections. This is a continuation of a trend identifiable when comparing 2012-based with 2008-based Subnational Household Projections.'*³

3.2 The key findings of the report for Exmoor National Park (ENP) are:

- The 2014-based Household Projections are lower for all areas with significant reductions in the housing projected to be needed to 2031 when compared to the 2012 household figures;
- For ENP as a whole the projections are 25.9% lower⁴ (for the North Devon part of ENP, the figure is 20% and, for the part in West Somerset, 28.1%);
- The unadjusted demographic figure for ENP is lower (406 dwellings) when compared to the 2012 figure (552 dwellings);
- Taking into account the allowance for 196 dwellings for ENP in North Devon, a lower affordable housing need figure for the part of West Somerset in ENP (238 dwellings) when compared to the 2012-based figure (336 dwellings).⁵

3.3 Table 3.1 sets out the housing projections as they apply to Exmoor National Park with adjustments for vacant dwellings, second and holiday homes and the backlog of affordable housing.

² Paragraphs 2.14 to 2.18, pages 40-41. Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need Report, Housing Vision, September 2016

³ Ibid, paragraph 2.13, page 40.

⁴ Ibid, Table 2.1, page 34.

⁵ Table 4.3, Exmoor National Park Housing Topic Paper, May 2016, page 23 [CE6](#)

Table 3.1 Demographically derived housing requirements for Exmoor National Park showing the split between the North Devon and West Somerset parts of the National Park, incorporating consideration of vacant dwellings, second & holiday homes and affordable housing (Updated from Table 5 of [CE7](#))

Household projection scenarios	North Devon in ENP	West Somerset in ENP	ENP
1. Unadjusted			
2014 based CLG household projections	119	287	406
2. Adjusted for vacant dwellings rates of:	3.34%	2.79%	3.34% + 2.79%
Adjusted 2014-based CLG household projections	123	297	420 (422)
3. Adjusted for vacant dwellings, second & holiday homes rates of:	19.20%	19.20%	19.20%
Adjusted 2014-based CLG household projections	142	342	484
4. The backlog of affordable housing:			
At September 2016	20	37	57
Total dwellings - including adjustment for vacant dwellings, second & holiday homes and affordable housing backlog	162	379	541

Source: Table 2.4, Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need Report, Housing Vision, September 2016

3.4 The lower household figures have resulted in a reduction in the need for affordable housing for the area within Exmoor National Park. The revised figures are set out in Table 3.2 below including the housing projections and adjustments for vacant and second/holiday homes plus the backlog of affordable housing as they apply to the constituent district areas in Exmoor National Park.

**Table 3.2 Exmoor National Park OAHN and Affordable Housing Need 2011-2031
(Updated Table 4.3, [CE6](#))**

	Unadjusted Demographic Baseline Figure	Unadjusted Affordable Housing within the demographic baseline ³	Affordable Housing with Uplift	Affordable Housing with uplift and backlog	Unadjusted Market Housing	Market housing plus uplift	Total Figure with uplift and backlog
North Devon in ENP	119	70	83	103	49	59	162
West Somerset in ENP	287	169	201	238 ²	118	141	379
Whole ENP	406	239	284 ⁴	341 ⁴	167	200	541 ¹

Notes

¹ OAHN for ENP 2011-31

² Affordable housing figure proposed to be included as an estimate of need in the ENP Local Plan.

³ Source: paragraph 2.18, page 41, Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need Report, Housing Vision, September 2016.

⁴ Variation of 1 unit due to rounding effect

3.5 As a consequence, it is considered that a reduction in the (affordable) need figure in the Local Plan from 336 to 238 dwellings to better reflect this more recent evidence would be justified. This approach is consistent with National Park statutory purposes and the National Park Authority's legal duty⁶ and is underpinned by the range of evidence summarised in the ENP and Joint Housing Topic Papers ([CE6](#), [CE7](#)).

⁶ HM Government (1949) The National Parks and Access to the Countryside Act 1949 – Sections 5(1) and 11a (as amended by Section 62 of the Environment Act 1995)

4 The Implications of the 2014-Based Household Projections for the Northern Peninsula HMA

- 4.1 For the constituent LPAs and the NPHMA as a whole, the key finding of the report is a significant reduction in the housing projected to be needed to 2031 when compared to the 2012 household figures. The 2014-based Household Projections are lower for all areas - 7.8% lower in Torridge, 18.98% lower in North Devon and 28.7% lower in West Somerset. For Exmoor National Park the projections are 25.9% lower (see paragraph 3.2 above).
- 4.2 The slower growth in households in CLG's 2014-based projections, compared with the 2012-based projections, is caused by differences in the underlying population projections rather than by differences in household formation trends. The slower population growth in the 2014-based projections, compared with the 2012-based projections, stems mainly from smaller net gains from internal migration from the rest of the UK; the 2014 SNPP also show greater losses through natural change. In North Devon and Torridge, these reductions are offset in part by greater projected gains through net international migration.⁷
- 4.3 Table 4.1 below sets out:
- the revised demographic 2014-based household projections;
 - OAHN by LPA area;
 - the planned housing requirement;
 - updated figures on housing delivery; and
 - the identified housing supply.
- 4.4 Table 4.1 updates Table 10 of the Joint Housing Topic Paper ([CE7](#)) which with paragraph 6.1 of [CE7](#) show that the planned housing requirement within the three emerging Local Plans exceed the OAHN for the HMA as a whole.
- 4.5 The planned housing provision proposed in both the West Somerset and North Devon and Torridge Local Plans remains the same as the figures for the planned housing requirement set out in Table 10 ([CE7](#)), which exceeded the OAHN.
- 4.6 As the 2014 household projections (including those for North Devon and Torridge) are lower than the 2012 projections, across the NPHMA, there is increased 'headroom' between the OAHN and the planned housing requirement and identified housing supply.

⁷ Paragraphs 6.3 Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need Report, Housing Vision, September 2016, paragraphs 6.3 and 6.4, page 28.

Table 4.1: Housing Provision across Northern Peninsula HMA (Updated Table 10 CE7).

LPA	Unadjusted Demographic Figure	Total OAHN	DtC Adjustment (+/-)	Planned Housing Requirement	Housing Delivered 2011-2016	Identified Housing Supply ¹
North Devon	4,612 (4,231)	8,872		-	1,239 ⁸	8,768
Torrige	6,600 (6,208)	7,620		-	1,470	8,478
North Devon & Torrige ²	11,212 ⁴ (10,439)	16,492	+196	17,220 ⁶	2,709	17,246
West Somerset ³	2,398 ⁵	2,848		2,900	405 ⁷	2,900
Exmoor National Park	406	541 ⁸	-196	238 ⁹	110	360 ¹⁰
Total	14,016 (13,243)	19,881		20,358	3,224	20,506

Notes

¹ Figures from emerging Local Plans

² North Devon and Torrige OAHN derives from GL Hearn report from 2014 based household projections (August 2016) see note x below) and includes an economic uplift.

³ The West Somerset LPA figures are taken from the Strategic Housing Market Assessment: West Somerset Update Housing Vision (November 2013) which has informed the housing provision figure in the emerging West Somerset Local Plan and includes an economic uplift of 450 dwellings.

⁴ Combined total of North Devon & Torrige in rows above. Single and combined figures for North Devon & Torrige are derived from Table 32 (page 37), Implications of 2014-based Population & Household Projections - Final Report, GL Hearn, August 2016 available at: <http://consult.torrige.gov.uk/file/4131113>. It quantifies the housing needed to support economic growth and is considered by North Devon and Torrige to be more appropriate to the needs of the area. The figures in column 1 are similar to the equivalent figures in the September 2016 Housing Vision Implications of the 2014-Based Household Projections Report (shown in brackets alongside the GL Hearn figure in the table. For North Devon LPA this is 4,231 and Torrige LPA 6,208. The combined total 10,439 dwellings). The GL Hearn demographic need figures for North Devon and Torrige already include an allowance for vacant and second homes and are therefore more comparable to the figures provided under part 3 of Table 2.3 (Appendix 4) rather than the 'unadjusted' demographic requirement.

⁵ West Somerset figures taken from the West Somerset Update 2013 (SHMA 3 see CE7). The 2014 based household projection (unadjusted) for West Somerset LPA is 934 dwellings.

⁶ Incorporating total OAHN, allowance for 196 dwellings arising from the OAHN for the part of Exmoor National Park within North Devon.

⁷ Completions over period 2012-2016

⁸ Figure includes 238 affordable dwellings

⁹ Affordable housing element of total for West Somerset Housing Authority area in the National Park 2011-31 which is included in the emerging ENP Local Plan. The market housing (was 186 dwellings now 141 dwellings) arising from the West Somerset part of ENP is not provided for in the ENP Local Plan.

¹⁰ Total identified housing supply from developable SHLAA sites have total capacity of 250 dwellings (derived from the 2015/16 ENP SHLAA Update), with a further 110 windfall completions (2011-2015).

5 Conclusion

- 5.1 Table 4.1 shows the unadjusted demographic figure, total OAHN, adjustment for duty to cooperate, planned housing requirement (which remains the same in both the West Somerset and North Devon and Torridge emerging Local Plans), housing delivered to date, and identified housing supply.
- 5.2 Based on the most recent and up to date evidence, an objective assessment of housing need in the National Park and in the wider housing market area results in a lower OAHN figure for each LPA and for the NP HMA area as a whole. The planned housing requirement set out within the Local Plans exceeds the OAHN. This demonstrates the partner authorities' commitment to addressing the identified housing needs of their local communities through a positive approach to housing delivery.
- 5.3 It also results in a lower figure for affordable housing need in Exmoor National Park. Exmoor National Park Authority considers that a revised figure of 238 as an estimate of need for affordable housing should therefore be included in the Exmoor National Park Local Plan, based on this updated evidence. The Plan, together with other emerging local plans in the HMA, will make adequate provision to meet market and affordable housing needs across the HMA.

Appendix 1

Historic Rates of House Building across Northern Peninsula HMA (Updated Table 8 [CE7](#))

Local Planning Authority	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	Over Proposed Plan Period ⁹	
										Total	Average
West Somerset	122	109	55	40	81	67	84	155	99	405	101.25
Exmoor NPA	29	20	24	12	42	18	26	10	14	110	22.0
North Devon	417	341	331	227	177	269	246	283	264	1,239	247.8
Torrige	378	498	320	205	304	191	129	466	380 ¹	1,470	294
Total	946	968	730	484	604	545	485	914	757	-	

Source: Local planning authority dwelling completion monitoring; line indicates Local Plan start date

¹Provisional figure

⁹ 2011-2031 for Exmoor National Park Authority, North Devon Council and Torrige District Council; and 2012-2032 for West Somerset Council.

Appendix 2

Demographically derived housing requirements by local planning authority, incorporating consideration of vacant dwellings, second & holiday homes and affordable housing (Updated Table 4 [CE7](#))

Household projection scenarios	North Devon LPA 2011-2031	Torrige LPA 2011-2031	West Somerset LPA 2011-2031	Exmoor NPA 2011-2031
1. Unadjusted				
2014-based CLG household projections	4,231	6,208	934 ¹⁰	406
2. Adjusted for vacant dwellings rates of:	3.34%	3.36%	2.79%	3.36% & 2.79%*
Adjusted 2014-based CLG household projections	4,372	6,417	960	418
3. Adjusted for vacant dwellings, second & holiday homes rates of:	10.26%	8.94%	11.22%	19.20%
Adjusted 2014-based CLG household projections	4,665	6,763	1,039	484
4. The backlog of affordable housing:				
At September 2016	683	342	193	57
Total dwellings - including adjustment for vacant dwellings, second & holiday homes and affordable housing backlog	5,348	7,105	1,232	541

* the vacancy rates for North Devon and West Somerset have been applied to those areas of the Exmoor National Park within each respective District.

Source: Table 2.3, Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need Report, Housing Vision, September 2016

¹⁰ Figure arising from calculations based on the 2012 Household projections, Table 10 sets out the figure using longer term trends which underpins proposed housing provision in the West Somerset Local Plan.

Appendix 3

Table 2.3: the impact on housing projections of 2014-based household projections (highlighted) and previous projections and scenarios, North Devon, Torridge and West Somerset LPAs 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
1. Unadjusted				
2008-based CLG household projections	8,269	9,676	2,452	954
2012-based @ 2008 average household size	6,468	7,486	1,633	664
2012-based @ CLG 2011 to 2021+2008 post -2021	5,652	6,939	1,297	542
2012-based @ CLG 2008 adjusted to 2011 Census	6,844	7,502	1,654	681
2012-based @ constant household formation rates	5,585	6,787	1,448	584
2012-based CLG household projections	5,232	6,727	1,302	552
2014-based CLG household projections	4,231	6,208	934	406
2. Adjusted for vacant dwellings rates of:	3.34%	3.36%	2.79%	3.36% & 2.79%*
2008-based CLG household projections	8,551	10,001	2,521	976
2012-based @ 2008 average household size	6,689	7,738	1,680	678
2012-based @ CLG 2011 to 2021+2008 post -2021	5,845	7,172	1,333	553
2012-based @ CLG 2008 adjusted to 2011 Census	7,078	7,754	1,701	696
2012-based @ constant household formation rates	5,776	7,015	1,488	597
2012-based CLG household projections	5,405	6,953	1,341	569
2014-based CLG household projections	4,372	6,417	960	418
3. Adjusted for vacant dwellings, second & holiday homes rates of:	10.26%	8.94%	11.22%	19.20%
2008-based CLG household projections	9,124	10,541	2,728	1,129
2012-based @ 2008 average household size	7,137	8,155	1,817	784
2012-based @ CLG 2011 to 2021+2008 post -2021	6,236	7,559	1,443	640
2012-based @ CLG 2008 adjusted to 2011 Census	7,552	8,173	1,841	805
2012-based @ constant household formation rates	6,162	7,394	1,610	690
2012-based CLG household projections	5,767	7,328	1,451	658
2014-based CLG household projections	4,665	6,763	1,039	484
4. The backlog of affordable housing:				
At September 2016	683	342	193	57

Source: Housing Vision (2016) Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need

Table 2.4: the impact on housing projections of 2014-based household projections (highlighted) and previous projections and scenarios, North Devon and West Somerset Councils in the Exmoor National Park and the Exmoor National Park Authority, 2011-2031

Household projection scenarios	North Devon in the Exmoor National Park	West Somerset in the Exmoor National Park	Exmoor NPA 2011-2031
1. Unadjusted			
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
2012-based CLG household projections	150	402	552
2014-based CLG household projections	119	287	406
2. Adjusted for vacant dwellings rates of:			
	3.34%	2.79%	3.34% & 2.79%*
2008-based households	249	737	986 (983)
2012-based @ 2008 average household size	194	491	685 (684)
2012-based @ CLG 2011 to 2021+2008 post -2021	171	390	560
2012-based @ CLG 2008 adjusted to 2011 Census	206	497	703 (701)
2012-based @ constant household formation rates	168	435	604 (602)
2012-based CLG household projections	155	416	571 (569)
2014-based CLG household projections	123	297	420 (422)
3. Adjusted for vacant dwellings, second & holiday homes rates of:			
	19.20%	19.20%	19.20%
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
2012-based CLG household projections	179	479	658
2014-based CLG household projections	142	342	484
4. The backlog of affordable housing:			
At September 2016	20	37	57

Source: Housing Vision (2016) Northern Peninsula Housing Market Area SHMA: Review of 2014-based Subnational Household Projections and the Implications for Housing Need