

## **Appendix 3: Letter from West Somerset Council to Exmoor National Park Authority**

D. Wyborn,  
Head of Planning and Sustainable  
Development,  
Exmoor National Park Authority,  
Exmoor House,  
Dulverton,

TA22 9HL

Our Ref        DTC/KT/MW/01  
Your Ref  
Contact        Martin Wilsher  
Extension      5334  
Date            25<sup>th</sup> November 2014

## **Duty to Co-operate: Housing Requirement**

Dear Mr. Wyborn,

I write further to discussions between Officers of the National Park and West Somerset Council regarding the Duty to Co-operate, and specifically a request made by the Park for West Somerset to meet some of its objectively assessed housing need. This request has now been followed up in a recent letter to the Planning Policy Manager dated 13 November 2014.

I understand that this request was for West Somerset Council to consider including the open-market housing element of the Somerset part of the Exmoor National Park's housing requirement for its Local Plan as part of its own. After careful consideration of the various issues and potential impact they would have on the West Somerset Local Plan to 2032, it has been concluded that this would not be a beneficial course of action for the Council as Local Planning Authority to take.

The West Somerset Strategic Housing Market Assessment Update report of 2013 produced a housing need figure for the plan period (2012 – 2032) that was very close to the long-term delivery rate in the West Somerset LPA area since the mid 1970's, of around 120 dwellings per annum. The emerging Local Plan to 2032, is seeking to plan for a housing figure that is higher than that suggested in this study.

The justification for this higher figure is partly due to the need to plan for the possible impact on the West Somerset housing market of the proposed Hinkley Point C development. As there has been no comparable type of development in terms of size, scale and, duration in the UK, in the past 20 years, it is difficult to quantify how this will translate into additional demand in the local housing market. Additionally, the planned increase is an attempt to try and address the disparity in the tenure of housing that is projected to be needed over the plan period and maximise the delivery of affordable housing.

The Objectively Assessed Need identified in the emerging West Somerset Local Plan is reliant upon a larger proportion of affordable housing than could reasonably be delivered through Section 106. As a consequence of this, West Somerset has had to approach its neighbours in Taunton Deane and Sedgemoor to see if they would be willing to assist by including a portion of the projected housing need in the form of affordable housing as part of their own future proposals for the provision of housing.

Given that the long-term trend in housing delivery based on previous completions data is virtually flat, the figure being planned for by the emerging Local Plan is challenging but aims to give comfort to an independently appointed planning inspector that the Plan will maximise the delivery of affordable housing but also takes account of Hinkley C.

Having established the justification for the housing requirements underpinning the West Somerset Local Plan as part of the preparation for the Revised Preferred Strategy (Local Development Panel – 11<sup>th</sup> April 2011), it would be inappropriate for the Council to accede to your request to consolidate the Exmoor National Park market housing requirement. Nor do we consider it feasible to increase the strategic housing target for the West Somerset Local Planning Authority area to accommodate this element of the National Park's housing requirement. This would call into question the robustness of the West Somerset Local Plan and, in-light-of the time and effort that this Council has invested over the past five years, threaten the soundness of the Development Plan as it would be questionable if housing targets on this basis could be considered either, justified or, deliverable. Furthermore, to-date, we have not seen the evidence which would justify the need for market housing needs arising in the West Somerset part of the Park needing to be exported.

The Council and its Officers will continue to liaise and participate with its equivalents from the National Park Authority on similar relevant Duty-to-Co-operate matters as required by the legislation. I am informed that there has been a successful resolution of a number of issues to date, and the efforts of the Officers involved from both Authorities in achieving this should be commended.

If you require any further information and details on the matters mentioned above, I would recommend that you contact the Council's two Planning Policy Officers who have been most closely associated with the emerging Local Plan, Toby Clempson and, Martin Wilsher.

Yours sincerely,

Cllr. K. Turner  
Portfolio Holder: Housing, Health & Wellbeing