

Home Builders Federation
Respondent No.
Hearing Session : Matter 2

WEST SOMERSET LOCAL PLAN EXAMINATION

INSPECTOR'S MATTERS AND ISSUES

Matter 2: Strategic Housing Market Areas and the Objectively Assessed Housing Need

- 1. Subject to the caveat set out within it, Framework paragraph 47 requires the objectively assessed needs for market and affordable housing in the housing market area to be met in full. The West Somerset local planning authority area 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 addressing 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 Council has not met the requirements of the NPPF because an OAHN for market and affordable housing in the HMA has not been undertaken. Until an OAHN for the HMA is undertaken it is impossible to determine if housing needs will be met in full.

Since 2013 West Somerset has been included as part of the North Peninsula HMA together with North Devon and Torridge District Councils and Exmoor National Park authority. In 2013 a series of reports were produced for each individual authority respectively. The SHMA West Somerset Up Date Final Report November 2013 (EB2) looked at demographic projections, affordable housing needs, housing tenures, types and mix for West Somerset LPA area only (excluding the National Park area). This report identifies a projected net housing requirement without backlog for West Somerset excluding the National Park of 2,398 for the period 2011 – 2031. The housing requirement number in the submitted Local Plan is based on this figure together with an adjustment of 450 dwellings for the impact of the Hinckley Point development. However these figures are not derived from an OAHN for the HMA.

In 2015 two reports on demographic projections for the whole North Peninsula HMA were published. Firstly the North Peninsula HMA SHMA Up-Date Final Report January 2015 (EB3) and secondly North Peninsula SHMAA Implications of 2012 based household projections Final Report December 2015 (EB21). As above the figures contained within these reports are not an OAHN for the HMA because such demographic projections only represent an appropriate starting point from which the calculation of an OAHN for the HMA can begin.

In conclusion the submitted Local Plan is unsound because it is not based on an OAHN for the HMA so it is unjustified and inconsistent with national policy. Therefore the Examination should be suspended so the North Peninsula HMA authorities working together can undertake an OAHN for the HMA.

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, if not, in what way is it deficient and what are the implications for the OAHN?

This analysis is not robust. As stated above there is no OAHN for the North Peninsula HMA until the OAHN is calculated it is impossible to determine if a housing requirement of 2,900 dwellings in the submitted Plan is above, below or equal to an OAHN.

The North Peninsula SHMAA Implications of 2012 based household projections Final Report December 2015 (EB21) represents an appropriate starting point for an OAHN for the HMA (NPPG ID 2a-015-20140306). It is noted that some sensitivity testing has been undertaken and the conclusions thereon are reasonable. However further sensitivity testing may be necessary on for example household formation rates. The report also correctly converts household growth to dwelling numbers by the application of a vacancy rate and second home allowance.

However the Council's evidence is deficient because the assessment does not progress beyond this demographic starting point. As set out in the NPPG an assessment of economic forecasts (ID 2a-018-20140306) and market signals (ID 2a-019-20140306 & 2a-020-20140306) are also necessary in the calculating an OAHN. Affordable housing need should be separately calculated (ID 2a-022-20140306) and then consideration given to an increase in housing if it helps to deliver affordable houses (ID 2a-029-20140306).

In conclusion the submitted Plan is unsound because it is not based on OAHN for the HMA so it fails all four tests of soundness. The Examination should be suspended until an OAHN for the HMA has been calculated. It is likely that an assessment of economic growth forecasts, market signals and affordable housing needs will increase the OAHN figure above the demographic projections set out in EB21. Until the work on establishing an OAHN for the HMA is concluded the implications are unknown. The OAHN would have to be apportioned between the North Peninsula authorities. This apportionment may or may not result in unmet needs which the authorities would have to work together to resolve so OAHN in the HMA were met in full.

**Susan E Green MRTPI
Planning Manager – Local Plans**