

**West Somerset Local Plan Examination****Matter 3**

Written Statement by Exmoor National Park Authority

(Representor No. 5)

**MATTER 3: The Plan Strategy and the Delivery of Affordable Housing**

Under Issue 4 of this Matter we will discuss whether the sites that have come forward either in the submitted Plan or as early release sites post-submission are the most appropriate 'fit' with the strategy and justified by the evidence base, principally the Sustainability Appraisal. Representations about the deliverability of any site will be discussed under Matter 5.

**Issue 1: The points raised in my initial letter to the Council (ED3) at paragraphs 18 to 35, including the questions in that final paragraph, have not been fully answered by the Council in its subsequent correspondence (ED4, ED8 and the papers to the Local Development Panel on 25 November 2015. Having regard to those questions is the strategy on which the Plan is based the most appropriate of those considered to deliver the required market and affordable housing?**

**Issue 2: Is it justified by the evidence base?**

**Issue 3: The Housing and Planning Bill will be enacted during the life of the Plan and, perhaps, prior to its adoption. Assuming that the provisions of the Bill and particularly Part 1 remain largely as set out are the policies of the Plan sufficiently flexible to allow the required starter homes and self-build and custom house building to come forward? If not, what changes are required?**

**Issue 4: Having regard to the Sustainability Appraisal (SD11 to SD15) and the November 2015 Addendum and Appendix is the selection of strategic and, especially, early release sites justified by the evidence base and, if not, what should be done by way of correction?**

**1. West Somerset Local Plan Strategy**

- 1.1. Exmoor National Park Authority (ENPA) do not have any comments to make on the strategy adopted by West Somerset Council (WSC) in their Local Plan. The high levels of affordable housing need in the District are similar to the needs in the National Park, and the delivery of affordable housing to meet local needs should therefore be a strong component of the strategy approach.
- 1.2. As set out in ENPA's response to the Publication Draft Local Plan, we welcome the recognition of the National Park's status<sup>1</sup> and protection of its setting. We have proposed some minor changes to the wording of the relevant policies (NH2 Landscape Character Protection, NH10 Securing High Standards of Design) and the relevant settlement policies (MD1 Minehead

<sup>1</sup> The National Park statutory purposes are set out in Appendix 1 of the ENPA written statement for Matter 1

Development, MD2 Key Strategic Development Allocation at Minehead/Alcombe) to strengthen the protection of the National Park's setting.

## 2. Duty to Co-operate Discussions – Role and Function of Settlements

- 2.1. If the Inspector is minded to consider changes to the spatial strategy for the West Somerset Local Plan, including other settlements considered at the options stage, ENPA would like to draw the Inspector's attention to the duty to co-operate discussions that ENPA and WSC held regarding the role and function of settlements. This was a strategic priority identified in the Exmoor-wide Duty to Co-operate [Protocol](#) (paragraph 4.5, page 11), recognising that a number of settlements sit within more than one Local Planning Authority area. This raised some issues of consistency regarding the policy and strategy approach to these settlements in the respective Exmoor National Park and West Somerset Local Plans.
- 2.2. The main settlements where cross-boundary issues between WSC and ENPA apply are (see maps Appendix 1):
- Dunster
  - Carhampton
  - Monksilver
  - Battleton
  - Withycombe
- 2.3. The discussions held between WSC and ENPA regarding these settlements are summarised in the ENPA Publication Draft Local Plan Duty to Co-operate [Statement](#) (Table 2, Strategic Priority (b) Role and Function of Settlements, page 13). Further details are set out below<sup>2</sup>:
- 2.4. **Dunster.** The parish of Dunster is split between the National Park and West Somerset Local Planning Authority areas. The parish has a population of 817, with 585 estimated to be within the settlement of Dunster<sup>3</sup>. The settlement of Dunster is within the National Park but close to the boundary, situated on the A396 near to the junction with the A39. The settlement known as Dunster Marsh is located to the north east of the A39 within the local planning area of West Somerset Council. Dunster has been described as one of the finest examples of a medieval settlement in the country, with notable buildings such as the castle, yarn market, church and priory. This historic interest therefore supports its popularity as tourist destination. Dunster has a number of facilities including the first school and medical practice which serve the local community and surrounding areas. However, its main retail and service functions are mainly reliant on seasonal visitor spend. The

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<sup>2</sup> Settlement information taken from the Exmoor National Park Authority Spatial Strategy Local Plan Topic Paper, 2015

<sup>3</sup> Estimated population based on number of households multiplied by average household number for the parish (does not include allowance for dwellings with no usual residents).

importance of its medieval heritage and resulting low landscape capacity also indicates that there are key constraints for future development. The coastal town of Minehead (outside the National Park) is located 2 miles to the west of Dunster and has a wide range of services and facilities. In terms of accessing convenience and comparison goods, the local population is more likely to travel to Minehead making use of the transport connections between the settlements. Following discussions with West Somerset Council officers, the status of Dunster was changed in the Exmoor National Park Publication Draft Local Plan to be listed as a Village rather than a Local Service Centre, as WSC felt that its elevation to a Local Service Centre may encourage further development in Dunster Marsh which is identified as a secondary village in the WSC Local Plan for small scale development (Policy SC1 Hierarchy of Settlements).

- 2.5. **Carhampton** is mainly located within the West Somerset local planning authority area. A small area of the settlement to the south of Park Lane and bounded by The Court, is within the National Park boundary. The parish has a population of around 865, but there are only around 14 dwellings within the area of the settlement within the National Park. The A39 bisects the settlement and leads to Minehead, 2 miles to the west, and Williton, 5 miles to the east. Carhampton has a number of facilities and services and is well connected to larger centres. The majority of the settlement is within the West Somerset local planning area, consequently it is considered that the opportunities for future housing development to meet local affordable need within the parish and adjoining parishes are more likely to be accommodated outside the National Park. This is supported by the settlement's status as a Primary Village in the West Somerset Local Plan (Publication Draft). As a consequence, the area of Carhampton within the National Park boundary continues to be identified as open countryside in the Exmoor National Park Local Plan (Publication Draft).
- 2.6. **Monksilver** lies on the very eastern edge of Exmoor National Park. The National Park boundary splits both the parish and the village along the B3188. The parish has a population of 113, – the area of Monksilver within the National Park has an estimated population of 73<sup>4</sup>. Monksilver has retained two key services, the village hall (shared with adjoining parishes of Elworthy and Nettlecombe) and the pub. In terms of accessing a wider range of services and facilities, residents are likely to travel to Minehead (10miles) or Williton (3 miles). There is limited landscape capacity within the area of the settlement within the National Park boundary to enable future development to meet the long term community needs for affordable housing taking into account any biodiversity or flood risk constraints. Monksilver is proposed to retain the status of Village in the spatial strategy of the Exmoor National Park Local Plan (Publication Draft). Monksilver is not identified as a settlement

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<sup>4</sup> Estimated population based on number of households multiplied by average household number for the parish (does not include allowance for dwellings with no usual residents).

within the Publication Draft Local Plan for West Somerset; however the approach of providing for affordable housing on rural exception sites in the open countryside (SC4, OC1) where an established long-term need is demonstrated would be consistent with the status of Village in the emerging Exmoor National Park Local Plan.

- 2.7. **Battleton** is on the edge of Dulverton along both sides of the B3222 road which forms the boundary between the National Park and West Somerset local planning areas. The population of Dulverton's parish is 1408 (including the area of that part of the parish including Battleton outside the National Park boundary). Dulverton's facilities serve its local community and several surrounding communities within and outside the National Park boundary. In the Exmoor National Park Local Plan (Publication Draft), it is considered that the local affordable housing needs of the Dulverton parish outside the National Park can be met within Dulverton. This recognises the proximity of Battleton to Dulverton, its topography and other constraints. In the National Park this would be through a rural exceptions approach.
- 2.8. **Withycombe** is located on the north eastern edge of the National Park. The main built area of the settlement is within the local planning authority area of West Somerset Council with only a few residential properties along West Street within the National Park boundary. Withycombe is closely related to Carhampton, which is just over a mile away. Withycombe is not identified as a settlement within the Publication Draft Local Plan for West Somerset but there could be some provision for affordable housing on rural exception sites in the open countryside (Policies SC4, OC1) where an established long-term need is demonstrated. This would be consistent with the policy approach in the emerging Exmoor National Park Local Plan, where Withycombe would be considered as a rural community (para 6.132) and as such could have a limited number of custom or self-build houses to address local affordable housing needs.

### 3. Custom and Self-Build

- 3.1. The Inspector makes reference under Issue 3 to self-build and custom housing. Exmoor and Dartmoor National Park Authorities were part of a 'Right to Build' Vanguard which sought to investigate opportunities for custom and self-build housing to address local housing needs. This included setting up a register and identifying sites. Further information is available on the ENPA [website](#).

#### 4. Additional sites

4.1. The Inspector has asked in Issue 4 about the selection of strategic and early release sites. ENPA made comments on the strategic sites as part of our [response](#) (Representor 5) to the West Somerset Publication Draft Local Plan, and we do not have anything to add to this.

4.2. ENPA notes that the early release sites around Minehead (MIN4/5 and MIN30/41) are close to the National Park boundary. The assessment accompanying these sites (ED18/19) does not reference the proximity to the National Park. A desktop review of the sites was carried out by the ENPA Landscape Officer, who had the following comments to make:

SITE REF	Description and discussion.	Effects on Exmoor National Park Landscape.
MIN 4 & MIN 5	<ul style="list-style-type: none"> <li>• Site immediately abuts the A39 and Exmoor National Park boundary.</li> <li>• The site is currently a caravan park and is screened from views from the A39 by a high evergreen hedge. The magnitude of change from Caravan Park to housing is not as great as agriculture to housing. The site levels falls away from the A39. Site planning and mitigating screen planting would mean that the visual effects could be limited.</li> <li>• Concern that the proposed development is likely to be visible from the A39 and that it will be seen in the same context as the National Park and be seen by potentially large numbers of visitors entering and leaving the National Park.</li> <li>• Concern that proposed development is likely to result in high density at the settlement edge – this is out of character – development at the edge of settlements should peter out – see 2015 inspectors report for housing in Alcombe.</li> </ul>	<p><b>Effects on character - neutral</b></p> <p><b>Effect on visual amenity – neutral as long as screen planting is <u>retained/reinforced</u></b></p>
MIN 30 & MIN41	<ul style="list-style-type: none"> <li>• Land that slopes to the northwest and is open from the highway.</li> <li>• The site is sloping and development is likely to be difficult to screen.</li> <li>• Likely to be visible from North Hill.</li> <li>• Concern that proposed development is likely to result in high density at the settlement edge – this is out of character – development at the edge of settlements should peter out – see 2015 inspectors report for housing in Alcombe.</li> </ul>	<p><b>Effects on landscape character - neutral</b></p> <p><b>Effect on visual amenity – neutral as long as screen planting is retained</b></p>

- 4.3. In conclusion, ENPA would request that if MIN4/5 and MIN30/41 go forward as part of the West Somerset Local Plan, these reflect the need for appropriate treatment (including screen planting) in the context of the proximity to the National Park.
- 4.4. ENPA's comments relating to sites in the same area put forward by other respondents are included under Matter 6.