

## Matter 7; Policy SC1

Policy SC1 aims to limit the growth (in number of dwellings) of the *Primary Villages* by 10%. Stogumber Parish Council supports this policy. However, for some reason we cannot understand, the Local Plan takes the number of dwellings in the *Parish* as a proxy for the number of dwellings in the *Primary Villages*. From the 2011 Census, here is the data on dwellings in the Parishes and 'Built-Up-Areas' for the *Primary Villages* covered by this policy, with our addition of the final column:

### Number of dwellings

Date	Geography	Geography code	Parish	Built-Up-Area	Parish as % of Built-up-Area
2011	Bicknoller	E04008826	195	195	100 %
2011	Carhampton	E04008830	467	351	133 %
2011	Stogumber	E04008856	331	198	167 %
2011	Stogursey	E04008857	632	382	165 %
2011	West Quantoxhead	E04008863	184	184	100 %
					665
	<b>Average</b>				<b>133 %</b>
	<b>Omitted</b>				
	Crowcombe	Built-Up Area data suppressed			
	Kilve	Built-Up Area data suppressed			
	Washford	True number of dwellings already given in the WSC Local Plan as it is one of three villages (with Roadwater [ENP] and Old Cleeve) in Old Cleeve parish			

As you can see, using a proxy the number of dwelling in the *Parishes* overstates the number of dwellings in the *Primary Villages* by one-third on average. This is by itself significant, but for Stogumber and Stogursey the overstatement is by two-thirds. This makes a nonsense of the 10% policy. For the villages of Stogumber and Stogursey, the actual limit to growth is thus arbitrarily changed to 16.5%.

We do not understand the necessity for a proxy when for most of the villages concerned, the actual number of dwellings is publically available (see Appendix). Furthermore, for Washford, the draft Local Plan *does* use the actual number of dwellings, because it is one of three villages in Old Cleeve Parish. If it appropriate to use accurate data for Washford, why not for each of the villages covered by this policy?

Even where a proxy is needed, we believe it should be one that is likely to give values as close as possible to the real figures, distributed on either side of the real figures. The proxy chosen for the Local Plan *only* be equal to or larger than the real figure. In other words, given that all parishes have at least some dwellings outside of the main village, the actual maximum amount of growth permitted under the plan can only exceed the maximum 10% figure stated.

We accept that the Office of National Statistics suppresses the number of dwellings in Crowcombe and Kilve because in those villages, there are either fewer than 100 people or fewer than 40 households (see the correspondence in the Appendix). In both of these, the number of dwellings in both these parishes are not suppressed by the ONS: Crowcombe has 230 and Kilve has 185. Knowing these figures, and that the number of dwellings / people in these villages are too small to be disclosed, it seems quite likely that the proxy is also inaccurate for these villages as for the rest, leading to an actual limit of growth exceeding that of the stated policy.

We request, quite simply, that the Local Plan should use the actual number of dwellings in the villages, where these are available.

For the two villages of Crowcombe and Kilve, we suggest that the proxy (number of dwellings in the parishes) should be reduced to 75% to reflect the *average* overstatement of 133% for the villages where the data is available, but obviously those Parish Councils should be consulted.

It may be noted that Stogumber Parish Council is preparing a Neighbourhood Plan for a 10 year period that provides for a level of growth greater than 10%. However, this has been subject to extensive consultation (unlike the Local Plan where the inaccurate proxy number of dwellings did not appear until the final consultation draft) and of course is subject to a referendum of residents. A higher level of growth (for a shorter period) in these circumstances is quite different to an increase in excess of the amount ostensibly stated in the Local Plan policy, caused by use of an inaccurate proxy.