



To: Members of the Local Development Panel
(Councillors K H Turner (Chairman), S Y Goss (Vice Chairman),
D Archer, B Heywood, B Maitland-Walker, J Parbrook, I Aldridge
and T Venner)

Our Ref DS/KK

Your Ref

Contact Krystyna Kowalewska kkowalewska@westsomerset.gov.uk

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Date 17 November 2015

**THE PRESS AND PUBLIC ARE WELCOME TO ATTEND THE MEETING
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OR IN OTHER LANGUAGES ON REQUEST**

Dear Councillor

I hereby give you notice to attend the following meeting:

LOCAL DEVELOPMENT PANEL

Date: Wednesday 25 November 2015

Time: 2.30 pm

Venue: Council Chamber, Council Offices, Williton

Please note that this meeting may be recorded. At the start of the meeting the Chairman will confirm if all or part of the meeting is being recorded.

You should be aware that the Council is a Data Controller under the Data Protection Act. Data collected during the recording will be retained in accordance with the Council's policy.

Therefore unless you advise otherwise, by entering the Council Chamber and speaking during Public Participation you are consenting to being recorded and to the possible use of the sound recording for access via the website or for training purposes. If you have any queries regarding this please contact Committee Services on 01984 635307.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bruce Lang', written over a light blue horizontal line.

BRUCE LANG

Proper Officer

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RISK SCORING MATRIX

Report writers score risks in reports uses the scoring matrix below

Risk Scoring Matrix

Likelihood	5	Almost Certain	Low (5)	Medium (10)	High (15)	Very High (20)	Very High (25)
	4	Likely	Low (4)	Medium (8)	Medium (12)	High (16)	Very High (20)
	3	Possible	Low (3)	Low (6)	Medium (9)	Medium (12)	High (15)
	2	Unlikely	Low (2)	Low (4)	Low (6)	Medium (8)	Medium (10)
	1	Rare	Low (1)	Low (2)	Low (3)	Low (4)	Low (5)
			1	2	3	4	5
			Negligible	Minor	Moderate	Major	Catastrophic
Impact							

Likelihood of risk occurring	Indicator	Description (chance of occurrence)
1. Very Unlikely	May occur in exceptional circumstances	< 10%
2. Slight	Is unlikely to, but could occur at some time	10 – 25%
3. Feasible	Fairly likely to occur at same time	25 – 50%
4. Likely	Likely to occur within the next 1-2 years, or occurs occasionally	50 – 75%
5. Very Likely	Regular occurrence (daily / weekly / monthly)	> 75%

- Mitigating actions for high ('High' or above) scoring risks are to be reflected in Service Plans, managed by the Group Manager and implemented by Service Lead Officers;
- Lower scoring risks will either be accepted with no mitigating actions or included in work plans with appropriate mitigating actions that are managed by Service Lead Officers.

LOCAL DEVELOPMENT PANEL

Meeting to be held on Wednesday 25 November 2015 at 2.30 pm

Council Chamber, Williton

AGENDA

1. Apologies for Absence

2. Minutes

Minutes of the Local Development Panel held on 28 July 2015, to be approved and signed as a correct record – **SEE ATTACHED.**

3. Declarations of Interest

To receive and record any declarations of interest in respect of any matters included on the Agenda for consideration at this Meeting.

4. Public Participation

The Chairman to advise the Committee of any Agenda items on which members of the public have requested to speak and advise those members of the public present of the details of the Council's public participation scheme.

5. West Somerset Authority Monitoring Report (AMR) 2012-2014

To consider the Report No. WSC 164/15, to be presented by Gill Littlewood, Planning Policy Officer – **SEE ATTACHED.**

The purpose of the report is to inform the Panel of the new Authority Monitoring Report (AMR), which provides direct focus on the implementation of development plan policies in the emerging West Somerset Local Plan to 2032.

6. West Somerset Local Plan to 2032 Interim Release of Sites

To consider the Report No. WSC 174/15, to be presented by Anna-Mari Vuori & and Martin Wilsher – **SEE ATTACHED.**

Interim release of sites report - The purpose of this paper is to identify the need for and, scope to, recognise an interim release of sites that would form part of the emerging Local Plan to 2032, including the Sustainability Appraisal of the sites considered.

7. Consideration of Potential Amendments to the West Somerset Local Plan in Response to Matters Raised by the Examination Inspector in Initial Correspondence

To consider the Report No. WSC 175/15, to be presented by Toby Clempson, Principal Planning Officer - Policy – **SEE ATTACHED.**

The purpose of this report is to consider the wording of potential changes to the Plan's policies for forwarding to the examining Inspector in respect of the compliance issues which he has identified.

8. West Somerset Local Plan to 2032 Update on the Implications of Recent Statistical Projections on the Objectively Assessed Housing Need

To consider the Report No. WSC 176/15, to be presented by Martin Wilsher – **SEE ATTACHED.**

The purpose of this report is to inform the Panel of the findings of recently commissioned studies dealing with future population and household projections and their implications for West Somerset and the emerging Local Plan to 2032.

COUNCILLORS ARE REMINDED TO CHECK THEIR POST TRAYS

The Council's Vision:

To enable people to live, work and prosper in West Somerset

The Council's Corporate Priorities:

- Local Democracy:
Securing local democracy and accountability in West Somerset, based in West Somerset, elected by the people of West Somerset and responsible to the people of West Somerset.
- New Nuclear Development at Hinkley Point
Maximising opportunities for West Somerset communities and businesses to benefit from the development whilst protecting local communities and the environment.

The Council's Core Values:

- Integrity
- Respect
- Fairness
- Trust

LOCAL DEVELOPMENT PANEL

**Minutes of the Meeting held on 28 July 2015, The Council Chamber, Williton
at 10.30 am**

Present:

Councillor S Goss (Chairman)
Councillor B Maitland-Walker

Councillor B Heywood
Councillor J Parbrook

Members in Attendance:

Councillor D Archer
Councillor A H Trollope-Bellew
Councillor R Woods

Councillor M O A Dewdney
Councillor T Venner

Officers in Attendance:

Tim Burton, Assistant Director Planning and Environment
Martin Wilsher, Principal Planning Officer (Policy)
Toby Clempson, Principal Planning Officer (Policy)
Nick Bryant, Planning Policy Manager
Andrew Randell, Meeting Administrator

LD1 Apologies for Absence

Apologies for absence were received from Councilor's K Mills and K H Turner.

LD2 Minutes

(Minutes of the Local Development Panel held on 10 June 2015 – circulated with the Agenda).

RESOLVED that the Minutes of the Meeting of the Local Development Panel held on 10 June 2015 be confirmed as a correct record.

LD3 Declarations of Interest

Members present at the meeting declared the following personal interests in their capacity as a Member of a County, Parish or Town Council:

Name	Minute No	Description of Interest	Personal or Prejudicial	Action Taken
Cllr K H Turner	All Items	Brompton Ralph	Personal	Spoke and voted
Cllr C Maitland-Walker	All Items	Carhampton	Personal	Spoke and voted
Cllr J Parbrook	All Items	Minehead	Personal	Spoke and voted
Cllr D Archer	All Items	Minehead	Personal	Spoke
Cllr A Trollope-Bellew	All Items	Crowcombe	Personal	Spoke

LD4 Public Participation

No member of the public had requested to speak.

LD5 West Somerset Strategic Housing Land Availability Assessment Update

(Report No. WSC 116/15, circulated with the Agenda.)

Councillor Trollope-Bellew declared an interest as a landowner on the sites of CRO 1, 2 and 3.

Councillor Venner declared an interest to section 4.7 of the report as a property owner.

The purpose of the report was to set out the results of the Council's Strategic Housing Land Availability Assessment Panel's consideration of sites which had been submitted to the Council as having the potential to form part of the Council's future housing land supply.

The Principal Planning Officer presented the report, informing the housing elements of the Council's Corporate Priorities. In particular, local democracy objective 2 relating to maximising the funding opportunities from Central Government in relation to the provision of new housing and, new Nuclear Development at Hinkley Point Objective 5 relating to the availability of adequate availability of housing supply to meet demand

Various questions and issues were raised by Members, and the following main points were discussed:

- The old hospital at Minehead was discussed. This had been regarded as an employment site previously but had been nominated for residential use but was likely to be considered for mixed use.
- Members requested for the table provided in the report be accessible on the internet.
- Concern was expressed in relation to the settlement limit being breached, if this was done in other applications then it could set a precedent to be breached on other sites.

- Those sites that were nominated would not allow planning conditions to determine their nomination. In addition there was no control over sites submitted and development limits.
- If nominated then sites would have to be considered but planning permission was still for the authority to determine.
- Potential flood risks on some of the sites that were submitted were discussed. Particularly in relation to surface water.
- Members were advised that Flood Risk Assessments would be required at the planning application stages.
- The composition of the panel to determine the sites were made up of a national housebuilder, a regional house builder and 3 registered housing providers who all held an interest in the development of the sites.
- There was a general consensus and agreement with all the verdicts on conclusions that were went through.

Councillor Trollope-Bellew proposed the recommendation of the report which was duly seconded by Councillor Maitland-Walker.

RESOLVED that the panel notes the content and findings of the SHLAA Update report and endorses it as forming part of the evidence-base supporting the local plan to 2032 through its subsequent stages to adoption.

LD6 Submission of the Draft West Somerset Local Plan – Verbal Update

The purpose of the verbal update was to present a verbal update on the formal submission of the Local Plan to the Secretary of State for Communities and Local Government for Examination.

Principal Planning Officer (Policy) Toby Clempson, gave a verbal update on matters relating to the formal submission of the Local Plan to the Secretary of State for Communities and Local Government for Examination, which would take place on the 31st of July. It was clarified that amendments to policies CC2 and CC6 had been incorporated in the Submission Draft Local Plan.

The question of how the matter of the information which had not been forthcoming from utility providers in the Infrastructure Delivery Plan would be addressed was raised. It was indicated that as the plan's proposals became closer to implementation the various works needed to develop the Plan's allocations would become more clearly defined. The importance of involving the Internal Drainage Board in the preparation of the Infrastructure Delivery Plan was also emphasised.

A discussion ensued about the prospects for introducing the Community Infrastructure Levy within West Somerset in view of the changes to the provisions for using S106 agreements to fund infrastructure. Officers acknowledged that in irrespective of whether or not the Council wished to

introduce CIL, there will need to be a thorough review of the Infrastructure Delivery Plan.

The question of whether the Local Plan would now gain more weight in the development management decision making process was also raised. It was indicated that the Local Plan did gain some weight with submission (although it would only gain its full weight on adoption). In respect of policies which had not been subject to a significant weight would be greater in terms of the level of challenge in representations.

Various questions and issues were raised by Members, and the following main points were discussed:

- CC2 and CC6 were now incorporated to include representations from historic England were still to be determined.
- Following questioning relating to the parsonage farm site, it had been decided that further work evidence was required on the site, this was to be completed by the end of the week and made publically available.
- Referring to the Strategic Housing Land availability assessment, it was considered that this would form part of the infrastructure delivery plan, which would be incorporated into the pack of submission documents of framework that would be submitted.
- The costings of infrastructure projects was discussed.
- The policy framework of the New Homes Bonus was not set in favour of small authorities due to new housing being provided were not large developments.
- Concerns were expressed in relation to drainage provision from Wessex water being overloaded and that additional drainage infrastructure would be needed.
- Officers were advised that the ability to 'pool' section 106 monies is greatly limited and as a consequence CIL may represent the best opportunity to maximise financial contributions from new development.
- In order to introduce CIL the council must first ensure it can demonstrate a funding gap between infrastructure required and what could otherwise be secured. Then it must prepare and consult on a set of draft charges which must be financially viable.
- Members commended officers for work undertaken on the draft West Somerset Local Plan.
- Councillors were informed that the Policy Advisory Group to be held on 29th July would discuss section 106 and CIL setting out the pros and cons.

RESOLVED that the update be noted.

The meeting closed at 11.40 am.

Report Number: WSC 164/15

Presented by: Gill Littlewood, Planning Policy Officer

Author of the Report: Gill Littlewood, Planning Policy Officer

Contact Details:

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Report to a Meeting of: Local Development Panel

To be Held on: 25 November 2015

Date Entered on Executive Forward Plan Or Agreement for Urgency Granted: Not Applicable

WEST SOMERSET AUTHORITY MONITORING REPORT (AMR) 2012 - 2014

1. PURPOSE OF REPORT

- 1.1 The purpose of this report is to inform the Panel of the new Authority Monitoring Report (AMR), which provides direct focus on the implementation of development plan policies in the emerging West Somerset Local Plan to 2032.

2. CONTRIBUTION TO CORPORATE PRIORITIES

- 2.1 The regular monitoring undertaken to produce an AMR is vital to inform Officers and Members of 'what is happening now' and 'what may happen in the future'. Indicators are used to measure the progress of the Local Plan policies, particularly when specific targets have been set out in the Plan. Trends can be established to assess whether policies and objectives are delivering sustainable development.

3. RECOMMENDATIONS

- 3.1 Members are requested to note the attached report and endorse it as a basis for monitoring the emerging Local Plan.

4. RISK ASSESSMENT (IF APPLICABLE)

Risk Matrix

Description	Likelihood	Impact	Overall
Risk: Risk of an Authority Monitoring Report not being published annually as required by current national guidance.	Unlikely (2)	Minor (2)	Low (4)

<p>Mitigation: Monitoring is undertaken on a regular basis, to ensure the Authority Monitoring Report is as thorough as possible and published by December of the reporting year.</p>	<p>Rare (1)</p>	<p>Negligible (1)</p>	<p>Low (1)</p>
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The scoring of the risks identified in the above table has been based on the scoring matrix. Each risk has been assessed and scored both before the mitigation measures have been actioned and after they have.

5. **BACKGROUND INFORMATION**

- 5.1 All local planning authorities are required, under Section 113 of the Localism Act 2011, to publish an annual AMR directly to the public in the interests of transparency. Prior to the 2011 Act, local authorities were required to submit an Annual Monitoring Report to the Secretary of State by 31 December every year.
- 5.2 The 2012-2014 Authority Monitoring Report has been produced in line with the emerging West Somerset Local Plan to 2032, to directly review the progress in the implementation of the Plan once adopted. This AMR covers the reporting period from 01 April 2012 to 31 March 2014. It is anticipated that the AMR for the reporting period 01 April 2014 to 31 March 2015 will be complete by December 2015, this will then continue on an annual basis.
- 5.3 If the Indicators set out in the AMR are not being met, regular monitoring provides the opportunity for a quicker response to required changes to policies and plans. Flexibility to update components of the Local Development Framework is key to retaining the Local Plans relevance.
- 5.4 Some of the most crucial indicators are those that measure and monitor the housing situation in the District. The Local Plan requires at least 2,900 additional dwellings to be built over the plan period, which equate to an average of 145 dwellings per annum. As can be seen in the attached AMR, during the first two years of the plan period this target was not reached (67 new dwellings in 2012/13 and 84 in 2013/14), however there was an increase of 17 dwellings. During the period 2014/15, 155 dwellings were completed, which exceeds the target, however some of the completions recorded during this year would have been completed during previous years. Due to a previous lack of staff resources 2015 was the first year that site visits were undertaken to check the progress of new dwelling applications, prior to this Building Control completion lists were the main source of this information. It is estimated that at least 91 of the 155 completions were actually in 2014/15, which indicates a continuing upward trend.
- 5.5 The AMR is not just based on internal monitoring, the Office for National Statistics (ONS), Department of Environment and Climate Change (DECC) and RegenSW provide annual statistics for several indicators, i.e. local labour market profile,

average weekly earnings of residents (Economy indicators), per capita CO₂ emissions and renewable energy completions (Climate Change indicators). The data for the general Indicators are based on the 2011 Census, the next UK Census is scheduled to take place in March 2021.

5.6 The profile calculations for the West Somerset Council Local Planning Area (based on the 2011 Census) show that the District has a population of 26,900, of which 57.2% are over the age of 45 (15,400 people). 98.6% of West Somerset LPA's population are 'white' compared to 95.4% regionally and 85.7% nationally. The District is sparsely populated with a density of 0.5 people per hectare (compared to 3.7 nationally).

5.7 It is important for the Council to understand the demographics of the District as well as the current housing, employment and general economic position to enable effective decision making.

6. FINANCIAL/RESOURCE IMPLICATIONS

6.1 There are no direct financial implications arising from the contents of this report.

7. COMMENTS ON BEHALF OF SECTION 151 OFFICER

7.1 There are no Section 151 issues from the contents of this report.

8. EQUALITY & DIVERSITY IMPLICATIONS

Members need to demonstrate that they have consciously thought about the three aims of the Public Sector Equality Duty as part of the decision making process.

The three aims the authority **must** have due regard for:

- Eliminate discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

8.1 There are no equality and diversity implications from the contents of this report.

9. CRIME AND DISORDER IMPLICATIONS

9.1 There are no Crime and Disorder implications arising from the contents of this report.

10. CONSULTATION IMPLICATIONS

10.1 There are no requirements to consult on the subject matter covered by this report.

11. ASSET MANAGEMENT IMPLICATIONS

11.1 There are no direct asset management implications arising from the contents of this report.

12. ENVIRONMENTAL IMPACT IMPLICATIONS

12.1 There are no direct environmental impact implications arising from the contents of this report.

13. HEALTH & WELLBEING

Demonstrate that the authority has given due regard for:

- People, families and communities take responsibility for their own health and wellbeing;
- Families and communities are thriving and resilient; and
- Somerset people are able to live independently.

13.1 There are no direct Health & Wellbeing issues identified as arising from the contents of this report.

14. LEGAL IMPLICATIONS

14.1 The preparation of an Authority Monitoring Report Local is a statutory duty of the Council.



West Somerset Council
Authority Monitoring Report 2012 – 2014

Contents

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 - Climate Change
 - Natural and Historic Environment
 - Gypsies and Travellers
 - General Indicators
4. Other matters
5. Contact details

Chapter 1. Introduction

- 1.1 Section 35 of the Planning and Compulsory Purchase Act 2004 required that every local planning authority submitted an Annual Monitoring Report to the Secretary of State by the 31st December every year.
- 1.2 Section 113 of the Localism Act 2011 amended section 35 of the 2004 Act. In particular, the requirement to submit the AMR to the Secretary of State was removed, the document renamed an Authority's Monitoring Report and a requirement introduced for local planning authorities to publish this information directly to the public at least yearly, in the interests of transparency. This document covers the reporting period from April 2012 to March 2014, however the AMR for reporting period April 2014 to March 2015 will be produced by December 2015. This will continue on an annual basis.
- 1.3 On 31st March 2011 CLG wrote to Chief Planning Officers withdrawing previous guidance on local plan monitoring and stating "it is therefore a matter for each Council to decide what to include in their monitoring reports."
- 1.4 This document is West Somerset Council's Authority Monitoring Report (AMR), for the local planning authority area outside of the Exmoor National Park (ENP). The format differs from that of previous Annual Monitoring Reports. It follows the requirements set out in regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 whilst providing a more direct focus on the implementation of development plan policies than was the case under previous Annual Monitoring Reports.
- 1.5 Regular monitoring is vital to establish what is happening now and what may happen in the future. Trends can be established to assess whether policies and objectives are delivering sustainable development. These are often expressed as 'Indicators'. If Indicators are not being met, regular monitoring provides the opportunity for a quicker response to required changes to policies and Plans. Flexibility to update components of the Local Development Framework to retain its relevance and assist implementation of policies and the delivery of sustainable development is a key feature of the new planning system within which the AMR rests.

Chapter 2. Local Development Scheme Implementation

- 2.1 The 2004 Act requires that a local planning authority must prepare and maintain a Local Development Scheme (LDS), setting out the timetable for preparation of various Local Development Documents.
- 2.2 The most recent LDS document came in to effect by resolution of Full Council on 21st January 2015. It outlines the timetable for the West Somerset Local Plan to 2032, as shown in Table 3.1 below.

Table 3.1 LDF Progress

	Local Plan to 2032 and Proposals Map	
	Proposed Date	Actual Date
Revised Preferred Strategy Consultation*	July – September 2013	Milestone Hit
Formal Publication	February 2015	Milestone Hit
Examination	July 2015	Submitted 31 July 2015, awaiting examination date.
Inspector’s Report received	December 2015	
Adoption	February 2016	

*The original Preferred Strategy consultation took place between 22 March and 16 May 2012. The Revised Preferred Strategy sought to ensure that the emerging policies were compliant with the NPPF which was published on 27 March 2012, after the consultation period on the Preferred Strategy had commenced.

Chapter 3. Policy Monitoring

Policy Status

- 3.1** Paragraph (2) of Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the local planning authority to identify and provide reasons for not implementing any policy in a local plan.
- 3.2** There are no policies that are not currently being implemented within the District.

Monitoring of Policies

- 3.3** The Council's draft Local Plan preparation process identified the following key issues:
- Housing and Community
 - Settlement hierarchy and development distribution
 - Transport
 - Employment / Business / Tourism
 - Climate Change and
 - Historic and Natural Heritage protection

Another key issue is coordinating policy development with the Exmoor National Park Authority. West Somerset Council is only responsible for spatial and land-use planning within the Local Planning Authority Area (LPA). This excludes those parts of Exmoor National Park (ENP) which fall within the District Council's boundaries.

- 3.4** The following tables set out the main policy areas, their related policies and implementation, measured against associated monitoring indicators and targets.

Sustainable Communities & Settlement Policies

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source	
	Total number of dwellings in West Somerset LPA		2011 SHMA 13,209 Plus annual completions: 2011/12 81 2012/13 67 2013/14 84 <u>13,441</u>	2012/13 +67 2013/14 +84 +151	2011 Baseline from Strategic Housing Market Assessment: West Somerset Update (Nov 2013) plus annual completions.	
SC2	Net additional dwellings in the reporting year	An average of 145 dwellings per annum	2012/13 67 2013/14 84	+17	Internal Monitoring	
Sc2	Net additional dwellings over the plan period	At least 2,900 net dwellings 2012 - 2032	2012/13 67 2013/14 151	+84	Internal Monitoring	
SC2	Net additional dwellings on allocated strategic sites over the plan period	At least 1,450 net dwellings 2012 - 2032	2012/13 0 2013/14 0	0	Internal Monitoring	
			2012/13	2013/14		
SC2	Percentage of dwellings completed on: i) Allocated sites ii) Windfall sites	50% 50%	i) 0% ii) 100%	0% 100%	0 0	Internal Monitoring
SC3	Percentage of new build dwellings completed by bed size	To provide a mix that meets the needs of the community	1 bed 0% 2 beds 50.0% 3 beds 38.1% 4+beds 11.9%	2.6% 39.7% 52.6% 5.1%	+2.6pp -10.3pp -14.5pp -6.8pp	Internal Monitoring
SC3	Percentage of new build dwellings completed by type	To provide a mix that meets the needs of the community	Flat 11.9% House 78.6% Bungalow 9.5% 55+ accom 0%	5.1% 88.5% 6.4% 0%	-6.8pp +9.9pp -3.1pp 0	Internal Monitoring

Policy No	Indicator of achievement	Target	Current Status		Change from previous monitor	Source
	Percentage of residential units built on brownfield sites		2012/13 2013/14	84.2% 19.8%	-64.4pp	Internal Monitoring
SC4	Affordable housing completions	35% of annualised target	2012/13 2013/14	4.3% 38.8%	+35pp	Internal Monitoring
SC4	Affordable housing completions over the plan period	An average of 50 dwellings per annum	2012/13 2013/14	3 36	+33	Internal Monitoring
OC1	Net additional dwellings outside identified settlements in Policy SC1		2012/13 2013/14	13 9	-4	Internal Monitoring
OC1	Percentage of net additional dwellings outside identified settlements in Policy SC1		2012/13 2013/14	18.6% 10.6%	-8pp	Internal Monitoring
	Five Year deliverable supply of housing sites	At least five years' supply for West Somerset Council planning area	5.1 years		N/A	Strategy and Housing Topic Paper (Jan 2015)
	Total number of households		11,962		N/A	West Somerset Strategic Housing Market Assessment (Nov 2013) Profile calculations for WSC LPA based on 2011 Census Review
	Average household size (persons)		2.2		N/A	
	1 person households		33.7%		N/A	
	Couples with no children		20.1%		N/A	
	Families with dependent child(ren)		15.8%		N/A	
	Lone parent with dependent child(ren)		4.3%		N/A	

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source
	Households – all aged 65 and over		34.6%	N/A	
	Owner occupied (inc shared ownership)		67.9%	N/A	
	Rented (LA, HA, RSL)		14.2%	N/A	
	Private rented/rent free		17.8%	N/A	

Economy

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source
	Total number of jobs in West Somerset		2012/13 13,200 2013/14 11,600	-1,600	Nomis Labour Market Profile – Labour supply in employment
	Gross average weekly earnings of full time residents (% of regional average)	To reach South West regional average earnings	2013 West Somerset £429.50 South West £485.10 2014 West Somerset # South West £495.60	N/A +£10.50	Nomis Labour Market Profile – Earnings by residents
	Gross value Added (GVA) per head (% of regional average)	To increase GVA to South West regional average	2012 Somerset £17,664 South West £20,651 2014 Somerset £18,381 South West £21,163	+£717 +£512	ONS Regional GVA data (Dec 2014)

Policy No	Indicator of achievement	Target	Current Status			Change from previous monitor	Source
EC1	Employment land commitments		2012/13	5.20 ha			Employment Land Review Stage 3 Report. April 2010 and Internal Monitoring
			2013/14	5.37 ha		+ 0.17 ha	
EC2	Net additional Class B employment floorspace on Major Employment Sites	To protect the success of existing business areas	2012/13	0 ha			Internal Monitoring
			2013/14	0 ha		0	
EC3	Amount of completed employment land on Greenfield sites	To protect Greenfield sites from unnecessary development	2012/13	0 ha			Internal Monitoring
			2013/14	0 ha		0	
EC5	Amount of Class B employment land lost to other uses over the plan period	To protect existing employment land from redevelopment for non Class B use	2012/13	-0.35 ha			Internal Monitoring
			2013/14	-0.35 ha		0	
EC7	Amount of completed floorspace for training and educational provision	To increase the range and/or skill level of the local workforce	2012/13	0 sq m			Internal Monitoring
			2013/14	385 sq m		+385	
			2012/13	2013/14			
EC8/ EC9	Number of planning applications for tourism generating developments/facilities	To encourage more visitors to the area	Approved	0	0	0	Internal Monitoring
			Refused	0	0	0	
EC8/ EC9	Net additional holiday lets/tourist accommodation		Self-catering Units	2	21	+19	Internal Monitoring
			Hotel beds	0	0	0	
			Caravan Pitches	0	0	0	

Policy No	Indicator of achievement	Target	Current Status			Change from previous monitor	Source
			2012/13	2013/14			
EC11	Number of planning applications for farm diversification proposals	To support the local agricultural economy	Approved	1	1	0	Internal Monitoring
			Refused	0	0	0	
EC12	Amount of completed retail floorspace (A1/A3/A4/A5) within the defined retail areas over the plan period	To protect the existing retail areas and maintain their economic vitality and viability	New	0 sq m	0 sq m	0	Internal Monitoring
			COU	0 sq m	0 sq m	0	
EC12	Amount of completed retail floorspace (A1/A3/A4/A5) outside of the defined retail areas over the plan period		New	0 sq m	0 sq m	0	Internal Monitoring
			COU	-150 sq m	-150 sq m	0	

Sample size too small for reliable estimate

Transport

Policy No	Indicator of achievement	Target	Current Status		Change from previous monitor	Source
			2012/13	2013/14		
TR1/ TR2	New housing located within 400m of a principle bus corridor	To maintain and strengthen the existing public transport network and reduce the reliance on private cars	2012/13	85.7%	+7.9pp	Internal Monitoring
			2013/14	93.6%		
TR1/ TR2	Residential units constructed as car-free developments (new build)		2012/13	0%	0pp	Internal Monitoring
			2013/14	0%		
	Percentage of households with no car		19.4%		N/A	West Somerset Strategic Housing Market Assessment (Nov 2013)

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source
	Commuting - Car/motorcycle		59.9%	N/A	2011 Census* % of work age population in employment
	Commuting - Public Transport		3.1%	N/A	
	Commuting - Cycle		2.8%	N/A	
	Commuting - Foot		20.5%	N/A	
	Commuting - Other		0.9%	N/A	
	Commuting - Less than 2km		24.7%	N/A	2011 Census* Distance travelled to work in km
	Commuting - 2-5km		7.4%	N/A	
	Commuting - 5-20km		22.0%	N/A	
	Commuting - More than 20km		18.1%	N/A	
	Work mainly at or from home		27.9%	N/A	
	Commuting – Average distance		18.9km	N/A	

* District level data

Community Facilities and Public Health

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source
CF1	Recreation and leisure land (D2 class use) completions	To provide sufficient sport, recreational and cultural facilities for the local community	2012/13 0	0	Internal Monitoring
			2013/14 0		
CF1	Recreation and leisure land (D2 class use) completions over the plan period		2012/13 0	0	Internal Monitoring
			2013/14 0		
CF2	Number of major planning applications with a health impact assessment	To ensure new development contribute to improving public health within the area	2012/13 0	0	Internal Monitoring
			2013/14 0		
CF2	Number of major planning applications without a health impact assessment		2012/13 0	0	Internal Monitoring
			2013/14 0		

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source
	Life expectancy at birth	Year on year increase	80.0 years - male 84.4 years - female	N/A N/A	ONS* (2011 – 2013)
	Adult participation in sport and active recreation (equivalent to at least 3 x 30min sessions of moderate activity per week)	Year on year increase	26.6%	N/A	Sport England* (2011 – 2013)

* District level data

Climate Change

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source
CC1	Per capita carbon dioxide emissions	Year on year reduction	7.9t (2012)	-1.2t (-13.2%) (2011)	Dept of Environment and Climate Change* (2012)
2012/13 2013/14					
CC1	Number of applications for renewable energy installations	Year on year increase	Approved 11 7 Refused 1 3	-4 +2	Internal Monitoring
CC1	Approved renewable energy applications by type	Year on year increase	Power kW kW 84 180 Heat 28 33	+96 kW +5 kW	Internal Monitoring
CC1	Completed renewable energy applications by type	Year on year increase	Power kW kW 2,563 3,468 Heat 2,741 4,968	+905 kW (+35.3%) +2,227 kW (+81.2%)	RegenSW South west Renewable Energy Progress Report 2014*

Policy No	Indicator of achievement	Target	Current Status			Change from previous monitor	Source
CC2	Number of planning permissions granted contrary to Environment Agency advice	Zero permissions	2012/13	0		0	Internal Monitoring
			2013/14	0			
			2012/13	2013/14			
CC3	Number of planning applications within the Coastal Change Management Area	To protect new (and existing) development from flood risk arising from increasing sea levels	Approved	0	0	0	Internal Monitoring
			Refused	0	0	0	
CC4	Number of planning applications on greenfield sites within the Coastal Zone	To protect the undeveloped coastal landscape	Approved	0	0	0	Internal Monitoring
			Refused	0	0	0	

* District level data

Natural and Historic Environment

Policy No	Indicator of achievement	Target	Current Status		Change from previous monitor	Source
NH1	Changes in the number of: <ul style="list-style-type: none"> Listed Buildings Scheduled Ancient Monuments Conservation Areas Historic Parks & Gardens Areas of High Archaeological Potential 	No net loss	716		N/A	Somerset County Council – West Somerset Historic Environment Paper* (April 2014)
			81		N/A	
			11		N/A	
			3		N/A	
			7		N/A	

Policy No	Indicator of achievement	Target	Current Status			Change from previous monitor	Source										
			2012/13	2013/14													
NH5	Amount of Grade 1, 2 and 3a agricultural land lost to other uses (on sites of 10ha +)	To protect Grade 1, 2 and 3a agricultural land from development		0	0	0	Internal Monitoring										
NH8	Number of planning applications for new dwellings within the Bat Consultation Zone	To protect the Barbastelle Bat	Approved Refused	0 0	0 0	0 0	Internal Monitoring NB. Full extent of area not identified until Dec 2014.										
NH9	Number of planning applications for wind energy development within the Waterfowl Consultation Zone	To protect migrating bird populations vulnerable to collision with wind turbines	Approved Refused	0 0	0 0	0 0	Internal Monitoring										
	Condition of the following designated Sites of Special Scientific Interest:																
	<ul style="list-style-type: none"> • Blue Anchor to Lilstock Coast • Bridgwater Bay • Briggins Moor • Cleeve Hill • Ge-Mare Farm Fields • Roebuck Meadows • The Quantocks 	% of site in either 'favourable' or 'unfavourable recovering' condition		100%	99.71%	100%	100%	100%	100%	90.57%	N/A	N/A	N/A	N/A	N/A	N/A	Natural England*

* District level data

Gypsies and Travellers

Policy No	Indicator of achievement	Target	Current Status	Change from previous monitor	Source
GT1	Net additional gypsy and traveller pitches over the plan period	At least 10 pitches 2012 - 2032	2012/13 0 2013/14 0	0	Internal Monitoring

General Indicators

Indicator	West Somerset LPA	South West	England & Wales	Source
Population				West Somerset Strategic Housing Market Assessment (Nov 2013) Profile calculations for WSC LPA based on 2011 Census Review
Population size	26,900	5,377,500	56,948,200	
Age Structure				
0-15	3,900	942,000	10,764,400	
16-24	2,600	601,100	6,601,200	
25-44	5,000	1,288,200	15,268,800	
45-64	7,700	1,428,800	14,408,000	
65+	7,700	1,116,400	9,905,800	
Ethnic Composition				
White	98.6%	95.4%	85.7%	
Mixed	0.6%	1.4%	2.2%	
Asian	0.5%	1.5%	7.0%	
Black	0.1%	1.0%	3.4%	
Chinese or other	0.2%	0.7%	1.7%	

Indicator	West Somerset LPA	South West	England & Wales	Source
Population Density				
People per hectare	0.5	2.2	3.7	2011 Census*

* District level data

Chapter 4. Other Matters

Neighbourhood Development Orders (NDO) and Neighbourhood Development Plans (NDP)

- 4.1** Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 require a planning authority's AMR to contain details of any NDO or NDP prepared within its area.

At 1st April 2014 there were no such Orders or Plans within the District. However a NDP is currently being prepared for Stogumber by the Parish Council.

Community Infrastructure Levy (CIL)

- 4.2** If a Community Infrastructure Levy is in place, Regulation 34 (2012) requires a local planning authority to prepare a report for the CIL it has collected for that financial year.

West Somerset Council does not currently have CIL in place.

Contact Details

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Report Number: WSC 175/15

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Report to a Meeting of: Local Development Panel

To be Held on: 25th November 2015

*Date Entered on Executive Forward Plan
Or Agreement for Urgency Granted:*

CONSIDERATION OF POTENTIAL AMENDMENTS TO THE WEST SOMERSET LOCAL PLAN IN RESPONSE TO MATTERS RAISED BY THE EXAMINATION INSPECTOR IN INITIAL CORRESPONDENCE

1. PURPOSE OF REPORT

- 1.1 The Inspector examining the West Somerset Local Plan has indicated in his initial letters to the Council concerning the Examination, as well as questions requesting points of clarification, that the submitted Plan is not compliant with national planning policy in certain respects. Whilst responses have been provided to the Inspector on his questions, there remain a number of issues, the resolution of which is likely to require changes to the Plan's content if the Plan is to be found sound and capable of adoption.
- 1.2 The purpose of this report is to consider the wording of potential changes to the Plan's policies. The proposed amended wording has been prepared by officers in response to some of the issues raised by the Inspector. Subject to approval, these changes will be uploaded on the Council's Examination webpage and be forwarded to the Inspector for his consideration as part of the Examination process.
- 1.3 It is to be emphasised that any such potential changes to the Submission Draft Local Plan forwarded to the Inspector would be subject to public consultation as part of the examination process. Changes to the Plan's policies would only become effective subject to the decision of Full Council to formally adopt the Plan following consideration of the recommendations made by the Inspector as a result of the Examination.

2. CONTRIBUTION TO CORPORATE PRIORITIES

- 2.1 The emerging Local Plan contributes to the Corporate Priority "Local Democracy" in that it seeks to increase the amount of Central Government funding arising from New Homes Bonus through increasing the supply of new housing within the District. The Local Plan will also contribute towards the realisation of the Corporate Priority

“New Nuclear Development at Hinkley Point” by helping to mitigate the impact of the development through the application of the Plan’s policies.

3. **RECOMMENDATION**

That the Local Development Panel recommends that Council RESOLVE to endorse the potential amendments to the submitted West Somerset Local Plan policies set out at Appendix 1 to this report, so that these may be forwarded to be considered by the Inspector through the examination process.

4. **RISK ASSESSMENT**

Risk Matrix

Description	Likelihood	Impact	Overall
Risk: Risk of the Local Plan being found unsound due to failure to meet requirements of examination as prescribed in National Planning Policy Framework and legislation and guided by the examining Inspector. The Inspector has indicated that the submitted Local Plan is not compliant with national planning policy in relation to certain policies, increasing the likelihood of this risk being triggered.	Likely (4)	Major (4)	High (16)
Mitigation: The risk can be mitigated by putting forward appropriate potential changes to the policies identified by the Inspector in his letters as requiring amendment, for consideration through the Examination process.	Unlikely (1)	Moderate (4)	Low (4)

The scoring of the risks identified in the above table has been based on the scoring matrix. Each risk has been assessed and scored both before the mitigation measures have been actioned and after they have.

5. **BACKGROUND INFORMATION**

5.1 The Examination of the West Somerset Local Plan to 2032 commenced with the submission of the Plan to the Secretary of State for formal examination on the 31st July 2015. Following his initial consideration of the submission documents the appointed Inspector wrote to the Council (see letter ED3) setting out a number of matters on which he requested clarification or other specific actions from the Council which would be necessary in order for him to carry out the Examination hearings and report on the soundness of the Local Plan.

5.2 The correspondence from the Inspector has identified a number of matters which, without some amendment to the Plan’s content, would appear to prevent it from being found sound on examination. This report addresses a number of Local Plan

policies which the Inspector has identified as being non-compliant with the National Planning Policy Framework, the Inspector has requested that the Council put forward to him potential amendments which would make the policies Framework compliant. It should be noted that the report only considers policies for which potential amendments are being recommended. The Inspector has requested that any potential policy amendments should be made available in time for them to inform the preparation of statements for the Examination Hearings.

5.3 Policies considered to be not in compliance with national planning policy by the Inspector and additional policies required:

- **Wind energy issues - Policies EN2 and CC1** – The Ministerial Statement regarding wind energy and Local Plans issued on 18th June 2015 has rendered policies EN2 and CC1 ineffective in terms of wind power development because of the terms in which the policies are expressed. The National Planning Guidance and the Ministerial Statement require that any areas considered suitable for wind power should be identified on the proposals map in Local Plans, proposals for such development within these areas are subject to further specific conditions relating to the consultation of affected communities. Removal of the application of these two policies pending either an early review of the local plan or the preparation of a development management policies document will help to ensure that the Plan is not in conflict with the Framework. Any proposals for wind energy would be considered against the national planning policies pending the development of specific local policies. See recommended amended wording for the policies set out at **Appendix 1**.
- **Heritage asset issues - Policies EN2, MD1, MD2, WA1, WA2, WI1, LT1, CC1, NH1 and NH4:** The basis of the outstanding matters raised by Historic England is that a number of the Local Plan's policies assume that some level of harm to heritage assets is acceptable. This position is stated to be in conflict with Framework paragraphs 128 to 141. Discussions have taken place with Historic England concerning these matters and as a result, a number of recommended potential policy amendments and Key Strategic Site Allocation area changes are set out at **Appendix 1** (including a revised Key Strategic Site Allocation Plan for Williton), in order to address these concerns. The potential changes set out include an extension of the Key Strategic Site area west of Williton to protectively include, and facilitate the management of, the area of archaeology at Battlegore, and the deletion of the Key Strategic Site to the north of Danesfield School, Williton. This will secure the long term protection of this important Heritage Asset and its setting. At the request of Historic England a Heritage Asset Impact Study has been undertaken in respect of the listed buildings at Parsonage Farm. The conclusions of this report can be applied through the proposed amendment to policy WA2 in order to ensure that the heritage asset and its setting is appropriately protected through the masterplanning process.
- **Gypsies and Travellers - Policy GT1:** The Inspector has drawn attention to the lack of compliance of the policy GT1 Gypsies and Travellers with the national policy. The Plan does not provide for the need identified through the Gypsy and Traveller Accommodation Update completed in 2013 either through specific allocations or a criteria-based policy against which applications could be assessed. New guidance published by the

Government in August 2015 requires that Local Planning Authorities should, in producing their Local Plan:

- *Identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets.*
- *identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15*
- *consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)*
- *relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density*
- *Protect local amenity and environment.*

The 2013 GTAA Update identified a need for an additional provision of 10 permanent Gypsy / Traveller site pitches for the West Somerset Local Planning Authority area during the period to 2032. The new Government guidance requires that the Council should set out criteria to guide land supply allocations where there is an identified need. Such a policy should be:

“...fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interests of the settled community.”

The Inspector raises this matter as a potential Duty to Co-operate issue, however it is suggested that the Duty has been satisfied in the act of jointly preparing the evidence base for Gypsies and Travellers, and the Council's participation in the previous and current reviews of potential gypsy and traveller sites. It is also the case that none of the Somerset LPAs are currently meeting their requirement and seem unlikely to be able to meet part or all of the West Somerset LPA's requirement in addition.

Whilst it is a requirement of the Local Planning Authority under the national Planning for Traveller Sites to allocate a 5 year supply of land, the evidence available suggests that there is little actual demand for pitches in the West Somerset LPA area at present.

The Council has however sought to identify sites for allocation through joint working with the other Somerset district councils and agencies. Following the completion of the 2010 GTAA, a Countywide multi-agency monitoring and implementation group was set up including the District Councils, County Council, Police, Fire & Rescue, NHS, The Children's Society, Citizens Advice and representatives from the Gypsy and Traveller community. Unfortunately the group was ultimately unable to bring about the allocation of sites and the initiative ceased in 2013.

Since then, the Countywide Gypsy and Traveller Working Group has been tasked with the identification of sites for residential and transit accommodation, it comprises officers from each Somerset local authority, the County Council and Homes and Communities Agency. Options for provision

on public land holdings are being considered as well as the scope for joint provision across local authority boundaries. Whilst the Working Group has yet to report its findings and recommendations, to-date the project has established search criteria and an assessment pro-forma. It is now in the process of reviewing public land holdings and undertaking a desktop assessment of any potentially suitable sites. A replacement criteria based Gypsy and Traveller policy GT1 is included at **Appendix 1**.

- **Community facilities issue - Policy CF1** – seeks only the replacement of lost recreational facilities in paragraph 2, placing it in conflict with Framework paragraph 70, second bullet. A proposed additional bullet for the policy is set out at **Appendix 1** in order to address this issue.
- **Area of Outstanding Natural Beauty – New policy NH11** - The Inspector considers that in order to be compliant with the Framework, the Plan should include a policy setting out how the Area of Outstanding Natural Beauty would be protected in the exercising of the Council's planning duties. A suggested AONB policy is set out at **Appendix 1**.
- **Best and Most Valuable Agricultural Land – Policy NH5** - The Inspector considers that in its submitted form, policy NH5 applies a different approach to that set out in Framework paragraph 112. In particular there is no evidence supporting the use of a 10 hectare threshold in the submitted policy which he considers would make the application of the policy ineffective as well as non-compliant with national policy. A suggested revised policy taking account of the Inspector's comments is set out at **Appendix 1**
- **Settlement Hierarchy – Policy SC1 and its relationship with Policy OC1 - Open Countryside Development** - The Inspector has drawn attention to the fact that Policy SC1 section 4 and policy OC1 both address proposals for development in the open countryside but are worded differently and indicates that this issue needs to be resolved by the Council. Whilst there was no intention to create two different approaches concerning this matter in these two policies, it is accepted that the two different wordings could give rise to a lack of clarity. It is therefore suggested that clause 4 of Policy SC1 should be deleted in favour of Policy OC1, with a reference to the latter policy being added at the end of Policy SC1. An appropriately re-worded Policy SC1 is included at **Appendix 1**.
- **Settlement Hierarchy – Policy SC1 and its relationship with Policy SV1 - Development at Primary and Secondary Villages** – The Inspector has also queried the distinction between policy SC1 in relation to Primary and Secondary Villages and its relationship to Policy SV1. SC1 clauses 2 and 3 set out the appropriateness in principle of development at these settlements, whereas Policy SV1's main purpose is to manage the local impact of development at the Primary and Secondary Villages through the use of appropriate design in response to the character of the settlement and its contribution to the local provision of facilities. The explanatory text could be amended to make this distinction clearer.
- **Policy EC1** – The Inspector has indicated that the policy's second paragraph needs to be re-worded in order to make its meaning clearer in the interests of applying the policy. An appropriately revised version of Policy EC1 is included at **Appendix 1**.

- **Flood Risk Management - Policy CC2** - needs to be more clearly expressed because as currently drafted both parts of the policy address the same matters. The first part of the policy is essentially about location and the second is about design. A suggested re-wording of the policy is set out at **Appendix 1**.

6. THE NEXT STEPS

- 6.1 Subject to their approval for recommendation to Council by the Panel, and endorsement by Full Council, the provisional amendments to the Local Plan set out in this report will be used in preparing the Council's submissions for the Examination hearings in the new year.

7. FINANCIAL/RESOURCE IMPLICATIONS

- 7.1 The cost of carrying out the statutory Local Plan Examination including the cost of the Inspector, accommodation for the Examination Hearings, printing, postage and officer time will be met from within the existing approved departmental budgets. The anticipated costs of Examination and public consultation on any modifications recommended by the Inspector remain within the approved sum.

8. COMMENTS ON BEHALF OF SECTION 151 OFFICER

- 8.1 The matters addressed in this report play an essential part in seeking to progress the Local Plan through the examination process towards a "sound" finding by the examining Inspector.

9. EQUALITY & DIVERSITY IMPLICATIONS

- 9.1 The submitted Local Plan has been subject to an Equalities Impact Assessment (EqIA).

10. CRIME AND DISORDER IMPLICATIONS

- 10.1 Policy NH10 of the Local Plan to 2032 aims to ensure that the public realm is attractive, safe, accessible and well connected to its surroundings. The justification of the policy also refers to designing out crime approaches although it is considered that further more detailed consideration of this matter may be required as part of any Design SPD to be prepared at a subsequent date as well as through the development management process.

11. CONSULTATION IMPLICATIONS

- 11.1 Should the potential Local Plan amendments set out in this report be recommended for inclusion as part of the Local Plan to 2032 by the Local Plan Inspector, they will form part of the formal public consultation associated with those recommended modifications to the plan document.

12. ASSET MANAGEMENT IMPLICATIONS

- 12.1 None identified.

13. ENVIRONMENTAL IMPACT IMPLICATIONS

- 13.1 Under the Strategic Environmental Appraisal Directive (2004) the Council is obliged to consider the effects of certain plans and programmes on the environment. The Sustainability Appraisal which has been prepared to underpin the Plan and accompany it sets out all likely significant effects on the environment as well as economic and social factors and mitigation measures. The Council will need to consider which of any potential changes being provided for the Examination should be subject to Sustainability Appraisal
- 13.2 West Somerset Council is the 'competent authority' under the Conservation of Habitats and Species Regulations 2010, in fulfilment of which a Habitat Regulations Assessment of the Publication Draft Local Plan has been prepared by the Somerset County Council ecologist.

14. HEALTH & WELLBEING

- 14.1 Policy CF2 of the Local Plan to 2032 aims to address the causes of ill health and maximise the benefits which spatial planning can provide in shaping healthy communities. The policy seeks to ensure development proposals should be designed to maximise the attractiveness of walking and cycling and encourages provision for disability access.

15. LEGAL IMPLICATIONS

- 15.1 The preparation of a Local Plan is a statutory duty of the Council.

APPENDIX 1

	POTENTIAL AMENDMENTS TO POLICIES AND NEW POLICIES IN RESPONSE TO THE INSPECTOR'S COMMENTS.
Policy EN2:	MITIGATION OF IMPACT OF MAJOR NON WIND ENERGY GENERATING PROPOSALS
Arising from discussions with Historic England and the Inspector's comments.	<p>MAJOR ENERGY GENERATING DEVELOPMENT PROPOSALS (OTHER THAN THOSE FOR WIND TURBINES) WILL BE SUPPORTED WHERE:</p> <ul style="list-style-type: none"> • THEY RESPECT THE LOCAL NATURAL ENVIRONMENT IN WHICH THEY ARE LOCATED; • THE IMPACTS ON THE HISTORIC ENVIRONMENT, THE SIGNIFICANCE OF HERITAGE ASSETS AND THEIR SETTING ARE JUSTIFIABLE AND CAN BE MITIGATED; • THEY RESPECT THE POSITIVE ECONOMIC AND SOCIAL CHARACTERISTICS OF COMMUNITIES AFFECTED ESPECIALLY THOSE NEIGHBOURING THEM; AND, • ADEQUATE MEASURES ARE TAKEN TO MITIGATE THE CULTURAL, ECONOMIC, ENVIRONMENTAL AND SOCIAL IMPACT OF ANY RELATED DEVELOPMENT ON THE COMMUNITIES AFFECTED, BOTH IN THE SHORT AND THE LONGER TERM.
Policy SC1	HIERARCHY OF SETTLEMENTS
Arising from the Inspector's comments.	<ol style="list-style-type: none"> 1. NEW DEVELOPMENT WILL BE CONCENTRATED IN THE DISTRICT'S MAIN CENTRE, MINEHEAD / ALCOMBE, AND IN THE RURAL SERVICE CENTRES OF WATCHET AND WILLITON, THIS WILL BE ON A SCALE GENERALLY PROPORTIONATE TO THEIR RESPECTIVE ROLES AND FUNCTIONS TO THEIR OWN COMMUNITIES AND THOSE IN SURROUNDING SETTLEMENTS THAT RELY ON THEIR LARGER NEIGHBOURS FOR ESSENTIAL SERVICES AND FACILITIES. 2. LIMITED DEVELOPMENT IN THE PRIMARY VILLAGES: BICKNOLLER, CARHAMPTON, CROWCOMBE, KILVE, STOGUMBER, STOGURSEY, WEST QUANTOXHEAD AND WASHFORD, WILL BE PERMITTED WHERE IT CAN BE DEMONSTRATED THAT IT WILL CONTRIBUTE TO WIDER SUSTAINABILITY BENEFITS FOR THE AREA. 3. AT THE SECONDARY VILLAGES: HOLFORD, DUNSTER MARSH, BROMPTON RALPH, BATTLETON AND, BRUSHFORD, SMALL SCALE DEVELOPMENT WILL BE PERMITTED WHERE IT CAN BE DEMONSTRATED THAT IT WILL CONTRIBUTE TO WIDER SUSTAINABILITY BENEFITS FOR THE AREA. 4. DEVELOPMENT IN THE OPEN COUNTRYSIDE WILL BE LIMITED TO THAT FOR WHICH THERE IS AN ESTABLISHED LONG TERM NEED AND FOR WHICH SUCH A LOCATION IS ESSENTIAL, INCLUDING AGRICULTURE, FORESTRY, HORTICULTURE, EQUINE AND, HUNTING. DEVELOPMENT IN SUCH LOCATIONS WILL ALSO NEED

	<p>TO DEMONSTRATE GOOD PROXIMITY AND EASY ACCESSIBILITY TO THE EXISTING HIGHWAY NETWORK, OR ALTERNATIVE TRANSPORT MODES, AND SETTLEMENTS PROVIDING ESSENTIAL SERVICES AND FACILITIES.</p> <p>4 5. DEVELOPMENT WITHIN OR IN CLOSE PROXIMITY (WITHIN 50 METRES) TO THE CONTIGUOUS BUILT-UP AREA OF MINEHEAD/ALCOMBE, WATCHET, WILLITON AND PRIMARY AND SECONDARY VILLAGES WILL ONLY BE CONSIDERED WHERE IT CAN BE DEMONSTRATED THAT:</p> <p>A. IT IS WELL RELATED TO EXISTING ESSENTIAL SERVICES AND SOCIAL FACILITIES WITHIN THE SETTLEMENT, AND;</p> <p>B. THERE IS SAFE AND EASY PEDESTRIAN ACCESS TO THE ESSENTIAL SERVICES AND SOCIAL FACILITIES WITHIN THE SETTLEMENT, AND;</p> <p>C. IT RESPECTS THE HISTORIC ENVIRONMENT AND COMPLEMENTS THE CHARACTER OF THE EXISTING SETTLEMENT, AND;</p> <p>D. IT DOES NOT GENERATE SIGNIFICANT ADDITIONAL TRAFFIC MOVEMENTS OVER MINOR ROADS TO AND FROM THE NATIONAL PRIMARY AND COUNTY HIGHWAY ROUTE NETWORK</p> <p>E. IT DOES NOT HARM THE AMENITY OF THE AREA OR THE ADJOINING LAND USES.</p> <p>DEVELOPMENT ELSEWHERE IN THE OPEN COUNTRYSIDE WILL BE CONSIDERED UNDER POLICY OC1.</p>
POLICY MD1:	MINEHEAD DEVELOPMENT
Arising from discussions with Historic England	<p>DEVELOPMENT PROPOSALS AT MINEHEAD/ALCOMBE, MUST:</p> <ul style="list-style-type: none"> • SUPPORT AND STRENGTHEN THE SETTLEMENT'S ROLE AS THE MAIN SERVICE AND EMPLOYMENT CENTRE IN WEST SOMERSET, PARTICULARLY IN TERMS OF THE DIVERSITY AND QUALITY OF ITS HISTORIC AND NATURAL ENVIRONMENT, SERVICES AND FACILITIES, AND; • PRESERVE AND ENHANCE TO MINIMISE THE IMPACT ON THE HISTORIC ENVIRONMENT OF THE URBAN AREA; • MAINTAIN AND ENHANCE ITS ATTRACTIVENESS AS A TOURIST DESTINATION, AND; <p>WHERE APPROPRIATE DEVELOPMENT PROPOSALS MUST ALSO:</p> <ul style="list-style-type: none"> • CONTRIBUTE TOWARDS RESOLVING THE FLOOD RISK ISSUES WHICH AFFECT THE SETTLEMENT INCLUDING IMPROVING THE SEA DEFENCES PROTECTING THE EASTERN END OF THE TOWN, • GIVE APPROPRIATE TREATMENT TO THE TOWN'S SURROUNDINGS IN THE CONTEXT OF NATIONAL DESIGNATIONS INCLUDING THE EXMOOR NATIONAL PARK.
POLICY MD2:	KEY STRATEGIC DEVELOPMENT ALLOCATION AT MINEHEAD/ALCOMBE
Arising	WITHIN THE AREA IDENTIFIED ON THE PROPOSALS MAP SOUTH

<p>from discussions with Historic England</p>	<p>OF THE A39, HOPCOTT ROAD, MINEHEAD/ALCOMBE A MIXED DEVELOPMENT WILL BE DELIVERED SUBJECT TO AN INDICATIVE MASTERPLAN INCORPORATING:</p> <ul style="list-style-type: none"> • APPROXIMATELY 750 DWELLINGS, • A DISTRIBUTOR ROAD THROUGH THE SITE LINKING THE DEVELOPMENT TO THE A39 AT TWO POINTS, ONE CLOSE TO EACH END OF THE SITE, • PROVIDE SPACE FOR THE FUTURE LINKAGE OF THE DISTRIBUTOR ROAD TO THE LT1 SITE TO THE WEST, AND; • A MINIMUM OF 3 HECTARES OF APPROPRIATE AND COMPATIBLE, NON-RESIDENTIAL USES, • MEASURES TO PREVENT HARM TO THE SIGNIFICANCE OF HISTORIC ASSETS OF THE LATE 19TH / EARLY 20TH CENTURY VILLAS ON HOPCOTT / PERITON ROAD; LOWER HOPCOTT; PERITON & PERITON COTTAGES; GRADE II LISTED BUILDINGS AND HIGHER HOPCOTT FARM, AND; • WHICH PROVIDES AN APPROPRIATE DESIGN RESPONSE TO THE SITE'S PROXIMITY TO THE EXMOOR NATIONAL PARK <p>THE DEVELOPMENT MUST BE FACILITATED BY THE APPROPRIATE INTEGRATED PROVISION OF TRANSPORT, COMMUNITY AND FLOOD RISK MANAGEMENT INFRASTRUCTURE.</p>
<p>POLICY WA1:</p>	<p>WATCHET DEVELOPMENT</p>
<p>Arising from discussions with Historic England</p>	<p>DEVELOPMENT PROPOSALS AT WATCHET, MUST:</p> <ul style="list-style-type: none"> • SUPPORT AND STRENGTHEN THE SETTLEMENT'S ROLE AS A LOCAL SERVICE AND EMPLOYMENT CENTRE FOR THE NORTH EASTERN PART OF WEST SOMERSET DISTRICT, PARTICULARLY IN TERMS OF THE RANGE AND QUALITY OF ITS SERVICES AND FACILITIES, AND • MAINTAIN AND ENHANCE THE ATTRACTIVENESS OF THE HISTORIC CHARACTER AND HERITAGE ASSETS AS A TOURIST DESTINATION, INCLUDING THE OPERATION OF THE MARINA. ITS ATTRACTIVENESS AS A TOURIST DESTINATION AND THE OPERATION OF ITS MARINA. <p>WHERE APPROPRIATE, DEVELOPMENT PROPOSALS MUST ALSO:</p> <ul style="list-style-type: none"> • CONTRIBUTE TOWARDS RESOLVING THE FLOOD RISK ISSUES WHICH AFFECT THE SETTLEMENT, • ALLOW FOR POTENTIAL REALIGNMENT OF THE WEST SOMERSET RAILWAY WHICH MAY BE NECESSITATED BY COASTAL EROSION, • IMPROVE LINKAGES BETWEEN THE TOWN CENTRE AND THE PARTS OF THE TOWN TO THE SOUTH OF THE RAILWAY, • PROVIDE ADDITIONAL ALLOTMENTS FOR THE TOWN, AND; • COMPLEMENT THE PROVISION OF EMPLOYMENT OPPORTUNITIES, SERVICES AND FACILITIES IN NEIGHBOURING WILLITON.

POLICY WA2:	STRATEGIC DEVELOPMENT ALLOCATION AT PARSONAGE FARM, WATCHET
Arising from discussions with Historic England	<p>WITHIN THE AREA IDENTIFIED ON THE PROPOSALS MAP AT PARSONAGE FARM, WATCHET, A MIXED DEVELOPMENT WILL BE DELIVERED INCLUDING, SUBJECT TO AN INDICATIVE MASTERPLAN INCORPORATING:</p> <ul style="list-style-type: none"> • APPROXIMATELY 290 DWELLINGS, • APPROXIMATELY 3 HECTARES OF APPROPRIATE AND COMPATIBLE, NON-RESIDENTIAL USES AT THE FARM BUILDING COMPLEX, AND; • MEASURES TO PREVENT HARM TO THE SIGNIFICANCE OF HISTORIC ASSETS AT PARSONAGE FARM, GRADE II LISTED BUILDINGS AND THEIR SETTING AS DESCRIBED IN THE PARSONAGE FARM HISTORIC ASSET IMPACT ASSESSMENT, AND; • PROVIDE ADDITIONAL ALLOTMENTS. <p>THE DEVELOPMENT MUST BE FACILITATED BY THE APPROPRIATE INTEGRATED PROVISION OF TRANSPORT, COMMUNITY AND FLOOD RISK MANAGEMENT INFRASTRUCTURE TO INCLUDE WALKING AND CYCLING LINKS CONNECTING THE NEW DEVELOPMENT WITH THE TOWN CENTRE.</p>
POLICY WI2	KEY STRATEGIC DEVELOPMENT ALLOCATIONS AT WILLITON (SEE ALSO PLAN BELOW).
Arising from discussions with Historic England	<p>WITHIN THE AREAS IDENTIFIED ON THE PROPOSALS MAP TO THE WEST AND NORTH OF WILLITON, MIXED DEVELOPMENT WILL BE DELIVERED SUBJECT TO AN INDICATIVE MASTERPLAN INCORPORATING:</p> <ul style="list-style-type: none"> • APPROXIMATELY 406 DWELLINGS, AND; • APPROXIMATELY 3 HECTARES OF APPROPRIATE AND COMPATIBLE, NON-RESIDENTIAL USES, AND; • ENHANCEMENT OF THE DESIGNATED HERITAGE ASSET BATTLEGORE BARROW CEMETARY AND ITS SETTING SHOULD TAKE PLACE. THE SITE SHOULD BE ENHANCED TO ENSURE ITS USE AS A COMMUNAL ASSET AND CONTRIBUTE POSITIVELY TO THE COMMUNITY. THIS SHOULD BE ACHIEVED THROUGH LANDSCAPING, PUBLIC ACCESS, APPROPRIATE USE OF THE SITE AND THE IMPLEMENTATION OF A MANAGEMENT PLAN AGREED WITH HISTORIC ENGLAND. <p>THE DEVELOPMENT MUST BE FACILITATED BY THE APPROPRIATE INTEGRATED PROVISION OF TRANSPORT, COMMUNITY AND FLOOD RISK MANAGEMENT INFRASTRUCTURE TO INCLUDE WALKING AND CYCLING LINKS CONNECTING THE NEW DEVELOPMENT WITH THE VILLAGE CENTRE. IT MUST ALSO CONTRIBUTE TO THE ENHANCEMENT OF THE DESIGNATED HERITAGE ASSET BATTLEGORE BARROW CEMETARY AND ITS SETTING THROUGH LANDSCAPING, LAND USE CHANGE AND SITE MANAGEMENT REGIME.</p>

	In addition, the extent of the Key Strategic Site allocation to the west of Williton should be extended to include the Battlegore archaeological area so that this can be positively conserved, interpreted and managed and the Key Strategic Site Allocation to the north of Danesfield School should be deleted.
POLICY LT1	POST 2026 KEY STRATEGIC DEVELOPMENT SITES.
Arising from discussions with Historic England	<p>WITHIN THE TWO AREAS IDENTIFIED FOR LONGER TERM STRATEGIC DEVELOPMENT ON THE PROPOSALS MAP:</p> <ul style="list-style-type: none"> • TO THE SOUTH OF PERITON ROAD, MINEHEAD FOR WHICH ACCESS WOULD BE VIA A DISTRIBUTOR ROAD THROUGH THE SITE LINKING THE DISTRIBUTOR ROAD FOR THE MD2 SITE WITH THE SITE'S A39 FRONTAGE AND; • TO THE WEST OF WATCHET AT CLEEVE HILL, WHERE DEVELOPMENT MUST CONTRIBUTE TO ENHANCING THE UNIQUE HISTORIC ENVIRONMENT OF THE TOWN INCLUDING MITIGATING THE EROSION OF DAW'S CASTLE AND ENCOURAGING VISITORS TO THE MONUMENT THROUGH FUNDING EXCAVATIONS AND IMPROVEMENT OF SITE MANAGEMENT, AND ALSO TO PROVIDING A NEW ALIGNMENT FOR THE B3191 TO ADDRESS THE IMPACT OF COASTAL EROSION, • PROPOSALS FOR THE WATCHET SITE MUST SAFEGUARD AND WHERE APPROPRIATE ENHANCE THE HISTORIC ASSETS OF DAW'S CASTLE AND THE ADJACENT LIME KILNS AND THEIR SETTINGS. • OPTIONS FOR RESCUE ARCHAEOLOGY EXCAVATIONS IN ADVANCE OF FURTHER COASTAL EROSION OF DAW'S CASTLE WILL BE SOUGHT THROUGH SECTION 106 AGREEMENTS WITH DEVELOPERS. <p>DEVELOPMENT OF BOTH OF THESE SITES WOULD BE GUIDED BY THE PROVISION OF INDICATIVE MASTERPLANS.</p> <ul style="list-style-type: none"> • IN RESPECT OF THE MINEHEAD LONG TERM SITE, THE MASTERPLAN SHOULD PROVIDE FOR AN APPROPRIATE DESIGN RESPONSE TO THE SITE'S PROXIMITY TO THE EXMOOR NATIONAL PARK. • THE MASTERPLAN FOR THE WATCHET LONG TERM SITE SHOULD INCLUDE THE USE OF SOFT LANDSCAPING, GREEN SPACES AND SYMPATHETIC DESIGN IN TERMS OF APPEARANCE TO MITIGATE HARM. <p>PROVISION IS MADE FOR DEVELOPMENT IN THE LATTER PART OF THE PLAN PERIOD POST 2026.</p>
POLICY EC1	WIDENING AND STRENGTHENING THE LOCAL ECONOMY
Arising from the Inspector's comments.	<p>PROPOSALS WHICH WILL MAKE THE WEST SOMERSET ECONOMY STRONGER AND MORE DIVERSE AND THAT ARE LIKELY TO INCREASE THE PROPORTION OF HIGHER PAID JOBS LOCALLY WILL BE SUPPORTED.</p> <p>NEW DEVELOPMENT, REDEVELOPMENT AND, CONVERSION</p>

	<p>PROPOSALS FOR ALL TYPES OF EMPLOYMENT GENERATING ACTIVITIES WILL BE ENCOURAGED. AND DIRECTED TO EXISTING AND EXTANT PREMISES AND SITES FOR SIMILAR AND COMPATIBLE USES AND WOULD NOT HAVE AN ADVERSE IMPACT ON THE AMENITY OF EXISTING NEIGHBOURING LAND USES.</p> <p>WHERE POSSIBLE, SUCH PROPOSALS SHOULD MAKE USE OF EXISTING EMPLOYMENT SITES, OR OF SITES WITH SIMILAR AND COMPATIBLE USES WHERE THE DEVELOPMENT PROPOSED WOULD NOT HAVE AN ADVERSE IMPACT ON THE AMENITY OF EXISTING NEIGHBOURING LAND USES.</p>
POLICY CF1	MAXIMISING ACCESS TO RECREATIONAL FACILITIES
Arising from the Inspector's comments.	<p>THE PROVISION OF NEW, AND IMPROVEMENT OF EXISTING, HEALTH, SPORT, RECREATION AND CULTURAL FACILITIES WILL BE SUPPORTED, WHERE THIS HELPS TO STRENGTHEN AND OR ENHANCE A BALANCED RANGE OF PROVISION FOR LOCAL COMMUNITIES AND VISITING TOURISTS.</p> <p>THE UNNECESSARY LOSS OF VALUED SERVICES AND FACILITIES SHOULD BE PREVENTED, PARTICULARLY WHERE THIS WOULD REDUCE THE COMMUNITY'S ABILITY TO MEET ITS DAY TO DAY NEEDS.</p> <p>WHERE A DEVELOPMENT PROPOSAL WOULD RESULT IN THE LOSS OF RECREATIONAL FACILITIES, EQUIVALENT OR GREATER REPLACEMENT FACILITIES SERVING THE SAME AREA MUST BE PROVIDED AS PART OF THE PROPOSALS.</p> <p>THE APPROPRIATE PROVISION OF FORMAL SPORTS FACILITIES AND / OR INFORMAL PUBLIC AMENITY OPEN SPACE / PLAY SPACE WILL BE REQUIRED AS AN INTEGRAL PART OF NEW DEVELOPMENT.</p>
POLICY CC1	CARBON REDUCTION – SMALL SCALE, NON WIND ENGERGY SCHEMES
Arising from Inspector and discussions with Historic England	<p>SMALL SCALE DEVELOPMENT PROPOSALS WHICH ASSIST IN THE DEVELOPMENT OF A LOW OR ZERO CARBON ECONOMY, OTHER THAN WIND ENERGY SCHEMES, WILL BE SUPPORTED.</p> <p>SUCH PROPOSALS MAY INCLUDE THE DEVELOPMENT OF WOODFUEL OR OTHER RENEWABLE ENERGY SOURCES, AND PROVISION OF LOW ENERGY SYSTEMS TO SERVE NEW AND EXISTING DEVELOPMENT.</p> <p>PROPOSALS MUST SAFEGUARD AND WHERE APPROPRIATE ENHANCE HISTORIC ASSETS AND THEIR SETTINGS.</p>
POLICY CC2	FLOOD RISK MANAGEMENT
Arising from the Inspector's comments.	<p>DEVELOPMENT PROPOSALS SHOULD BE LOCATED AND DESIGNED SO AS TO MITIGATE AGAINST, AND TO AVOID INCREASED FLOOD RISK ELSEWHERE, WHILST HELPING TO PROVIDE FOR THE DEVELOPMENT NEEDS OF THE COMMUNITY IN ACCORDANCE WITH THE FLOOD RISK MANAGEMENT SEQUENTIAL TEST, AND WHERE APPROPRIATE, THE APPLICATION OF THE FLOOD RISK</p>

	<p>MANAGEMENT EXCEPTION TEST.</p> <p>DEVELOPMENT MUST BE DESIGNED TO MITIGATE ANY ADVERSE FLOODING IMPACT WHICH WOULD ARISE FROM ITS IMPLEMENTATION, AND WHERE POSSIBLE SHOULD CONTRIBUTE TOWARDS THE RESOLUTION OF EXISTING FLOODING ISSUES.</p>
POLICY NH1	HISTORIC ENVIRONMENT
Arising from discussions with Historic England	<p>PROPOSALS FOR DEVELOPMENT SHOULD SAFEGUARD AND/OR ENHANCE THE BUILT AND ARCHAEOLOGICAL HERITAGE OF THE DISTRICT WHILST CONTRIBUTING APPROPRIATELY TO THE REGENERATION OF THE DISTRICT'S COMMUNITIES.</p> <p>1. PROPOSALS AND INITIATIVES WILL BE SUPPORTED WHERE THE HISTORIC ENVIRONMENT AND HERITAGE ASSETS AND THEIR SETTINGS ARE CONSERVED AND / OR ENHANCED IN LINE WITH THEIR INTEREST AND SIGNIFICANCE. PLANNING DECISIONS WILL HAVE REGARD TO THE CONTRIBUTION HERITAGE ASSETS CAN HAVE TO THE DELIVERY OF WIDER SOCIAL, CULTURAL, ECONOMIC AND ENVIRONMENTAL OBJECTIVES.</p> <p>2. ELEMENTS OF THE HISTORIC ENVIRONMENT WHICH CONTRIBUTE TOWARDS THE UNIQUE IDENTITY OF AREAS AND HELP CREATE A SENSE OF PLACE WILL BE CONSERVED AND/ WHERE POSSIBLE, ENHANCED. ELEMENTS OF PARTICULAR IMPORTANCE INCLUDE:</p> <p>(A). REGISTERED PARKS AND GARDENS, ST AUDRIES / WEST QUANTOXHEAD LANDSCAPE PARK, FAIRFIELD HOUSE DEER PARK AND CROWCOMBE COURT PARK, AND;</p> <p>(B). IMPORTANT HISTORIC LANDSCAPE FEATURES SUCH AS THE IMPRESSIVE UPSTANDING MEDIAEVAL REMAINS INCLUDING CLEEVE ABBEY AND STOGURSEY CASTLE, OR THE BRONZE AGE BARROW CEMETARY AT BATTLEGORE IN WILLITON AND THE IRON AGE HILLFORT OF TRENDLE RING, AND;</p> <p>(C). HISTORIC FEATURES WITHIN THE ANGLO SAXON TOWN OF WATCHET WITH ITS TUDOR PORT, AND;</p> <p>(D). MINEHEAD, WITH ITS TUDOR PORT AND AS A VICTORIAN RESORT.</p> <p>3. A VARIETY OF APPROACHES WILL BE USED TO ASSIST IN THE PROTECTION AND ENJOYMENT OF THE HISTORIC ENVIRONMENT INCLUDING:</p> <p>(A). THE USE OF APPRAISALS AND MANAGEMENT PLANS OF EXISTING AND POTENTIAL CONSERVATION AREAS</p> <p>(B). TAKING OPPORTUNITIES FOR REMOVING ASSETS FROM THE AT RISK REGISTER,</p> <p>(C). CONSIDERING THE USE OF ARTICLE 4 DIRECTIONS,</p> <p>(D). WORKING WITH PARTNERS, OWNERS AND DEVELOPERS TO IDENTIFY WAYS TO POSITIVELY MANAGE AND MAKE BETTER USE OF HISTORIC ASSETS,</p> <p>(E). CONSIDERING IMPROVEMENTS TO THE PUBLIC REALM AND</p>

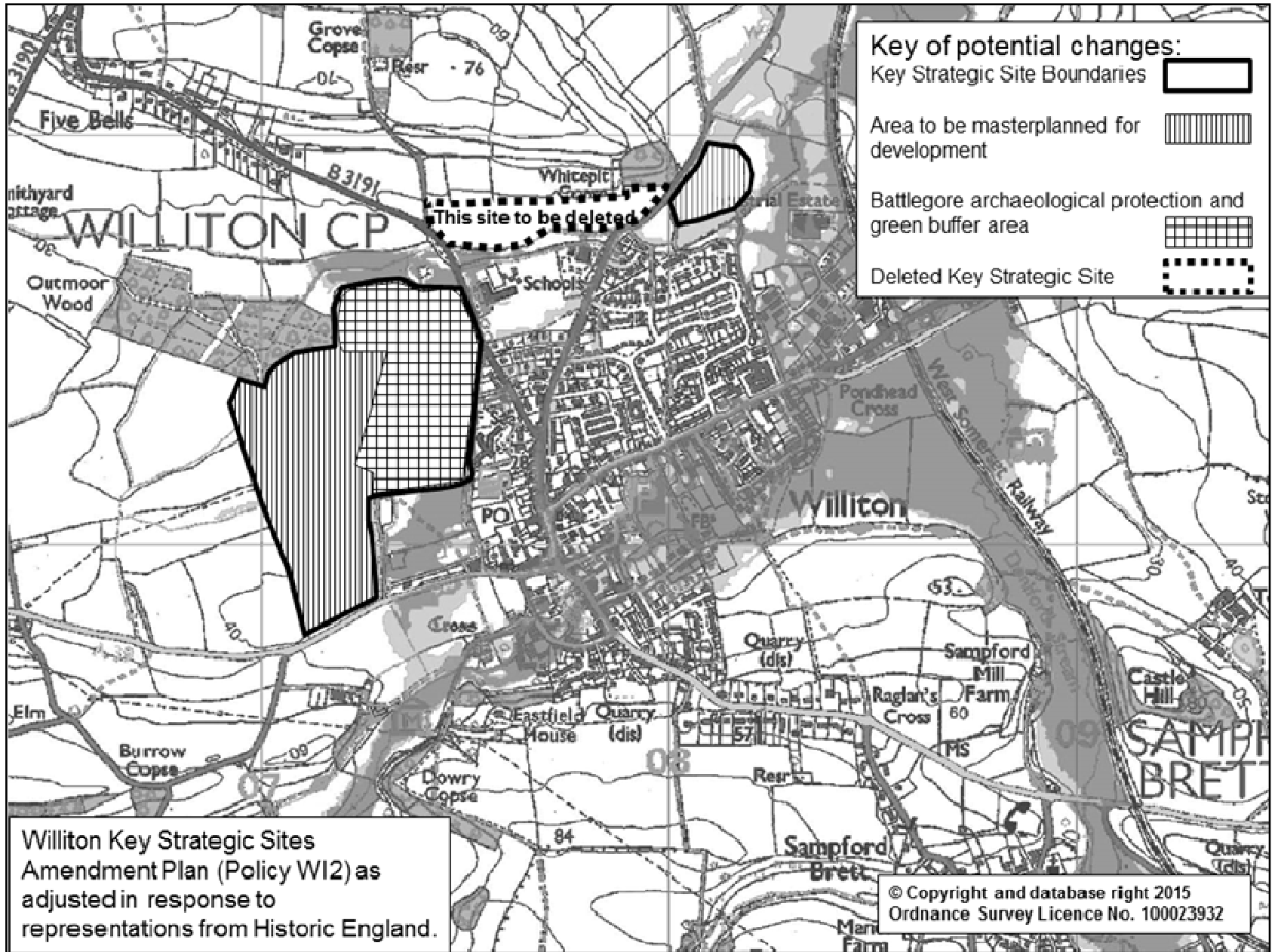
	<p>THE SETTING OF HERITAGE ASSETS WITHIN IT,</p> <p>(F). ENSURING THAT INFORMATION ABOUT THE SIGNIFICANCE OF THE HISTORIC ENVIRONMENT IS PUBLICLY AVAILABLE,</p> <p>(G). WHERE THERE IS A LOSS IN WHOLE OR IN PART TO THE SIGNIFICANCE OF AN IDENTIFIED HISTORIC ASSET THEN EVIDENCE SHOULD BE RECORDED OF ITS IMPORTANCE, AND;</p> <p>(H). CONSIDERING THE NEED FOR THE PREPARATION OF LOCAL EVIDENCE OR PLANS.</p> <p>4. PARTICULAR ATTENTION WILL BE GIVEN TO HERITAGE ASSETS AT RISK OF HARM OR LOSS OF SIGNIFICANCE, OR WHERE A NUMBER OF HERITAGE ASSETS HAVE SIGNIFICANCE AS A GROUP OR GIVE CONTEXT TO A WIDER AREA.</p>
POLICY NH4	GREEN INFRASTRUCTURE
Arising from discussions with Historic England	THE CREATION AND ENHANCEMENT OF A GREEN INFRASTRUCTURE NETWORK WILL BE SUPPORTED. GREEN INFRASTRUCTURE SHOULD BE USED TO HELP PROTECT AND ENHANCE THE HERITAGE ASSETS OF THE AREA.
POLICY NH5	PROTECTION OF BEST AND MOST VERSATILE AGRICULTURAL LAND
Replacement policy arising from the Inspector's comments.	<p>WHEREVER POSSIBLE, THE BEST AND MOST VERSATILE AGRICULTURAL LAND (GRADES 1, 2 AND 3A) WILL BE PROTECTED FROM SIGNIFICANT DEVELOPMENT PROPOSALS IN RECOGNITION OF ITS ECONOMIC VALUE.</p> <p>WHERE SIGNIFICANT DEVELOPMENT OF AGRICULTURAL LAND IS DEMONSTRATED TO BE NECESSARY, LAND OF A LOWER GRADE (GRADES 3B, 4 AND 5) SHOULD BE USED IN PREFERENCE TO THE HIGHER GRADE LAND PROVIDED THAT IT IS IN AN APPROPRIATE LOCATION TO PROVIDE SUSTAINABLE DEVELOPMENT, UNLESS THE AVAILABLE LOWER GRADE LAND HAS AN ENVIRONMENTAL VALUE RECOGNISED BY A STATUTORY OR NON-STATUTORY WILDLIFE, HISTORIC OR ARCHAEOLOGICAL DESIGNATION WHICH OUTWEIGHS THE AGRICULTURAL CONSIDERATIONS.</p>
	<p>SUBJECT TO A MINIMUM THRESHOLD OF 10 HECTARES THE BEST AND MOST VERSATILE AGRICULTURAL LAND (GRADES 1, 2 AND 3A) WILL BE PROTECTED FROM SIGNIFICANT DEVELOPMENT PROPOSALS. PLANNING PERMISSION FOR DEVELOPMENT AFFECTING SUCH LAND WILL ONLY BE GRANTED EXCEPTIONALLY IF THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT OUTWEIGHS THE NEED TO PROTECT IT AND EITHER:</p> <ul style="list-style-type: none"> • SUFFICIENT LAND OF A LOWER GRADE (GRADES 3B, 4 AND 5) IS UNAVAILABLE IN AN APPROPRIATE LOCATION TO PROVIDE SUSTAINABLE DEVELOPMENT; OR • AVAILABLE LOWER GRADE LAND HAS AN ENVIRONMENTAL VALUE RECOGNISED BY A STATUTORY OR NON-STATUTORY WILDLIFE, HISTORIC OR ARCHAEOLOGICAL DESIGNATION

	<p>WHICH OUTWEIGHS THE AGRICULTURAL CONSIDERATIONS.</p> <p>IF BEST AND MOST VERSATILE LAND NEEDS TO BE DEVELOPED AND THERE IS A CHOICE BETWEEN SITES IN DIFFERENT GRADES, LAND OF THE LOWEST GRADE AVAILABLE SHOULD BE USED.</p>
NEW POLICY NH11	AREA OF OUTSTANDING NATURAL BEAUTY
New policy arising from the Inspector's comments. (Based on the first section of Sedgemoor District Council's local plan policy D14 'natural environment')	DEVELOPMENT PROPOSALS WITHIN THE QUANTOCK HILLS AONB WILL ONLY BE SUPPORTED WHERE THEY ENHANCE OR CONSERVE THE NATURAL BEAUTY, OR THE EXCEPTIONAL CHARACTER OR QUALITY OF THE LANDSCAPE IN THE AREA.
	GYPSY AND TRAVELLER SITE POLICY
POLICY GT1	APPROPRIATE PROVISION WILL BE MADE TO MEET AN IDENTIFIED NEED FOR UP TO 10 GYPSY AND TRAVELLER PITCHES DURING THE PLAN PERIOD.
REPLACE MENT POLICY GT1 Replacement policy arising from the Inspector's comments.	<p>PROPOSALS FOR THE USE OF LAND FOR OCCUPANCY BY GYPSIES AND TRAVELLERS SHOULD DEMONSTRATE THAT:</p> <p>(A) EVIDENCE IS SUBMITTED THAT THE FUTURE OCCUPANTS ARE MEMBERS OF THE GYPSY OR TRAVELLING COMMUNITIES, INCLUDING INFORMATION ABOUT THE INTENDED OCCUPANTS' PAST TRAVEL AND THEIR LINK TO WORK PATTERNS WHERE APPLICABLE.</p> <p>(B) THE PROPOSAL WILL HELP TO MEET A CLEAR AND EVIDENCED NEED AS DEMONSTRATED THROUGH A GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT OR OTHER EVIDENCE SUBMITTED WITH THE APPLICATION, AND;</p> <p>(C) THE SITE IS WELL RELATED TO LOCAL SERVICES AND FACILITIES INCLUDING SHOPS, SCHOOLS AND DOCTORS' SURGERIES AS WELL AS EXISTING EMPLOYMENT PROVISION, AND;</p> <p>(D) THE ENVIRONMENTAL IMPACTS OF THE PROPOSAL ARE MINIMISED, THIS WILL INCLUDE APPROPRIATE SCREENING AND SITING OF DEVELOPMENT TAKING INTO ACCOUNT LANDSCAPE ISSUES AS WELL AS ANY LIKELY IMPACTS UPON WILDLIFE, HERITAGE ASSETS AND FLOOD RISK; PROPOSALS SHOULD IN PARTICULAR AVOID ANY ADVERSE IMPACT ON NATURA 2000 SITES AND COMPLY WITH HABITATS REGULATIONS 2010.</p> <p>(E) THE PROPOSAL WOULD NOT UNACCEPTABLY PREJUDICE THE AMENITY OF ADJOINING OR ADJACENT OCCUPIERS; AND</p> <p>(F) THE SITE CAN BE ADEQUATELY SERVED BY THE APPROPRIATE INFRASTRUCTURE TO SUPPORT THE DEVELOPMENT INCLUDING FOUL AND SURFACE WATER</p>

DRAINAGE, AND;

(G) THE IMPACT OF THE PROPOSAL WILL NOT GIVE RISE TO AN UNACCEPTABLE IMPACT ON TRAFFIC MOVEMENTS, NOISE AND OTHER POTENTIAL DISTURBANCE ARISING OUT OF THE MOVEMENT OF VEHICLES ON TO AND OFF OF THE SITE.

EXPANSION OF AN EXISTING SITE WILL BE CONSIDERED ON ITS MERITS, TAKING INTO ACCOUNT THE POTENTIAL IMPACTS OF EXPANSION IN ACCORDANCE WITH THE PROVISIONS SET OUT AT (A) TO (G) ABOVE.



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Report to a Meeting of: Local Development Panel
To be Held on: 25th November 2015
Date Entered on Executive Forward Plan N/A
Or Agreement for Urgency Granted:

WEST SOMERSET LOCAL PLAN TO 2032 UPDATE ON THE IMPLICATIONS OF RECENT STATISTICAL PROJECTIONS ON THE OBJECTIVELY ASSESSED HOUSING NEED

1. PURPOSE OF REPORT

- 1.1 To inform the Panel of the findings of recently commissioned studies dealing with future population and household projections and their implications for West Somerset and the emerging Local Plan to 2032.

2. CONTRIBUTION TO CORPORATE PRIORITIES

- 2.1 This report helps to inform the housing elements of the Council's Corporate Priorities in particular, Local Democracy Objective 2 relating to maximising the funding opportunities from Central Government in relation to the provision of new housing and, New Nuclear Development at Hinkley Point Objective 5 relating to the availability of adequate housing supply to meet demand

3. RECOMMENDATIONS

- 3.1 **It is recommended that the Local Development Panel;**
- **Notes the content and conclusions of this report and the contents of the various studies referred to within it, and,**
 - **In the context of these, confirm to the Inspector examining the West Somerset Local Plan to 2032, that it considers the evidence used in determining the Objectively Assessed Housing Need for the local planning authority area and, the housing requirement figure planned for within it, remains the same as that which was included in the Submission Draft.**

4. RISK ASSESSMENT (IF APPLICABLE)

- 4.1 This is an information item only for which no risk assessment is required.

5 BACKGROUND INFORMATION

- 5.1 The production of the West Somerset Local Plan to 2032 is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended)¹ and associated Regulations. Its purpose is to identify the scale of development that is likely to be required over the plan period and determine both how this is to be met and where it should be delivered. An important element of this is the need to identify the anticipated quantum of future housing need for the plan period based on the evidence available. Previously this had been provided by higher level, strategic planning documents such as the Somerset structure plans and the Regional Planning Guidance (RPG)/Regional Spatial Strategies (RSS). However, with the election of the Coalition Government in 2010, the decision was taken to abolish these documents and delegate the responsibility to individual local planning authorities (LPA's).
- 5.2 The development plan process and, the associated legislation, does not permit individual LPA's to plan in an area administered by a neighbouring LPA. This can only be achieved through the production of a joint plan or, with the willing and active sanction and co-operation of their neighbours. It was recognised that there would be instances where individual LPA's would not be able to accommodate its future projected housing need, especially in the larger urban areas. In order to assist and formalise this process the Coalition Government included the 'Duty to Co-operate' as a legal obligation through the Localism Act 2011.² This has been linked to the Strategic Housing Market Assessment (SHMA) studies which form part of the evidence-base of material that inform the evolution of the strategy and policies that are part of local plans.
- 5.3 SHMA studies originated as part of the RSS process and are expected to identify housing requirement across the whole area and disaggregate it down to the LPA area. They are expected to identify the composition of the housing requirement for each LPA and cover the period covered by the emerging local plan. This is known as the Objectively Assessed Need (OAN). When first identified for the south-west region, West Somerset fell into two SHMA areas, the Taunton & South Somerset HMAs (T&SS SHMA) which included all the Somerset local authorities except Mendip District Council and, the Northern Peninsula SHMA (NP SHMA) which included, (former) North Cornwall, North Devon, Torridge and, West Somerset District Councils plus, the Exmoor National Park Authority.

¹ H.M. Government; Planning and Compulsory Purchase Act 2004, Chapter 5 (as amended); The Stationary Office; 2004; ISBN 0 10 540504 3.

² H.M. Government; Localism Act 2011, Chapter 20; The Stationary Office; 2011; ISBN 978 0 10 542011 8

- 5.4 West Somerset Council participated in both the initial studies for the SHMA areas which were completed in 2008³ and 2009.⁴ Due to the type and availability of the information required to produce the studies, both were compiled on a 'whole' local authority basis, which meant that all of West Somerset was covered in each study. Whilst both studies resulted in broadly similar findings in respect of the future housing requirement and its potential composition, preference was given to the use of the data in the Northern Peninsula SHMA as this better reflected the rural nature of the area. The whole of the SHMA had previously been described as polycentric with numerous sub-markets within it whilst all the other SHMA areas in the south-west were mono-centric, where one settlement dominated the housing market.
- 5.5 Within the West Somerset local authority area, the initial NP SHMA identified three sub-markets out of a total of nine for the whole of the Northern Peninsula area. These comprised;
- Minehead Coastal: Lower Value – this covered the northern coastal fringe of the District including the three main settlements of Minehead, Watchet and, Williton.
 - Exmoor and Downland Fringe – this covered the whole of the Exmoor National Park including the land to the south, south-west and west of it. It incorporated the detached part of the West Somerset LPA area around the village of Brushford.
 - Dispersed Rural – in a West Somerset context, this covered the remaining rural parts including; the areas south from the Brendons, The Quantocks and the land to the north-east of them around Stogursey, Kilve and Holford.

These housing sub-markets tend to reflect the economic and social focus of the settlements and people within it.

- The 'coastal fringe' including the three largest West Somerset settlements is the location of most commercial activity and home to the widest range of services and facilities. Containing c.60% of the District's population, it has the most active housing market.
- The Exmoor National Park account for almost two-thirds of the geographic area of West Somerset and including the Brushford parish to the south only accounts for less than 25% of the population. The latter area are looks to Dulverton, the National Park's largest settlement for its essential day-to-day services and facilities and Tiverton, some distance to the south, for a wider range, if required. House prices within the National Park attract a 'premium' compared to those outside of it but due to the low population numbers generally and the dispersed pattern of settlements within it, house market activity is quite limited compared with the 'coastal fringe'.
- The 'Dispersed Rural' area accounts for the remaining 15% of the population and is made up of a range of modest-sized villages. It can be sub-divided again into two parts;
 - The scattered villages along the southern slopes of the Brendon Hills and the western side of the Quantocks are relatively small and dispersed. They tend to look to the larger settlements of Taunton and Wellington for most of their needs in terms of services and facilities.

³ Housing Vision; Strategic Housing Market Assessment for the Northern Peninsula – December 2008; Northern Peninsula Housing Market Partnership; 2008;

⁴ Fordham Research; Taunton and South Somerset Housing Market Areas Strategic Housing Market Assessments Final Report – February 2009; Somerset Housing Market Partnership; 2009.

- The villages on the eastern slopes of the Quantocks and out towards the Steart Peninsula are like-wise dispersed but look towards Bridgwater to the east. Whilst there has been limited housing market activity in recent times, this is likely to change significantly should the construction of Hinkley Point C commence.

- 5.6 The initial NP SHMA calculated a housing requirement figure (or OAN) for the whole of the West Somerset district of 3,888 for the twenty year period 2006 – 2026.⁵ Concerns were expressed that in order to meet this figure, development in the West Somerset LPA area would have to occur over the projected time-scale, at a much higher level than had been achieved in most years since 1976/77.⁶ It was considered that the figure may have been conflated by the economic and housing market conditions that existed at the time much of the relevant data used to compile the projections was collected (2006/07).
- 5.7 The publication of the National Planning Policy Framework (NPPF) in 2012⁷ meant that LPA's should plan to meet the whole of the projected OAN identified for the plan-period within their respective areas unless it could be clearly demonstrated that this was not a viable or practical proposition. The information collected would form part of the evidence-base and should be revised and updated on a regular basis. Emerging local Plans were expected to show through strategies, policies and allocation of land, how the LPA sought to meet its OAN including a clear indication of how this would be met in the first two five-year periods of the plan. As a consequence of this, West Somerset Council commissioned an update to the NP SHMA for its area in 2012 including the identification of an OAN figure for the LPA area. It also, requested as part of the study that a calculation be made as to the likely additional housing that might be required in the LPA area, as a consequence of the proposal to build a major new nuclear power station at Hinkley Point. This was programmed to take c.10 years to complete, which was likely to occur wholly within the twenty year period covered by the emerging local plan (2012 – 2032).
- 5.8 The West Somerset Update produced an OAN figure of 2,398 households being created over the period 2011 – 2031,⁸ through existing sources (a combination of births, deaths and, migration), and additional accommodation in the form of new homes would be required to meet this. The study also indicated a further 450 new dwellings might be required to meet the impact of the Hinkley Point project on the local housing market. These figures were used to inform the process that led to the decision to plan for 2,900 new dwellings in the Revised Preferred Strategy version of the Local Plan to 2032.⁹ This version was consulted on during the summer of 2013 and the figure has remained as part of the emerging local plan in Policy SC2.
- 5.9 Whilst the overall OAN figure had reduced between the 2008 and 2013 studies, one consistent feature in both was the proportion of the future housing need that would

⁵ Housing Vision; Strategic Housing Market Assessment for the Northern Peninsula – December 2008; op.cit.; p.125.

⁶ West Somerset Council; West Somerset Local Plan to 2032 Strategy and Housing Topic Paper – January 2015; West Somerset Council; 2015; (Annex 1, Table 5)

⁷ Department for Communities and Local Government; National Planning Policy Framework – March 2012; Department for Communities and Local Government; 2012; ISBN 978 1 4098 3413 7

⁸ Housing Vision; Strategic Housing Market Assessment: West Somerset Update – Final Report, November 2013; West Somerset Council; 2013; p.165 (Table 7.1)

⁹ West Somerset Council; The West Somerset Local Plan to 2032 Revised Preferred Strategy – June 2013; West Somerset Council; 2013

be for affordable housing to rent. This remained high at over 60% (including the Coalition Government's definition of affordable housing to rent, which was set at 80% of local open-market rent values). The implications of this issue were identified in the Council's Strategy and Housing Topic Paper that forms part of the evidence-base supporting the Local Plan to 2032.¹⁰

- 5.10 During 2014, the emerging Derbyshire Dales Local Plan was subject to the examination and the Inspector concerned suspended the process after expressing concern over the LPA's approach to meeting its OAN. He proposed a hybrid method for its calculation which included the latest, then, (2012-based) sub-national population projections published by the Office for National Statistics (ONS).¹¹ This resulted in a higher OAN figure than the LPA had been providing for through its Local Plan. The outcome of these findings was that the Inspector's approach established a bench-mark in the calculation of OAN and, emphasised the need for LPA's to use the latest available data.
- 5.11 As a consequence of these findings the four remaining LPA's that formed the NP SHMA area commissioned additional work to establish the collective, and individual, OAN's using the 2012-based sub-national Population Projections and the hybrid methodology suggested by the Derbyshire Dales Inspector, as one of the scenarios, in the study. A number of other scenarios using alternative data-sources were also included as part of this study. This was completed in February 2015¹² and indicated that using the Derbyshire Dales 'methodology' the OAN for the West Somerset LPA area, would now be significantly lower than that included in the 2013 West Somerset Update. This also applied to a number of the other data-sources and scenarios that were tested. The figures being suggested by this study suggested an OAN number that was substantially below the projection of the long-term average delivery rate at c.120 dwellings per annum or, 2,400 across the plan period. This has remained relatively stable throughout the last 39 years when compared against previous housing requirements for different development plan periods established through four structure plans.
- 5.12 Almost as soon as the study mentioned above was completed ONS published a further set of projections which sought to quantify the number of household that would be generated over the 25 year period, 2012 – 2037.¹³ The National Planning Practice Guidance (NPPG) which supports, and adds detail, to the interpretation of the NPPF, emphasises the importance of using the most up-to-date data, where it is available in the production of development plans. At the time of the release of the 2012-based National Household Projections, the emerging Local Plan to 2032 had been placed on 'deposit' for its Publication stage. Following completion of this stage, The Local Plan was 'Submitted' to the Secretary of State (via the Planning Inspectorate – PINS) on 31st July. In the intervening period between the Publication and Submission stages, the other members of the NP SHMA felt that it would be prudent to commission a further study to consider the implications on the area of the latest projections. West Somerset Council, following advice from the appointed Inspector

¹⁰ West Somerset Council; West Somerset Local Plan to 2032 Strategy and Housing Topic Paper – January 2015; op. cit.

¹¹ Office for National Statistics; 2012-based Subnational Population Projections for England; Office for National Statistics; 2014 (data-set)

¹² Housing Vision; Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report – January 2015; Northern Peninsula Housing Market Partnership; 2015

¹³ Office for National Statistics; 2012-based Subnational Household Projections for England; Office for National Statistics; 2015 (data-set)

participated in commissioning this study. The final draft of the study indicated that there was no substantive difference in the outcomes using the same scenarios used in the earlier population projection study.¹⁴

- 5.13 In view of the findings of the two latest NP SHMA projection studies, concern has also been expressed at the future ability of the planning system, through the development plan process, to help provide the quantum of affordable housing that would be required in the future. Whilst the OAN appeared to be reducing, the proportion of affordable housing to rent was not. This is being compounded by difficulties being experienced in getting reliable data of local need for this type of housing through the Homefinder Somerset system. Data from this source has been used to inform and provide an understanding of the future affordable housing need within the local authority area and fed into the various studies mentioned in this report. The recorded evidence of people registering on the system is showing that the total number, through registration with Homefinder Somerset, is declining quite rapidly but, anecdotal evidence, at the very local level, seems to contradict this. However, without the individuals and households formally registering through the Homefinder Somerset system, there is no formal record of their existence and, therefore a need for housing. The absence of this data means that it is also absent from the calculations needed to determine future housing need of this type. These individuals and households who are seeking accommodation for themselves are becoming 'hidden' from the system, with no way of quantifying the scale of the problem, both now, and in the future. If the situation persists the next time they are likely to appear in a statistical form will be through the 2021 Census. The problem is not confined solely to West Somerset. There appears to be concern amongst other Somerset authorities that the Homefinder Somerset system is not providing an accurate picture of housing need across the County.
- 5.14 As part of the correspondence for the Examination of the Local Plan to 2032, the Inspector has indicated that the LPA has not referred to the significance of these two 2012-based projection data-sets and their implications for the OAN. In response to the issues above, the LPA has sought clarification from the organisation, Housing Vision that has produced the two projection-based studies. It was asked to look at the reliability of the data-sources when applied to the determination of an OAN figure for an LPA such as West Somerset with its, relatively, small population (compared with other LPA's), its demographic composition and, implications for planning for future housing needs. The report, which is included at Appendix 1.¹⁵
- 5.15 The review of the data-sources identifies a number of issues where care is advised in the use and the interpretation of this type of data. It makes four key observations;
- a) The 2008-based projections have effectively been discredited as a reliable source for determining the OAN, when compared against the two 2012-based sub-national projections and their sources (see para. 1.39)
 - b) The 2012-based projections need to be treated with a degree of caution as there are elements within them which are subject to a 'time-lag' before they become obvious and an influence – e.g. the number of projected births in households will not have an impact until the individuals have grown up. This

¹⁴ Housing Vision; Northern Peninsula Housing Market Strategic Housing Market Assessment: The Implications of 2012-based Household Projections: Final Draft Report – October 2015; Northern Peninsula Strategic Housing Market Partnership; 2015.

¹⁵ Housing Vision; Understanding Changes in Population and Household Projections: West Somerset Council: Draft Report – November 2015; West Somerset Council; 2015.

would only begin to be recorded towards the end of the projection period (see para. 1.17) – it is noted that whilst this can be applied to all household projections, it will have a particular significance and impact as the generation born during the ‘baby-boom’ (1945 – 1965) reach the latter stages of their lives over the next 25 years. It is expected the impact will be particularly noticeable in areas where they comprise a significant proportion of the existing population.

- c) Migration trends are based on a relatively short period (five years) just before the base-date for the projection(s). This is more of a change than a trend. As a consequence these can be subject to significant distortion when projected forward depending on the economic and/or social conditions prevailing during the five-year period (see paras.1.26 & 1.36).
- d) The potential ‘unreliability’ of the source data in c) above, has been noted in the initial 2014-based National Population Projections information that was published on 29th October 2015.¹⁶ This suggests that internal migration has been under-stated and was (probably) on an upward ‘trend’ (see para. 1.27).

5.16 The review concludes that due of the many unpredictable elements operating at the local level in West Somerset – e.g. inward migration amongst older adults, impact of Hinkley Point C on the housing market, etc. There is a degree of uncertainty concerning the effect of future trends, but based on the emerging evidence, there is a strong indication that any future revisions to the OAN are likely to increase the figure. Because of this, using the findings in either of the 2012-based sub-national projections to reduce the OAN would be an unwise option.

5.17 It would appear that there are two main factors mitigate against a downward revision to the OAN for the LPA area and, as a consequence a reduction in the number of dwellings to be provided for through the local plan. These are;

- The degree of uncertainty mentioned through the review that could be associated with relying too heavily on the latest data-sources used for projections
- the absence of any housing supply indicators to suggest a significant reduction in future delivery of new dwellings compared to the long-term average

As a consequence of the above conclusions, it is recommended that the Local Development Panel;

- Notes the content and conclusions of this report and the contents of the various studies referred to within it, and,
- In the context of these, confirm to the Inspector examining the West Somerset Local Plan to 2032, that it considers the evidence used in determining the Objectively Assessed Housing Need for the local planning authority area and, the housing requirement figure planned for within it, remains the same as that which was included in the Submission Draft.

6. FINANCIAL/RESOURCE IMPLICATIONS

6.1 There are no financial and/or resource implications arising from the contents of this report

¹⁶ Office for National Statistics; 2014-based National Population Projections for England; Office for National Statistics; 2015 (data-set)

7. COMMENTS ON BEHALF OF SECTION 151 OFFICER

- 7.1 This is an information report. There are no considerations for the Section 151 Officer arising from the contents of this report.

8. EQUALITY & DIVERSITY IMPLICATIONS

Members need to demonstrate that they have consciously thought about the three aims of the Public Sector Equality Duty as part of the decision making process.

The three aims the authority **must** have due regard for:

- Eliminate discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

- 8.1 There are no direct equality or diversity implications arising from the contents of this report.

9. CRIME AND DISORDER IMPLICATIONS

- 9.1 There are no direct crime and/or disorder implications arising from the contents of this report.

10. CONSULTATION IMPLICATIONS

- 10.1 There are no requirements for consultation to be carried out as a direct consequence of the contents of this report.

11. ASSET MANAGEMENT IMPLICATIONS

- 11.1 There are no asset management implications arising as a consequence of this report.

12. ENVIRONMENTAL IMPACT IMPLICATIONS

- 12.1 There are no environmental impact implications arising as a consequence of the contents of this report.

13. LEGAL IMPLICATIONS

- 13.1 There are no legal implications arising as to the contents of this report.

APPENDIX 1

UNDERSTANDING CHANGES IN POPULATION AND HOUSEHOLD PROJECTIONS: WEST SOMERSET COUNCIL



HOUSING VISION

Understanding Changes in Population and Household Projections: West Somerset Council

Draft Report

November 2015

Understanding Changes in Population and Household Projections: West Somerset Council

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4th November 2015

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Introduction

- 1.1 Recent official projections point to different levels and compositions of population and household growth during the period 2011-2031. This paper provides additional information identifying and accounting for these differences, and considers whether there are any indications that the latest 2012-based Subnational household projections would not be a suitable basis for identifying the Objectively Assessed Need (OAN) for the West Somerset Council area.
- 1.2 Table 1 presents the headline results from recent official projections for the period 2011-2031. The 2011 'interim projections' are omitted as they only extended to 2021 and are technically flawed. The 2008-based projections show the highest growth in population and household numbers and the 2012-based the lowest.

Table 1: Summary of recent projections for the period 2011-2031

Projections	Population	Households
2008-based	+4,300	+3,200
2010-based	+2,900	NA
2012-based*	+2,200	+1,700

*includes change 2011-2012 from annual mid-year population estimate (MYE)

- 1.3 The differences in household numbers derive from differences in the underlying population projections combined with differences in projected 'household representative rates'; the latter rates convert the population projections into household numbers after taking account of people living in non-household communal accommodation, such as care homes.
- 1.4 The household representative rates applied to the 2012-based projections were based on a review of household formation trends in the light of 2011 Census results. The effect of this review was to reduce slightly the projected growth in households as explained below. The following table summarises the household projections scenarios for West Somerset, including the CLG 2008 and 2012-based projections and which was included in the October 2015 SHMA Update for the Northern Peninsula.

Table 2: household projections scenarios for West Somerset, totals, 2011-2031

Scenario	West Somerset DC	West Somerset LPA
2008-based CLG projections		
Households	3,165	2,452
2012-based scenarios		
Population	5,400	4,183
1. Households @ 2008 average household size	2,108	1,633
3. Households @ CLG 2011 to 2021+2008 post -2021	1,674	1,297
4. Households @ CLG 2008 adjusted to 2011 Census	2,135	1,654
5. Households @ constant household formation rates	1,869	1,448
2012-based CLG projections		
Households	1,704	1,302
Variation of 2012-based CLG household projections from 2012-based population projections scenario 3	30	+5

1.5 This table identifies a difference of 1,461 households between the CLG 2008-based and 2012-based projections (3,165 minus 1,704). 431 of this difference stems from applying different household representative rate assumptions (CLG 2012-based of 2,135 less Scenario 4 of 1,734). However, most of the difference in household growth (1,030) derives from slower population growth in the 2012-based population projections.

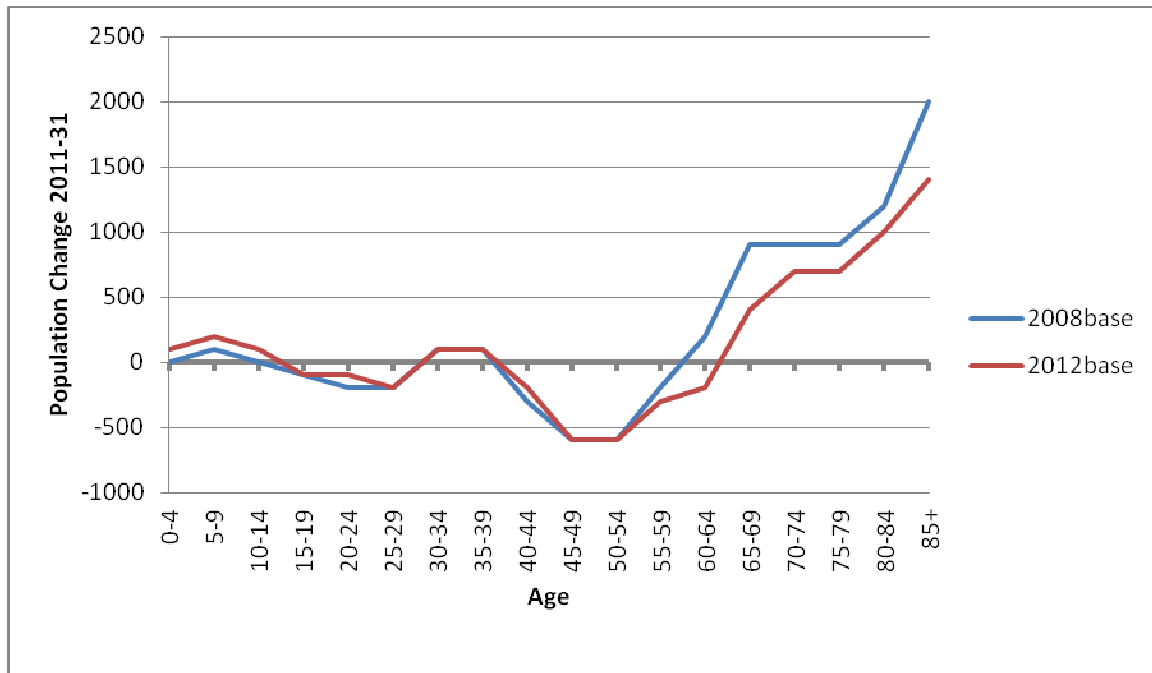
1.6 The remainder of this report focuses on identifying and examining the differences between the 2008 and 2012-based household projections. The reasons for this focus are:

- there were no official household projections with a 2010 base;
- the 2008-based projections are informed by data that predates the economic recession;
- the 2012-based projections are the most recent; and
- the 2012-based projections benefit from improved information from the 2011 Census, and improved methods and data for monitoring migration.

Population and household change: comparison between 2008-based and 2012-based projections

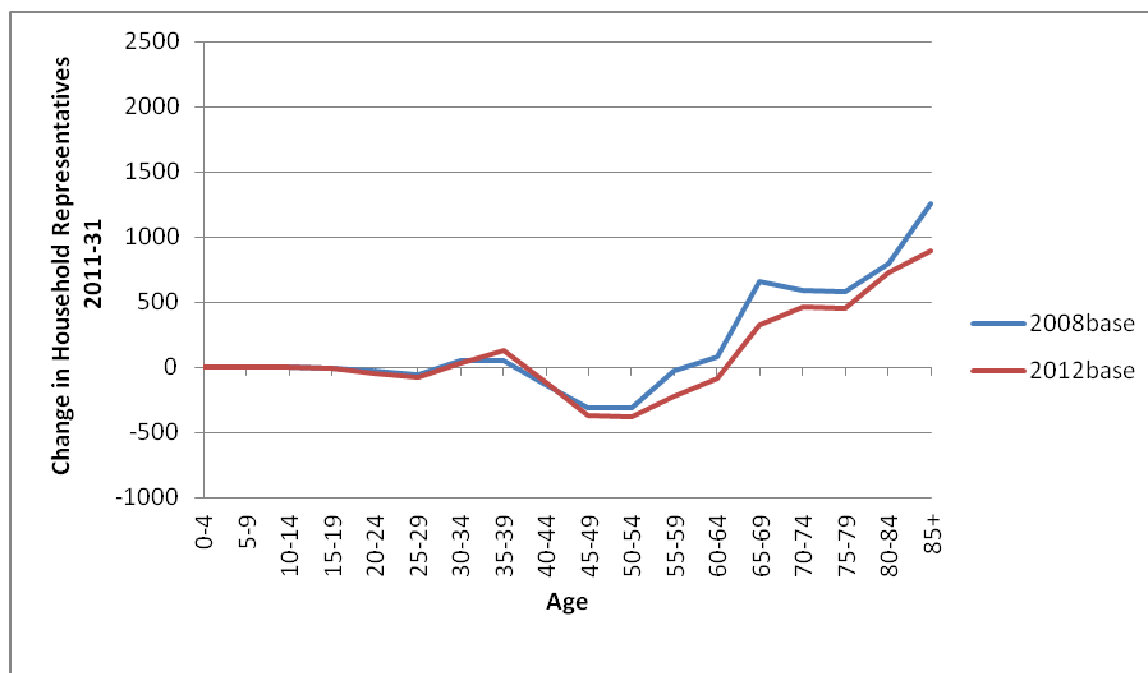
1.7 Charts 1 and 2 below provide breakdowns of projected population then household change by age using both sets of projections. Comparison of the charts shows that the age pattern of projected household change is broadly consistent with the age changes in the population projections.

Chart 1: Population Change 2011-2031, 2008-based and 2012-based Population Projections



(Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.2.0)

Chart 2: Change in Household Representatives, 2011-2031, 2008-based and 2012-based Household Projections



(Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.2.0)

- 1.8 Both sets of projections point to population and household growth that is almost entirely concentrated in the retirement age groups. However, growth in the older population is less rapid in the 2012-based projections than in the 2008-based: 4,200 compared with 5,900. Growth in household numbers is concentrated among those aged 65 or older: the 2008-based projections show greater growth: 3,900 as against 2,900 for the 2012-based projections.
- 1.9 Both projections point to reductions in population and households in the 40-59 age groups between 2011 and 2031 with greater the reductions in the 2012-based projections.
- 1.10 The following table presents projected population and household change by broad age groups. The 2012-based projections show slower growth in the population aged 65 or older and a greater reduction in those aged between 45 and 64. These differences are reflected in the projections of household change.

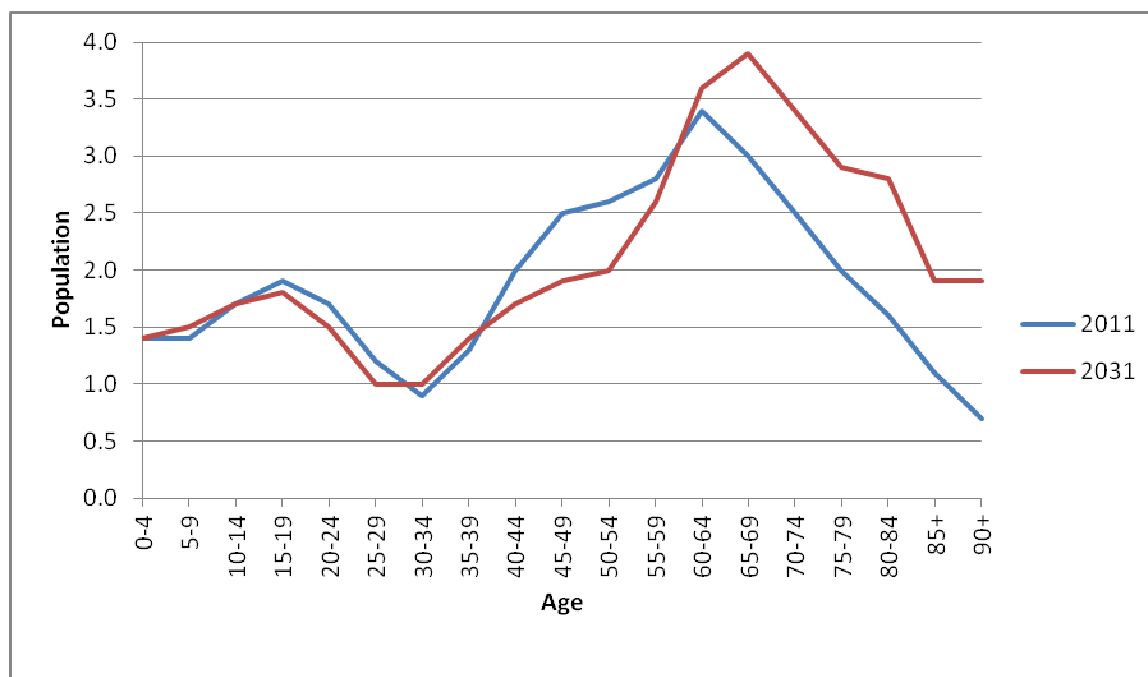
Table 3: population and household change by broad age groups, 2011-2031, 2008-based and 2012-based population projections

Age	Population		Households	
	2008-based	2012-based	2008-based	2012-based
0-14	100	200	0	0
15-29	-500	-400	-100	-100
30-44	-100	0	0	0
45-64	-1,200	-1,700	-600	-1,100
65+	5,900	4,100	3,900	2,900
Total	4,300	2,200	3,200	1,700

(Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.2.0)

1.11 Chart 3 compares the populations in 2011 and 2031 according to the 2008-based projections. The ageing of the population between 2011 and 2031 goes some way to explaining the changes in age groups; for example those aged 45-49 in 2011 will be 65-69 by 2031. However, migration is a key contributor to growth in the older age groups, offset by mortality.

Chart 3: population in 2011 and 2031, 2008-based projections



(Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.2.0)

1.12 Chart 4 compares the populations in 2011 and 2031 according to the 2012-based projections. A comparison of age structures in 2031 shows that the shift to an older population is less marked and the 2012-based projections show more young adults than the 2008-based.

Chart 4: population in 2011 and 2031, 2012-based projections



(Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.2.0)

- 1.13 It should be noted in relation to Charts 3 and 4, that the Census showed that 2011 figures from the 2008-based projections were incorrect whereas the 2012-based figures were based on the 2011 Census and are correct.

Understanding the differences between 2008-based and 2012-based population projections

- 1.14 Future population change is driven by births, deaths, migration and ageing. These interact over time, and this interaction creates obstacles to understanding change. Difficulties are compounded when comparing projections that start from different base years and are informed by historical trend data from different periods. Furthermore, there may be differences in the nature of the evidence and methods used, for example, the 2012-based projections take account of the results of the 2011 Population Census, and use revised evidence flows of international migrants to local authorities.
- 1.15 The following table compares the contributions made by migration and natural change in the 2008-based and 2012-based projections; the 2011-2012 figures for the 2012-based projections are derived from the Mid-Year Population Estimates.

Table 4: Components of population change 2011-2032; 2008 and 2012-based projections

Component	2012-based	2008-based	Difference
Natural Change	-3,565	-4,627	1,062
Births	5,789	5,366	423
Deaths	9,354	9,993	-639
Migration	5,792	8,951	-3,159
UK	5,382	9,876	-4,494
International	415	-926	1,341
Total Change	2,213	4,257	-2,044

(Source: mid-2002-to-2010-revised-components-of-change-for-england-and-wales.zip, ONS <http://www.ons.gov.uk/ons/about-ons/what-we-do/publication-scheme/published-ad-hoc-data/population/may-2013/index.html>)

Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.1.0.)

1.16 The most significant contributor to the smaller population growth in the 2012-based projections is the reduced net gain from migration. The net migration from the rest of the UK is nearly 4,500 smaller in the 2012-based projections. This fall is partly offset by the effect of international migration, where a loss of about 900 is replaced by a gain of 400. Comparison between the international figures has been affected by a change in the methods and data used to estimate immigration flows.

1.17 The reduced gain from UK migration is partly offset by greater natural growth in the 2012-based projections, with more births and fewer deaths. However, household projections depend on numbers of adults and births do not have much direct impact on the projection of household numbers in the period up to 2031. The number of deaths has more effect, but the reduced numbers probably stem from the smaller numbers of older persons in the 2012-based projections.

1.18 The following table examines the migration projections in more detail. The most important difference between the projections is that the 2012-based have smaller flows into West Somerset from the rest of the UK. This is only partly offset by smaller number leaving the district. In contrast, the 2012-based projections have noticeably higher International inflows.

Table 5: Migration flows 2011-2032; 2008 and 2012-based projections

Migration flows	2012-based	2008-based	Difference
UK Migration			
Net	5,382	9,876	-4,494
In	42,891	49,612	-6,721
Out	37,509	39,736	-2,227
International			
Net	415	-926	1,341
In	2,944	1,746	1,198
Out	2,528	2,672	-144

(Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.2.0)

1.19 Migration projections are based on trends in the 5 years before the base date, and the smaller gains from UK migration in the 2012-based projections stem mainly from a reduction in migration into West Somerset in the years following 2008 as presented in the following table which provides a 10 year perspective.

Table 6: Internal Migration, West Somerset, net effect for the 10 year Period ending June 2014, 000s

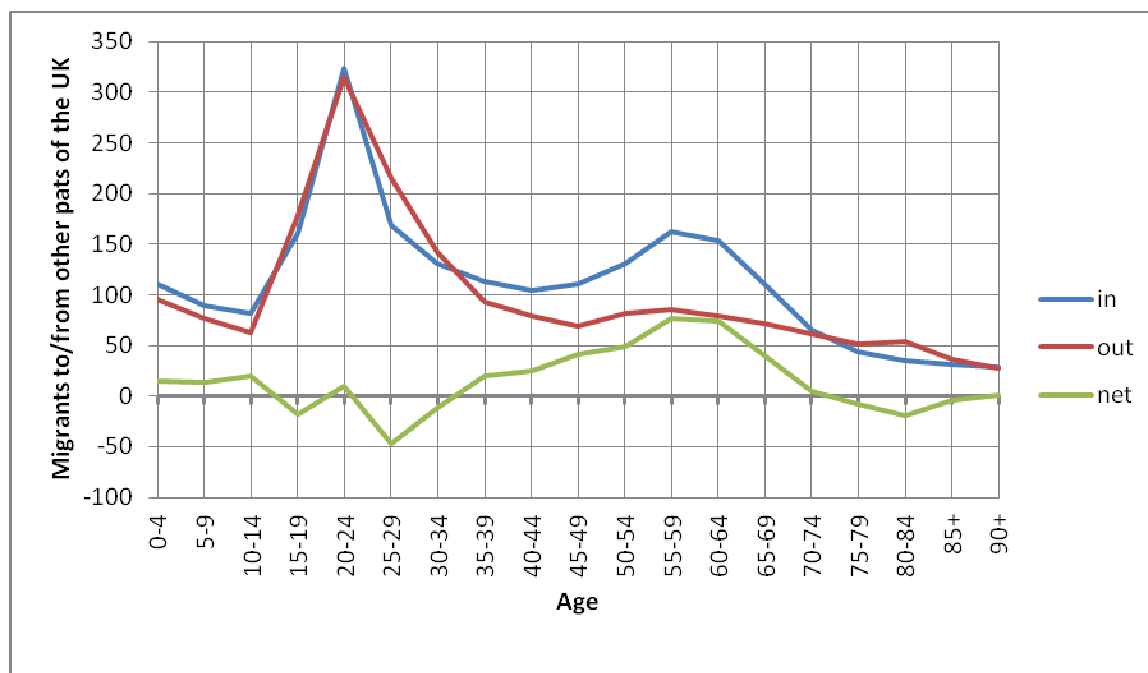
Area	2004/ 05	2005/ 06	2006/ 07	2007/ 08	2008/ 09	5 year average	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	5 year average	10 year average
West Somerset	0.1	0.1	0.3	0.3	0.1	0.18	0.2	-0.2	0.1	0.0	0.1	0.04	0.11

(Source: Estimates from NHS Patient Registration with GPs data, Office for National Statistics website, <http://www.ons.gov.uk/ons/index.html>. Contains public sector information licensed under the Open Government Licence v1.0 <http://www.nationalarchives.gov.uk/doc/open-government-licence/>).

Key findings:

- There has been a marked slowdown in net internal migration over the 10 years since June 2004, with the average over the most recent 5 year period almost one third that compared with the first 5 years.
- 1.20 Chart 5 shows the age breakdown of annual average migration flows between West Somerset and the UK over the period 2011-2031, according to the 2012-based projections

Chart 5: projected annual net migration by age in the 2012-based population projections, 2011-2031



(Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.2.0)

- 1.21 In and out flows are greatest among those aged between 15 and 34 and there are net outflows in the 25-34 age group. Net gains are projected from the age of 35 up to age 69. Inward flows increase markedly after age 44, reaching a peak in the 55-59 age group. Flows out of the area follow a broadly downward direction after age 54, with a slight rise among the 80-84 age group.
- 1.22 Unfortunately age details are not available for the 2008-based projections. Nevertheless the differences in projected age groups, shown in Chart 1, suggest that the 2008-based projections assumed greater in-migration in the older middle-age groups. This conclusion is supported by information on migration change in the years leading up the 2008 and 2012-based projections.
- 1.23 The following table shows information on net UK migration in the five years preceding the 2008 and 2012-based projections. Information for 2014 is also presented, as this will inform the 2014-based projections to be published in 2016. Net inflows were higher in the years before the 2008 projections and this is particularly noticeable in the 45-64 age group. The 2014 average shows no increase over 2012.

Table 7: annual migration between West Somerset and the rest of the UK (5 year averages)

Age band	Migration Gain/Loss (thousands)		
	2008	2012	2014
0-14	0.0	0.0	0.0
15-29	-0.2	-0.1	-0.2
30-44	0.0	0.0	0.0
45-64	0.3	0.1	0.1
65+	0.1	0.1	0.1
Total	0.2	0.1	0.0

(Source: Estimates from NHS Patient Registration with GPs data, Office for National Statistics website, <http://www.ons.gov.uk/ons/index.html>).

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<http://www.nationalarchives.gov.uk/doc/open-government-licence/>).

Are recent demographic trends a reliable guide to future population and household projections?

1.24 This section reviews three issues of relevance to assessing whether recent demographic trends are a reliable guide to future, these are:

- internal migration among older adults;
- the population of working age; and
- technical considerations.

Internal migration among older adults

1.25 The previous section showed that the slower growth in the 2012-based projections is primarily associated with fewer moves by adults in the 45-64 age groups but will the recent low volumes persist? A second question is whether there are potential factors that might increase inflows, or reduce out migration among younger adults.

1.26 Migration assumptions are based on the 5 years preceding the projection base year. Table 7 identified the difference in the trends in the 5 years leading up to 2008 and 2012. The latter period was one of poor economic performance and a subdued housing market.

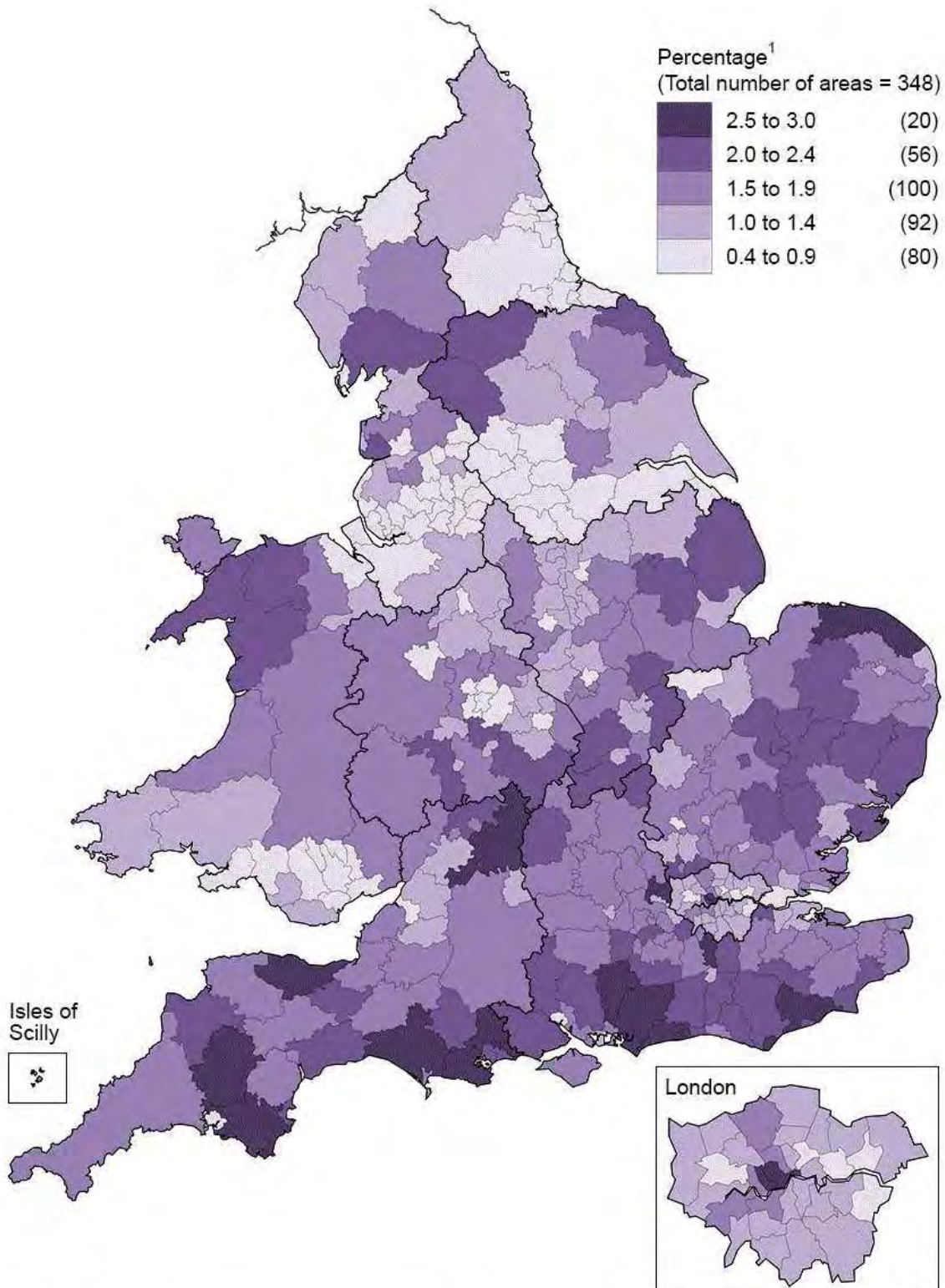
1.27 There is so far no demographic evidence to indicate a revival of moves by older people into West Somerset. However, ONS report that, nationally, the number of people aged between 50 and 80 moving to another local authority was higher in 2013-14 than in the previous year (Internal migration, England and Wales, year ending June 2014, ONS, 25 June 2015). Some of this increase stems from the growing numbers of people in these age groups, but other possible reasons are reviewed as follows:

“The year ending June 2014 was a period of steady economic growth and growing employment. These may have contributed to the increase in the

number of moves for younger adults, but the effect is likely to have been limited for people aged between 50 and 80. For those age groups in particular, a possible factor is the 10% increase in house prices during the year, which may have encouraged people to move after a few years of avoiding moving because of comparatively stable prices”.

- 1.28 This has not affected West Somerset so far, but it is reasonable to assume that some increases are likely.
- 1.29 The following map, produced by ONS, shows that the proportion of West Somerset’s residents aged 65 or older who had moved into the district in the year leading up to the Census was in the highest category shared by only 19 other local authorities in England and Wales. It is likely that any recovery in migration among older people would lead to greater movements into the district.
- 1.30 Whilst there is no demographic evidence of a revival of moves by older people into West Somerset, one potential indicator is the level of home moves which can be measured in part by the level of house sales. The following table summarises the pattern of all sales recorded between 2005 and 2015, the 2015 figure has been derived by projecting the pattern of sales until 31stAugust of that year. The sale of new build properties has been separately identified as it may be a possible ‘pull factor’ in relation to inward migration.

Map 1: percentage of usual residents aged 65 and over who had moved from elsewhere in the UK in the year prior to Census 2011



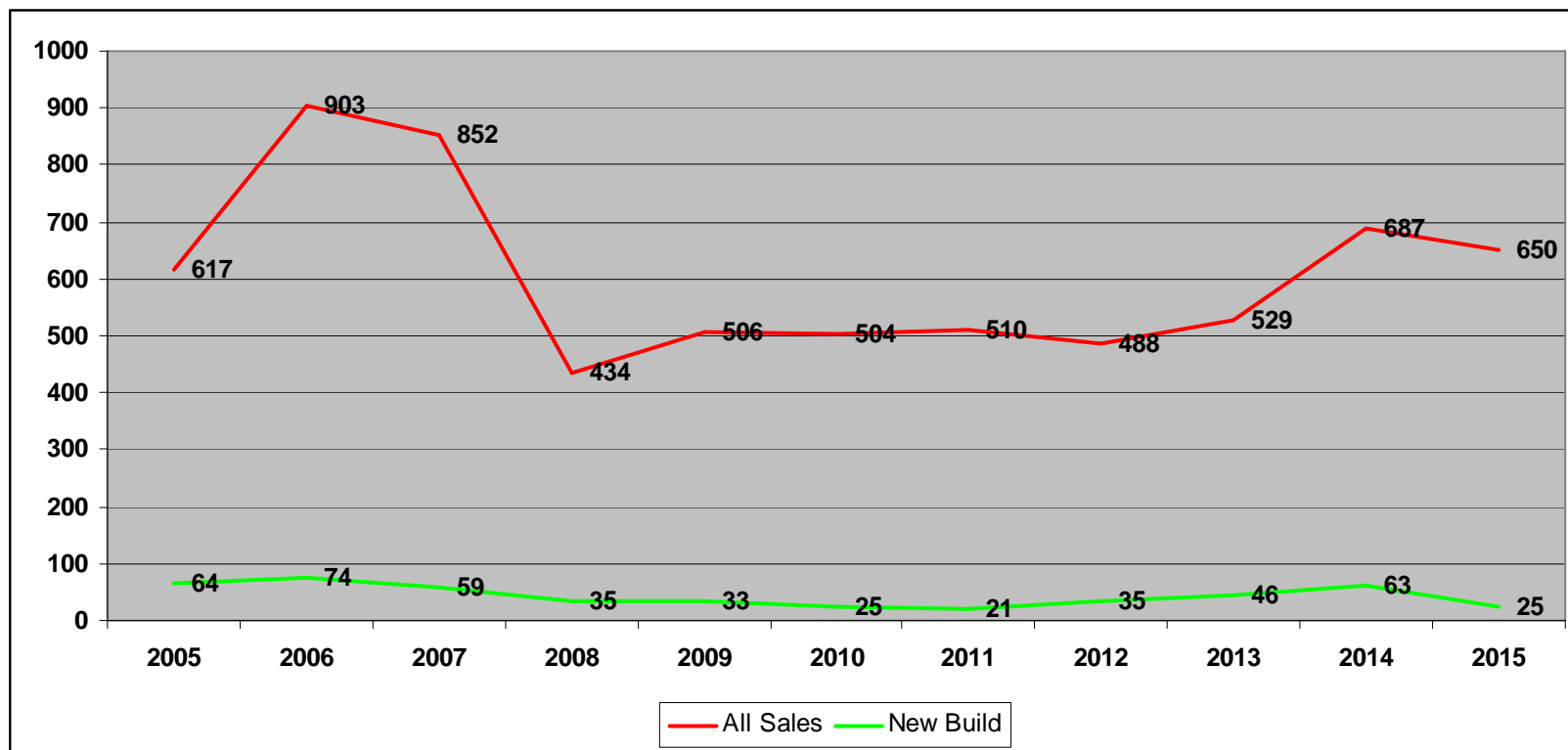
¹ Data have been merged for Isles of Scilly and Cornwall and also for City of London and Westminster because of small population sizes.

Source: Office for National Statistics

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Table 8: all sales and new build sales, West Somerset Council area, 2005-2015



(Source: Land Registry)

- 1.31 The table demonstrates clearly the impact of the recession after 2007 when sales almost halved in a year. They proved remarkably stable over the period 2009-2013 then almost doubled in 2014 with 2015 sales estimated to be at a similar level. New build sales may be part of that process with a dramatic increase in 2014 but also a dramatic decline in 2015.
- 1.32 Whilst no data is available to profile purchasers, it is likely that some of the increase in sales will be due to inward migration, including from older people. However, it is too early to say whether the pattern for 2014 and 2015 reflect a sustained revival in sales.

The working age population

- 1.33 Chart 1 identified that both the 2008 and 2012-based projections show large reductions in the older working age groups and smaller reductions among those aged between 15 and 29. The development of the Hinckley Point C power station may change these trends, although it is difficult at this stage to quantify this.
- 1.34 2014-based national population projections were issued on 29 October 2015. These show national growth being somewhat more rapid than the 2012-based population projections, primarily due to greater gains from international migration. This is likely to have a limited impact on West Somerset projections, but the position will not be known until sub-national projections are produced in 2016.

Technical considerations

- 1.35 The future is uncertain and the projections merely show what would happen to the population if recent trends were to be maintained.
- 1.36 Migration assumptions are based on the 5 years preceding the projection base year. Table 7 demonstrated the difference in UK migration trends in the 5 years leading up to 2008 and 2012 and these differences explain much of the variation between the sets of projections. They illustrate the sensitivity of long-term projections to changes in trends over a fairly short period. Consequently, it is unwise to base the assessment of OAN on one set of projections as economic and other factors will lead to variations in change during a 20 year period.
- 1.37 The population of West Somerset is very small. ONS consider that:

‘Projections become increasingly uncertain the further they are carried forward due to the inherent uncertainty of demographic behaviour. This is particularly so for smaller geographical areas and detailed age and sex breakdowns.’

(2012-based Sub-national Population Projections for England, ONS, 29 May 2014).

- 1.38 On technical grounds the 2012-based projections are to be preferred over the 2008-based as they were informed by the 2011 Census and improved evidence on migration. Some of the evidence used to inform the 2008-based projections has been shown to have been inaccurate.

Conclusions

- 1.39 The 2008-based projections cannot now be used for setting OAHN as the evidence base on which they relied has been superseded by the findings of the 2011 Census.
- 1.40 The January 2015 Strategic Housing Market Assessment Update for the Northern Peninsula Housing Market Area recommended the application of household projections Scenario 3, 'Interim 2011-based household projections to 2021 followed by 2008-based projections to 2031', and incorporating 2012-based population projections. This identified a growth of 1,674 households for whom homes would need to be provided over the period 2011-2031.
- 1.41 The October 2015 Strategic Housing Market Assessment Update for the Northern Peninsula Housing Market Area assessed the impact of applying 2012-based household projections and identified a growth of 1,704 households for whom homes would need to be provided over the period 2011-2031, a difference of only 30 when compared with Scenario 3 based on 2012-based population projections.
- 1.42 It is now clear that the 2012-based household projections provide the soundest technical base available for assessing OAHN.
- 1.43 The 2012-based household projections provide no grounds for increasing the assessment of OAHN beyond the 30 households which are additional to those identified from the previous Scenario 3 based on 2012-based population projections
- 1.44 A number of factors, in particular, inward migration among older adults and the housing market impact of Hinkley Point C, introduce a degree of uncertainty concerning the effect of future trends, the direction of which would be to increase OAHN. Given these considerations, it would be unwise to reduce the assessment of OAHN derived from applying either the 2012-based household or population projections.