

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

PART 1 – MAIN REPORT

Exmoor National Park Authority

December 2014

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1. Introduction

1.1. Strategic Housing Land Availability Assessment Report

1.1.1. Delivery of housing, including affordable housing, to meet the needs of present and future generations is an important national priority as set out in the National Planning Policy Framework (NPPF). The NPPF requires Local Planning Authorities to proactively plan for housing delivery using an evidence-based approach, including the preparation of a Strategic Housing Land Availability Assessment (SHLAA). The role of the SHLAA is to identify and assess land and buildings that might have the potential to deliver future housing development. The process seeks to ensure future decisions relating to the provision of housing are based on sound evidence of deliverability.

1.1.2. The SHLAA Report includes:

- Introduction to the SHLAA Report
- National and local context and policy background;
- An overview of the study area;
- An overview of the approach and methodology used in the SHLAA; and
- The SHLAA findings for Exmoor National Park.

1.2. Geographical Area

1.2.1. This report provides the SHLAA for the geographical area of Exmoor National Park, covering parts of North Devon and West Somerset District Councils, within the Northern Peninsula Housing Market Area (HMA) (see Figure 1).

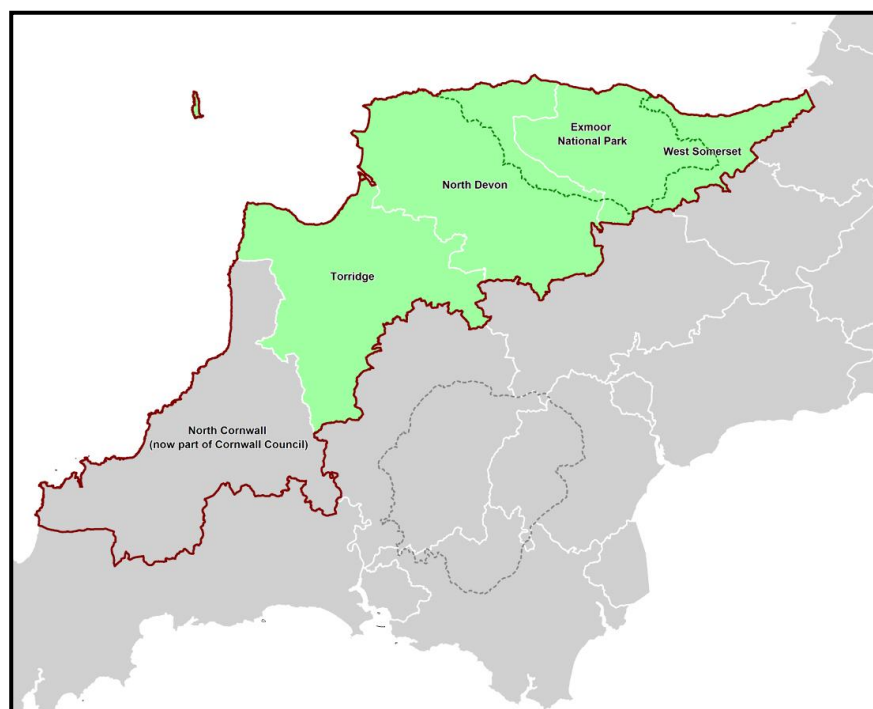


Figure 1 Map of Exmoor National Park within the Northern Peninsula Housing Market Area (Map courtesy of Torrige District Council)

1.3. Purpose of the SHLAA

- 1.3.1. In order to inform the housing elements of Local Plans, Paragraph 159 of the NPPF states that *“local planning authorities 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”*. The SHLAA forms a key component of the evidence base to underpin policies in development plans for housing.
- 1.3.2. Recent National Planning Practice Guidance¹ (NPPG) published by the Government in March 2014 states that the purpose of *“an assessment of land availability is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.”* SHLAAs are intended to identify a readily available supply of housing land with the intention of demonstrating a five-year supply of deliverable sites; and identifying a further supply of developable sites for subsequent years. The NPPG accepts that circumstances may arise where plan makers will have to depart from the guidance, providing they set out reasons for doing so.
- 1.3.3. It is accepted Government policy that special circumstances arise for the delivery of housing in National Parks (see paragraph 2.2.2). **Whilst the SHLAA for Exmoor National Park is following the approach set out in the NPPG, the SHLAA is not being used to demonstrate a five year land supply given the policy of focusing on the delivery of local needs affordable housing through a rural exceptions approach, without the allocation of sites (see Chapter 2).** The SHLAA has been carried out as part of the evidence base, to demonstrate that suitable and available sites could come forward if a local need for affordable housing was identified. The NPPG also recognises that the assessment should be thorough but proportionate, building where possible on existing information sources. Given the levels of housing likely to be required on Exmoor, it is judged that this approach meets the NPPG requirements
- 1.3.4. The NPPG also suggests that local planning authorities should combine their economic and housing assessments to create Strategic Housing and Economic Land Availability Assessments (SHELAAAs). An Employment Land Review for Exmoor National Park² was undertaken to inform the emerging Local Plan. This assesses the future demand for business premises on Exmoor including for offices, manufacturing, tourism, agriculture and public services, through engagement with stakeholders such as agents and local businesses and a study into the quality of existing employment sites. It concludes that instead of allocating land for employment purposes the Local Plan should provide a basis for the release of appropriate sites and premises for business uses in response to emerging needs and that existing employment land should be protected from alternative uses unless there is a clear justification for a loss of employment use. **As a consequence, no employment land is being allocated in the emerging Local Plan, hence the SHLAA does not include an assessment of economic land availability.**

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/about-the-assessment/>

² Exmoor National Park Employment Land Review, Nathaniel Lichfield and Partners, Nov 2009 <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/evidence-base>

1.4. **Status of the SHLAA**

1.4.1. The SHLAA is a technical report which helps to identify and assess sites with the potential to deliver housing. It forms an important part of the evidence base for the emerging Exmoor National Park Local Plan, which will replace the policies set out in the adopted Local Plan 2001-2011.

1.4.2. **The SHLAA Report does not:**

- Form part of the Development Plan and does not allocate sites for development nor preclude those sites not identified from coming forward for planning permission in the future.
- Provide a relative assessment of sites against each other and does not provide any ranking or order of preference. Each site is appraised on its own merits.
- Indicate that planning permission will be granted for housing development if a site is included in the SHLAA. It is not intended to pre-empt any plan making or other planning related decisions and does not indicate that planning permission should be granted or not granted for housing or any other use on any identified site.

1.4.3. Planning applications on sites identified within the SHLAA will continue to be determined on their merits in line with the development plan unless material considerations indicate otherwise. The SHLAA may however form a material consideration in the determination of planning applications.

1.4.4. This SHLAA Report is the outcome of work carried out during January-September 2014. It therefore forms a snapshot in time and the status of individual sites may change over time (i.e. there may have been development progress upon a site, or land ownership may have changed, and so on). The SHLAA supply figures quoted in this report relate to the period from 1st April 2014.

1.4.5. The report forms the culmination of an extensive exercise of desk-based analysis, consultation and survey work and has been prepared with the support of a wide ranging Stakeholder Panel. The SHLAA is an ongoing process and will be monitored as part of the Local Plan annual monitoring process (Exmoor National Park Annual Monitoring Report). The evaluation of the monitoring reviews will indicate when the SHLAA Report should be updated.

2. National and Local Context and Policy Background

2.1. National Park Statutory Purposes and Duty

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

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

2.1.2. The National Park Authority's (NPA) primary responsibility is to deliver the statutory purposes. In doing so, it is expected to be an exemplar in achieving sustainable development, helping rural communities in particular to thrive. In pursuing National Park purposes, National Park Authorities have a duty to *"seek to foster the economic and social well-being of local communities within the National Park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park"*. Within the Parks, conserving and enhancing the landscape, biodiversity, cultural heritage, dark skies and natural resources, and promoting public understanding and enjoyment of these should lie at the very heart of developing a strong economy and sustaining thriving local communities³.

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

2.2. National Policy Background

2.2.1. The **NPPF** states that local planning authorities should *'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'* (para 47). The local authority, when preparing or updating its Local Plan, should objectively assess and indicate how it will meet the need for housing in the housing market area, unless specific policies in the NPPF – such as those covering National Parks – indicate that development should be restricted (para 14, footnote 9).

2.2.2. 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"* (para 115). The purposes of National Parks and duties of relevant bodies set out in the

³ UK Government Vision and Circular English National Parks and the Broads, Defra, 2010

Environment Act 1995 (sections 61 and 62) carry great weight and in themselves provide the context for interpreting policy.

- 2.2.3. The special circumstances relating to the delivery of housing in National Parks is also embodied in the **Government’s Vision and Circular for the English National Parks and the Broads (2010)** *“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 needs⁴.
- 2.2.4. Delivery of housing within the National Park is therefore achieved using a rural exceptions approach as set out in the NPPF. The NPPF definition of rural exception sites has changed the policy approach to allow, at the local authority’s discretion, for small numbers of market homes where essential to enable the delivery of significant additional local needs affordable housing (*NPPF para 54*).
- 2.2.5. A rural exception site is defined in the NPPF as *“Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding”* (*NPPF Glossary*).
- 2.2.6. Applying the ‘rural exception site’ approach – that local need affordable housing may be permitted, where new housing would not normally be allowed – has the effect of reducing the value of land and buildings to a more reasonable level so that local communities and housing providers can acquire sites and buildings for affordable housing. The approach to rural exception sites in the National Park is set out in paragraph 4.10.11.
- 2.2.7. The NPPF allows windfall sites to be taken into account where the evidence supports this: *“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens”* (*para 48*). The approach to windfall sites in the National Park is set out in paragraph 4.13.2.

2.3. **Exmoor National Park Local Plan**

- 2.3.1. The current Exmoor National Park Local Plan 2001-2011 was adopted in March 2005. A new Local Plan⁵ is being produced, which will guide development in the National Park to 2030. During November and December 2013, ENPA consulted on the Draft Local Plan. This

⁴ English National Parks and the Broads UK Government Vision and Circular 2010 (para 78)

⁵ Previously referred to as the Local Development Framework

sets out the overall vision and objectives for the National Park and provides a spatial strategy and policies that will guide how these will be achieved. The overall aim of the Local Plan is to ensure that any new development will help to achieve the National Park purposes and deliver sustainable development. The Local Plan includes both strategic policies and development management policies. Details of the Draft Local Plan can be found on the Exmoor National Park website at www.exmoor-nationalpark.gov.uk.

- 2.3.2. Existing planning policies set out in the adopted Exmoor National Park Local Plan focus on the delivery of housing to meet the needs of local communities, the principal need being for local affordable housing. This long standing approach to housing has been adopted because the opportunities for housing development in National Parks are limited due to the statutory conservation purposes and the local socio-economic duty. Priority is therefore given to addressing the housing needs of the National Park communities rather than meeting the external demand for market housing in these particularly attractive environments. This approach is recognised in previous plans (now revoked), including the Joint Structure Plan⁶ - that provision for new residential development should be to meet local needs only - and the draft Regional Spatial Strategy⁷ - which accepted that there should only be an estimated provision in the National Parks against local needs.
- 2.3.3. Since the adoption of the 2005 Local Plan and the policy approach of prioritising housing for local needs through a 'rural exceptions' approach, there has been an increase in completions of affordable local need homes and a fall in completion of open market dwellings⁸. The emerging Local Plan continues this policy approach but, in recognition of the reduction in public grants available for delivering affordable housing, it includes proposals to provide for limited cross-subsidy from market (principal residence⁹) housing where this is shown to be necessary to provide the viability to deliver affordable housing. In all cases however, the starting assumption is to seek 100% affordable housing. If cross-subsidy is required to make the development viable, then only the minimum number of market units would be permitted to deliver the affordable units, and the number of affordable units should be greater than the number of market units.
- 2.3.4. The spatial strategy in the adopted Local Plan sets out where new development can be built and encourages the reuse of buildings and using land that has been previously developed. The settlement hierarchy includes three Local Rural Centres (Dulverton, Lynton & Lynmouth and Porlock) which act as key service centres. A number of Villages are also identified (see Figure 2). These settlements are considered to be the most suitable for accommodating development, where new build housing and employment development to address local needs are considered to be acceptable, including new local services and community facilities. In addition, the emerging Local Plan proposes a tier of 'Rural Communities' where the provision of new local need affordable housing would be supported (for example through self build or conversions), and new employment development including local services and facilities can be provided through the change of use of existing buildings. These Rural Communities include a few settlements which have

⁶ Somerset and Exmoor National Park Joint Structure Plan 1991-2011

⁷ The Draft Regional Spatial Strategy for the South West, 2006-2026, South West Regional Assembly

⁸ Exmoor National Park Annual Monitoring Report 2013/14

⁹ Housing can only be lived in by a person as their principal residence, and cannot be used as second or holiday homes

not previously been listed in the spatial strategy, namely Hawkridge, Kentisbury, Martinhoe, Selworthy, West Porlock, Countisbury, Heasley Mill, Oare/Malmsmead, Twitchen and Withycombe. The area outside these settlements is classified as ‘open countryside’ where the re-use of existing buildings can be considered (as opposed to new build) in order to protect the landscape.

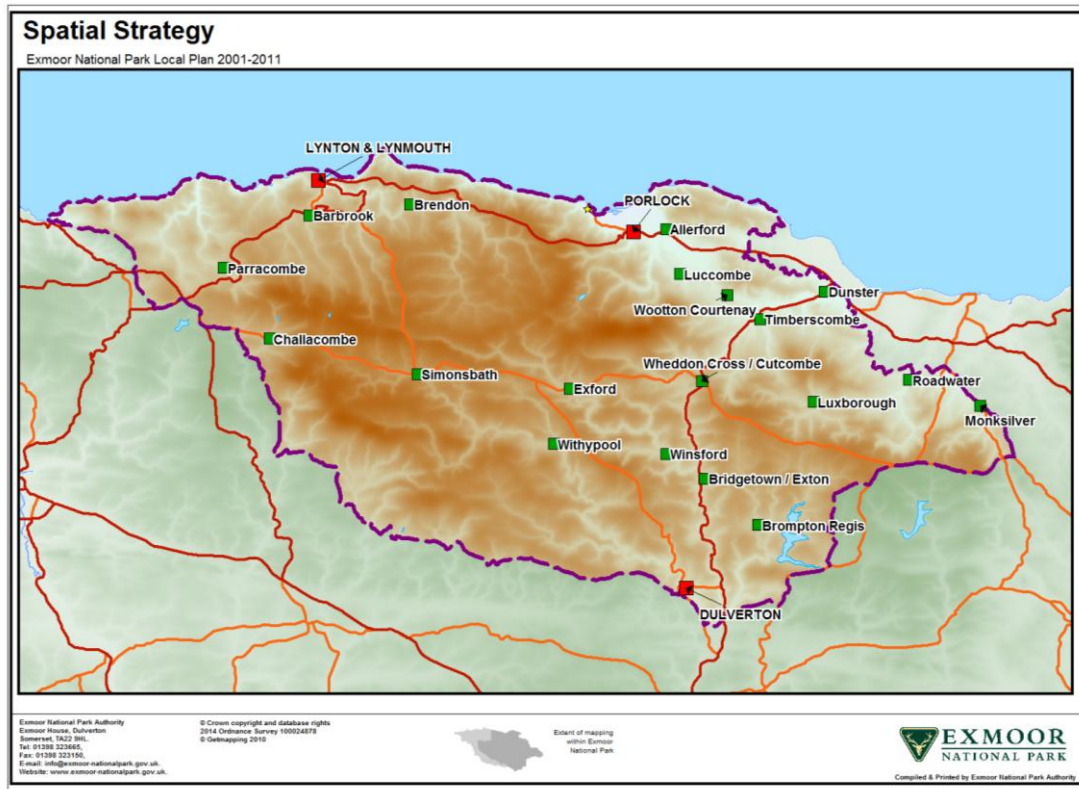


Figure 2 Exmoor National Park Proposed Settlement Strategy (adopted Local Plan)

- 2.3.5. As a consequence of this approach, the adopted and emerging Local Plans do not include a housing requirement or allocate sites, although an estimate of local housing need (consistent with achieving National Park purposes and duty) is being prepared for the emerging Local Plan. Exmoor National Park Authority (ENPA) is working with neighbouring authorities under the Duty to Co-operate to demonstrate how housing needs should be distributed across the housing market area, with a focus on local affordable housing within the National Park (see section 3.4).

3. Overview of the Study Area

3.1. Exmoor National Park

- 3.1.1. Exmoor National Park is a small, rural area that forms part of North Devon and West Somerset Districts, with a population of around 10,000. The National Park was designated in recognition of its exceptional landscape value and importance for wildlife and cultural heritage and is afforded the highest level of landscape protection by the planning system. The settlement pattern is characterized by small dispersed settlements, villages, hamlets and farmsteads which also provide a high quality built environment. This is a key factor in the National Park's attractiveness as a place to live and work, and supports its role as a visitor destination.
- 3.1.2. An assessment of the landscape sensitivity of the National Park's settlements to housing development demonstrated that there is a limited capacity for new housing on greenfield sites within the National Park without detriment to landscape character.¹⁰ The existing stock of accommodation, buildings and previously developed land/buildings is therefore an important component of future supply, to minimise the level of greenfield housing development within the National Park and ensure that, in the longer term beyond the plan period, there will still be some suitable housing sites in settlements to help meet the needs of National Park communities.

3.2. Population, Housing Stock and Housing Market

- 3.2.1. Exmoor National Park is characterised by an ageing population driven by high external demand from in-migration. Evidence indicates that the age imbalance is likely to become more acute as those in older age groups and retired people continue to become more aged together with some growth in older households as a result of in-migration and at the same time, younger people of working age leave the National Park.¹¹
- 3.2.2. There are a high proportion of self-employed people which directly reflects the nature of the economy which is dominated by small-scale businesses particularly in the tourism and land management sectors. There are high levels of low paid, seasonal and part time jobs¹².
- 3.2.3. The make-up of the housing stock on Exmoor reflects its status as a National Park and popularity as a visitor destination and for people retiring. A large proportion of the housing stock on Exmoor (19.2% or 1,111 dwellings) has no usual residents which mean they are empty or second homes¹³. Two-thirds of Exmoor's housing is owner-occupied, the remainder is rented.
- 3.2.4. House prices are substantially higher than regional and national averages. The disparity between average house prices and average annual household incomes remains high at a

¹⁰ Exmoor National Park Authority, Exmoor National Park Landscape Sensitivity Study (2012) (capacity for 333 units).

¹¹ *Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset*, by Housing Vision for Exmoor National Park Authority, January 2014

¹² Exmoor National Park Employment Land Review, Nathaniel Lichfield and Partners, Nov 2009

¹³ Office for National Statistics 2011 Census, percentage of households with no usual residents

ratio of 14.1. Even the ratio of average lower quartile house prices to average household incomes is 6:1, illustrating that properties at the lower end of the market are still beyond the reach of many households, particularly families in need of larger housing¹⁴.

- 3.2.5. Private market rents are also beyond the range of those on average incomes in the National Park, particularly for larger, 3-4 bedroom homes. Even within the more affordable¹⁵ end of the market, there are still difficulties with affordability particularly for households in the lower quartile income bracket¹⁶.

3.3. **Strategic Housing Market Assessment**

- 3.3.1. Exmoor National Park Authority worked together in partnership with West Somerset, North Devon, Torridge District Councils and Devon County Council in the preparation of a Northern Peninsula Strategic Housing Market Assessment (SHMA) in 2008¹⁷. The aim of the SHMA is to identify over the plan period the scale and mix of housing and the range of tenures the local population is likely to require. Since then, three updates have been produced:

- for the North Devon and Torridge part of the HMA including the area of the National Park within North Devon¹⁸;
- for the part of Exmoor within West Somerset¹⁹; and
- for the area of West Somerset outside the National Park²⁰.

- 3.3.2. The authorities are now working on an update of the overall SHMA to take account of the 2012-based sub-national population projections.

3.4. **Duty to Co-operate**

- 3.4.1. Government expects local authorities to work together on housing policy and delivery. The NPPF states that *“Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework” (para 179).*

- 3.4.2. ENPA is the local planning authority within the National Park but does not have responsibility for other services, including building control, housing strategy and community leisure services, which remain within the remit of the individual local authorities. There is a history of joint working between the authorities on evidence base

¹⁴ Exmoor National Park Annual Monitoring Report 2012/13

¹⁵ Affordable rents are defined in the NPPF (glossary) as no more than 80% of the local market rent

¹⁶ Exmoor National Park Annual Monitoring Report 2013/14

¹⁷ Strategic Housing Market Assessment for the Northern Peninsula, led by the Housing Vision Consultancy, 2008

¹⁸ Strategic Housing Market Assessment: Torridge and North Devon Update, Housing Vision, 2012

¹⁹ Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Housing Vision, 2014

<http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/evidence-base>

²⁰ Strategic Housing Market Assessment: West Somerset Update, Housing Vision, 2013

preparation. Under the duty to co-operate, ENPA has been working with on the approach to housing within the Northern Peninsula Housing Market Area with North Devon and West Somerset Councils. There are a number of joint evidence base components either published or in production which have been developed across two or all three authorities. These include:

- Joint Housing Needs Surveys;
- Rural Housing Project working across the local authority areas;
- Joint Strategic Housing Market Assessments;
- Joint Methodology for the SHLAA;
- A joint housing topic paper;
- Strategic Flood Risk Assessment; and
- Quantitative Needs Assessment.

3.4.3. Although no housing target has been identified for Exmoor National Park in line with national guidance, an indicative housing requirement is being identified through the Strategic Housing Market Assessment and subsequent updates. Discussions are underway with neighbouring authorities on the distribution of housing provision across the HMA.

4. **SHLAA Methodology**

4.1. **Approach**

4.1.1. The SHLAA has been carried out in-house by ENPA staff supported by an external project manager and the Stakeholder Panel.

4.1.2. Exmoor National Park lies within the Northern Peninsula Housing Market Area (see Figure 1). This covers a number of local planning authority areas:

- Exmoor National Park Authority (ENPA)
- North Devon Council (NDC)
- Torridge District Council (TDC)
- West Somerset Council (WSC)
- Former North Cornwall District Council (NCDC)²¹

4.1.3. Given that the timetables for the preparation of Local Development Documents at each local planning authority vary, it has not been practicable to prepare a single Housing Market Area wide SHLAA report. In addition, the situation on Exmoor is different from that in the other planning areas because the policy approach in the Exmoor National Park Local Plan focuses on delivery of affordable housing to meet local needs. However, in line with the duty to co-operate, the local planning authorities within the HMA have constructively worked together on SHLAA preparation.

4.1.4. The four local planning authorities ('partner authorities') of Exmoor National Park Authority, North Devon Council, Torridge District Council and West Somerset Council, have taken a partnership approach towards the preparation of SHLAA reports to cover their respective areas. This approach has been supported by the preparation of a commonly endorsed methodology and the use of Stakeholder Panels with overlap of membership.

4.1.5. A joint Methodology for preparation of each SHLAA report was prepared by the planning authorities within the Northern Peninsula Housing Market Area and was published in August 2009²². A Stakeholder Panel of experts and community representatives advised on the Methodology, which was subject to public consultation. The methodology is currently the subject of revision to take account of changes since it was published, including new national guidance.

4.2. **Stakeholder Panel**

4.2.1. A Stakeholder Panel was convened to provide advice on the Exmoor National Park SHLAA. The Panel includes members from developers, estate agents, architects, housing providers and community representatives. The Panel members were chosen for their knowledge and experience in delivering housing on Exmoor, and included a number of individuals who are

²¹ The geographical area formerly covered by North Cornwall District Council is not included in the Partnership as this has been amalgamated into Cornwall Council, although the approach is comparable

²² Northern Peninsula Housing Market Area Strategic Land Availability Assessment Methodology, North Devon, Torridge, West Somerset Councils, Exmoor National Park Authority, Devon County Council, 2009

also on the separate West Somerset and North Devon SHLAA Panels, to provide an overlap with these processes. Officers from West Somerset and North Devon Councils were also invited to attend the Panel in an advisory capacity. Further information about the Stakeholder Panel is given in Appendix 1 including the full list of those invited to attend.

4.3. **Joint Methodology Stages**

4.3.1. The Joint Methodology sets out a number of stages for the SHLAA, as shown in this Flow diagram:

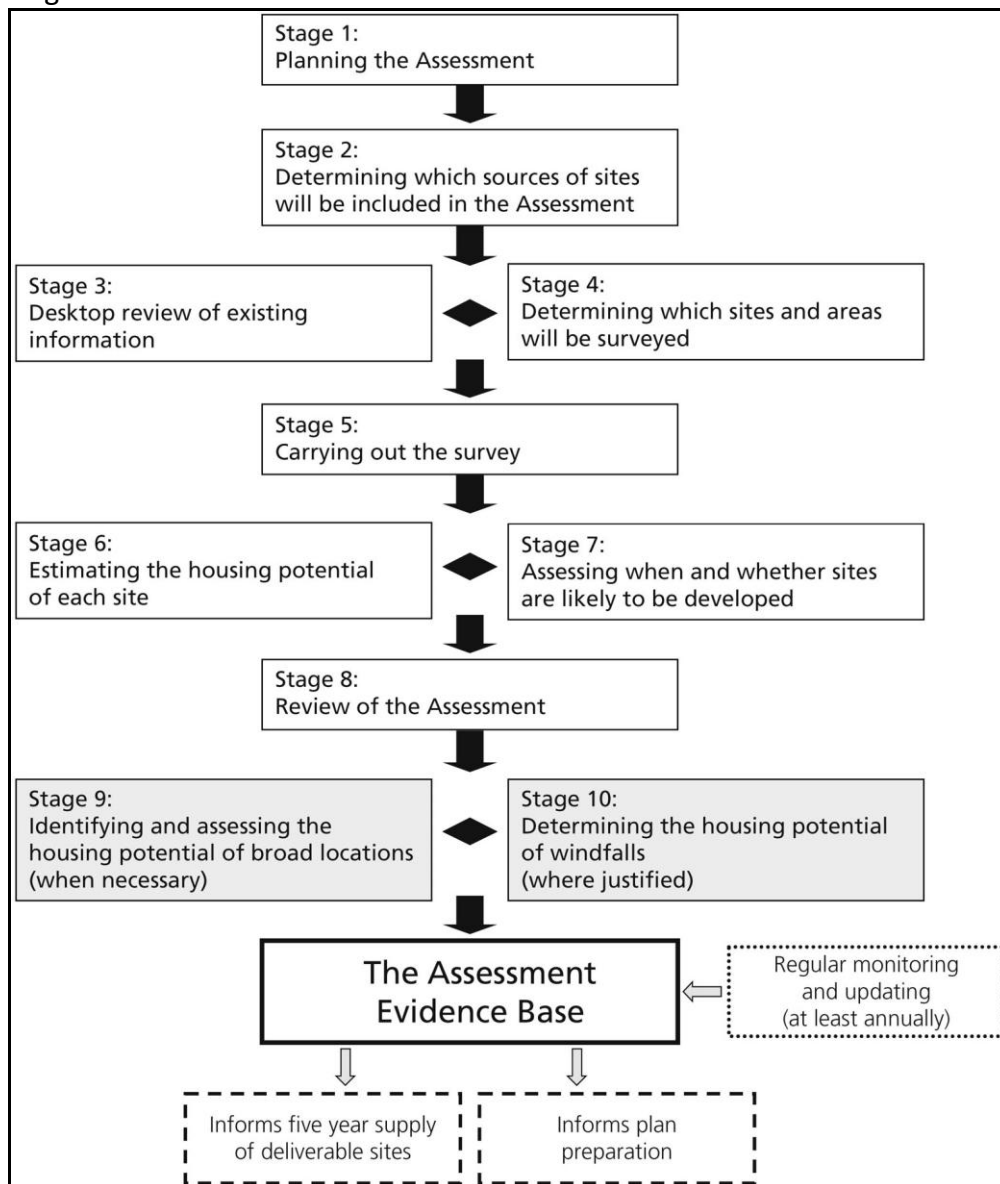


Figure 3 – The Strategic Housing Land Availability Assessment process and outputs
(Northern Peninsula HMA Joint Methodology for SHLAAs 2009)

4.3.2. The National Planning Policy Guidance (NPPG) provides a slightly different sequence of events (as set out in Appendix 2), but ultimately the same steps are included.

4.3.3. The following sections record the approach that was taken, following the stages set out in the Joint Methodology.

4.4. **Stage 1 – Planning the Assessment**

4.4.1. It was decided that the SHLAA would be carried out for the local planning authority area of Exmoor National Park, using the Joint Methodology agreed for the Northern Peninsula Housing Market Area and working in co-operation with North Devon and West Somerset Councils.

4.5. **Stage 2 - Determining which sources of sites will be included in the Assessment**

4.5.1. A desktop review of information was carried out using the list of sources set out in the Joint Methodology (Table 5) including:

- Sites within the planning process (such as unimplemented/outstanding planning permissions for housing; planning permissions for housing that are under construction; and sites where planning permission will be granted subject to the completion of a Section 106 agreement).
- Sites not currently in the planning process (such as vacant and derelict land and buildings; surplus public sector land in appropriate locations; land in non-residential use, which may be suitable for re-development for housing, such as commercial buildings or car parks; additional housing opportunities in established residential areas, such as under-used garage blocks; and sites within or well related to rural settlements).

4.5.2. An initial sift of sites was then undertaken as Stage A of the assessment process to assess fundamental site suitability criteria and discount sites in locations that are wholly unsuitable for housing development. The Stage A assessment considered policy restrictions - such as designations, protected areas, existing planning policy and corporate, or community strategy policy. Three key policy restrictions were considered and sites excluded if they were:

- Not in conformity with the adopted Local Plan (the spatial strategy);
- Land within areas identified as Flood Zone 3b; or
- Land within a Special Area of Conservation, or a Site of Special Scientific Interest, or where development is likely to cause significant harm to these designations²³.

4.6. **Stage 3: Desktop review of existing information**

4.6.1. The information sources listed in Table 7 of the Joint Methodology were used to identify sites with the potential for delivering housing including sites in the planning process and sites not currently in the planning process (see paragraph 4.5.1 above). Other sources of information included previous urban capacity studies, Register of Surplus Public Sector Land and sites identified by the Rural Housing Enabler, Parish Housing Working Groups and from officer knowledge of the identified settlements. One site was also identified by a Stakeholder Panel member and subsequently included in the assessment.

²³ The Joint Methodology also excludes sites within a Special Protection Area or Ramsar site, but there are no such designations on Exmoor

4.6.2. In addition, two Calls for Sites were carried out – in 2009 and 2014. These were publicised through the website and local newspapers to provide the opportunity for landowners and developed to present sites for consideration. Relevant organisations, agents and landowners were also notified of the process, including parish and town councils.

4.6.3. This resulted in a total of 271 sites being identified including 46 site promotions by landowners or their representatives. All the sites were entered in a custom database. A threshold of 0.1ha was then applied and sites below that threshold were excluded from detailed assessment²⁴ to ensure that the SHLAA remained strategic and manageable in terms of available resources. The sites were mapped using a Geographical Information System.

4.7. **Stage 4: Determining which sites and areas will be surveyed**

4.7.1. Sites identified in Stage 3 (over 0.1ha) were visited. A detailed site assessment pro-forma was prepared based on Appendix 1 of the Joint Methodology and a 1:1250 site plan. Sites identified in Stage 3 that fell within 'excluded' categories identified in the Stage A assessment were excluded from further assessment.

4.8. **Stage 5: Carrying out the survey**

4.8.1. Site information was collated and each site was visited by a planning officer from Exmoor National Park Authority and the pro-forma completed (see Appendix 3). This included:

- site details (*grid reference, Parish, site area, source etc*);
- site description (*Brief description of the site, including details of its setting and context*);
- further information (*whether previously developed or greenfield land; new build/conversion; current land use; planning history*); and
- Stage B detailed site information (*assessment of environmental considerations including landscape, biodiversity, built environment; site constraints such as topography, trees and hedgerows, site compatibility, land status; resources such as minerals, air quality, light pollution; accessibility including highway access, access to public transport and facilities, public right of way; development considerations such as open space and recreation facilities, employment land, other planning designations, infrastructure capacity; potential housing capacity of the site; the site availability status and commentary on achievability - viability, market, cost and delivery factors*).

4.8.2. In addition to the planning officer survey, all the sites were assessed by specialists within Exmoor National Park Authority relating to landscape, biodiversity, and historic environment/archaeology. Statutory agencies including Natural England and the Environment Agency were also consulted along with the Highways Authorities (Devon and Somerset County Councils), although detailed comments were not received on all sites from all consultees.

4.8.3. All the information was entered onto the database to inform stage 7.

²⁴ apart from sites which came forward as promotions from the Calls for Sites, all of which were assessed

4.9. Stage 6: Estimating the housing potential of each site

- 4.9.1. An estimate of the housing potential of each site was made. Where information on the numbers of dwellings that a site could support exists - such as from a planning application or information provided in the call for sites - this figure has been used. Where no such information was available, a contextual approach was used using officer knowledge and densities taken from recent developments (see Figure 5). Due to the small scale nature of developments on Exmoor, this was primarily done on a site by site basis using a contextual approach. In this way, the estimate of the density that would be achievable on each site was based on an assessment of the character of the surrounding built form and landscape to ensure that densities are appropriate to secure the conservation and enhancement of the National Park. For a few of the larger SHLAA sites, a density multiplier was used based on recent housing developments within the National Park as set out in Figure 5 below.

Site Location	Density (dwellings per hectare)
Cutcombe Market housing development	31
Porlock affordable housing scheme	35
Exford affordable housing scheme (edge of settlement)	19

Figure 5 Density Multiplier

- 4.9.2. The initial assessment of housing potential by officers was supplemented by advice from the ENPA specialists relating to potential constraints such as landscape impact or biodiversity and archaeological interest (see Stage 7d below). It was also tested with the Stakeholder Panel who provided additional advice on appropriate housing potential taking into account site constraints (such as topography and access) and considering viability.

4.10. Stage 7: Assessing when and whether sites are likely to be developed

- 4.10.1. The Joint Methodology states that the purpose of this stage is to assess whether a site is deliverable, developable or not currently developable for housing. To be considered:
- **deliverable** – a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within 5 years from the date of adoption of the plan; and
 - **developable** – a site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time.

Stage 7a: Assessing suitability for housing

- 4.10.2. A site is considered to be *suitable* for housing development if it offers a suitable location for development and would contribute to the creation of sustainable mixed communities.

Sites with planning permission for housing but where works had not started or are not completed were regarded as suitable unless there have been subsequent changes in circumstances which may affect this position. Sites where planning permission has been granted and all units have been completed are not included in the SHLAA.

- 4.10.3. The assessment of suitability was split into two Stages, A and B. Sites which did not meet the suitability criteria of Stage A (see paragraph 4.5.2) were excluded from further consideration. Stage B appraised the suitability of the site in terms of:
- physical problems or limitations such as access, infrastructure, ground conditions, flood risk, hazardous risks pollution or contamination;
 - potential impacts on landscape features, nature conservation and the historic environment;
 - likely on and off-site infrastructure requirements; and
 - environmental conditions in terms of compatibility with existing or proposed adjoining uses.
- 4.10.4. The assessment included all the information gathered from the site survey, existing knowledge, officer and specialist advice, and comments from the statutory consultees. An initial officer recommendation was made as to whether each site was suitable for housing development and should be included in the SHLAA supply or excluded from further consideration. This was discussed at a meeting of ENPA officers and subsequently at the Stakeholder Panel. Changes to the recommendations as a result of these discussions were recorded on the database.

Stage 7b: Assessing Availability for Housing

- 4.10.5. This stage established whether the site is *available* for housing including identifying any legal or ownership problems, establishing what the intentions of the owner are and when the site might be developed. A Proforma was sent to landowners and developers as part of the Call for Sites. Confirmation was sought from landowners and developers relating to sites that came forward in 2009 to establish whether these sites were still available, and some were excluded from further consideration as a result of this as ownership had changed or other circumstances had led to the site not being available.
- 4.10.6. Sites which came forward as promotions from the two Calls for Sites were considered to be available immediately for development unless stated otherwise by the promoter. The Stakeholder Panel advised on any issues that might impact on availability such as complications in land ownership, delivery record of developer, and planning history of the site.

Stage 7c: Assessing Achievability for Housing

- 4.10.7. The *achievability* of a site will be determined by whether there is a reasonable prospect that housing will be developed on the site at a particular point in time. This will be affected by the market conditions at that time, the costs associated with undertaking the

development and how long it takes to deliver the schemes. Delivery factors in assessing the achievability of potential sites include:

- Developer's own phasing plans;
- Realistic build out rates on larger sites;
- Whether a single developer or several developers are involved;
- What housing products are being offered; and
- The size and capacity of the developers.

4.10.8. The Joint Methodology includes a number of assumptions to guide the assessment of the achievability of individual sites (see Appendix 5 of the Joint Methodology report). These include:

- Gross to Net Site Size Ratios;
- Density multipliers;
- Lead-in time to commencement; and
- Build-out rates.

4.10.9. Given the small scale of developments in the National Park, it is unlikely that the full suite of assumptions will be appropriate, and this is recognised in the Joint Methodology. Where possible a similar approach has been taken, using the guidelines for small and rural sites. The approach to density is set out in section 4.9 and is comparable with the Joint Methodology guidelines for rural settlements of 30-40 dwellings per hectare. For lead in to commencement, a relatively short period is likely to be required as most developments within the National Park are likely to be small scale, and the processes involved in developing such a site are likely to be less demanding and hence quicker to complete. However, for some particularly sensitive sites²⁵ and those considered to be larger developments within the National Park, the period to commencement and delivery phases could both be longer to allow for various assessments and surveys to be undertaken and for more complex design and planning requirements to be met.

4.10.10. The NPPF emphasises the importance of viability as a key aspect of whether a site is achievable including *“realistic assumptions about the.....likely economic viability of land to meet the identified need for housing over the plan period”* (para 159). Many factors will impact development viability including:

- The type of product being proposed (type and size of dwelling);
- The level of affordable housing to be provided;
- On and off-site infrastructure requirements and contributions; and
- Unusual site constraints.

4.10.11. Viability of sites for delivering affordable housing within the National Park is based on the rural exceptions approach. **This is important to ensure land values are commensurate with providing for local need affordable housing and avoiding uplift through allocation of sites, so that the starting point for land values remains at, or just above, agricultural**

²⁵ for example in relation to landscape sensitivity and ecological or archaeological interest

land values. As the policy is to deliver local affordable housing, schemes will be worked up based on an identified need and then once planning permission is given, the land will be bought, with the landowner receiving a value based on an aggregate value derived from the overall number of plots, rather than the whole site area, to ensure viability which relies on land values remaining low. The success of the approach being taken on Exmoor is demonstrated by the increase in delivery of affordable units as shown in the Annual Monitoring Report²⁶, particularly supported through the Rural Housing Project. Exmoor NPA will produce a Housing Supplementary Planning Document, which will assess viability in more detail. Further assessments of viability have been carried out for the Northern Peninsula HMA²⁷ and specifically for Exmoor National Park²⁸.

- 4.10.12. Assessment of site viability for the SHLAA was based on officer experience supported by discussions with the Rural Housing Enabler and the Stakeholder Panel. The Stakeholder Panel considered the likelihood of housing development taking place on sites identified through the SHLAA process. This included viability in relation to delivering affordable housing, and whether there are likely to be abnormal costs relating to infrastructure, site development (particularly cut and fill given the topography of a number of sites) and what requirements may exist for the provision of community facilities such as open space or biodiversity considerations to make development acceptable in sustainability terms.

Stage 7d: Overcoming Constraints

- 4.10.13. The site surveys and consultations with ENPA specialists and statutory agencies highlighted a number of sites where the potential of the whole or part of the site could be constrained. These were considered at the Officer Meeting and where it was considered that the constraints could be mitigated, recommendations were made for example to limit the developable area of the site to reduce landscape impact or impact on wildlife and archaeological interests. In some cases, the need for detailed ecological and archaeological assessments as part of future planning applications was identified. Similarly, advice from the Highways Authorities (based on a desk top review) were considered in the light of site visits and acknowledging the deep rural nature of many of the settlements, with recommendations made by the Panel on the basis of whether it was considered that potential constraints could be overcome through detailed design and layout²⁹. There were a number of sites where it was considered that the potential impacts could not be mitigated for example due to topography or difficult access, and consequently the recommendation was for the site to be excluded from the SHLAA supply.
- 4.10.14. Officer recommendations were reported to the Stakeholder Panel and other potential constraints were discussed during the meeting. Changes made to the site assessment as a result of the Panel discussions were recorded on the database.

²⁶ Exmoor National Park Annual Monitoring Report 2013/14

²⁷ A Strategic Housing Viability Assessment Study Prepared by Stephen Walker, Jane Galloway and Danny Myers University of the West of England, Bristol for the Northern Peninsula Housing Market Area Partnership, Oct 2008

²⁸ Exmoor National Park Housing Viability Assessment, Nathaniel Lichfield and Partners for Exmoor National Park Authority, 2011

²⁹ The NPPF (para 29) recognises that different solutions may be required in rural areas compared to urban areas

4.11. Stage 8: Review of the Assessment³⁰

- 4.11.1. The outcomes of the SHLAA assessments were recorded in the database with a final recommendation to include the site in the SHLAA supply or to exclude it from further consideration. For each site included within the SHLAA supply, the potential capacity of the site was noted and whether the site was likely to come forward in the first five years of the Plan or in the longer term (6+ years). Given the need-based approach on Exmoor where there is no housing target and no site allocations, it is not appropriate to prepare a five year land supply or development trajectory. As a result, a slightly different approach has been taken to considering the deliverability and developability of sites as set out below.
- 4.11.2. To be considered **Deliverable** sites should be: *“available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans” (NPPF para 47, footnote 11.)*
- 4.11.3. The NPPF definition of a **Developable** site is: *“A site should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged” (para 47, footnote 12).*
- 4.11.4. The approach taken in this SHLAA was therefore to assume:
- **Sites which came forward as promotions from the Call for Sites and which were suitable, and sites which have planning permission but the units have not yet been completed were considered to be *deliverable* and could come forward within the first five year period.**
 - **Sites which were considered to be suitable but were not currently available (i.e. they had not come forward as promotions) were considered to be potentially *developable* over the longer term.**
- 4.11.5. The developable sites are considered to be potential sites for the delivery of housing in the latter stages of the Plan period (6+ years). This approach was taken to demonstrate that there are suitable sites which could potentially come forward in future as rural exception sites to assist in delivering the needed supply of affordable housing, even though these sites are not currently being promoted.
- 4.11.6. The SHLAA will be reviewed as part of the annual monitoring process (Exmoor National Park Annual Monitoring Report). The evaluation of the monitoring reviews will indicate when the SHLAA report should be updated. Where there is evidence of sites not coming

³⁰ Note – in the joint methodology this mainly covers monitoring and review of the SHLAA, but the NPPG Stage 4 – Assessment Review is a pulling together of the evidence

forward to provide for identified local affordable needs, the SHLAA may be updated and to inform future Local Plan reviews.

4.12. **Stage 9: Identifying and assessing the housing potential of broad locations (where necessary)**

4.12.1. This stage is included in the Joint Northern Peninsula Methodology but was not considered to be relevant to the preparation of a SHLAA for Exmoor National Park as site allocations are not being made in the Local Plan.

4.13. **Stage 10: Determining the housing potential of windfall**

4.13.1. Windfall sites are defined in the NPPF as “Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available” (Annex 2). Normally, sites identified in the SHLAA would not be considered as windfall³¹.

4.13.2. The Joint Methodology states that windfall allowances will only be used where there are clearly justified local circumstances, but recognises that this will apply to the area within Exmoor National Park. As there are no site allocations in the Local Plan, sites that do come forward within the National Park could technically be counted as windfall sites. However, as a housing delivery trajectory is not being prepared, it was not considered necessary to consider potential windfall sites as part of future delivery.

³¹ Planning Advisory Service website

5. SHLAA Findings

5.1. Introduction

5.1.1. This section of the report presents the findings of the SHLAA for housing supply in Exmoor National Park. It provides information regarding the outcome of the site assessments and quantifies the potential deliverable and developable housing supply.

5.2. SHLAA Site Assessment

5.2.1. For the SHLAA assessment, **271** sites were identified (including 46 site promotions by landowners or their representatives). Of these:

- 20 sites have planning permission but units are not yet completed (8 have planning permission but have not started works, and 12 have permission and have started works on site but are not yet completed). These sites are considered to be deliverable;
- 79 sites were excluded as they fell under the 0.1ha threshold;
- 25 sites were excluded at Stage A; and
- 147 went forward to detailed assessment under Stage B.

5.2.2. Of the **147** sites that went forward to detailed assessment:

- 25 sites are deemed to be deliverable (at least in part);
- 49 sites are categorised as being suitable but not available (*i.e. developable*); and
- 73 sites have been excluded from further consideration (*i.e. exclude at Stage B*).

5.2.3. Details of the sites assessed are given in Part 2 of this Report. Individual site maps and settlement maps showing the sites that were assessed are given in Part 3.

5.2.4. The potential yield from these sites is based on a site-by-site assessment of capacity, following the methodology set out in section 4.9 (contextual approach and density multiplier, supported by ENPA specialist advice and Stakeholder Panel). Following the approach in the Joint Methodology for sites with planning permission, a 15% discount was applied to the potential site yield from the 8 sites with planning permission (for a total of 21 units) which have not yet been started, to allow for some sites not being completed. The discount was not applied to the 12 sites with planning permission (for a total of 26 units) where works have started, reflecting the fact that development is more likely to be completed.

5.2.5. **The SHLAA indicates a potential supply of 45 deliverable sites with capacity for 249 dwellings. An additional 49 sites with 228 dwellings have also been identified, which are suitable but not currently available.** An overview of the conclusions is given in Figure 4 below.

Site Status	Site Count	Yield
Deliverable (promotions)	25 sites	205 dwellings ³²
Deliverable (sites with planning permission)	20 sites	44 dwellings ³³
Suitable but not Available	49 sites	228 dwellings ³⁴
Exclude from further consideration (Stage B)	73 sites	N/A
Exclude at Stage A	25 sites	N/A

Figure 4 - Overview of SHLAA supply

5.3. Development Type (New Build / Conversion)

5.3.1. A breakdown of deliverable sites by development type is given below in Figure 5. This indicates that although a significant proportion of deliverable sites (33%) are conversions, the yield from these sites is quite low (15% of overall dwellings), with the potential dwelling supply predominantly being through new build (83% of dwellings). This compares with an average of 40% of dwellings in the National Park being delivered through conversions over the last nine years³⁵.

	Deliverable (promotions)		Deliverable (sites with planning permission ³⁶)		Total	
	Site Count	Yield	Site Count	Yield	Site Count	Yield
New Build	19 (76%)	192 (94%)	10 (50%)	18 (38%)	29 (65%)	210 (83%)
Conversions	6 (24%)	13 (6%)	9 (45%)	25 (53%)	15 (33%)	38 (15%)
Mixed	0	0	1 (5%)	4 (9%)	1 (2%)	4 (2%)
Total	25 sites	205 dwellings	20 sites	47 dwellings	45 sites	252 dwellings

Figure 5 - Breakdown of Deliverable sites by development type

³² Note: In some cases, a potential range is given for dwelling capacity in the SHLAA site assessments. The figures quoted here are the upper capacity number.

³³ Total figure of units permitted is 47 dwellings (of which 23 are proposed to be affordable). A 15% discount (3 units) was applied to the 8 sites (21 units permitted) where works have not yet started, to reflect the possibility that not all the sites would be developed.

³⁴ Note: In some cases, a potential range is given for dwelling capacity in the SHLAA site assessments. The figures quoted here are the upper capacity number.

³⁵ Exmoor National Park Annual Monitoring Report 2013/14

³⁶ Note: the 15% discount has not been applied to these tables as it is not known which sites may not be delivered. The totals therefore add up to more than the deliverable supply recorded in Figure 11.

5.4. **Previously Developed Land and Greenfield Sites**

5.4.1. It is noticeable from the breakdown of deliverable sites given in Figure 6 below that a significant proportion (79%) are on greenfield sites, with only 14% on previously developed land, and the remaining 7% from a mixed site. This contrasts with a much higher proportion of dwellings being delivered on previously developed land since the adoption of the Local Plan in 2005/6 – an average of 65% over the nine year period, ranging from 25% to 92% in any one year³⁷.

	Deliverable (promotions)		Deliverable (sites with planning permission)		Total	
	Site Count	Yield	Site Count	Yield	Site Count	Yield
Previously developed land (pdl)	2 (8%)	2 (1%)	12 (60%)	33 (70%)	14 (31%)	35 (14%)
Greenfield	22 (88%)	185 (90%)	8 (40%)	14 (30%)	30 (67%)	199 (79%)
Mixed	1 (4%)	18 (9%)	0	0	1 (2%)	18 (7%)
Total	25 sites	205 dwellings	20 sites	47 dwellings	45 sites	252 dwellings

Figure 6 - Breakdown of Deliverable sites by previously developed land and greenfield land

5.5. **Additional Sites**

5.5.1. In addition to the sites identified as part of the SHLAA supply, there are two sites which were excluded at Stage A as they did not conform with the adopted Local Plan spatial strategy (they were considered to be new build development in the open countryside), but which could potentially come forward in future if the changes to the spatial strategy proposed in the emerging Local Plan are adopted. These relate to settlements (Kentisbury and Oare/Malmsmead) which are currently not listed in the adopted Local Plan, but are proposed as Rural Communities under the consultation draft Local Plan (see paragraph 2.3.4). Conversions to a residential use in these settlements would be considered in principle under current policy. The two sites comprised one promotion with capacity for 1 dwelling and one site identified through the desktop review with capacity for 2 dwellings. Future updates of the SHLAA will be able to reconsider these sites in the light of any relevant changes to the spatial strategy once the emerging Local Plan is adopted.

5.6. **Breakdown of SHLAA Supply by Parish**

5.6.1. Figure 7 provides a breakdown of SHLAA Supply by Parish. This will enable a comparison to be made of identified local affordable housing need at a given point in time against potential delivery.

³⁷ Exmoor National Park Annual Monitoring Report 2013/14

	Deliverable (promotions)		Deliverable (sites with planning permission)		Developable (suitable but not available)	
	Site Count	Yield	Site Count	Yield	Site Count	Yield
Brendon	0	0	0	0	5	23
Brompton Regis	1	18	1	1	1	6
Carhampton	2	6	0	0	0	0
Challacombe	0	0	0	0	2	8
Combe Martin	0	0	1	1	0	0
Cutcombe	1	3	1	2	11	48
Dulverton	3	97	1	4	1	6
Dunster	1	3	1	1	1	1
Exford	1	6	0	0	5	15
Exmoor	0	0	0	0	4	20
Exton	0	0	1	2	0	0
Luxborough	2	6	0	0	1	3
Lynton & Lynmouth	0	0	7	22	6	42
Martinhoe	0	0	0	0	1	4
North Molton	0	0	1	1	0	0
Parracombe	3	7	0	0	0	0
Porlock	3	30	2	4	2	7
Roadwater	0	0	2	6	0	0
Timberscombe	3	15	0	0	0	0
Winsford	1	5	2	3	5	25
Withypool	2	7	0	0	2	15
Wootton Courtenay	2	2	0	0	2	5
Total	25 sites	205 dwellings	20 sites	47 dwellings	49 sites	228 dwellings

Figure 7 Breakdown of SHLAA supply by Parish

5.7. Conclusion

5.7.1. The SHLAA indicates a current supply of 45 deliverable sites with capacity for 249 dwellings across the National Park. This includes 20 sites with planning permission (not yet completed) for 44 dwellings, and a further 25 promoted sites which could yield 205 dwellings. In addition, it has identified a potential supply of 49 sites with a yield of 228 dwellings which are considered to be developable (i.e. sites that are considered suitable within the National Park context but are not currently available as they have not been formally promoted by landowners), that could come forward to meet local needs affordable housing as and when these needs are identified.

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Appendix 1 - Exmoor National Park SHLAA Stakeholder Panel

A Stakeholder Panel was used to support the preparation of the Exmoor National Park SHLAA. The use of such a Panel is supported through the endorsed Northern Peninsula Methodology and fits with best practice which advocates that stakeholders should be actively engaged throughout the preparation process. A total of 31 invitations were sent to representatives from developers, estate agents, architects, housing providers, the Local Economic Partnership and the local community (see Figure 8). Officers from the other local planning authorities within the Northern Peninsula Housing Market Area were also included on the Panel for information and in an advisory capacity.

Name	Role	Organisation
John Blaney	Director	John Blaney Ltd
Matt Steart	Associate	Woodward Smith Architects
Sue Green	Planning Manager	Home Builders Federation
Steve Briggs	Partner	Smiths Gore
Judith Gannon		Heart of the South West Local Economic Partnership
Clare Guthrie		Natural England
Jon Fellingham	Highways	Somerset County Council
Paul Young	Highways	Devon County Council
Sarah Squire		Environment Agency
Ross Simmonds		English Heritage
Mukhtar Ali	Development Manager	Magna West Somerset
Sam Southam	General Manager	Falcon Rural Housing
Alan Partridge	Development Policy Manager	Devon and Cornwall Housing Association
Graham Mansbridge	Development Manager	North Devon Homes Ltd
Ian Gillespie	Regional Development Manager	English Rural Housing Association
Rob Aspray	Regional Head of Development	Hastoe Group
Angela Gascoigne		SHAL Housing Limited
Sharron Taylor	Project Manager (Development)	Knightstone Housing Association Ltd
Francesca Topazio	Project Manager	Knightstone Housing Association Ltd
Colin Savage	Rural Housing Enabler	Exmoor, North Devon and West Somerset Rural Housing Project
Manager		Chanin and Thomas
Napoleon Wilcox		Webbers
Noel Sexton	Manager	Webbers and Fine & Country
Jonathan Scanlan		Reed Holland Associates Ltd
Richard Holland	Director	Reed Holland Associates Ltd
Mark Thomas		Acorn Developments

Name	Role	Organisation
Chris Winter		Summerfields
Peter Huntley		Exmoor Farmers
Cllr Andrea Davis	Chairman, Exmoor National Park Authority	Exmoor National Park Authority (Devon County Council)
Cllr Richard Edgell	Chairman, Planning Committee	Exmoor National Park Authority (Devon County Council)
Cllr Frances Nicholson		Exmoor National Park Authority (Somerset County Council)
Andrew Austen	Planning Policy Team	North Devon Council
Ian Rowland	Planning Policy Team	Torrige District Council
Martin Wilsher / Toby Clempson	Planning Policy Team	West Somerset Council

Figure 8 - Representatives invited to be on the Exmoor National Park SHLAA Stakeholder Panel

The Terms of Reference and Constitution governing the conduct and make-up of the Stakeholder Panel is prescribed within the Northern Peninsula Methodology. Initially 17 people accepted the invitation to be on the Stakeholder Panel, or nominated alternative representatives, although not all were able to attend Panel meetings or provide comments. Details of the composition of the Panel active during the preparation of this SHLAA Report are available in Figure 9 below.

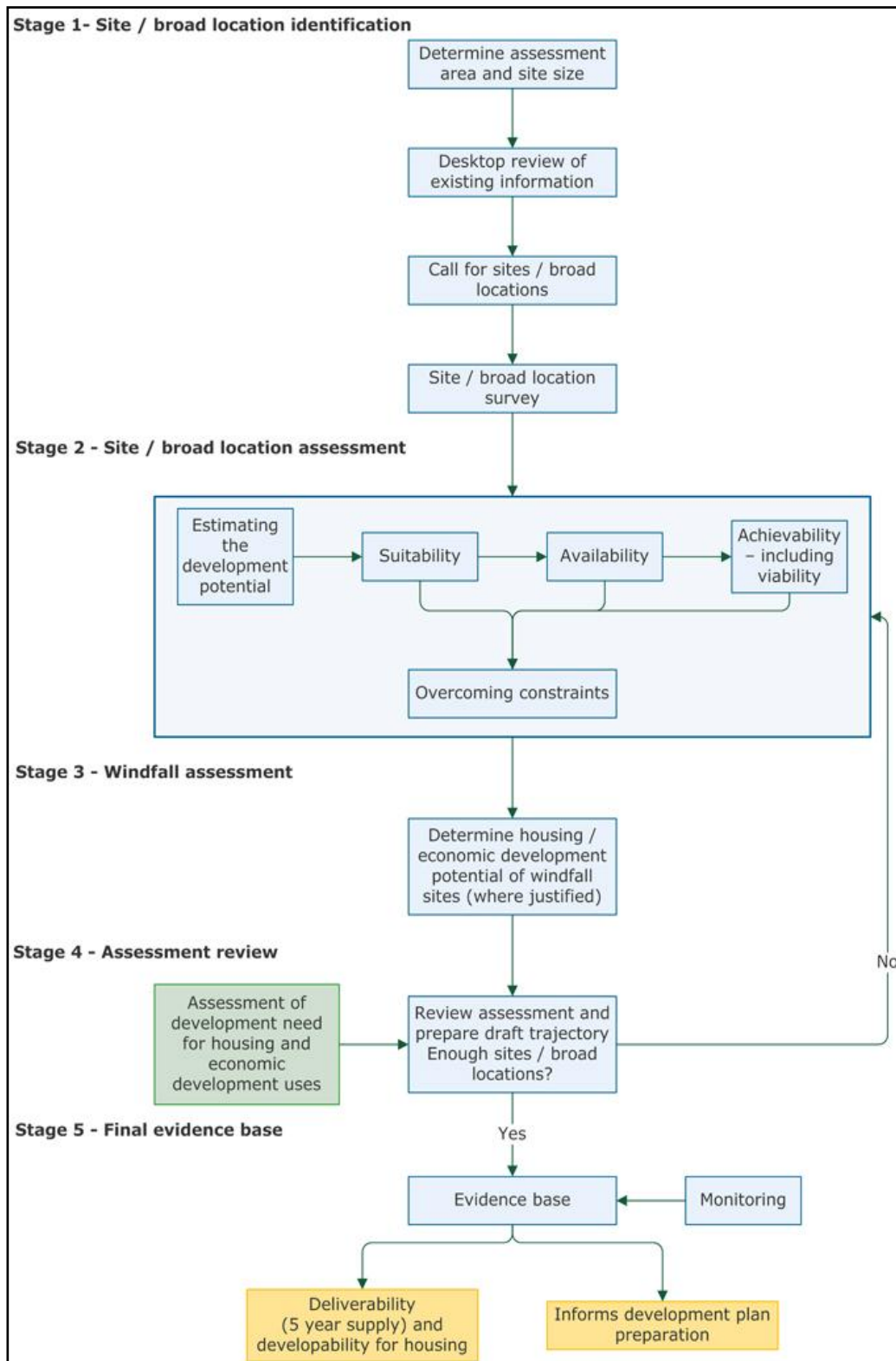
Name	Role	Organisation
Sue Green*	Planning Manager	Home Builders Federation
Steve Briggs*	Partner	Smiths Gore
Judith Gannon*		Heart of the South West Local Economic Partnership
Graham Mansbridge	Development Manager	North Devon Homes Ltd
Colin Savage	Rural Housing Enabler	Exmoor, North Devon and West Somerset Rural Housing Project
Noel Sexton	Manager	Webbers and Fine & Country
Richard Holland	Director	Reed Holland Associates Ltd
Mark Thomas		Acorn Developments
Chris Winter**		Summerfields
Cllr Andrea Davis	Chairman, Exmoor National Park Authority	Exmoor National Park Authority (Devon County Council)
Cllr Richard Edgell	Chairman, Planning Committee	Exmoor National Park Authority (Devon County Council)
Cllr Frances Nicholson		Exmoor National Park Authority (Somerset County Council)
* also on the North Devon/Torrige SHLAA Stakeholder Panel		
** also on the West Somerset SHLAA Stakeholder Panel		

Figure 9 - Active Panel Members

Stakeholder Panel Meeting Schedule

9 th June 2014	Panel briefing session
14 th July 2014	Panel meeting to consider sites
8 th September 2014	Panel meeting to review draft SHLAA Report

Appendix 2 – National Planning Policy Guidance SHLAA Methodology Flow Diagram (2014)



Appendix 3 – SHLAA Site Assessment Proforma

REF: SHA/

SITE DETAILS					
SHLAA Reference		Promotions (SHA/PRO./...)			
Settlement					
Address					
Postcode					
OS Grid Reference		E		N	
Parish		Ward			
Site Area (Gross / ha)					
Source:					
SITE DESCRIPTION					
<i>Brief description of the site, including details of its setting and context:</i>					
FURTHER INFORMATION					
Greenfield / Brownfield					
New build / Conversion					
Current Land Use(s) <i>Including relevant historic uses</i>					
Planning Status None / Proposal / Allocation / Pre-app / Outline / Full					
Pertinent Planning Information <i>References, history, under construction, etc.</i>					
ADMIN					
Assessing Officer					
Site Visit Date (DD/MM/YY)		Photos (Y/N)			
Processed (DD/MM/YY INIT)					
Scanned (DD/MM/YY INIT)					

**STAGE B – SUITABILITY ASSESSMENT (II)
DETAILED SUITABILITY & AVAILABILITY ASSESSMENT**

FURTHER ENVIRONMENTAL CONSIDERATIONS

LOCAL BIODIVERSITY

What is the impact upon any further important site(s) or upon the habitat of any protected flora or fauna (Local Nature Reserves, wildlife corridors, etc)?

LANDSCAPE

What would be the impact of development on landscape character (AONB, AGLV, etc.)?

BUILT ENVIRONMENT

What would be the impact on the historic environment (setting and / or character of a Listed Building, Scheduled Ancient Monument, sites on the Sites and Monument record, Conservation Area, Historic Park and Garden, etc.)?

SITE CONSTRAINTS

SITE FEATURES

Are there any topological constraints on the site? Is there evidence of contamination or instability, underground or overhead services?

TREES AND HEDGEROWS

What would be the impact upon any trees or hedgerows (including those covered by TPOs)?

LAND STATUS

Is the site Greenfield or brownfield? Are there any existing structures? Is it good quality agricultural land?

COMPATABILITY

Would development for residential use be compatible with existing and / or proposed surrounding uses?

RESOURCES

MINERAL RESOURCES

Would development of the site result in sterilisation of mineral resources? Is the site within a designated minerals safeguarding area?

AIR QUALITY

What would be the impact of development on air quality (including impacts on any designated Air Quality Management Areas)?

LIGHT POLLUTION

Is the site likely to generate inappropriate levels of light pollution?

ACCESSIBILITY

ACCESS TO PUBLIC TRANSPORT*

What access does the site offer to public transport (details of distance, services, frequency and destinations)?

ACCESS TO SERVICES AND FACILITIES*

What access does the site offer to services and facilities both locally and accessible at higher order centres?

HIGHWAY ACCESS

Can adequate access be provided from a highway?

PUBLIC RIGHTS OF WAY (PROW) / PEDESTRIAN AND CYCLE LINKS

Are there any Public Rights of Way (PROW) on or adjacent to the site? Is there pedestrian and cycle access to the site or could it be provided?

* please note that for rural communities or local needs affordable housing accessibility issues will not preclude sites from further consideration

DEVELOPMENT CONSIDERATIONS

OPEN SPACE / RECREATIONAL FACILITIES

Would development of the site result in the loss of open space / recreational facilities? Could replacement provision be accommodated?

EMPLOYMENT LAND

Would development of the site result in the loss of existing or future employment land? Could replacement provision be accommodated?

OTHER DEVELOPMENT PLAN DESIGNATIONS

Are there any further development plan designations covering the site that could impact on development?

INFRASTRUCTURE CAPACITY

Is the site adequately served by existing infrastructure? If not, what improvements would be required? (Includes consideration of local and strategic highway network, education, water, drainage and sewerage, health and any other appropriate infrastructure)

OTHER CONSIDERATIONS

Is there anything else that could impact on the suitability of the site to deliver housing development?

SITE AVAILABILITY & DELIVERY

HOUSING CAPACITY

Proposed Land Uses:							
Capacity Estimation Method: Tick (✓) appropriate selection	Existing Information		Density Multiplier		Contextual		Urban Design
Net Developable Area (ha):			Density Assumptions:				
Estimated Dwelling Capacity:							
Capacity Notes: Brief details of the approach used to calculate site capacity							

CONTRIBUTIONS

Based on the estimated level of development, what would be the expected level of contributions?
(Affordable housing, recreational open space, education, highways, etc.)

AVAILABILITY

Availability Status:	Unknown		Unavailable	
	Being Marketed		Developer Option	
	Developer Ownership		Under Construction	

Summary of site availability information including ownership, legal issues, ransom strips, etc.:

Anticipated Availability:
(YYYY)

ACHIEVABILITY

Commentary on achievability - viability, market, cost and delivery factors:

Anticipated Commencement:
(YYYY)

Duration of
Construction:

Comments on potential delivery rates, phasing, etc.:

JUSTIFICATION AND CONCLUSION

The site is considered (tick (✓) the boxes that apply):

Suitable	<input type="checkbox"/>	Available	<input type="checkbox"/>	Achievable	<input type="checkbox"/>
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Include within SHLAA Supply Discount from SHLAA Supply

Provide short summary conclusion and justification about site suitability and availability:

OVERCOMING CONSTRAINTS

If applicable, what opportunities are there to overcome any constraints and enable site delivery?

POTENTIAL YIELD

0-5 Years	5-10 Year	10-15 Years

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