

East Coker Neighbourhood Plan Regulation 14 Consultation

Appendix A to the Matrix of Comments Received

Response to Comments received in relation to the strategic context of East Coker and related housing issues by East Coker Parish Council and Neighbourhood Plan Group.

1 Introduction

1.1 The summary of comments below relates to those submitted by businesses or their professional advisers as well as the Local Planning Authority, South Somerset District Council. Although varying in their details the comments in relation to housing fall into 2 main categories; namely:

- Those relating to the specific number of dwellings referred to in Policy EHC1
- Other more general references to comments in the Plan about future growth in the Parish as a result of the proposed development at Keyford and the need for the Plan to recognise that the Review of the South Somerset Local Plan has just started.

This appendix therefore provides the response to these representations from the East Coker Neighbourhood Plan Group and Parish Council, with an indication given as to where and how the Plan will be amended to reflect some of the points being made. **The issues are being addressed in this separate Appendix, as they are too extensive to include within the summary matrix of responses to representations received.**

1.2 The figure of 65 dwellings that is included within the Plan as being the level of development was assessed as being a proportionate number, having regard to Local Plan Policy SS2 and the overall growth envisaged in the Local Plan for Rural Settlements.

1.3 Policy SS2 for settlements such as East Coker, which does not have a Development Boundary essentially considers the area to be one of the open countryside, subject to certain criteria, with associated restrictive approach to development that would be expected. However, this figure and associated Policy is deemed by the representatives, to be neither robust in terms of supporting evidence, and nor do they consider that it meets the Basic Conditions, in terms of contributing towards sustainable development.

1.4 The need, in the view of the respondents for the Neighbourhood Plan to have regard to the emerging South Somerset Local Plan Review and the suggestion by the District Council that they may consider there may be potential for further major development in the vicinity of the Southern Urban Extension [Keyford] in the Local Plan Review with extends to 2034 and in their view that..."***The policies in the draft NP clearly seek to inhibit further large-scale growth of the south western edge of Yeovil. The Neighbourhood Planning Group should recognise that as the District's principal settlement, it is highly likely that Yeovil will need to grow in the future and accommodate additional residential and economic development. The Early Review of the Local Plan is underway and evidence already demonstrates that additional housing will be required across the district to support population growth to 2034***".

1.4 In response to these comments, it is proposed that the Plan will make reference to housing issues in more detail and the contribution the Plan makes towards sustainable development. It will draw clearer distinctions between the following:

- Major Strategic Housing aimed at meeting the wider needs of Yeovil and South Somerset
- Other, more modest housing growth on the periphery of Yeovil

- Growth that may take place within the settlements of East & North Coker which are more clearly defined as 'Rural Settlements under Policy SS2 of the Local Plan.

1.5 The summary of the key points in relation to these issues is set out below in Section 2 with a response from the Neighbourhood Plan Group and Parish Council set out in Section 3 and in the **Appendix** to these responses which addresses the housing assessment for the Rural Settlements that was included in the Plan, but now based on the 2014 projections, as advised by SSDC and other matters.

1.6 This document does not refer to other more detailed comments on other housing policies in the Plan which are referred to in the main matrix and included in a separate Appendix B to the matrix where amendments to policies are proposed where considered necessary and appropriate.

1.7 In the light of the consideration of the strategic housing issues, amendments will be made to the relevant sections of the Neighbourhood Plan to recognise that the Local Plan Review has just started and to set out the Neighbourhoods Plan/Parish Council's approach to the relevant issues under consideration, based on the this paper.

2 Summary of Representations on Strategic Housing Issues

2.1 Letter from Savills representing Wessex Farm

PROCESS - the ECDNP, it is clear that its primary focus is on the villages themselves, with less attention given to wider issues about the Parish or its relationship with Yeovil (or its other neighbours). This is emphasised by the reference to policy. The NP could cover a small area. The ECNDP acknowledges, there has been substantial discussion about the SUE and its overall planning status is firmly established. The ECDNP also recognises that the Keyford site accommodates growth for the whole of Yeovil (and is in the form it is to meet the town's requirements and not East Coker's or North Coker's). The development will be subject to national and local planning policy and the development management process – which have the same quality objectives and requirements that the ECDNP plan repeats. POLICY ECH1: excludes the SUE but provides no other guidance on where the additional development it refers to may take place. That process will presumably come from the application of policies in the SSLP.

The policy also fails to make provision for a review of the SSLP (between now and 2028 when both plans will expire). If this policy needs to be in the ECDNP (and we are not sure it does – Policy ECH1 of the Plan makes no distinction between settlement and parish. It should just apply to East Coker and North Coker, although ECH1 probably doesn't need to be in the ECDNP at all given that it is effectively already in the Local Plan (or other planning guidance), and we recommend that such a reference is added to the end.

POLICIES ECCN1, ECCN2, ECCN3, ECCN4, ECCN5, ECCN8, and ECCN9 -the need for these, they do not add value to SSDCLP or national policy. PROPOSAL MAP - inaccuracies and in need of further explanation.

A number of suggestions could be made in this light. However, because of the ECDNP's focus (and function) and because the Keyford site is already subject to quality control (that is at least equivalent to that proposed now), as a starting point we recommend that the Plan Area is reconsidered generally and/or that the Keyford site is removed from it.

2.2 John Bishop

Our comments are set out below and suggest that some further consideration be given to the chosen geographic boundary of the East Coker Neighbourhood Plan Form of the East Coker Parish From a Neighbourhood Plan point of view, East Coker Parish could be looked at as having three broadly different areas, as follows:

- ☐ *The core village areas of East Coker and North Coker*
- ☐ *Intervening and surrounding green countryside*
- ☐ *Land adjoining the southern urban edge of Yeovil either allocated in the South Somerset Local Plan for development (as in the case of the Keyford YSUE) or contained in the current HELAA (Housing and Employment Land Availability Assessment) as potential future southerly expansion areas for Yeovil.*

The HELAA East Coker information is publicly available and was published in the Western Gazette only a fortnight ago. The East Coker Neighbourhood Plan boundary The ECNP as drafted covers the entire Parish and encompasses all three of the broad areas set out above.

The Plan could have been drawn with a tighter boundary just covering the core village areas, or alternatively with a wider boundary to cover both the village areas and the surrounding countryside, but excluding land adjoining Yeovil's urban edge. Any one of these three alternative boundaries would be acceptable, provided that the text of the Plan addresses the issues pertinent to each of the broad geographic areas included within it.

The Plan's Approach. Although the references to the YSUE in the Plan are fully acknowledged, the main thrust of the Plan as drafted is to cover issues in the East Coker and North Coker villages, while generally remaining silent on any future expansion of Yeovil. As such, the Issues set out in Appendix 1 such as parking issues, grit bins, play areas, sound systems, etc. would be wholly appropriate and comprehensive if the Plan's boundary was tightly drawn around the villages. If the ECNP continues to include the land along Yeovil's southern boundary then the future expansion of Yeovil is something that perhaps should be addressed within the document.

2.3 Brooke Smith

In response to draft Policy ECH1, it is considered that the East Coker Parish area should actually have a wider housing role. Due to its geographical proximity to the defined Yeovil Development Area, the very northern reaches of the Parish Boundary have a role to play in accommodating growth associated with the Strategically Significant Town of Yeovil, which is the prime focus for new development, according to the adopted Local Plan (Policy SS1).

In light of this it is recommended that the stated Housing Objective of the Neighbourhood Plan be revised to reflect the dual roles of the Parish area in relation to new housing.

Land East of Holywell is being promoted for development via pre-application discussions. This is a reduced scheme from that which was subject to a planning appeal last year that was dismissed. The Plan should make provision for further development in the area of the Yeovil SUE. Policies in relation to general housing criteria and amenity space are supported and reflected in the new proposal

2.4 Gladman Developments

General references made to Basic Conditions and requirements of the NPPF, the presumption in favour of development is a 5 year land supply cannot be identified and the need for NPs to have regard to the strategic planning requirements of the area and national Planning Practice Guidance in respect of NPs.

However, due to the proximity of the Neighbourhood Area to Yeovil, the largest settlement in South Somerset, the plan should not be presented in a way that may have the effect of restricting development coming forward on the edge of Yeovil. The figure of 65 new houses in the Plan should be a minimum.

It is also not considered appropriate to set a level of growth for the Parish which is adjacent to Yeovil, the largest town in South Somerset. Suggesting a level of growth could result in restricting development coming forward on the edge of Yeovil that would otherwise be perfectly sustainable. PPG states: 'All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.'

Therefore, Gladman recommends deleting the dwelling target to comply with basic conditions (a) and (d).

It is also considered that Policies ECH4 and ECCN6 do not accord with the NPPF

2.5 Abbey Manor Group

The Neighbourhood Plan should be aligned with the strategic needs and priorities of the wider local area. This should include specific policies that introduce the flexibility to respond to reviews of the March 2015 South Somerset Local Plan (2006-2028) to ensure that the Strategically Significant Town of Yeovil as defined by Policy SS1 is not un-necessarily constrained. The Draft Neighbourhood Plan for consultation (DNHPfc) contains policies that distinguish between the YSUE (as defined by LP policy YV2) and the remainder of the Neighbourhood (eg Policy ECH 4 in respect of access to affordable housing).

This highlights the internal dissonance of the DNHPfc as to the nature of the Neighbourhood, seeking on the one hand to characterise the Neighbourhood as a Rural Settlement (which it is acknowledged that the village is defined in the Local Plan) whilst on the other hand encouraging pedestrian and cycling links between the villages of North Coker and the YSUE which is included within the Neighbourhood Plan. One is left wondering whether this is a Plan for the Village or the Parish.

The plan does not accord with the NPPF and 65 dwellings does not appear to have been objectively assessed as the housing need for East Coker parish, rather a proportion of the anticipated housing growth at District Local Plan level

To maintain sustainable rural communities, areas need to ensure that they have a good mix of younger and working age population, without this the school, community facilities and wider rural economy will suffer. This Policy has focussed on the numbers of dwellings to be provided without consideration of the national trend for households to become smaller (thereby needing more smaller dwellings) or the needs of the Parish in sustaining its economy and existing facilities.

Planning Policy Guidance states that Neighbourhood plans should be aligned with the strategic needs and priorities of the wider area. East Coker needs to take into account the strategic needs of Yeovil and South Somerset not just up to the end of the lifetime of the current district wide local plan, but beyond, by considering future needs and priorities, East Coker could plan proactively for the future.

Other more detailed comments also made in relation to housing policies and national policy

2.6 WYG on behalf of Abbey Manor

This Policy seeks to cap new developments to 65 additional dwellings, over the period April 2011 – March 2028 inclusive, subject to any change in higher level policies. It states that Applications will only be approved if they can demonstrate that they meet local need, conform to Local Plan policies SS2 and HG5 and other Local and Neighbourhood Plan policies.

Our concerns with this policy is that there is no evidence to quantify the 65 dwelling figure or what would constitute evidence that a particular development would meet local need. Ideally a housing needs survey should be used to demonstrate the precise housing needs for the Parish in terms of both affordable and market housing, including the size (number of bedrooms) of properties required.

Also detailed comments submitted in relation to Tellis Cross

2.7 South Somerset DC

The East Coker NP Area includes the south western edge of Yeovil (including the Keyford Sustainable Urban Extension) which is in the parish of East Coker. The policies in the draft NP clearly seek to inhibit further large-scale growth of the south western edge of Yeovil. The Neighbourhood Planning Group should recognise that as the District's principal settlement, it is highly likely that Yeovil will need to grow in the future and accommodate additional residential and economic development. The Early Review of the Local Plan is underway and evidence already demonstrates that additional housing will be required across the district to support population growth to 2034.

The Spatial Planning team will begin to work on options to accommodate this additional housing and 360 degree searches of appropriate settlements will be undertaken to establish potential sites/locations for development. The Neighbourhood Planning Group should not be seeking to constrain parts of the town from future development through this Neighbourhood Planning process as it is not in the spirit of sustainable development advocated in the NPPF. This could also result in community expectations not being met.

These paragraphs which seek to set out the methodology for deriving ECNP's "fair share" of housing development are not clear. As with the Local Plan, policies within the Neighbourhood Plan should be underpinned by robust, objectively assessed data. The Planning Advisory Service (PAS) note that many neighbourhood planning groups produce Housing Needs Assessments in support of their plans, setting out the evidence to verify their housing policies. Is there such a paper supporting the ECNP housing policies?

Paragraph 6.7 uses 2011 Census data and a Household Occupancy figure of 2.1. Previous comments from the District Council (email from Jo Wilkins dated 6th December 2016) have raised the issue of using up-to-date data such as the 2014 based Household Projections and 2014 Subnational Population Projections. The ECNP group have acknowledged this and will revise at Regulation 15 stage. A revision of the baseline from 2011 to 2014 as suggested by the Council will undoubtedly amend the figures.

Paragraph 6.8 suggests an 8.5% increase in population and dwellings in East Coker between 2011 and 2028. What is the evidence for this growth? The methodology as set out in the plan does not reflect the PAS Guidance "Housing Needs Assessment

for Neighbourhood Plans”

<http://www.pas.gov.uk/documents/332612/0/PASNP/5cd2a9da-dc5e-4c5c-a982-e2f4a23d3fcc> nor is there any evidence supporting the figure of 65 dwellings over the plan period.

It has previously been stated by the Council (email 6/12/16) that Policy ECH1 should refer to a minimum requirement rather than an absolute as this is in line with the Local Plan approach to housing requirements. The minimum requirement relates to the application of Local Plan Policy SS2 and recognition of issues surrounding the national requirement for local authorities to demonstrate a 5 year land supply.

3 Response to Representations on Strategic Housing and Related Issues by ECNP Group & ECPC

3.1 In the light of the representations received an initial report submitted to East Coker Parish Council in April 2017 set out a number of options as follows:

Option 1 To abandon the Neighbourhood Plan, to avoid ultimately having a Plan modified by the LPA in light of the Examiner’s report, that may not achieve the Parish Council and local community’s aspirations in terms of limiting housing growth to that currently planned.

Option 2 To defer the Plan until the outcome of the Local Plan Review is known and to focus on making representations on the Review, to protect the interests of East Coker at a more strategic level. This would also allow for the Neighbourhood Plan Group to consider what additional and up to date evidence at a local level may be required, to supplement that of the LPA e.g. Local Housing Needs Survey, to help inform any future neighbourhood plan housing policies.

Option 3 To continue with the Neighbourhood Plan, but to include reference to the fact that the Local Plan Review is underway and the views of SSDC, making reference to the recent HELAA document, but with no indication that any additional development would be supported at this time. It would also be appropriate to include references to the 2015 South Somerset Local Plan Inspector’s report, as in that report, after an extensive Local Plan Inquiry that ECPC contributed to, the Inquiry Inspector only approved the Local Plan as being sound, after the scale of development within East Coker at the Keyford area was reduced to its current size. The former larger scale of development that had originally been proposed in the Local Plan, was specifically not supported by the Inspector. This is an important material planning consideration

3.2 An **Option4** was considered and approved by the Parish Council, which was to continue with the Plan and to continue to make reference to a number for housing within the rural settlements, but reworked and updated to reflect SSDC comments. The Parish chose this as their preferred option as they considered it was important to make a clear statement about the proposed level of growth expected within the villages, particularly in the light of public comments on the Plan.

The Geographical Extent of the Neighbourhood Plan Area.

3.3 A number of respondents have suggested that the NP boundary should focus only on the villages of East & North Coker and not include the peripheral area around Yeovil, including the Keyford site and adjacent land. The decision to include the whole of the Parish within the Neighbourhood Plan area was one made at the outset of the process by the Parish Council and this boundary was formally approved by the District Council as Local

Planning Authority. Only a local planning authority can amend the boundary of a neighbourhood plan area after it has been designated, and this could only take place if it was responding to a new application for a new neighbourhood area to be designated. The Parish Council considers the Plan boundary is still appropriate.

3.4 The Plan makes reference to the strategic housing site at Keyford and shows it on the Proposals Map as a strategic housing site serving the wider needs of Yeovil and South Somerset. It does not however address the very detailed issues linked to the development of the site, as this is being addressed through the planning application process. This is considered to be the correct as well as a sensible and pragmatic approach. Therefore the Parish Council will be actively pursuing a plan and policies which will be applied throughout the Parish, but comments about the clarity of the plan's approach to housing are noted and amendments to text and policy will be made to improve clarity, as noted in section 1.4 above.

Early Review of the Local Plan & 5 Year Housing Land Supply

3.5 South Somerset DC has a recurring problem in being able to demonstrate a 5 year supply of housing land and has concerns about the NPPF's statement that there is presumption in favour of permissions being granted if a land supply cannot be demonstrated. Paragraph 14 of the NPPF advises that for decision-taking this means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or
- specific policies in this Framework indicate development should be restricted.

3.6 The **Housing Land Supply Report for 2016** confirms that there is a 4 year and 2 month supply of housing land, which is a reduction on the previous year's figure by a further 2 months. However the report also advises as follows...

... "So, in summary, the required target is growing due to continued under-delivery; whereas the amount of forecast supply remains approximately the same. However, there is one caveat to the future housing supply position, and that is the level of forecast completions in the district's largest settlements is not meeting expectations. Separately – and in combination – Yeovil, Chard and Crewkerne are not delivering the necessary numbers of dwellings to keep the overall district figures on track".

"In simple terms, the implication of not being able to demonstrate a five-year housing land supply is that the policies relating to housing within the local plan are deemed to be 'out-of-date'. As such, the weight that should be attached to them in decision-making should be reduced in reaching conclusions on the acceptability of housing development in the district".

3.7 The future course of action to address housing in SSDC is yet to be determined by the Local Plan Review and the NPPF, which highlights the importance of considering economic, social and environmental impacts and issues in a comprehensive manner...not in isolation

3.8 There is an apparent contradiction between the need for more housing sites to meet the 5 year supply and the reality of how house building is progressing in South Somerset and in Yeovil in particular, which is much slower than envisaged in the Local Plan. This is however perhaps not surprising, given the economic recession since 2008 and the difficulty

of obtaining loan funding by builders and mortgages by prospective purchasers; a factor recognised in the Council's Housing Supply Report. This is a situation that has been prevalent for some years across the UK, since the recession. The same is the case for employment land, which has not come forward as expected, especially in Yeovil where the Lufton, Bunford and Seafire sites are still to be developed. It cannot therefore be said that economic buoyancy or economic development needs are driving the need for yet more housing land in Yeovil, at this time.

3.9 Furthermore there are a number of large housing sites under construction in the Yeovil area that are proceeding at a slow pace, and in respect of these sites, the following figures provided by SSDC demonstrate the slow rate of housing development in Yeovil on two key sites:

- **Thorne Lane;** development commenced circa March 2014, Permission for 830 houses; 87 dwellings issued with a completion notice; just over 10% in 3 years
- **Agusta Park;** development commenced circa November 2013. Reserved Matters approval is in place for 696 dwellings. Approx. 121 dwellings have been completed but only 80 with formal completions from the approved inspector; just 17% of the total consented, in 4 years.

3.10 In addition, the 2 main strategic 'Urban Extension' housing growth sites in Yeovil; Keyford and Mudford have yet to even receive planning consent, let alone make a start on site, with little evidence of much recent progress by the prospective planning applicants/developers on their planning applications.

3.11 All of the above reinforces the point made in the Council 5 year housing land supply report quoted above in Section 3.4.

The Housing Figure of 65 within the Neighbourhood Plan

3.12 In their representations, the District Council highlight that the figure of 65 dwellings referred to in the Neighbourhood Plan as being the level of additional housing supported [in addition to Keyford], is not based on a detailed housing needs assessment or survey and they contend that it is not a robust or legitimate approach to take and that also, it is not appropriate to state an absolute figure in this way.

3.13 The Council also advises using up-to-date data such as the 2014 based Household Projections and 2014 Subnational Population Projections. As noted in their representations set out in Section 2 above, the Council also raises the query about the suggested 8.5% increase in population and dwellings in East Coker between 2011 and 2028 and maintain that the methodology as set out in the plan does not reflect the PAS Guidance "Housing Needs Assessment for Neighbourhood Plans"

3.14 In response to these comments, the figure of 65 was based on a methodology that had regard to the level of population and housing growth generally in rural settlements within the District and applying what was considered by the Parish Council, to be a proportionate, reasonable rate of growth to the Parish.

3.15 However, it is recognised that stating an absolute figure is not a realistic or robust approach and therefore the plan will be amended to state that the figure quoted will be an 'at least' figure. However, it is important to note that this is in the context of Policy SS2 that

applies to the villages of East & North Coker and this will be clarified further in the amended text and policies within the Plan.

3.16 The East Coker Parish Council made a decision at the outset of the Plan process not to undertake a Housing Needs survey (HNS). This was for a number of reasons:

- The NP would not allocate sites for new housing and therefore there was no requirement to attempt to identify the number of houses and to identify specific sites, that might otherwise have been the case.
- It was recognised that such a survey would only be a snap shot in time and would require regular update, something the Parish Council were unable to commit to in terms of time and other resources.
- The results would not fully address the overall demand for housing in the villages that was evident through the submission of planning applications on an ad-hoc, piecemeal day-to-day basis.
- Such surveys undertaken for Neighbourhood Plans aim to identify the need for housing in the village by local people and do not take account of pressure for housing generally, and this is particularly pertinent, given the Parish containing two strategic urban extension sites.
- It is recognised though, that a HNS would add value in terms of identifying e.g. the type and size of dwellings required in the Parish. But this benefit was not considered to outweigh the resource implications behind such an assessment and it's somewhat limited application, given the SS2 status of the Parish and considering that 'Keyford', was already the subject of a planning application.

3.17 An alternative approach was therefore developed which examined the scale of housing development that was planned for the Rural Settlements in the Local Plan and applying a growth level on the same basis as the Local Plan, but reduced to reflect the fact that rural areas were planned to be taking a reduced level of housing. This is reflected in Policy SS2, which essentially treats areas such as East & North Coker villages as 'open countryside'. However the Parish Council has taken a realistic and pragmatic approach to accommodating housing in the villages outside of the strategic sites and made further assessments based on the methodology that is set out in the Housing Paper attached as an **Appendix to this report**.

3.18 This Housing Paper explores the following:

- The relationship between housing and population in the Parish and District
- The place of the Parish within the context of South Somerset Local Plan 2006-2028
- Latest 2014 household¹ and population projections² and how these might relate at Parish level
- The SMHA October 2016 and the SSDC Monitoring Report September 2016

3.19 The paper draws on a range of sources to establish a proportionate and appropriate evidence base in which to make informed decisions about East Coker's future housing requirements. It is not the intention to identify affordable housing need per se but more to build a picture of the Parish and to provide a sound rationale basis for an "at least" housing requirement by 2028. In developing this paper due regard has been given to Strategic Policies of the Local Plan and the NPPF/NPPG. The conclusions in this paper need to be balanced against the views expressed during the Neighbourhood Plan consultations.

¹ 2014 Based Household Projections for England and Local Authority Districts

² 2014 Based Sub National Population Projection for Local Authority Districts

- 3.20 The paper makes assessment based on three approaches as follows:
- **The Adopted 2015 South Somerset Local Plan**
 - **The latest Office of National Statistics (ONS) 2014 Projections**
 - **Evidence being used for the emerging Local Plan -SSDC's Authority Monitoring Report Sept 2016 and Strategic Housing Market Assessment (SHMA) Oct 2016**

3.21 The details of these assessment are within the report but the conclusions in terms of housing numbers appropriate for the villages under each assessment method are as follows:

- The Local Plan: 65;
- ONS 2014 Projections: 47
- SHMA: 54.

3.22 It is concluded that based on latest evidence and conforming with the Local Plan Strategic Housing Policies, which are considered out of date, the housing stock in the villages of East Coker and North Coker should increase by **at least** 54 dwellings between 2011 and 2028 excluding the strategic Urban Extension site. The NP has therefore used up to date evidence to formulate its housing number policy, and this is the same information informing the Local Plan Review, therefore highlighting the robustness of the NP. To ensure the Neighbourhood Plan housing requirement remains up to date, it should be reviewed within 5 years and if necessary adjusted to take account of, and in support of future evidence that may arise as a result of the final approval of the Local Plan Review. This commitment to review is included in the Neighbourhood Plan.

Housing & Economic Land Availability Assessment HELAA

3.23 This assessment was published in February 2017 and identifies 15 potential housing sites in East Coker Parish, including extensive tracts of land in the vicinity of the existing Keyford Site. It is important to note that as stated in the HELAA document that:...

"The HELAA does not allocate sites for development nor does it imply that identified sites would be granted planning permission if an application were to be submitted".

3.24 It also states as follows: *"The HELAA only identifies opportunities for housing and economic development on sites, which are considered to be deliverable, developable and available. It does not allocate sites to be developed. The allocation of sites for future housing or economic development will be identified through the preparation of Local Plans and Neighbourhood Development Plans." "The identification of potential sites within the HELAA does not imply that planning permission would be granted if an application were to be submitted. The HELAA is a high level assessment. All planning applications will continue to be considered against the appropriate policies within the adopted Development Plan1, having regard to any other material considerations"*

3.25 The important implications of these statements therefore is that the identification of a site in the HEELA does not mean that it will be developed.

3.26 Furthermore, SSDC has just published, in April 2017, an Economic Development Monitoring Report which demonstrates that over the 10 year period 2006-16, whilst there has been an increase in floorspace, there was only 1 net additional hectare of employment land provided in Yeovil itself, whilst over 30 Hectares were developed in the 'Rest of the District'. This therefore suggests that coupled with the slow rate of delivery referred to in para 3.6 and 3.9, indicates that focusing the strategic delivery of housing and employment growth in and around Yeovil needs to be reconsidered, something that cannot be discounted at such early stages of the Local Plan review.

3.27 A more dispersed District wide housing strategy may therefore be more appropriate and the implications from SSDC in their representations on the Neighbourhood Plan, that the Local Plan Review may identify further land in East Coker and that therefore the Plan should reflect this now, are considered to be inappropriate and premature at this very early stage in the Local Plan Review process. The East Coker Neighbourhood Plan is already supporting the strategic development needs set out in the Local Plan by including the Keyford site for 800 dwellings and it is planning positively to support this local strategic development and development in the countryside that comes forward proportionately and in accordance with Policy It is also considered that to remove the site from the Neighbourhood Plan, as some of those making representations on the Plan have suggested, would therefore be a distortion of what is happening within the boundaries of East Coker Parish.

Further Comments on Strategic Housing Sites in Yeovil in the Adopted Local Plan

3.28 In responding to representations from the various parties referred to in Section 2 above, it is relevant to consider further, the strategic Urban Extensions and other sites where development is underway in the Yeovil area. East Coker Parish Council was well represented and gave evidence at the Public Inquiry into the South Somerset Local Plan. The original Plan had proposed a very large allocation of housing development as part of the Southern Urban Extension; over 2500 dwellings. This was dismissed by the Plan Inquiry Inspector who halted the Inquiry, advised that such an approach was not sustainable for a number of reasons and that SSDC should reconsider its strategic approach to housing and related growth around Yeovil. This resulted in a reduced allocation at Keyford to 800 dwellings, which is rightly incorporated in the Neighbourhood Plan and the allocation of site at Mudford to the north of the town for some 765 dwellings. The possible inference now being made by SSDC is that the Local Plan Review may revert to the previous scale of development that was deemed unacceptable, as a result of the recent statutory Local Plan process, deliberated upon by an independent Planning Inspector.

Clearly as these are the key strategic housing sites in the Local Plan within Yeovil, to meet the District Council's assessment of housing need, it is important to review their planning and development progress.

3.29 The situation at **Keyford**, within East Coker Parish, is that the planning application was submitted in February 2015, over 2 years ago and has yet to be granted planning permission. SSDC has recently advised that due to changes in the proposals, a new Master Plan and Environmental Statement have yet to be prepared and submitted and that there is not even a draft 106 agreement prepared to date.

3.30 It will clearly be many months before consideration can even be given to determining an application. SSDC has also advised themselves, that the build-out period for Keyford will span 11 years and even if building started in 2019, this means that the site will still be under development in 2030. This is well into the Local Plan Review period and beyond the Neighbourhood Plan's end date, which is 2028.

3.31 In respect of **Mudford**, this application was submitted in May 2014; some 3 years ago and yet does not have planning consent, with the application file on the SSDC website suggesting that little or no progress has been made on this application over the past year or so.

3.32 Therefore taking account of the dwellings yet to be started and completed a **Thorne Lane, Augusta Park, Keyford and Mudford**, it is clear that there is scope for nearly 3000 dwellings to be provided within Yeovil, in addition to those on other smaller sites. The clear

conclusion from the above therefore is that sites currently under construction are proceeding at a very slow pace, whilst the 2 largest sites allocated in the Local Plan in Yeovil have not even received consent or started and will have build-out period that extends beyond the current adopted Local Plan and Neighbourhood Plan periods.

3.33 This therefore raises the serious question as to why the District Council seems intent on potentially identifying yet more land for housing development in Yeovil at this time, as part of the Local Plan Review. Even if this route is eventually to be followed, it is premature for the ECNP to identify or even indicate that more strategic housing development could take place within the Parish to the south west of Yeovil, at this time. The Local Plan Review process has only just started, with many stages yet to be progressed, before a final strategy emerges. This is set out in the Council's own timetable in Section 3.35 below.

3.34 It is recognised however that the ECNP does need to refer to the Local Plan Review process and this will now be done, but with reference also being made to some of the valid points highlighted in this response document.

Local Plan Review Timetable

3.35 Although the HEELA assessment is the very start of the Local Plan Review process, it is important emphasise that this is not the Review document itself. The recently published South Somerset Development Plan Scheme in April, provides a guide as the Review timetable which can be summarised as follows:

Initial Consultation on Scope and Issues	September/October 2017
Preferred Approach Consultation	November/December 2018
Consultation on Submitted Plan	August /September 2019
Examination	June 2020
Adoption	November 2020

Clearly these are just guide dates and it is submitted that some are overly optimistic and that there will inevitably be delays in this timetable, as there has been already in the process.

3.36 Therefore it is unlikely that there will be a formally Adopted Local Plan Review until say; Mid 2021 at the earliest; a further 4 years into the future As estimated by SSDC and in accordance with its own phasing programme for the site, development at Keyford will only have just started by this time and will have a further 10 years build out period to run.

4 Summary

4.1 Having carefully considered the representations on the Draft Neighbourhood Plan following Regulation 14 Consultation, it is clear that amendments to both the strategic context in Section 2 of the Plan and Housing Section 6 do need to be made. The relationship between the Keyford area and the rest of the Parish is already addressed in the Plan, but the strategic housing issues as referred to in this response need to be added in summary form within the Plan, to explain how East Coker is responding to the representations made on these aspects on the Neighbourhood Plan, in relation to the Local Plan Review. This will assist in demonstrating how the Neighbourhood Plan is meeting the Basic Conditions, as required.

4.2 Given the timescale of the Review, if there were to be any changes required to the Plan once the final Review Plan were adopted, then the Parish Council is committed to reviewing the Neighbourhood Plan to reflect these requirements. This reflects precisely the approach adopted in the current plan where the NP includes the strategic allocation at

Keyford, which was determined through the currently adopted Local Plan process. It would therefore be inappropriate for the NP in 2017, to potentially predetermine the outcome of the Local Plan Review.

4.3 Whilst the NP will be amended recognise that the Local Plan Review is underway, it is important to highlight the key points in this response that will be referred to in the next stage of the neighbourhood Plan. These are as follows:

- In response to comments by SSDC about the methodology of calculating the number of dwellings that may be accommodated in the Rural Settlements of East & North Coker, the housing figures have been reworked using the 2014 projections as advised by SSDC and also having regard to SSDC's Housing Market Assessments. This reworking has in fact produced a lower figure than in the previous draft of the Neighbourhood Plan.
- In respect of the main issue raised by SSDC which was the need for the ECNP to have regard at this stage, to the prospect of further strategic housing growth in the East Coker area south of Yeovil, a summary of the key points is as follows:
 - The Local Plan Review has not yet even been published, with a Scope and Issues consultation planned towards the end of this year and a further consultation exercise in late 2018. The Review will have to go through all the statutory processes including another Public Inquiry/Examination that is not planned until at least 2020.
 - There is therefore no certainty that additional housing growth to the South of Yeovil, within East Coker Parish will be included within the final Local Plan Review
 - SSDC have advised that the current Keyford site which does not yet have planning consent, will have a build out period of 11 years, which extends to 2029/30, which is beyond the NP plan period of 2028.
 - The latest 2016 Housing Land Supply Report by SSDC confirms that the level of forecast completions in the District's largest settlements is not meeting expectations sites and this of course includes Yeovil.
 - This is reaffirmed that the fact that even large housing sites with permission and underway in Yeovil, are progressing at a very slow rate This raises the question of whether yet more land needs to be identified in Yeovil at this time, when there is provision for nearly 3000 dwellings of sites either allocated or with planning consent and underway.
 - The 5 year land supply issues relate to the whole of South Somerset and not just to the Yeovil area, where there is this large pool of housing land available, but simply allocating more sites is unlikely to resolve the problem which is market led and so not Council controlled, as such.
 - A recent April 2017 Economic Development Monitoring Report by SSDC which looks at employment land and space that has developed over the 2006-2016 period, demonstrates that more land was released for employment within the 'Rest of the District' compared with Yeovil. Although there has been additional floorspace developed, the net additional amount of employment land that has come forward was only 1 hectare. In addition there is further employment land allocated that has not yet come forward.
 - The above information suggest that the Local Plan Review should be considering a more dispersed District wide housing growth strategy, rather than focussing as much as implied, on Yeovil.
 - However, if over the Neighbourhood Plan period, housing development does proceed at a higher rate than currently envisaged, then the NP can be reviewed to reflect the situation at that time and there is already a commitment to this in principle, within the Plan.

This report is an Appendix to the matrix that summarises the representations received on the Regulation 14 Consultation draft of the East Coker Neighbourhood Plan. In the light of the above, the relevant sections of the NP that deal with the strategic context and Housing will be reworked to reflect the issues raised above in this response and which will accompany other amendments to the Plan as set out in the main matrix document and in Appendix B to the matrix.

It is proposed that these will all be discussed with South Somerset DC planning officers prior to the Regulation 15 submission draft of the Plan being prepared and finalised.

**East Coker Neighbourhood Plan Group &
East Coker Parish Council**

June 2017

Appendix

EAST COKER NEIGHBOURHOOD PLAN

HOUSING TECHNICAL PAPER

**02 May 2017
Version 5.1**

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1. Introduction

1.1 The aim of this paper is to bring together historic and future housing evidence to allow East Coker Parish Council to make proportionate evidenced based judgements on the future Parish housing requirement over the period of the Neighbourhood Plan.

1.2 This paper does not seek to second-guess the outcome of the future early review of the SSDC Local Plan. It reflects evidence shown in the Local Plan and latest household projections evidence, as recommended by SSDC during the consultation. Whilst land in the Parish is detailed in the Housing and Employment Land Availability Assessment (HELAA)³ SSDC makes it clear that it does not mean the land identified will be allocated for development. It is a tool to inform the District Council of land availability in South Somerset.

1.3 Changes in Government and Local Authority policies might effect future housing requirements within the Parish.

1.4 The paper explores the following:

- The relationship between housing and population in the Parish and District
- The place of the Parish within the context of South Somerset Local Plan 2006-2028
- Latest 2014 household⁴ and population projections⁵ and how these might relate at Parish level
- The SMHA October 2016 and the SSDC Monitoring Report September 2016

1.5 Where the housing/population evidence relates to Local Authority level the evidence has been extrapolated to give meaningful data at Parish level.

1.6 The paper draws on a range of sources to establish a proportionate and appropriate evidence base in which to make informed decisions about East Coker's future housing requirements. It is not the intention to identify affordable housing need per se but more to build a picture of the Parish and to provide a sound rationale basis for an "at least" housing requirement by 2028.

1.7 In developing this paper due regard has been given to Strategic Policies of the Local Plan and the NPPF/NPPG.

1.8 The conclusions in this paper need to be balanced against the views expressed during the Neighbourhood Plan consultations.

2. Background

2.1 The East Coker Parish long term housing requirement is linked to the South Somerset Local Plan and its Strategic Housing and Economic Policies as well as the latest up to date housing, population and employment evidence.

2.2 The East Coker Neighbourhood Plan (ECNP) process commenced in February 2013 and South Somerset District Council (SSDC) approved the Plan application in September

³ South Somerset HELAA dated February 2017

⁴ 2014 Based Household Projections for England and Local Authority Districts

⁵ 2014 Based Sub National Population Projection for Local Authority Districts

2013. The development of the ECNP has run concurrently with the SSDC Local Plan, taking into account the Local Plan Strategic Policies.

2.3 In March 2015 SSDC published its adopted Local Plan, which demonstrated a five-year land supply; therefore Local Plan Policies provided the direction when considering planning applications. In September 2015 SSDC advised that they could no longer demonstrate a five-year land supply and therefore housing policies were out of date and less weight might be applied to the Strategic Housing Policies. As of May 2017 SSDC remains unable to demonstrate a five-year land supply.

2.4 SSDC's Planning Policy Officers have indicated that the land supply issue is complex and is linked to under delivery, due in part to lower demand and slower than expected economic growth.

2.5 It is within this challenging background that East Coker Parish Council has been undertaking its Neighbourhood Plan work.

2.6 Within East Coker Parish there are designated rural settlements; it is one of over 100 Parishes in South Somerset that comes under SSDC Local Plan Strategic Policy SS2. This policy aims to limit development in rural settlements to that, which is sustainable and meets local need.

2.7 The lack of a five-year land supply has put pressure on rural settlements, with significant increases in planning applications. Currently the SSDC Monitoring Report⁶ recognises that there has been an over commitment of development in rural settlements.

2.8 SSDC advised in their consultation response to the Parish that it has begun to prepare for an early review of the Local Plan, but it is understood this is not expected to be delivered until 2020. The SSDC Authority Monitoring Report shows a significant under delivery of housing to meet the Local Plan target.

2.9 The Local Plan housing requirement was economically led based on the District Council's future economic aspirations and historic trend/data. In preparing the Local Plan SSDC relied on pre 2014 projections.

2.10 SSDC provided feedback on the draft neighbourhood plan in December 2016 and the 2017 regulation 14 during the consultation process. SSDC have recommended using the latest up-to-date 2014 household and population projections as part of the evidence base in assessing the housing requirement in East Coker.

2.11 To make a reasoned judgement on the future housing requirement of the Parish the following research has been undertaken:

- Age Profile, housing mix and household composition of East Coker Parish.
- Assessment 1 – The Future housing requirement based on SSDC Strategic Housing Policies and Local Plan.
- Assessment 2 – The Future housing requirement based on the ONS 2014 Household Projections and 2014 Sub National Population Projections.

⁶ SSDC Authority Monitoring Report September 2016

- Assessment 3 - Consideration of SSDC's Authority Monitoring Report dated September 2016 and the Strategic Housing Market Assessment (SHMA) dated October 2016⁷.

3. Rural Settlements and East Coker in Context

3.1 The South Somerset Local Plan has a strategy to limit housing growth in rural settlements and focus growth in other areas. To put this in context the plan growth of 2,242 dwellings across the rural settlements over the 22-year Local Plan period, this equates to 14% of new housing growth.

3.2 The percentage of households in East Coker Parish accounts for approximately 3.11% of rural settlement households (based on South Somerset 2011 Census Parish Profiles).

3.3 East Coker Parish is predominately rural and includes both rural settlements and a proportion of urban edge. It would be reasonable to expect the Parish housing growth rate to be higher than smaller rural settlements but lower than the district average growth rate.

4. Age Profile – Comparison of East Coker Parish with the District

4.1 The District and East Coker age profiles changed between the 2001 and 2011 censuses, the rounded figures are detailed in Table 1:

Table 1 – Age Profile

Age Range	South Somerset 2001	East Coker 2001	South Somerset 2011	East Coker 2011
0-15	20%	16%	18%	13%
16-64	61%	60%	61%	55%
65+	20%	25%	22%	32%

Source: South Somerset District and East Coker Parish Profile from 2001 and 2011 Census data

4.2 It can be seen that the change in age profile of East Coker Parish was more dramatic than the District. The 2014 projections⁸ show that an increasing percentage of the population in South Somerset will be over 65. Past trend indicates the change would be more significant for Parishes like East Coker (Rural Settlements) than urban areas. Account will need to be taken regarding the future age profile of the Parish, when considering the type and level of housing required in the future.

5. Accommodation Type – Comparison of East Coker Parish with the District

5.1 To ensure balanced communities in the future it is important to understand the housing mix and if the balance in a community is about right. Table 2 compares East Coker housing mix with that of the district.

Table 2 - Accommodation Type

⁷ Somerset SHMA dated October 2016

⁸ ONS 2014 Sub National Population Projections

Dwelling Type	District Number	District Percentage	East Coker Number	East Coker Percentage
Detached	24,593	34%	500	63%
Semi Detached	22,543	31%	150	19%
Terrace	17,662	24%	123	15%
Purpose Built Flats	5,763	8%	1	>1%
Converted/Shared	1,543	2%	16	2%
In commercial building	674	1%	1	>1%
Temporary Structure	632	1%	5	1%
Total	73410	100% (rounded)	796	100% (rounded)

Source: South Somerset Parish Profile data

5.2 It can be seen that the Parish is weighted towards larger properties when compared with the District. Whilst this is not unusual in rural areas, the percentage is high.

6. Household Composition – Comparison of East Coker with the District

6.1 The household composition in East Coker's 2011 Census shows a greater percentage of over 65's households when compared to South Somerset. This difference is similar to the 2001 data. Household composition is detailed in Table 3.

Table 3 – Household Composition

Household Composition			
	Parish Count 2011	Parish %	South Somerset %
One person household	295	30.4%	34.1%
Any type of household – all aged 65 and over	267	27.5%	20.6%
Married/Civil Partnership	303	31.2%	28%
Cohabiting couple	45	4.6%	7.4%
Lone parent household	34	3.5%	6%
Multi-person household	27	2.8%	3.9%

Source: South Somerset Parish Profile data

6.2 Overall, considering tables 1-3, a clear picture emerges that East Coker has a greater percentage of over 65's in comparison with the District and the gap is growing. It also shows a significantly larger percentage of detached dwellings than the District and with an average number of bedrooms per dwelling in East Coker at 3.1 in comparison to Somerset at 2.9⁹ it would indicate older couples/individuals continue to remain in the family house after the children have grown up.

⁹ East Coker Parish 2011 Census Profile

6.3 The challenge for both the Parish and District Council is to ensure residential planning provides for a balance between appropriately sized affordable housing for young families (who wish to remain in their communities) and housing that is more suitable for an ageing population (who also may wish to remain within their community). In this context it is important that new development in East Coker takes account of the need to accommodate both young local families as well as older members of the community who wish to downsize, but remain in the community. This could assist in freeing up larger family properties.

7. Assessment 1 - based on the Local Plan

7.1 This assessment was predominately related to the Local Plan and 2011 census data. It took the District's 2011 census data (relating to population and dwelling stock) from the Local Plan and also the Parish 2011 census data in order to establish a common baseline. It identified the District's percentage growth in housing and population between 2011 and 2028.

7.2 The assessment then considered the relationship between East Coker and other areas of the District within the context of SSDC Local Plan Strategic Housing Policies, which limits development in rural settlements. Having established the approximate district growth between 2011 and 2028 the Parish Council decided on a growth figure that reflected its desire to grow, but lower than the district average. It took some account of current planning applications.

7.3 The Parish Council concluded that based on the SSDC Local Plan growth projections and the Parish's aspirations, a population growth figure of up to 8.5% might be justified for East Coker, delivering up to 65 new dwellings.

Note: It should be noted that this assessment was based on the future employment projection and housing requirements that under pinned the Local Plan, which is now out of date.

7.4 The calculation used the baseline population and dwellings at the 2011 census from the Local Plan and projected out to 2028. The District housing number at 2028 was the District Council's Local Plan figure of 15,950 new dwellings. It also used the District Council's assessed figure of 2.1 persons per household by 2028 (which is low compared to latest household data). Table 4 illustrates District data while Table 5 projects the Parish requirement based on 8.5% growth.

Table 4

District data	Population	Dwellings	Percentage Increase in Population
2006 Start of Local Plan Period		68,000	
2011 Census	161,243	73,375	Baseline data in Local Plan
2028 Projected	176,295	83,950	9.33% or 0.55 per annum

Table 5

East Coker Data	Population	Dwellings	Percentage increase in population
2011 Census	1667	796	

2028	1809	861	8.5% growth in population
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7.5 The figure for East Coker under this assessment was based on a consideration of growth options based on Local Plan growth projections. These have limitations as they were strongly based on historic trend data, with periods of significant growth and recession.

8. Assessment 2 - based on the latest Office of National Statistics (ONS) 2014 Projections

8.1 This assessment considered data from the ONS 2014 Household Projections and 2014 Sub National Population Projections (as recommended by SSDC Planning Officers). Whilst it was not possible to drill down directly to find Parish level data it was possible to extrapolate information from Local Authority level to give some meaningful East Coker specific data; this was done by looking at the District's household data in 2011 and the Parish household data taken from the 2011 census. The assessment looked to see if the proportion of households in East Coker (as a percentage of the district) varied between the 2011 Census data and the 2014 Household Projection data. The difference was insignificant at Parish level and therefore it was considered sound to use the 2011 census data and 2014 household projections in tandem.

8.2 The 2011 Census identified 740 households in East Coker Parish and number of households stated in 2011 East Coker Parish Census represented 1.06% of the 69,883 households (at the 2011 point) shown in 2014 Household Projections for South Somerset. The 2014 household projections identified the projected new level of households in the District by 2028. The strategic housing policies within the SSDC Local Plan limits housing growth in rural settlements (including those within the East Coker Parish). Based on these policies a reasoned assumption is that East Coker Parish would represent a lower proportion of District housing compared with the 2011 figure.

8.3 The future household and housing stock figures for East Coker are based on various factors including rural settlement growth as a proportion of District growth, the future average persons per household and the level of vacant dwellings.

8.4 The 2014 Household Projections show that between 2011 and 2028 the District growth in households is projected to be 9,888 (approximately 12.4%). Based on the Local Plan strategy for rural settlements the Parish's assumption is that East Coker's households will likely grow at a lower rate than the District household growth. An assumption is made that the East Coker proportion of district households would fall from 1.06% to 1.03% by 2028. This assumption is based on the Local Plan rural settlement target figure of 2,242 (14% of the 15,950 Local Plan housing requirement). This takes into account that there is an element of urban fringe in the Parish.

8.5 The other consideration is that the average person per household (APPH), for East Coker is lower than the District average (it is also likely to be lower by 2028). The 2014 projections show the District average at 2.17 by 2028, East Coker is currently about 0.02 lower and therefore it assumes a figure of 2.15 by 2028. This would mean that future housing requirements in East Coker should take this into account.

8.6 The 2014 household projections shows District households for 2011 at 69,883. The 2011 census data for East Coker shows 740 households, which accounts for 1.06% of the district total. The 2014 Household Projection at 2028 shows 79,711 District households, East Coker households are assumed to account for 1.03% of district total also due to strategic housing policies. Table 6 summarises the assumptions made.

Table 6

2011- District figures from 2014 HH projection	2011 - East Coker figures from Census	Percentage of District
69,883 Households 158,152 Household Pop (2.27 PPH)	740 Households 1,667 Household Pop (2.25 PPH)	1.06% (Households) 1.05% (Population)
2028 – Projected District Households	2028 - Projected East Coker Households	Percentage of District
79,771 Households 173,067 Household Pop (2.17 PPH)	822 Households 1,767 Household Pop (2.15 PPH)	1.03% (Households) 1.02% (Population)

Total Housing Stock

8.7 In the 2011 Census East Coker had 56 unoccupied dwellings. This was an unusually high figure compared with the 2001 Census of 18, which is 2.21% against South Somerset's figure of 2.8%. The high 2011 census figure was most likely an effect of recessionary pressure, the CLG Vacant Dwellings tables¹⁰ show a rising trend during the recessionary years 2008 to 2011 and falling thereafter. The SSDC Empty Homes Strategy report shows SSDC's clear intention to reduce the percentage of empty dwellings by taking positive action. The latest SHMA report projected that South Somerset would have approximately 3.4% unoccupied dwellings by 2039. It is reasonable to assume a 2.5% figure for East Coker at 2028. This figure is considered reasonable given the difference in percentage between East Coker and the District percentage at the robust 2001 census point. A figure of 2.5% will be used to establish a total dwelling stock figure. Table 7 illustrates how the East Coker 2028 Housing Stock is derived.

Table 7

Households @2028	2.5% unoccupied dwellings	Total Housing stock @2028
822	21	843

Total housing stock in 2011 was 796 dwellings; based on the 2014 Projections and the assumptions this should rise to 843 by 2028.

9. Assessment 3 – SSDC's Authority Monitoring Report Sept 2016 and Strategic Housing Market Assessment (SHMA) Oct 2016

9.1 Consideration has been given to the Authority Monitoring Report of September 2016 and SHMA October 2016 to inform the Parish Council on current housing and economic data and to assess if this information makes a material change.

¹⁰ CLG – Vacant dwellings by Local Authority – Table 615

9.2 It was noted that the District Council's evidence, from a range of sources, shows employment and economic growth lagging behind that anticipated in the Local Plan. The Local Plan housing was based on a jobs-led plan and the future District-wide housing requirement was based on employment growth of at least 11,250 new jobs between 2006 and 2028.

9.3 The reports show a lower future jobs growth rates between 2014-2030 than achieved between 2000-2014, the latter (2000-2014) covered periods of strong and weak growth. The projected growth is lower than that used to inform the Local Plan. The SMHA suggests that if SSDC continue to use a future jobs led plan the level of housing growth would be 589 dwellings per annum against the Local Plan requirement of 725 per annum.

9.4 Within the various reports there are future projections on population, employment and housing growth. As these reports are the latest produced for the District Council it is considered relevant when balanced against the Local Plan, the 2014 household projections and the 2014 sub-national population projections.

9.5 The SHMA derived a range of scenarios for housing need for each District including South Somerset. This is a comprehensive document and discusses a variety of scenarios and evidence. The document recommends using the 2014 Household projections plus their assessed 10-year migration trend analysis and then an element as an allowance for concealed households. The summary detailed in figure 2 of the SHMA summary¹¹ is shown in Table 8 below for easy.

Table 8

Upper End of the range for Objectively Assessed Need – including allowance for concealed households (per annum housing need 2014-39)

	Projection Scenario	South Somerset
9.6	10 Year based migration trend projection + 2014-based Sub National Household Projections headship rates	597
	Annual Allowance for concealed households	10
	Total OAN (upper end of the range suggested)	607

The Neighbourhood Plan period covers 2016 -2028 which is a shorter period than the SHMA. Data relating to the Parish has been taken from the 2011 Census, as this is the most robust baseline point down to Parish level. Whilst there is a difference in timeline the impact on the result is considered insignificant at Parish level. Table 9 brings together the District household data and extrapolates this to East Coker Parish level adding a figure for unoccupied dwellings.

Table 9

Projection	District Households	East Coker Households	East Coker Dwelling Stock at
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¹¹ Somerset – Strategic Housing Market Assessment October 2016

		(1.03% of District at 2028)	2028 (2.5% unoccupied rate)
CLG 2014 Household Projection at the 2011 point.	69,883	740	NA
CLG 2014 Household Projection (HH) for 2028	79,771	822	843 (822+21)
10 year Migration trend + CLG 2014 HH (@ +11% over 2014 projection) for 2028	80,848	833	854 (833 + 21)

9.7 Considering where East Coker Parish fits into the wider South Somerset District an assessment of SHMA confirms that the Parish is predominately in the Rural Village/Dispersed Classification with an element on the Rural/Urban fringe. It is likely that the effect of the 10 year migration trend will have less impact on the Parish housing requirement than the wider District as the percentage of migrants in the Parish is significantly lower compared to the District figure. Between the 2001 and 2011 censuses the population of the Parish fell by 35 or -2%, which is a strong indicator that inward migration over that 10-year period was not a relevant housing issue at Parish level.

9.8 To achieve a robust figure for Parish housing an adjustment of the 10 Year Migration Trend Scenario would need to be made as this scenario considers East Coker has similar migration trend impacts as the District's urban areas. Evidence in the census support a lesser migration trend impact for the Parish therefore a 2028 housing stock figure that sits between 843 and 854 is the most likely. An assumption would need to be made to establish a target figure. While the Parish is predominately rural it does have an urban edge, which needs to be taken into account, therefore a figure towards the higher end would be reasonable. **A robust figure emerges for East Coker; this is a total housing stock of 850 by 2028. This is an increase in housing stock of 54 dwellings between 2011 and 2028.**

9.9 The SHMA report argues that the 10-year migration trend is very much at the top end and it might present "Duty to Cooperate" issues if unrealistic housing targets drove migration growth, which might adversely impact growth in other areas.

9.10 It is unlikely that the Hinckley project will have an impact on East Coker in terms of housing due to location and it is therefore not considered.

9.11 The District reports clearly show the enormous challenge to create the environment for jobs growth, thus housing growth. This is borne out on the ground by the under delivery of new homes against the Local Plan requirement due in part to the lack of demand driven by slack economic and employment growth.

9.12 The SHMA concludes that a District annual housing target of 720 is not realistic going forward as this was based on historic economic trend data. The emerging view of the Objectively Assessed Need for the District (over the period 2014-2039) should be 607 dwellings annually, a slower rate of District housing growth than shown in the Local Plan.

9.13 In the monitoring report SSDC recognise the danger of over development in rural settlements and the need to control such development so as not to detrimentally impact on

other policies. In this context it is important that East Coker has a robust plan to give certainty to planners, developer/landowners and the community.

9.14 The most optimistic scenarios within these reports indicate future housing need at levels lower than detailed in the Local Plan.

10. Summary

10.1 The first assessment was based on the evidence underpinning the Local Plan. This was to a great extent based on historic trend data. SSDC in formulating its Local Plan used a cautionary approach to the use of latest data, sighting the recession of 2008-2010 as an abnormality. The evidence SSDC used to formulate its Local Plan has increasingly become out of date and is significantly less reliable now as evidenced in the recent SHMA.

10.2 The second assessment relates to latest evidence in the 2014 ONS Projections as required by NPPF/NPPG. The information in the District Council's AMR of September 2016 supports the view that the evidence in the Local Plan has become increasingly out of date and future economic/employment growth is unlikely to meet the growth levels that underpinned the Local Plan assumptions. This is supported by the under provision against Local Plan requirement in both jobs and homes.

10.3 The third assessment looked at the SSDC AMR and SHMA both produced in the autumn of 2016. The data underpinning this work reflects the relationship between South Somerset and the other Districts in Somerset. It looks at a range of latest projections and balances these against past trend data. In terms of presenting up to date evidence this appears to be robust. It should be given weight when considering a Parish housing requirement.

10.4 As referred to in this paper adjustment has been made when relating District data down to rural parish level. The adjustments made for East Coker Parish are considered robust, based on reasonable and proportionate evidence.

A synopsis of the three assessments in this paper are shown in Table 10 below:

Table 10 – Synopsis of Assessments 1, 2 and 3

Assessment	Total Housing Stock @ 2028	Increase from 2011 census of 796 dwellings
1. Local Plan Assessment	861	65
2. 2014 Projections (adjusted for parish)	843	47
3. 2014 + 10 year migration trend (adjusted for parish)	850	54

11. Conclusion

11.1 It is concluded that based on latest evidence and conforming with the Local Plan Strategic Housing Policies the housing stock in the Parish of East Coker (excluding Keyford) should increase by at least 54 dwellings between 2011 and 2028. To ensure the Neighbourhood Plan housing requirement remains up to date it should be reviewed within 5 years and if necessary adjusted to take account of future evidence.