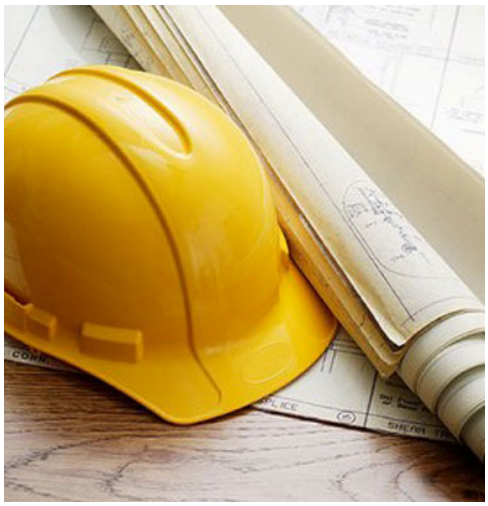
Authority Monitoring Report

(APRIL 2015 – MARCH 2016)



December 2016

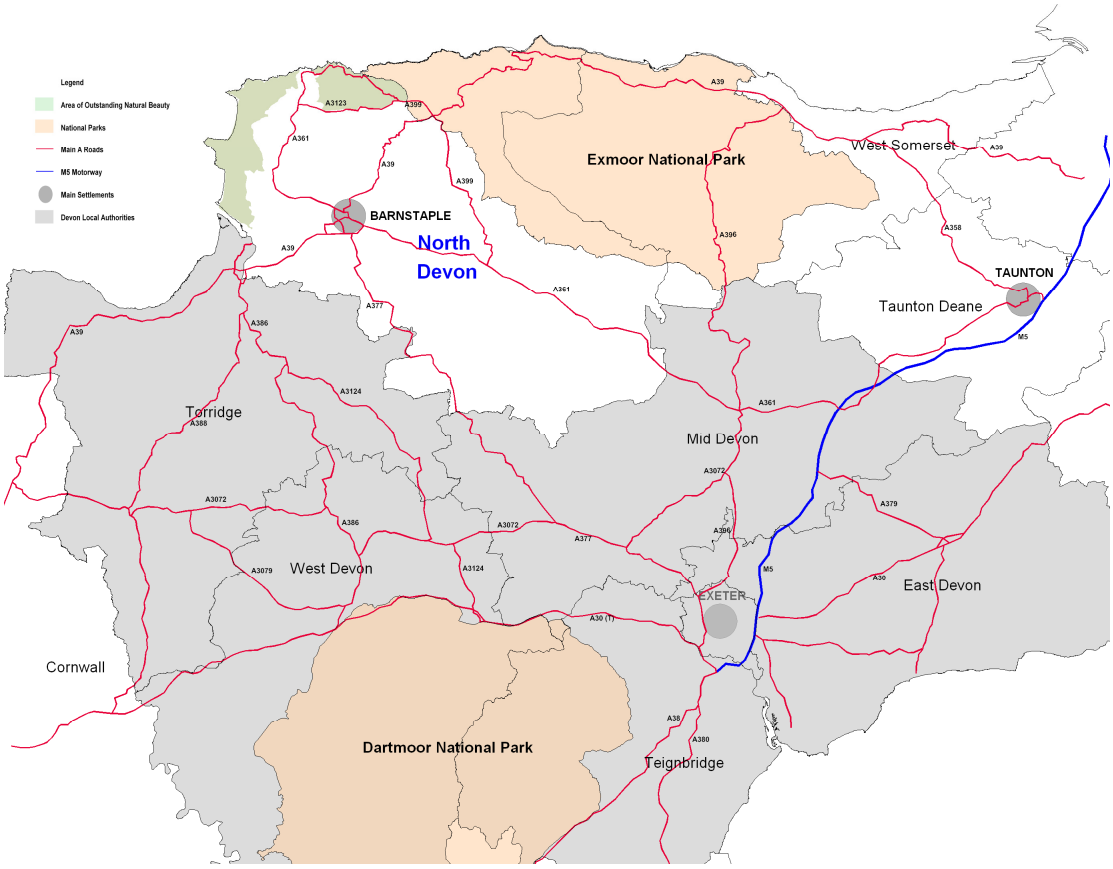
PART ONE - INTRODUCTION

Background

1.1. This Authority Monitoring Report (AMR) covers the period 1st April 2015 – 31st March 2016. The report covers the whole area of North Devon District excluding the area within Exmoor National Park.

NORTH DEVON DISTRICT PORTRAIT

Contextual Map of North Devon



Environment Portrait	
Area of the District (ha)	108,588
% area of district within National Park	18.5% [1]
% area of district within AONB	7.2%
Area covered by SSSIs (ha)	3,143 [2]
Area covered by registered parks and gardens of special historic interest (ha)	399
Number of listed buildings	2,909 [3]
Number of Conservation Areas	42 [4]
Number of Scheduled Ancient Monuments	82 [3]

1. The parts of Exmoor National Park within North Devon district are excluded from this AMR.
2. When the SSSIs within the North Devon part of Exmoor National Park are included, the total area covered by SSSIs within North Devon is 9,588 hectares.
3. These figures relate to North Devon district outside Exmoor National Park.
4. Within North Devon district there are 42 Conservation Areas outside the National Park plus 5 Conservation Areas within the North Devon part of Exmoor National Park.

1.2. Since 2010, there have been significant changes in legislation and guidance relating to planning over recent years. Most prominent are:

- the National Planning Policy Framework and National Planning Practice Guidance;
- the Duty to Co-operate;
- abolition of Regional Spatial Strategies and Structure Plans;
- the Town and Country Planning (Local Planning) (England) Regulations 2012;
- the Localism Act 2011; and
- Housing & Planning Act 2016

1.3. The Devon Structure Plan (2001 – 2016) and the draft Regional Spatial Strategy (RSS) for the South West region (2006 – 2026) were formally revoked on the 20th May 2013.

1.4. Taken together, these changes significantly affect how monitoring of planning performance should be reported. Part 8 of the Regulations fundamentally changes the previous annual monitoring regime, removing the requirement to report by 31st December each year and making the new Authority Monitoring Report in some ways a simpler process.

1.5. The changes introduced within the Localism Act 2011 mean that the content of the Authority's Monitoring Report is no longer prescribed by Government, nor is there a requirement to submit the document to the Secretary of State.

1.6. These changes offer an opportunity to restructure the monitoring report to provide a simpler view of the work undertaken by the planning service at North Devon Council, its joint working with Torridge District Council, and to reflect on the effectiveness of the policies adopted.

What is the Authority Monitoring Report?

1.7. Part 8 of the Regulations stipulate that the purpose of this document is to:

- Monitor the preparation of development plan against timetables in the Local Development Scheme (Section 2);
- Report actions taken under the Duty to Co-operate (Section 3);
- Provide details of any Neighbourhood Development Orders or Neighbourhood Development Plans (Section 4);
- Report on Community Infrastructure Levy (CIL) receipts and expenditure (section 5); and
- Assess the extent to which existing planning policies are being implemented (Sections 6 - 8).

2. LOCAL DEVELOPMENT SCHEME PROGRESS

2.1. The Local Development Scheme (LDS) is the project programme for the preparation of the development plan. It sets out the milestones or key stages in the development plan preparation process, including stages of public consultation. The LDS (adopted April 2015) replaces the previous version published in June 2014. The LDS focuses on the production of the Joint Local Plan for North Devon and Torridge. On adoption, the Local Plan will form the main part of the Development Plan for the district (excluding that part within Exmoor National Park). The key milestones set out within the April 2015 LDS regarding the delivery timetable for the joint Local Plan were considered unachievable and therefore an early review in 2016 was necessary. A revised LDS was adopted in May 2016 where the key milestones are generally on track to be met.

2.2. In addition to the Local Plan, the revised Local Development Scheme also includes the North Devon and Torridge Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD). Again, the timetable in the April 2015 LDS had slipped but the revised timetable in May 2016 is currently being met.

2.3. A report on the progress of these two Development Plan Documents and revised timetable are set out below.

(A) Joint North Devon and Torridge Local Plan

2.4. The Local Plan is a joint development plan being prepared by North Devon and Torridge District Councils for the period 2011 to 2031. There is a functional relationship between these districts in northern Devon, which ignores the administrative boundaries and enables the whole area to be planned in a consistent and coherent way.

2.5. Public consultation on a ‘consultation draft Local Plan’ took place from January to March 2013, having evolved from work on a previous pre-publication draft core strategy (January 2010). The document set out the identified need for housing, employment and supporting infrastructure across the Plan area up until 2031, together with a series of development management policies. In addition, it set out a spatial strategy for the distribution of new development as well as identifying a spatial vision and development strategy including strategic allocations for each of the main towns, which were based on an assessment of consultation and evidence based work carried out to date.

2.6. The consultation draft Local Plan did not include site allocations for the rural areas of northern Devon, although it included a framework to enable rural growth based on a settlement hierarchy of local centres and villages. During 2013, Parish Councils were engaged to identify their visions and objectives for their particular village over the plan period, local aspirations for the scale of future growth with any locational preferences. The Parish Councils were provided with a range of information to support the task, including the availability of developable (suitable and available) site options already considered through the SHLAA process. Parish Councils also had the opportunity to introduce alternative sites to meet their housing requirements which again were considered by the SHLAA panel.

2.7. Public consultation on a 'publication draft local plan' took place from June to August 2014, again this document evolved from work and consultation responses on the 'consultation draft local plan' (March 2013). In addition to the strategic policies in Part 1 of the Plan as well as the development management policies (Part 2), it also included more detailed strategies and policies for the rural areas (Part 3), identifying a number of housing and employment sites with associated supporting infrastructure in Local Centres and Villages across the Plan area up to 2031. This plan also provided opportunities for more limited growth within qualifying rural settlements.

2.8. Public consultation took place on the Proposed Main Changes from March to May 2015, a stage that was not envisaged within the previously adopted LDS (2014). The principal reason for not meeting the timetable and needing to undertake a further round of public consultation in March was due to changes in Government Policy and to therefore overcome potential soundness issues raised through consultation responses to the Publication Plan. Further public consultation on the Local Plan was undertaken during the latter part of 2015 and early 2016 which included a proposed policy for Starter Homes as well as main changes on the policy, a revised affordable housing policy following a High Court judgement and Wind Energy Development Options and proposed policy.

2.9. The future timetable for the Local Plan programme is set out within the adopted LDS (May 2016).

STAGE	PERIOD
Submission to the Secretary of State	May 2016
Examination in Public (Hearing Sessions)	September 2016
Receipt Inspector's Report	March 2017
Adoption of Plan	April 2017

(B) North Devon and Torridge Traveller and Travelling Showpeople Site Allocations DPD

2.10. Preparation of the Traveller and Travelling Showpeople Site Allocations DPD to date has focused largely on obtaining up-to-date evidence to identify the level of need through a Gypsy and Traveller accommodation assessment, commissioned jointly with a partnership of other authorities in Devon. The final report was published in April 2015, following which it will inform the identification of site options to meet identified needs and the drafting of this site allocations DPD.

2.11. The key milestones for the Traveller and Travelling Showpeople Site Allocations DPD were unachievable due in part to the lack of a robust evidence base in terms of the identified need in North Devon and delays in the preparation of the Local Plan. The key milestones set out within the April 2015 LDS regarding the delivery timetable for the North Devon and Torridge Traveller and Travelling Showpeople Site Allocations DPD were considered unachievable and therefore an early review in 2016 was necessary. A revised LDS was adopted in May 2016 where the key milestones are generally on track to be met.

STAGE	PERIOD
Public Participation in the Preparation of the Plan	July – August 2016
Public Participation on the Publication Draft	May 2017
Public Participation on Publication Document	October – November 2017
Submission to the Secretary of State	February 2018
Examination in Public (Hearing Sessions)	April 2018
Receipt of Inspector's Report	June 2018
Adoption of Development Plan Document	July 2018

3. DUTY TO CO-OPERATE

3.1. Local authorities are required to address strategic issues relevant to their areas through the Duty to Co-operate contained in section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by section 110 of the Localism Act (2011)) and further described in the National Planning Policy Framework (NPPF).

3.2. The Duty to Co-operate:

- Relates to strategic planning matters where these entail:
  - Sustainable development or use of land that would have a significant impact on at least two local planning areas;

- Where the development or use is a county matter or would have a significant impact upon a county matter;

- Relates to the preparation of development plan or other local development documents, and activities that prepare the way for that preparation including activities in support of those activities;
- Requires that councils and public bodies engage constructively, actively and on an ongoing basis in any process by which the activities in point one are undertaken;
- Requires councils to consider joint approaches to plan making; and
- Empowers the Inspector at the Examination in Public of the development plan to examine whether the Local Planning Authority has complied with the Duty to Co-operate.

3.3. Paragraph 156 of the NPPF sets out the strategic issues where co-operation might be appropriate. Paragraph 178 – 181 of the NPPF provides guidance on 'planning strategically across local boundaries', and highlights the importance of joint working on areas of common interest. The emphasis is on working collaboratively with other bodies to ensure that strategic priorities across boundaries are properly co-ordinated. Evidence will be required to demonstrate having successfully cooperated on issues with cross boundary impacts.

3.4. It should be noted that the Duty to Co-operate is not the same as public consultation on development plan preparation. The Duty is essentially about public-sector organisations working together. The Councils' approach to public consultation is set out in the Statement of Community Involvement (SCI), adopted January 2015.

Duty to Co-operate within North Devon and Torridge Local Plan

3.5. North Devon and Torridge District Councils have been preparing a joint plan since 2008, initially a joint core strategy, but more recently a joint local plan.

3.6. Many of the characteristics of the area and the issues which it faces are common across both Councils, with Barnstaple and Bideford forming the commercial, economic and administrative hub for the northern Devon sub-region, which functions as a single area serving a predominantly rural area with a protected coastal landscape. Much of the major infrastructure is delivered across both districts, such as North Devon District Hospital in Barnstaple, the A361 North Devon link road, A39 Atlantic Highway and Tarka railway line (Exeter to Barnstaple) providing accessibility for both districts. North Devon and Torridge need to plan jointly for sufficient development to provide housing and employment opportunities for existing and future residents within northern Devon housing market area and functional economic market area.

3.7. A joint working group to guide local plan preparation consists of elected members from both Councils. Alongside joint preparation of a local plan, the councils have prepared a joint evidence base and engaged stakeholders and the public jointly in accordance with a joint timetable. Duty to Co-operate activities have taken place before the duty was formally introduced. It is emphasised that the Councils' joint working is not being done just to meet the statutory 'duty to co-operate' requirements, introduced in 2011. Rather, it is one based on building meaningful and productive partnerships at the local level, and ensuring that strategic solutions are reached at the appropriate scale wherever these can be of benefit in the delivery of infrastructure and services to the communities of northern Devon.

3.8. The Duty to Co-operate requires joint working with neighbouring local authorities and other prescribed bodies. North Devon and Torridge district councils have been working in partnership with neighbouring authorities and statutory organisations. Specific activities during the year 2015/16 are as follows:

a) Implementing the Devon-wide duty to co-operate protocol which includes all Devon authorities, Dartmoor and Exmoor National Park Authorities, statutory agencies, Heart of the South West local enterprise partnership, Devon local nature partnership and public health organisations;
b) Continuing to work proactively with Exmoor National Park Authority and West Somerset District Council in implementing the strategic housing needs across the Northern Peninsula housing market area;
c) Implementing the Exmoor National Park-wide duty to co-operate protocol which includes West Somerset District Council and relevant Somerset organisations;
d) Continued participation in the Partnership of Devon local authorities to help deliver current accommodation needs for Gypsies and Travellers and future needs over the next 20 years across the partnership area;
e) Continued involvement with the Biosphere Reserve partnership in co-ordinating the spatial objectives of the local plan with those in the emerging Biosphere Reserve strategy;
f) Continuing to work collaboratively with the Environment Agency, Devon County Council and Barnstaple Town Council in the preparation of a flood defence study for Barnstaple to identify scale, cost and urgency of flood defence improvements and to facilitate redevelopment opportunities on previously developed land currently blighted by flooding issues;
g) Continuing to work with Ilfracombe Town Council to intervene and manage the delivery of development on sites that have 'stalled' and which are adversely impacting on the public realm of the town;
h) Continued engagement with Barnstaple Town Council and Town Centre Management in order to have a proactive and joined up approach to the regeneration and economic growth of Barnstaple; also to intervene and manage the delivery of development on sites that have 'stalled' and which are adversely impacting on the public realm of the town;

i) Continued engagement with Devon County Council on the strategy for the North Devon Link Road as the "Gateway to northern Devon", from Junction 27 of the M5, up the A361 to the A39 west of Bideford;
j) Actively engaged with a number of Parish Councils in support of their preparation of Neighbourhood Plans;
k) Working collaboratively with Torridge District Council, Exmoor National Park Authority, North Devon AONB Partnership, Devon County Council, the National Trust and Natural England to implement the Seascape Character Assessment for North Devon and Exmoor;
l) Continued engagement with infrastructure providers including NHS England, New Devon CCG, Community Health Partnership, Local GP Practice Managers and main utility companies.

Duty to Co-operate on Local Plans of Neighbouring Authorities

3.9. During the monitoring period 2015/16, North Devon Council made representations to Devon County Council as the planning authority responsible for the emerging Devon Minerals Plan prior to the plan's submission to the Secretary of State for public examination.

3.10. In addition to the above, the Council has worked continually with partners across the Northern Peninsula Housing Market Area to agree housing numbers across each Local Authority area and prepared a joint housing market topic paper.

4. Neighbourhood Development Plans / Neighbourhood Development Order / CIL

4.1. There have been four applications for commencement of a Neighbourhood Development Plan or order within North Devon up until the end of March 2016. The applications have been received from the parishes of Barnstaple, Bratton Fleming, Fremington and Georgeham. Post April 2016, applications for commencement of a Neighbourhood Plan have also been received from the parishes of Braunton and Instow. Preparation of these Neighbourhood Plans remain at a relatively early stage.

Progress on the Community Infrastructure Levy (CIL)

4.2. By the end of March 2016, substantial work had been undertaken to progress the Community Infrastructure Levy. Consultation took place on the Draft charging Schedule in June – August 2014, in tandem with the draft Publication Local Plan consultation. A subsequent revision of the viability study underpinning the proposed charges has suggested that the residential rate remain unchanged, but proposes certain changes to the non-residential elements of the schedule. It is intended that these changes along with the draft Reg.123 list will be consulted on in 2017 after the conclusion of the public examination of the emerging Local Plan. It is proposed to submit the CIL charging schedule and for its Public Examination after consideration

of any representations arising from the above consultation with the intention that it can be adopted in the summer of 2017 at approximately the same time as the Local Plan.

PART TWO – MONITORING OF PLANNING POLICIES

5. Monitoring of key objectives and indicators

5.1. The North Devon Local Plan (adopted 2006) forms part of the current Development Plan for the District. Targets in relation to monitoring the majority of its policies were not set because the local plan was prepared and examined before the Local Development Framework system introduced the requirement to prepare an Authority Monitoring Report. The following sections provide monitoring information on key policies, including an update to the five year land supply.

A) Housing Land Delivery

5.2. Paragraph 47 of the NPPF requires local authorities to *"identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land"*.

5.3. To determine whether North Devon should add a 5% or 20% buffer to its requirement, it is necessary to analyse past trends against requirements to establish whether there has been a *"persistent under delivery"*. The tables below show net completions against requirements as set out within North Devon's most recent housing land supply statement (April 2016). The tables measure delivery against a requirement figure against the Northern Devon Peninsula SHMA (2015), the Northern Devon Housing and Employment Study (2014), the Northern Devon Housing and Economic Needs Assessment (2016) and the emerging Joint North Devon and Torridge Local Plan (2016).

5.4. A North Devon and Torridge Update to the Strategic Housing Market Assessment (SHMA) was published in January 2015 with an update in December 2015. It identifies a need for 6,358 dwellings over the period 2011-2031, which excludes the housing requirements for the North Devon parts of Exmoor National Park.

Table 1: Strategic Housing Market Assessment Update (2011-2031)

Year	Requirement (2011-2031)	Dwellings Completed	Net surplus dwellings	Cumulative net surplus dwellings
2005/06	~	437	~	~
2006/07	~	482	~	~
2007/08	~	417	~	~
2008/09	~	341	~	~
2009/10	~	331	~	~
2010/11	~	227	~	~
2011/12	318	177	-141	-141
2012/13	318	269	-49	-190
2013/14	318	246	-72	-262
2014/15	318	283	-35	-297
2015/16	318	264	-54	-351
Total 2011/31	**6,358**	**1,239**		**-351**

5.5. The SHMA requirement of 6,358 homes (demographic need only for North Devon excluding ENP) has an outstanding requirement of 5,119 homes at April 2016, which equates to approximately 341 dwellings per annum during the remainder of the plan period (2016/31). Table 1 shows that over the last 5 years, annualised requirements have not been met, delivering a mean average of 248 dwellings per annum, but this level of delivery is not reflective across the whole economic cycle. Assessed against the delivery during the past 11 years (2005/06 – 2015/16) the mean average number of completions is 316 dwellings per annum. As such there has been under delivery, where either a 5% or 20% buffer could apply.

5.6. A North Devon and Torridge Update to the Housing and Employment Study was published in April 2014. It identifies a need for 10,137 dwellings over the period 2011-2031.

Table 2: Housing and Employment Study (2011-2031)

Year	Requirement (2011-2031)	Dwellings Completed	Net surplus dwellings	Cumulative net surplus dwellings
2005/06	~	437	~	~
2006/07	~	482	~	~
2007/08	~	417	~	~
2008/09	~	341	~	~
2009/10	~	331	~	~
2010/11	~	227	~	~
2011/12	507	177	-330	-330
2012/13	507	269	-238	-568

2013/14	507	246	-261	-829
2014/15	507	283	-224	-1,053
2015/16	507	264	-243	-1,296
Total 2011/31	**10,137**	**1,239**		**-1,296**

5.7. The Housing and Employment Study requirement of 10,137 homes has an outstanding requirement of 8,898 homes from April 2016, which equates to 593 dwellings per annum during the remainder of the plan period (2016/31). Table 2 shows that over the last 5 years, annualised requirements have not been met, delivering a mean average of 248 dwellings per annum. Assessed against the delivery during the past 11 years (2005/06 – 2015/16) the mean average number of completions is 316 dwellings per annum. As such there has been a record of persistent under delivery, where a 20% buffer would apply.

5.8. The Northern Devon Housing and Economic Needs Assessment was published in May 2016. It identifies a need for 8,872 dwellings over the period 2011-2031.

Table 3: Housing and Economic Needs Assessment (2011-2031)

Year	Requirement (2011-2031)	Dwellings Completed	Net surplus dwellings	Cumulative net surplus dwellings
2005/06	~	437	~	~
2006/07	~	482	~	~
2007/08	~	417	~	~
2008/09	~	341	~	~
2009/10	~	331	~	~
2010/11	~	227	~	~
2011/12	444	177	-267	-267
2012/13	444	269	-175	-442
2013/14	444	246	-198	-640
2014/15	444	283	-161	-801
2015/16	444	264	-180	-981
Total 2011/31	**8,872**	**1,239**		**-981**

5.9. The Housing and Economic Needs Assessment requirement of 8,872 homes has an outstanding requirement of 7,633 homes from April 2016, which equates to 509 dwellings per annum during the remainder of the plan period (2016/31). Table 3 shows that over the last 5 years, annualised requirements have not been met, delivering a mean average of 248 dwellings per annum. Assessed against the delivery during the past 11 years (2005/06 – 2015/16) the mean average number of completions is 316 dwellings per annum. As such there has been a record of persistent under delivery, where a 20% buffer would apply.

5.10. The Main Changes version of the emerging joint North Devon and Torridge Local Plan was published in March 2015. The overall housing requirement in the local plan is for 17,220 which applies across the joint plan area and is therefore **not** disaggregated to each individual local planning authority. However, the contribution from North Devon towards the overall housing requirement is an identified supply of 8,768 dwellings which can act as a proxy for the housing need with the North Devon part of the Plan area. This figure is replicated in Table 6 below.

Table 4: Emerging Joint North Devon & Torridge Local Plan (2011-2031)

Year	Supply (2011-2031)	Dwellings Completed	Net surplus dwellings	Cumulative net surplus dwellings
2005/06	~	437	~	~
2006/07	~	482	~	~
2007/08	~	417	~	~
2008/09	~	341	~	~
2009/10	~	331	~	~
2010/11	~	227	~	~
2011/12	438	177	-261	-261
2012/13	438	269	-169	-430
2013/14	438	246	-192	-622
2014/15	438	283	-155	-777
2015/16	438	264	-174	-951
Total 2011/31	**8,768**	**1,239**		**-951**

5.11. The emerging joint North Devon and Torridge Local Plan requirement (17,220) of which the North Devon supply is 8,768 homes has an outstanding requirement of 7,529 homes from April 2016, which equates to 487 dwellings per year during the remainder of the plan period (2015/31). Table 4 shows that over the last 5 years, annualised requirements have not been met, delivering a mean average of 248 dwellings per annum. Assessed against the delivery during the past 11 years (2005/06 – 2015/16) the mean average number of completions is 316 dwellings per year. As such there has been a record of persistent under delivery, where a 20% buffer would apply.

5.12. For each of the identified housing requirements, the five-year requirement needs to take account of any shortfall during the plan period to date in addition to the buffer. This has been done by taking the total shortfall over the plan period and adding it to the five-year requirement. This approach is commonly referred to as the 'Sedgefield' method.

B) Housing Land Supply

5.13. The components of housing supply within the next five years are as follows:

- Sites with planning permission for housing as at 31st March 2016;
- Sites where a planning application is yet to be approved but the principle of residential development has been established as at 31st March 2016;
- A limited number of sites without planning consent which are considered deliverable within five years from 1st April 2016;
- A windfall assumption which makes an allowance for delivery from small un-identified sites.

5.14. The delivery of individual sites within the next five years is informed by the most recent Strategic Housing Land Availability Assessment (SHLAA). A full review of the SHLAA was undertaken during this current monitoring year, this review had a base date of 1st April 2015. The full report was published in Spring of 2016. Information was also provided by developers as to their scheduled build-out rates.

5.15. Where no information has been provided by land owners and developers, the following assumptions have been applied. These reflect the assumptions set out within the SHLAA methodology adopted by the SHLAA panel members in March 2014.The delivery assumptions are:

- **Delivery Rates –** 20 dwellings in the first year, and 40 dwellings per annum thereafter per developer.
- **Number of Developers** – a single developer for sites up to 250 dwellings; two developers for site between 250 and 500 dwellings; and three developers for sites above 500 dwellings but with a maximum delivery annual rate of 160 dwellings on a single site.
- **Lead In Periods –** For sites of less than 10 dwellings there is an assumption of a one year lead in from the developer obtaining control of the site, through to commencement of dwelling construction of the first homes. For sites of 10 to 49 dwellings there is a two year lead in period, and for sites over 50 dwellings there is an assumed three year lead in period.
- **Windfall Assumptions** – projected rates of windfall delivery for previously developed windfall sites of up to 4 dwellings, recognising that the majority of larger scale development will come forward through allocated sites. Windfall development occurring on garden land is excluded from the figure in accordance with NPPF Paragraph 48. The windfall allowance is phased in following the first three years of the plan period to ensure that double counting of extant permissions does not occur. Based on historic trends, the windfall allowance of 60 dwellings per year is considered appropriate from 2015.
- **Non-implementation Rate** – based on historic trends for lapsed planning permissions, a non implementation rate of 15% is applied for unimplemented permissions and sites.

5.16. Based on the above, the Housing Trajectory (1st April 2015) assumed 319 completions for land availability year 2015 / 2016. However, as set out within Tables 1-4 above, North Devon housing completions for the monitoring period was 264 dwellings, a shortfall from the trajectory of 55 dwellings. The principal reason for this is mainly due to the allocations at Fremington Army Camp (FRE01) and Westaway Plain (BAR05) not delivering the level of housing as expected, with a shortfall of 38 dwellings across both sites. However, it is worth noting that completions have increased on both these sites post April 2016, most significantly at Fremington Army Camp. Other sites such as Glenwood Farm (BAR09) have delivered 13 more units than planned.

5.17. The remainder of the shortfall has come from a number of other large and small sites not being completed as projected. It is considered some of this shortfall could be due to a time lag with Building Control or other Approved Inspectors receiving completion certificates from the developers. It is expected that most of these sites will be completed post April 2016.

C) Five Year Land Supply Position

5.18. On 1st April 2016, North Devon's five year housing land supply statement (Table 5 below) shows a net deliverable land supply of 3,922 dwellings. The 'Sedgefield method' has been used to calculate the 5 year supply. The April 2016 land supply statement has demonstrated two scenarios under the 'Sedgefield method'. Firstly, the backlog was added after applying the 5% and 20% buffer to the requirement (see J – Table 6 below). Secondly, the backlog was added to the requirement and then the 5% and 20% was applied (see K – table 6 below). It is considered the second option is the preferred approach, for the buffer to be applied to both the requirement and shortfall. This is the most appropriate order as it ensures the buffer is applied to the full requirement which represents all the need that exists in order to deal with any undersupply within the first five years of the plan where possible in accordance with paragraph 035 of the PPG.

Table 5: Summary of Assessed Five Year Housing Land Supply

SOURCE OF HOUSING SUPPLY	TOTAL SUPPLY (net)	DELIVERY IN 5 YEARS (net)
A) Unimplemented Site with planning permission (at 31st March 2016)		
Large (SHLAA) Sites (≥ 5 dwellings or ≥0.1ha)	1,814	1,379
Small Sites (1 to 4 dwellings)	226	192*
Small Sites (Deemed Consent)	82	70*

SOURCE OF HOUSING SUPPLY	TOTAL SUPPLY (net)	DELIVERY IN 5 YEARS (net)
B) Implemented Sites with planning permission (at 31st March 2016)		
Large (SHLAA) Sites ~ dwellings under construction	413	404
Small Sites ~ dwellings under construction	122	122
Large (SHLAA) Sites ~ Un-commenced dwellings on commenced sites	613	613
Small Sites ~ Un-commenced dwellings on commenced sites	4	4
C) Other sites – with consent subject to signing of S106 (at 31st March 2016)		
Sites with planning permission subject to S106 agreement (Large Sites)	2,157	777
Sites with planning permission subject to S106 agreement (Small Sites)	22	19*
Additional Identified SHLAA supply	335	162

D) Windfall Supply (small brownfield sites)		
Expected windfall supply under the SHLAA threshold of five dwellings or sites under 0.1ha (60 d.p.a within years three, four and five)	180	180
TOTAL (A+B+C+D)	**5,968**	**3,922**

*15% discount lapse rate has been applied

Position Statement

5.19. Following formal revocation of the un-adopted South West Regional Spatial Strategy and the adopted Devon Structure Plan in May 2013, the Inspector at a recent appeal (APP/X1118/A/14/2224465 – Mead Park, Bickington, Barnstaple (56492) Allowed 19/05/15) recognised the emerging Local Plan (publication draft June 2014) advocated a "Policy-On" housing requirement of 418 dwellings per annum and although this figure remains to be tested he concluded *'it was a reasonable reflection of objectively assessed housing need (OAN) for North Devon between 2011 and 2031 on which to evaluate whether or not there is a five year land supply'*. However, following consultation on the Main Changes (March 2015) the housing requirement figure, through a supply figure of 8,768 has been amended to 438 dwellings per annum for North Devon.

Table 6: Requirements and Delivery: Annualised Objectively Assessed Need

		Calculation	**Houses**
A	Objectively Assessed Need 2011 – 2031		8,768 (438 d.p.a)
B	Net completions 2011 – 2016		1,239
C	Residual requirement to 2031	A – B	7,529
D	Local Plan years passed	2011/2016	5
E	Requirement for years passed	(A / 20) x 5	2,190
F	Shortfall to April 2016	E – B	-951

	Five Year Supply Calculation	Calculation	0%	5% buffer	20% buffer
G	Annual requirement	A / 20	438		
H	5-year requirement and buffers	G x 5	2,190	110	438
I	5-year requirement including buffers	(G x 5) + buffer	2,190	2,300	2,628
J	5-year requirement + buffer + shortfall	(G x 5) + buffer + F	**3,141**	**3,251**	**3,579**
K	5-year requirement + shortfall + buffer	(G x 5) + F + buffer	**3,141**	**3,298**	**3,769**
L	Percentage of 5-year supply	3,922[1] / J	124%	120%	109%
M	Percentage of 5-year supply	3,922[1] / K	124%	118%	104%
N	5-year requirement + buffer + shortfall annualised	J / 5	628	650	716
O	5-year requirement + shortfall + buffer	K / 5	628	660	754
P	Number of years of supply	L / J X 5	6.2	6.0	5.4
Q	Number of years of supply	M / K X 5	6.2	5.9	5.2

5.20. Against the emerging North Devon and Torridge Local Plan, North Devon can identify a 5.9 year supply applying the 5% buffer, or a 5.2 year supply with a 20% buffer (Sedgefield Method). Alternatively, using the Liverpool method, a 7.4 year supply applying the 5% buffer, and a 6.5 year supply with a 20% buffer. Details of the calculations for the Liverpool method are set out within 'North Devon's Five Year Housing Land Supply Statement at 1st April 2016'.

[1] See Table 5 – Summary of Assessed Five Year Housing Land Supply (Delivery in 5 years)

Affordable Housing Completions

5.21. In North Devon District there were 48 affordable homes built over the period 2015 / 2016, which equates to 18.18% of all homes built (264) over the monitoring period. Table 7 illustrates affordable housing completions 2011 – 2016, which indicates a considerable fluctuation in achieved delivery; 271 affordable homes were provided at an average rate of 54 dwellings per annum.

Table 7: Affordable Housing Completions

Monitoring Year	Total Housing Completions	Affordable Housing Completions	% of Total Completions
2011 / 2012	177	1	0.56%
2012 / 2013	269	58	21.56%
2013 / 2014	246	97	39.43%
2014 / 2015	283	67	23.67%
2015 / 2016	264	48	18.18%
TOTAL	**1,239**	**271**	**21.87%**

Windfall Sites

5.22. Historic housing completions (1st April 2006 to 31st March 2016) from previously developed land conforms to the current definition as set out in Annex 2 'Glossary' of the NPPF.

5.23. Table 8 identifies how small windfall sites have clearly and consistently formed a significant element of housing completions within North Devon district over the previous decade (April 2006 – March 2016), accounting for about 21% of the total delivery since 1st April 2006. Even throughout the recent recession, windfalls have continued to form a significant part of the district's housing supply and there is every reason to believe they will continue to do so in years to come. A number of these windfall sites are expected to be delivered through small sites with deemed consent. During the monitoring year, 65 dwellings were permitted through deemed consent, although with an implied discount of 15% for non-implementation, the Council would expect at least 56 additional dwellings to be delivered.

5.24. In order to identify a robust assessment of the number of windfalls likely to come forward in future years, the Council has sought to establish the number of dwellings that have been built on previously developed sites delivering fewer than 5 dwellings. Table 8 shows a mean average of 65 dwellings per annum and a median average of

62 dwellings being built on previously developed sites delivering fewer than 5 dwellings during the period 1st April 2006 to 31st March 2016. A future mean supply of 60 dwellings per annum is considered appropriate and represents a robust estimate.

Table 8: Housing completions from windfall sites on previously developed land during the period 1st April 2006 to 31st March 2016

YEAR	BROWNFIELD WINDFALL (sites under 5 dwellings)
2006/07	78
2007/08	63
2008/09	78
2009/10	76
2010/11	39
2011/12	61
2012/13	45
2013/14	54
2014/15	108
2015/16	43
TOTAL	**645**
Average (mean) per year	**65**
Average (median) per year	**62**

Self / Custom House Building Register

5.25. Prior to the formal self/custom build register being introduced on 1st April 2016, North Devon and Torridge District Councils set up a joint informal self/custom build register which was open from September 2015. This informal register identified 69 individuals and/or households who were interested in acquiring a self/custom build plot across both District Council areas. There were also 6 individuals with available building plots.

5.26. The formal register was set up on the 1st April 2016 with opportunities for registration being available on the Council's website. The Council invited those individuals on the non-statutory register to enter their details on to the statutory register if they met the Government's eligibility criteria as the Council was unable to transfer the applicant's details without their consent. More detailed information on the statutory register will be included in the monitoring year 2016 / 2017.

5.27. The 'Housing and Economic Needs Assessment - HEDNA' (G L Hearn, May 2016 – paragraph 9.37) recognised 459 people who had registered their details on the Custom Build register and 209 active members on the Plotsearch register within the North Devon local authority area as at February 2016. The HEDNA also identified (February 2016) 9 locations available in North Devon with a capacity for 14 plots.

5.28. As at the 1st April 2016, there had been no serviced building plots approved explicitly for self/custom house building. However, following a review of current extant planning permissions for small scale housing developments, there is the potential for approximately 280 dwellings to be constructed by self/custom builders either by those who have gained planning permission for their own purposes (designed to their own specifications) or to sell the consent on the open market to other would be self/custom builders who would then have the opportunity to amend the design to meet their own requirements.

6. EMPLOYMENT LAND SUPPLY

6.1. The current employment land supply position at 31st March 2016 is outlined below:

Table 9: Employment Land Supply (Adopted & Draft Local Plan Allocations)

	Area (ha)
Gross Allocated Employment Land	47.4
Land developed during 2015/16	0
Land developed from 2011 to 2016	3.089
Land lost during 2015/16	9.69
Land lost from 2011 to 2016	13.64
Outstanding Allocated Employment Land	**30.67**

6.2. Allocated land not started comprises of vacant sites with outline planning permission, or an in principle planning permission on existing business parks and new allocations. In Barnstaple, land at Roundswell - north of A39 (BAR10) has approximately 5.4 hectares remaining, Mount Sandford Green (BAR04) has 2.8 hectares and Larkbear (BAR02) has approximately 1.0 hectare.

6.3. In Braunton, the extension to Wrafton (BRA01) includes approximately 10 hectares for new economic development. Perrigo also has an extant planning permission for approximately 8 hectares, this consent was granted for a period of 10 years as an extension of time to a previous ten year permission. In Ilfracombe, the urban extension to the south of the town (ILF01) has an in principle planning permission for 1 hectare of land for economic uses, whilst 4 hectares remain at Mullacott Business Park, although there is a current planning application pending for the erection of 7 industrial units. The status of these sites is set out in Figure 1.

6.4. In addition to the sites with planning permission or with an in principle planning permission, there is an additional 6 hectares at Roundswell - south of A39 (BAR10) and 10.8 hectares at Pathfields Business Park in South Molton (SM01). These sites have been allocated in the emerging Local Plan but neither site had the benefit of any formal planning permission as at the 1st April 2016. However, post April 2016 an outline planning permission has been granted on part of the allocation at Pathfields Business Park of approximately 5.2 ha with new estate road from the west off the B3226.

Figure 1: Employment Allocations with Extant / Pending Planning Permission & Status

Local Plan	Allocation Ref.	Location	Application Number	Area (ha) Net Gain	Area (ha) Gross Loss	Status
Draft	BRA01	Chivenor / Perrigo, Wrafton	55214 52823	10 8		UC Not Started
Draft	BAR04	Mount Sandford Green, B'ple	54923 59566	2.8		Not Started
Draft	ILF01	Ilfracombe Southern Extension	56675	1		Not Started (subject to S106 being signed)
Draft	ILF04	Mullacott Business Park	59192	0.36		Approved June 2015
Draft	ILF04	Mullacott Business Park	61033	0.156		Not Started (approved post April 2016)
Draft	ILF04	Mullacott Business Park	61914	0.425		Pending decision
Draft & Adopted	BAR10 BAR3	Roundswell Business Park	59112	0.47		UC
Draft & Adopted	BAR10 BAR3	Roundswell Business Park	55882	0.6		Built post April 2016
Draft & Adopted	BAR10 BAR3	Roundswell Business Park	61128	0.9526		Pending decision
Draft & Adopted	BAR02 BAR3a	Larkbear, B'ple	54762	1	3.6 (Housing)	Not Started (subject to S106 being signed)
Draft & Adopted	BAR09 BAR3	Glenwood Farm Roundswell	55479	0.5	3.7 (Housing)	Part Built
Adopted	BAR3	Land east & west of Old Torrington Rd, B'ple	56232 56724		6.4 (Housing)	Part Built

Draft & Adopted	BAR12 BAR1a	Anchorwood Bank	55809 59837 60370	15,090m^2 (gross floorspace)	11,150m^2 (gross floorspace)	Part Built – post April 2016 (A1 uses)
Draft & Adopted	SMO3 SM03	Pathfields Business Park	60780	5.2		Not Started (approved post April 2016)

6.5. As shown in Tables 9 and 9A, there was limited new employment delivered during the monitoring year with nothing being built on allocated land although, approximately 0.2 ha (2,705 m^2) was delivered on non-allocated sites through smaller extensions to existing businesses. There was a small loss of employment land to residential use. Whilst no employment completions on allocated land during the monitoring year, it is worth noting that a number of allocated employment sites are currently under construction and are expected to be completed post April 2016.

Table 9A: Employment Land Supply (Non Allocations)

	Area (ha)
Land developed from 2011 to 2016	1.8405
Land developed during 2015/16	0.2705
Loss from 2011 to 2016	0.0255
Loss during 2015/16	0.0095

6.6. Further losses have also occurred on the business parks through the diversification of existing Class B uses to other employment opportunities, mainly in the form of leisure uses. However, it is not considered a loss to the overall supply of employment land in the same way as losing employment land to residential uses because leisure uses generate a different type of economic development.

Table 9B: Total Employment Land Supply

	Area (ha)
Total Land developed from 2011 to 2016	3.4145
Total Land developed during 2015/16	0.2705
Total Land Lost from 2011 to 2016	8.8895
Total Land Lost during 2015/16	0.0095

7. RETAIL FLOORSPACE

7.1. The partial redevelopment of Green Lanes to deliver a new TK Maxx store was delivered during the monitoring year (2015 / 2016). Also, several major retail developments have been approved by the Council, of which a number within Table 9 are under construction or with an extant planning permission and will be delivered post April 2016. Most notably is the new Asda store at Anchorwood Bank which was completed in November 2016.

Table 10: Retail Floorspace

Site (application number)	Retailer	Retail Floorspace (m^2 gross)	Status	Date
Green Lanes / Joy Street, Barnstaple (55991)	TK Maxx	1,868 m^2 gross (or 1,410 m^2 net following demolition of existing comparison retail)	Within town centre (primary frontage)	Built - 2015
Roundswell (south of A39), Barnstaple (46453, 57389, 58011)	St. John's Garden Centre	6,475 m^2 (A1 & A3) (or 987 m^2 net above current store floorspace)	Out of town	A'ments / App of Det Approved in Aug / Sep 2014
Anchorwood Bank, Barnstaple (55809, 59837, 60370)	Asda	• 6,820 m^2 (retail food store, net retail sales 3,662 m^2) • Up to 7,154 m^2 (convenience retail/service A1 & A2) • Up to 1,116m^2 (Restaurants/Café A3)	Edge of centre – Food store built post April 2016	App of Det (Phase 1) Approved January 15. Variation of condition Approved December 2015.
Unit 14, Two Rivers Ind. Est. B'ple	Baby Glow	233 m^2 of ground floor A1 retail incl. ancillary uses (B1, D1, B8)	Edge of centre	Built 2015
Land at Chivenor Cross, Wrafton (55214)		400m^2 multi-purpose hub (A1, A3, A5, D1 & D2)	Employment - led development	Approved October 2014 - UC

7.2. Most of the new retail floorspace approved relates to Barnstaple, the sub-regional centre, with the new garden centre at Roundswell relocating from Newport with a net increase in retail floor space of approximately 987 m^2. The Green Lanes development replaced an existing smaller store, hence the net floorspace.

7.3. The Anchorwood Bank site is allocated for a mixed use residential and retail redevelopment (Policy BAR1a) including office and light industrial uses (B1) and 6,000 to 10,000 m^2 of non-food bulky goods. Policy BAR12 of the emerging Local Plan allocates the site for mixed use redevelopment including 6,000 m^2 net retail floorspace for comparison goods as well as community and leisure facilities. The approved convenience floorspace is not policy compliant, but did not have an unacceptable adverse impact on the town centre under the retail impact assessment and was justified in securing redevelopment of a prominent, strategic brownfield site on the edge of the town centre. Part of the retail element was completed in November 2016 with the remainder of the retail uses being due for completion by 2017.

7.4. The following table aims to identify the consented schemes at Anchorwood Bank and sets out the gross floor area in square metres.

Figure 2: Planning History of Anchorwood Bank

	43599	55809/59837	60370	60406/60711
Dwellings C3	Up to 450	Up to 450	~	172
Foodstore A1 (Asda)	~	6,820 gross	6,820 gross 3,662 net	~
Petrol Filling Station (Asda)	~	Not specified	Not specified	~
Bulky Goods A1	10,000	~	~	~
Convenience Retail/Service A1 & A2	1,000	1,000	7,154	~
Restaurants/Cafes A3	Not specified	1,300	1,116	~
Hotel C1	Up to 60 beds	Up to 60 beds	~	~
Public House A4	Not specified	400	~	~
Takeaway A5	Not specified	400	~	~
Leisure D2	Not specified	1,000	~	~
Community Facilities D1	1,000	200	~	~
Employment B1	4,000	4,000	~	~
TOTAL	16,000	15,120	15,090	~

8. TOURISM / LEISURE FLOORSPACE

8.1. The redevelopment of a unit at Roundswell Business Park to a new trampoline park (Class D2) and a retrospective approval for a gymnasium was delivered during the monitoring year (2015 / 2016). Also, a number of other leisure developments have been approved by the Council. Table 10 identifies those sites with an extant planning permission. The Council are expecting these developments to be delivered post April 2016.

Table 11: Leisure Floorspace

Site (application number)	Use Class	Leisure Floorspace (m^2 gross)	Status	Date
Hyde House, 6 Union Terrace, B'ple (60174)	C1 Hotel	New hotel floorspace - 375 m^2	Edge of Town Centre Change of use C4 to C1	Extant permission December 2015
Living Wells Church, Braunton Road, B'ple (59998)	D2 Assembly & Leisure	New gymnasium floorspace - 212 m^2	Edge of Town Centre Change of Use D1 to part D2	Extant permission December 2015
Thompson Aerospace, Fishleigh Road, Roundswell Business Park (60010)	D2 Assembly & Leisure	New Trampoline Park floorspace - 593 m^2	Edge of District Centre Change of Use B2 to D2	Extant permission November 2015
Centurion Court, Lauder Lane, Roundswell Business Park (60246)	D2 Assembly & Leisure	New Trampoline Park (Air Extreme) floorspace - 930 m^2	Edge of District Centre Change of Use B2 to D2	Extant permission January 2016 - Built
Inspirations Gym, 2-3 Narita House, Roundswell Business Park (60610)	D2 Assembly & Leisure	New gymnasium floorspace - 177 m^2	Edge of District Centre Change of Use B2 to D2	Built. Retrospective change of use. March 2016
Former Colossus Nightclub, Ilfracombe	C1 Hotel	New hotel (Premier Inn) floorspace 2,488 m^2 gross. Existing D2 use 800 m^2.	Edge of Town Centre D2 to C1	Extant permission October 2015

9. TOWN CENTRES

9.1. The adopted local plan (July 2006) seeks to protect the level of shops (A1 uses) on the ground floor within the defined primary shopping frontages for Barnstaple and Ilfracombe (High Street) as defined on the Policies Maps. A wider range of town centre uses are also supported within the secondary frontages of the main town / village centres including Braunton, Ilfracombe (Harbour), South Molton and Woolacombe. All town / village centres are surveyed annually where practicable to do so on or around the same period of time as the previous year. The assessment for April 2016 identified the following changes within the primary and secondary frontages of Barnstaple and Ilfracombe, with comparison to the previous survey in 2015.

Table 12: Retail Uses on Primary and Secondary Shopping Frontages

Percentage of shops (A1 Use Class) in the primary shopping frontages of Barnstaple (Policy BAR4) and Ilfracombe (Policy ILF5). (Target: no net decrease in the number of shops within the primary shopping areas of Barnstaple and Ilfracombe)		Barnstaple 71.7% A1 use (no significant net loss from May 2015) Ilfracombe (High Street) 48.9% A1 use (no significant net loss from May 2015)
Percentage of Use Classes A1 – A5, C3 and D2 at ground floor level in the secondary shopping area of Barnstaple (BAR05) and Ilfracombe (ILF06). Other uses include B1, B2, D1 & Sui Generis.	<u>Barnstaple</u> April 2016 (2015) A1 37.2% (37.5%) A2 8% (8.9%) A3 8.3% (8.3%) A4 4.1% (4.1%) A5 3.2% (3.2%) C3 6.5% (4%) D2 1.1% (1%) Vacant 16% (16%) Other 15.1% (14.2%)	<u>Ilfracombe</u> April 2016 (2015) A1 39.6% (41%) A2 9% (9%) A3 6.4% (7%) A4 1.9% (2%) A5 2.5% (3%) C3 10.8% (10%) D2 1.2% (1%) Vacant 11% (15%) Other 13.6% (12%)

9.2. It can be seen from Table 12 that both the primary frontages of Ilfracombe and Barnstaple town centres remain relatively consistent in terms of the proportion and retention of shops (A1) albeit the primary frontage of Ilfracombe has a much lower base compared with Barnstaple. The proportion of shops (A1) in the secondary shopping frontage has also remained relatively consistent, although there has been a slight decrease in Barnstaple, The more notable decrease is within the secondary frontage of Ilfracombe town centre.

Table 13: Vacancy Rates in Town Centres

	(i) A1 Uses	(ii) Vacant
Percentage of ground floor units in Barnstaple Town Centre which are (i) Use Class A1 (retail) and (ii) vacant.	48.8% A1 use (approx. 1% lower than 2015)	14.8% vacant (approx. 1% higher than 2015)
Percentage of ground floor units in Ilfracombe Town Centre which are (i) Use Class A1 (retail) and (ii) vacant.	41.8% A1 use (approx. 1% higher than 2015)	12.3% vacant (approx. 3% lower than 2015)
Percentage of ground floor units in Ilfracombe Harbour which are (i) Use Class A1 (retail) and (ii) vacant.	27.8% A1 use (about the same as 2015)	3.8% vacant (approx. 2% lower than 2015)
Percentage of ground floor units in South Molton Town Centre which are (i) Use Class A1 (retail) and (ii) vacant.	34.9% A1 use (approx. 1% lower than 2015)	4.9% vacant (about the same as in 2015)
Percentage of ground floor units in South Molton Town Centre (west of New Road) which are (i) Use Class A1 (retail) and (ii) vacant.	39.6% A1 use (approx. 1% lower than 2015)	6.1% vacant (about the same as in 2015)
Percentage of ground floor units in Braunton Village Centre which are (i) Use Class A1 (retail) and (ii) vacant.	54.3% A1 use (about the same as in 2015)	1.7% vacant (approx. 1% lower than 2015)
Percentage of ground floor units in Woolacombe Village Centre which are (i) Use Class A1 (retail) and (ii) vacant.	36.3% A1 use (about the same as in 2015)	2.2% vacant (approx. 2% higher than 2015)

9.3. The proportion of A1 uses has decreased slightly in Barnstaple but Ilfracombe High Street has seen a slight increase and Ilfracombe Harbour has maintained a consistent level of A1 uses from the previous monitoring year. South Molton has also decreased slightly whereas the village centres of Braunton and Woolacombe have maintained a consistent level as shown in Table 13.

9.4. The policy requirement for no less than 50% target (A1 uses) within South Molton town centre (SM05) has never been achieved since the policy was adopted in 2006. This is partly due to the area covered by the town centre incorporating a high proportion of Class C3 – dwelling houses east of North Road. However, by excluded this area and focussing on the area west of North Road the 50% target has still not been achieved but the gap in the threshold target is less significant. There is similar concern with the 50% target for Woolacombe village centre (WOO2) which in earlier AMRs it was being achieved but there has been a steady decline. This latest AMR has shown some encouraging stability over the previous monitoring period.

9.5. A review of the town/village centre core areas has informed the draft Local Plan, as set out in the publication draft (June 2014). The review has proposed a slight increase to the Barnstaple Town Centre core, a reduction to Ilfracombe and South Molton, Braunton has remained the same but Woolcombe has been deleted.

9.6. Vacancy rates have increased slightly in the main town centre of Barnstaple whereas Braunton, Ilfracombe (High Street) and Ilfracombe (Harbour) have decreased against the last monitoring period (2015). South Molton has remained unchanged. In Woolacombe, there has been a 2% increase in vacant units, although this only relates to an individual unit from the previous monitoring period. However, the overall vacancy levels in the largest town centres (Barnstaple and Ilfracombe High Street) continues to remain high enough to cause some concern.

9.7. Although this decline is likely to reflect national economic trends, the vacancy rate is slightly higher than the average for the South West (approximately 10%). Due to the current economic climate there is concern this current trend of relative stagnation in our town centres may continue over the short to medium term. The evidence from the site surveys undertaken in April / May 2016 has informed this AMR and the annual review in 2017 will provide a much clearer picture on the future health of our town centres and the effectiveness of retail policies within the new Local Plan which is likely to be adopted in the Spring of 2017.