



## Examination of the West Somerset Local Plan 2032

Written statement on behalf of The Crown Estate, Representor ID 18  
(February 2016)

### Matter 2: Strategic Housing Market Assessment and the Objectively Assessed Housing Need

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

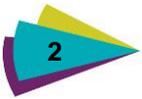
#### The Crown Estate's response

- 1.1.1 The Council's approach is unsound because it fails to meet the requirements of NPPF Paragraph 47, which requires the Full Objectively Assessed Housing Needs (FOAHN) of the HMA to be met. As noted by the Inspector (ED3, paras. 13-17) it remains unclear what the FOAHN is for the HMA as a whole. The latest SHMA (Housing Vision, January 2015) provides no definitive conclusions on the FOAHN and is heavily caveated for the period 2021-2031 (given the absence of up-to-date household projections). The FOAHN is therefore not properly justified.
- 1.1.2 As well as lacking justification, the FOAHN is in conflict with National Planning Practice Guidance (NPPG) given that it does not factor in 'market signals' (including affordability). This is a fundamental weakness given that affordability is one of the most critical issues facing the plan area. Under NPPG (ID 2a-019) an 'upward adjustment' should be considered when deriving FOAHN in areas where affordability is a particular problem. The guidance clearly explains that in areas where a larger improvement on affordability is needed then *"the larger the additional supply responses should be"*.
- 1.1.3 The need for upward adjustments as part of FOAHN figures has been recognised as part of other local plan examinations, where the Inspector has wanted to see how this has been considered (see Cheshire East<sup>1</sup> and Eastleigh<sup>2</sup> for example, with accompanying details enclosed in Appendix A). The need for an upward adjustment, and at what level, therefore needs to be more explicitly considered to derive a robust and justified FOAHN on which to base the new Local Plan.
- 1.1.4 The only way that the plan can be corrected is to provide an up-to-date SHMA which identifies the FOAHN, including consideration of 'market signals' and the need for an upward adjustment in

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<sup>1</sup> Here, the Inspector wanted to see specific consideration of how affordability has led to an uplift in the FOAHN. See Paragraph 47 of the Inspector's Interim Views on the Legal Compliance and Soundness of the Submitted Local Plan Strategy (PS A017b Inspector's Interim Views). Included within Appendix A to this representation.

<sup>2</sup> Here, the Inspector sought an uplift to the FOAHN to reflect affordable housing pressures. See Paragraph 36 of the Inspector's Preliminary Conclusions on Housing Needs and Supply and Economic Growth (Post Hearing Note 2). Included within Appendix A of this representation.



response to affordability. As part of this process, discussions will also need to take place with adjoining authorities to understand how the HMA's needs will be met as part of the Duty-to-Cooperate (see The Crown Estate's response to Matter 1).

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

### The Crown Estate's response

1.1.5 Given the lack of justification regarding the 2900 home requirement (explained in 1.1.1-1.1.4), it is not possible to conclude that this is above the FOAHN.

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## **Appendix A – Relevant Inspector’s Decisions**