




# Proposed Further Changes to Section 6 CONSULTATION

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](mailto:localplan@exmoor-nationalpark.gov.uk)

 01398 323665

## CONSULTATION - Schedule of Proposed Changes to the Publication Draft Local Plan – DECEMBER 2016

### Section 6 Achieving a Thriving Local Community

#### 1. INTRODUCTION

- 1.1. The following changes are proposed as a result of new evidence commissioned following the release of the 2014-based Subnational Household Projections to 2031 by the Department of Communities and Local Government on the 12th July 2016.<sup>1</sup> The evidence commissioned analysed the implication of these new projections for housing need within the Northern Peninsula Strategic Housing Market Area, which includes the local planning authority areas for Exmoor National Park Authority and North Devon, Torridge and West Somerset Councils.<sup>2</sup>
- 1.2. Due to the findings of this report<sup>3</sup>, the Authority has proposed a series of changes to the supporting text relating to HOUSING NEED (paras 6.26 to 6.31) and ASSESSING THE NEED FOR AFFORDABLE HOUSING IN THE NATIONAL PARK (paras 6.32 to 6.35) within Section 6 of the Local Plan. These changes are proposed to be made to the Publication Draft Local Plan 2011-2031 ([SD1](#)) as submitted for examination on 6th May 2016. The changes proposed to the paragraphs identified in this schedule are therefore intended to supersede the equivalent changes proposed to these paragraphs in the Schedule of Proposed Changes ([SD5](#)) May 2016 and [EX19](#) Main Modifications Proposed by ENPA – as amended.<sup>4</sup>
- 1.3. To denote the changes made; text underlined is the new proposed text whilst text which is ~~struck through~~ indicates where text is proposed to be deleted. Text which is struck through and underlined represents that which was proposed in the Schedule of Proposed Changes ([SD5](#)) May 2016, which has subsequently been superseded based on the review of the 2014-based sub-national household projections.<sup>5</sup>

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<sup>1</sup> <https://www.gov.uk/government/statistics/2014-based-household-projections-in-england-2014-to-2039>

<sup>2</sup> Housing Vision (September 2016) Northern Peninsula: Review of the 2014-based Subnational Household Projections and Implications for Housing Need

<sup>3</sup> Ibid

<sup>4</sup> These documents can be found in the Examination Library at: <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-plan-examination/examination-library>

<sup>5</sup> Housing Vision (September 2016) Northern Peninsula: Review of the 2014-based Subnational Household Projections and Implications for Housing Need

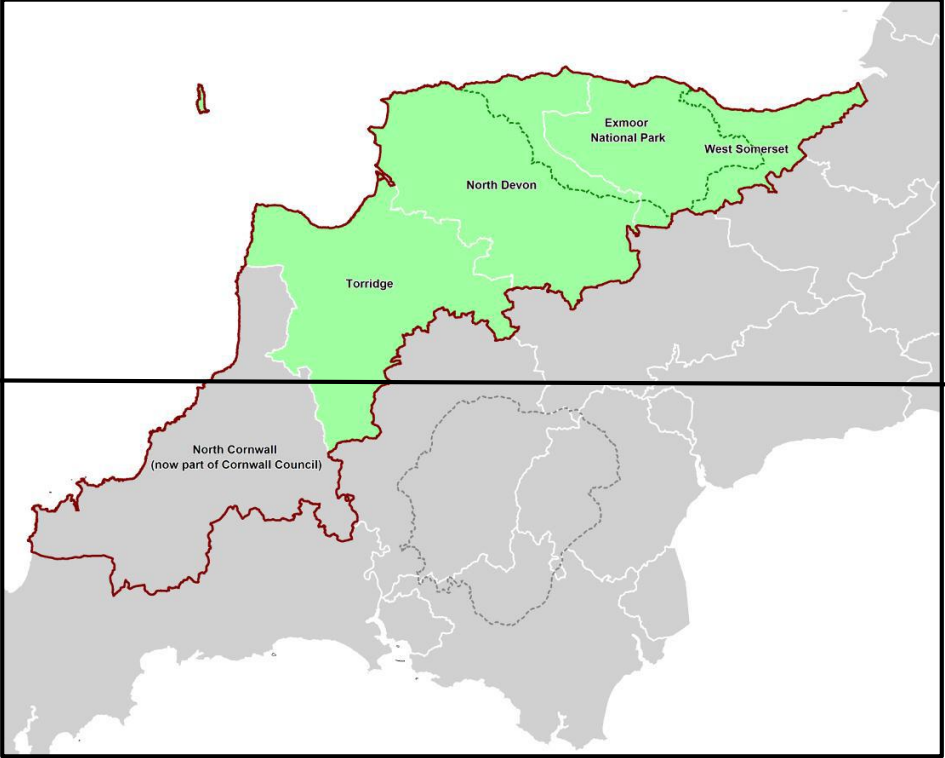
1.4. Any representation made in relation to this consultation should focus solely on these proposed changes and list the reference number which relates to each comment made. The inspector will consider all the representations before making any recommendations on the proposed changes in his report.

REF	PAGE/PARA	PROPOSED CHANGE	REASON
PC1	Page 125 Para. 6.26	<p><del><b>HOUSING NEED</b></del>  <del><b>Objectively Assessed Need</b></del>  <b><u>OBJECTIVELY ASSESSED HOUSING NEED (OAHN)</u></b></p> <p>6.26 In line with national policy, the need (both affordable need and market demand) for housing in the Northern Peninsula Housing Market Area (<u>HMA</u>) has been objectively assessed and updated. The 2008 Northern Peninsula Strategic Housing Market Assessment (<u>SHMA</u>) was prepared in partnership with the other local authorities <del>within in the same HMA housing market area (North Cornwall, Torridge, North Devon West Somerset and Exmoor National Park).</del><sup>286</sup> <del>and updates were subsequently completed To take account of the changes in economic and market conditions since the preparation of the original assessment, separate updates were completed between 2012 and 2014.</del><sup>287</sup> <del>In early 2015, a joint Northern Peninsula Strategic Housing Market Area (SHMA) Update was carried out to provide evidence for Torridge, North Devon, West Somerset and the National Park.</del><sup>288</sup> <del>Together with a Cornwall Council assessment of the requirement and future delivery of housing in the former North Cornwall district, it provides evidence on future population led growth A joint review of the implications of the 2012-2014 household projections was completed in 2015 it provides evidence to underpin planning for the delivery of housing in the Housing Market Area over the plan period.<sup>z</sup></del></p> <p><i>References:</i>  <sup>286</sup> Housing Vision (2008) Strategic Housing Market Assessment for the Northern Peninsula.  <sup>287</sup> <del>Housing Vision (2012) Strategic Housing Market Assessment: North Devon and Torridge Update, Final Report. Housing Vision (2013) Strategic Housing Market Assessment: West Somerset Update,</del></p>	Provides updates to the text, to reduce the length and complexity and to refer to the new evidence commissioned by ENPA, North Devon Council and Torridge District Council.

SCHEDULE OF PROPOSED CHANGES TO THE PUBLICATION DRAFT EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031

REF	PAGE/PARA	PROPOSED CHANGE	REASON
		<p>Final Report. Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report.  <sup>288</sup> Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.  <sup>X</sup> <u>Housing Vision (December 2015) (September 2016) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA): The Implications for Housing Need of the 2012-2014-based Household Projections.: Final Report</u></p>	
PC2	Page 125 Para. 6.27	<p><del>6.27 — The Government has clarified that need alone is not the only factor to be considered. Objectively assessed need should not be met if adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, or where specific policies indicate development should be restricted, such as within a National Park.<sup>289</sup> Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty.<sup>290</sup> The NPPF refers to the National Parks and the Broads Vision and Circular as providing further guidance.<sup>291</sup> National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.<sup>292</sup></del></p> <p><i>References:</i>  <sup>289</sup> DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 &amp; 47. DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: <a href="https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land">https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land</a> () DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, paragraph 54  <sup>290</sup> Ibid. Paragraph 115.  <sup>291</sup> DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online] <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/">http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/</a>; and</p>	Text proposed to be deleted to avoid repetition with other text in Section 6 and to reduce the length and complexity of the Plan.

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REF	PAGE/PARA	PROPOSED CHANGE	REASON
		<p><sup>2002</sup> DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.</p>	
PC3	Page 126 Map 6.1	<p><b>Map 6.1 Exmoor National Park within the Northern Peninsula Housing Market Area</b> <i>(Map courtesy of Torrridge District Council)</i></p> 	Delete Map as included within the Housing Topic Paper 2016. <sup>6</sup>

<sup>6</sup> ENPA (2016) Housing Topic Paper May 2016

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REF	PAGE/PARA	PROPOSED CHANGE	REASON
PC4	Page 126 Para. 6.28	<p>6.28 <del>The Exmoor National Park Housing Topic Paper sets out how the objectively assessed housing need (OAHN) for Exmoor National Park of is 718 541 units 2011-31 has been calculated.<sup>x</sup> The unadjusted housing figure identified by the Joint SHMA Update for Exmoor National Park based on household projections 2011-31 is 537 units.<sup>293</sup></del></p> <p><i>References:</i>  <sup>x</sup> <u>ENPA (2016) Exmoor National Park Local Plan Housing Topic Paper-Housing Vision (September 2016) Northern Peninsula Housing Market Area SHMA: The Implications for Housing Need of the 2014-based Household Projections. Figures derived from Tables 2.3 and 2.4</u>  <sup>293</sup> <u>Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report</u></p>	To refer to the new evidence commissioned by ENPA, North Devon Council and Torrridge District Council regarding the review of the 2014-based subnational household projections and implications for housing need.
PC5	Page 126 Para. 6.29	<p>6.29 <del>The figure for the area of North Devon within the National Park is 205 (when adjusted). This includes both affordable and market housing and does not take into account housing completions since 2011/12.<sup>294</sup> In considering the evidence for the area, and co-operating with North Devon Council, t</del>There is agreement that <u>provision to meet the delivery of the 205 units of housing need identified for the part of North Devon in Exmoor National Park, a proportion of which will be affordable, identified for that part of North Devon in Exmoor National Park will be included</u> in the North Devon and Torrridge Local Plan <u>housing requirement</u> to be met in the North Devon area outside the National Park. North Devon Council has taken the view that the additional housing should be located close to and accessible to the National Park's boundaries and that community aspirations for growth identified by Ilfracombe, South Molton and local centres complement this objective.</p> <p><i>References:</i>  <sup>294</sup> <u>Ibid</u></p>	To rationalise housing evidence in the plan itself and to reduce the length and complexity of the Plan.

SCHEDULE OF PROPOSED CHANGES TO THE PUBLICATION DRAFT EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031

REF	PAGE/PARA	PROPOSED CHANGE	REASON
PC6	Page 126 Para. 6.30	<p><del>6.30</del> Taking into account the backlog of affordable housing, there is projected to be an objectively assessed need (OAN) for 306 affordable units in the area of the National Park in West Somerset over the plan period.<sup>295</sup> <u>The remaining area of the National Park is within the West Somerset housing authority area. In this plan, the focus is on the delivery of affordable housing for which it is projected that there will be a need for <b>336 238</b> units over the plan period.<sup>x</sup></u></p> <p><i>References:</i>  <sup>295</sup> <u>Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park. Final Report, Dulverton: Exmoor National Park Authority.</u>  <sup>x</sup> <u>Housing Vision (December 2015) Northern Peninsula Housing Market Area, Strategic Housing Market Assessment (SHMA): The Implications of the 2012-Based Household Projections, Final Report</u> Housing Vision (September 2016) Northern Peninsula Housing Market Area SHMA: The Implications for Housing Need of the 2014-based Household Projections. Figures derived from Tables 2.3 and 2.4</p>	To refer to the new evidence commissioned by ENPA, North Devon Council and Torridge District Council regarding the review of the 2014-based subnational household projections and implications for housing need within the National Park.
PC7	Page 127 – insertion of new paragraph	<p><b><u>STRATEGIC POLICY HC-S1</u></b>  <u>6.30A National policy is that if adverse impacts would outweigh the benefits when assessed against the policies in the NPPF or where specific policies indicate development should be restricted, such as within a National Park, that objectively assessed housing need should not be met.<sup>x</sup> The National Parks and the Broads Vision and Circular states that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.<sup>xx</sup></u></p> <p><i>References:</i>  <sup>x</sup> <u>DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 &amp; 47. DCLG (2014) Do housing and economic needs override constraints on the use of land, such as Green Belt? [Online] available: Paragraph: 044 Reference ID: 3-044-20141006 Underlining in text has been added.</u></p>	For clarification.



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REF	PAGE/PARA	PROPOSED CHANGE	REASON
		<p><u>DCLG (2014) Do local planning authorities have to meet in full housing needs identified in needs assessments? [Online] available: Paragraph: 045 Reference ID: 3-045-20141006.</u>  <sup>xx</sup> <u>DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online]; and DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115</u></p>	
PC8	Page 127 – insertion of new paragraph	<p><u>6.30B ENPA has taken account of statutory National Park purposes, the local socio-economic duty to National Park communities and constraints which indicate that development should be restricted and that the ability to meet the full need (demand) for housing over the plan period is constrained.</u></p>	For clarification.
PC9	Page 126-7 Para. 6.31	<p>6.31 <del>The estimate of local affordable housing need in the National Park 2011-2031 is 306 units. This does not take into account affordable housing completions since 2011.</del> The approach to housing delivery in this Plan is therefore to <u>provide positively for housing, working with estimates of housing provision through a rural exceptions approach and without a target to deliver locally needed affordable homes housing up to the point at which the National Park would be harmed. <b>The indicative figure of affordable housing units needed in the National Park 2011-2031 for this Local Plan is 336-238 units.</b></u></p> <p><i>{Split to create a new paragraph}</i></p> <p><u>6.31A</u> This approach is appropriate in a remote rural area, given the small size of Exmoor’s settlements, landscape sensitivity and capacity, <u>and SHLAA supply and is consistent with National Park purposes, national policy and guidance, and the duty to local communities, and national policy and guidance.</u></p>	To refer to the new evidence commissioned by ENPA, North Devon Council and Torrridge District Council regarding the review of the 2014-based subnational household projections and implications for housing need – resulting in an updated indicative figure for affordable housing in the National Park.

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REF	PAGE/PARA	PROPOSED CHANGE	REASON
PC10	Page 127 Para. 6.32	<p><b>ASSESSING THE NEED FOR AFFORDABLE HOUSING IN THE NATIONAL PARK</b></p> <p>6.32 Feedback from the community ‘Your Future Exmoor’ events demonstrated widespread support for housing that is affordable to local people.<sup>296</sup> The National Park Authority, through being based on Exmoor, <del>and working at a local level and</del> in partnership with others (including the District Housing Authorities) has a good understanding of the needs of the area and, <del>from 2002,</del> hosted the Rural Housing Project (RHP).</p> <p><i>Reference:</i>  <sup>296</sup> Exmoor National Park Authority (2010) Your Future Exmoor’ Feedback Reports (2010). [online: available: <a href="http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/your-future-exmoor">http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/your-future-exmoor</a></p>	For clarification and to reduce the length and complexity of the Plan.
PC11	Page 127 Para. 6.33	<p>6.33 Housing Authority waiting lists have been replaced with a housing register which may not record local connection or may define it differently from planning policies. Households bid for affordable housing as it becomes available. As with the former waiting lists, there remains an issue with rural households registering on the system.</p> <p><i>{Split to create a new paragraph}</i></p> <p><del>6.33A This was an important reason for the setting up of the RHP. It is therefore important that actual need is assessed. The RHP <del>it carried</del> approach, carrying out rural parish housing need surveys across West Somerset, North Devon, and Exmoor National Park and provided more accurate information on affordable need, and it consistently revealed a local, albeit often small, need, in some cases fewer than three households, for affordable housing in settlements as well as detailed information on size, type and tenure.<sup>297</sup></del></p> <p><i>Reference:</i>  <sup>297</sup> <a href="http://www.exmoor-nationalpark.gov.uk">http://www.exmoor-nationalpark.gov.uk</a> <u>At September 2013 the estimate of affordable need for Exmoor National Park was 90 units.</u></p>	To simplify the wording for clarification and correct a grammatical error.

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REF	PAGE/PARA	PROPOSED CHANGE	REASON
PC12	Page 127 Para. 6.34	<p><del>6.34 Surveys carried out between 2002 and 2008 identified 262 households in affordable need in the parishes within and split by the National Park boundary while a Park wide ‘snapshot’ survey to estimate housing need, identified 127 households with a local connection.<sup>298</sup> A ‘snapshot’ Based on analysis of the needs data and affordable housing completions at September 2013, provided the an estimate of housing need of 90 units for the whole of Exmoor National Park at September 2013 was 90 units.<sup>299</sup> The reduction in the number of households assessed as being in need indicates, despite newly arising households, that the strategy has, through the delivery of 83 local need affordable homes 2005/06 to 2013/14, helped to address need in the National Park.</del></p> <p><i>References:</i>  <sup>298</sup> Rural Housing Project (2008) Exmoor National Park LDF survey of affordable housing need.  <sup>299</sup> Exmoor National Park, West Somerset and North Devon Rural Housing Project: Households in Affordable Housing Need in Exmoor National Park.</p>	To reduce the length and complexity of the Plan. This data is set out in the Housing Topic Paper.
PC13	Page 127 Para. 6.35	<p><del>6.35 This figure of 90 units should be considered as part of the 306 estimate of 336 affordable households identified needed for West Somerset within the National Park.<sup>300</sup> This estimate, within the affordable need figure of 306, is considered helpful in framing the Local Plan housing strategy for the National Park to 2031. However, The affordable need figure of 238 units is considered helpful in framing the Local Plan housing strategy to 2031<sup>x</sup>, however the housing figures set out in this plan should therefore not be used in determining individual planning applications- and Pparish surveys may ultimately show a different figure for the remaining period of the Local Plan.</del></p> <p><i>Reference:</i>  <sup>300</sup> Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report.</p>	To reduce the length and complexity of the Plan. This data is set out in the Housing Topic Paper. The review of the 2014-based subnational household projections and implications for housing need provides an updated indicative figure for affordable housing in the National Park.

SCHEDULE OF PROPOSED CHANGES TO THE PUBLICATION DRAFT EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031

REF	PAGE/PARA	PROPOSED CHANGE	REASON
		<u><sup>x</sup> Housing Vision (September 2016) Northern Peninsula Housing Market Area SHMA: The Implications for Housing Need of the 2014-based Household Projections, Figures derived from Tables 2.3 and 2.4.</u>	