

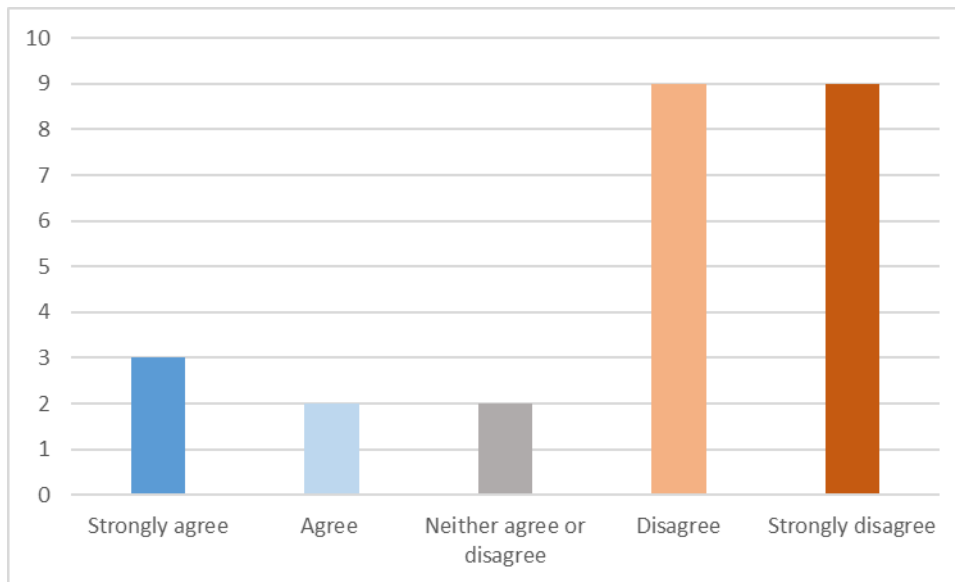
Local Plan Survey Results: Housing and Community

25 individual responses were received for the Housing and Community section of the Local Plan 5-Year Review Survey.

The questions within the Housing and Community section are listed below with the comments received for each question.

Question 10: Our analysis to date (in the summary paper and interim housing and community topic paper) suggests that although fewer homes have been delivered than expected, there are other factors outside the planning system impacting on the delivery of sufficient affordable housing for local people. As such, changes are not needed to the housing policies to enable the delivery of local need homes.

To what extent do you agree or disagree with this statement?



25 responses were received with 19 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Strongly disagree	The supply of housing on Exmoor would be greatly improved if ENP could prevent the purchase of second homes which are empty for most of the year, instead of being used for local people to live in. Other countries have such policies , it is time we did this too before Exmoor becomes nothing more than a collection of empty villages.	Most existing open market housing on Exmoor (as elsewhere) can become a second / holiday home because, under nationally set planning law, they are in the same residential “use class”. It is therefore not possible for a local planning authority to prevent the purchase or use of such housing as a second home. The Welsh Government proposed a different use class for second homes and short term holiday letting but this would not apply in England. The high percentage of second / holiday homes on Exmoor is noted as a concern in the Local Plan and it led to the National Park Authority introducing a new Local Plan policy HC-S4 that any new market housing permitted to enable new affordable housing, or new units created through the sub-division of existing housing, has to have a “Principal Residence” condition - it must be lived in as a main or principal residence (p153 Part 6 Achieving a Thriving Community (exmoor-nationalpark.gov.uk) & p20-21 Local Plan 2011-2031 Summary (exmoor-nationalpark.gov.uk)). This can only apply to new units of housing and not existing housing.
Andrew Milne	Disagree	The policies are trying to provide but they ignore the large number of people that have to travel into the park to work because rentals and purchase price prevents purchase closer. This is not only bad on the housing front it is bad as far as climate change is concerned as it is encouraging increased traffic and consequent CO2 emissions.	Noted. Local Plan Policy HC-S3 includes a criterion that enables people to qualify as being in local housing need through a work connection – this could be someone who needs to move into the National Park to work.
Nicola Kemp/ Rural Housing Enabler at	Strongly agree	Strong pipeline with number of potential sites in pre-planning system and growing awareness and interest locally in affordable housing. Rural	Noted. The RHE post plays a vital role in supporting delivery of affordable housing on Exmoor working with the National

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Somerset West and Taunton		Housing Enabler has been in post for 15 months of 5 year programme that will continue to support progress. Significant progress has been seen during last 15 months.	Park Authority as the local planning authority and other partners to bring forward locally needed affordable housing.
James Holbrook/ Somerset West and Taunton	Disagree	Since the adoption of the Local Plan, Exmoor National Park has declared a climate emergency. The importance of Biodiversity Net Gain needs to be considered as this will have an impact on any proposed residential development coming forward and being developed in the National Park. In addition, the topic papers refer to the Phosphates issues currently impacting planning applications in Somerset West and Taunton and the Somerset Levels and the topic paper states that it is not "anticipated" that phosphates will impact upon Exmoor National Park. Whilst, it is agreed that it might not directly, it could indirectly if Somerset West and Taunton were unable to support Exmoor National Park in meeting their housing need due to the lack of a phosphates solution in our area. Options and solutions are being considered but in the short term, there may be additional pressure from developers looking outside of the areas impacted by the phosphates issue.	<p>The ENP Local Plan includes policies to conserve <i>and enhance</i> biodiversity. This provides a policy hook to implement BNG, which as national legislation and policy, does not need to be repeated in Local Plan policies. ENPA will prepare further guidance on BNG to provide further guidance on how to implement the requirements within the National Park.</p> <p>The situation regarding phosphates and the impact on housing delivery in Somerset has been identified through Duty to Co-operate discussions and will be kept under review.</p> <p>The adopted ENP Local Plan housing strategy furthers statutory National Park purposes and the National Park Authority duty to local communities and is in line with national policy which is that National Parks have the highest status of protection and that the scale and extent of development should be limited.¹ The focus for housing delivery in National Parks is on affordable housing and Local Plans should respond to local housing needs and prioritise local need affordable housing.² The Exmoor National Park Local Plan therefore includes an <i>indicative</i> figure for local affordable housing. Updated evidence of housing need</p>

¹ National Planning Policy Framework (July 2021) paragraph 176

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

² DEFRA, English National Parks and the Broads UK Government Vision and Circular 2010

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf, para 78.

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			<p>carried out by ENPA and SWT to common methodologies and summarised in the ENP Local Plan 5 Year Review Interim Topic Paper³ demonstrates that the figures for local affordable housing need in the National Park are slightly reduced, and so can be accommodated within the current ENP Local Plan policies.⁴ It is not considered that this is a reason to trigger a review of the ENP Local Plan.</p>
<p>Michael Harrison</p>	<p>Strongly disagree</p>	<p>The above statement basically devolves responsibility for delivering affordable housing. Yes there are factors outside of ENPA control, but there are also things ENPA could do which would help. My focus is on social rent houses rather than houses that will be sold on the open market. The policies of ENPA make the economic case for social rent affordable housing very difficult for the housing association.</p> <p>The most important cost for a Housing Association is the ongoing maintenance cost over perhaps a 50 year life cycle. By insisting on wooden doors and windows, even in newly built properties which are not in conservation areas, ENPA are massively impacting on the expected costs that a HA must bear over the life-cycle of the property. UPVC windows and doors would massively reduce the expected cost burden for the HA.</p> <p>In addition, the policies regarding eligibility for being a tenant of such properties are currently too restrictive, which means the HA must factor in more time when they can expect the houses to</p>	<p>Local Plan policies prioritise local need affordable housing in the context of Exmoor's National Park designation. National Park statutory purposes include the conservation & enhancement of natural beauty and cultural heritage which provide the framework for design policies to reflect local distinctiveness including through traditional materials. Design requirements including for materials can be taken account of in affordable housing grant applications by registered housing providers and decisions on levels of funding by Homes England to ensure that new housing is appropriate and can be delivered in National Parks. Public authorities have a legal duty to have regard to National Park purposes.</p> <p>Exmoor's Local Plan policies were finalised following an evidence based process and extensive consultation including with local communities. New affordable housing through a rural exceptions approach must meet a local need in line with national policy. The local connection definition in Policy HC-S3 includes a number of ways in which people can demonstrate eligibility, including through a work connection. There may be opportunities, some outside the planning system, to work collaboratively including on the marketing</p>

³ [Local-Plan-Review-Interim-Housing-Topic-Paper.pdf \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/local-plan-review-interim-housing-topic-paper.pdf)

⁴ [2021-11-29-FINAL-ORS-Exmoor-NPA-Ind-LHNA.pdf \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/2021-11-29-FINAL-ORS-Exmoor-NPA-Ind-LHNA.pdf)

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>stand empty whilst they find suitably qualified tenants. This of course impacts their revenue stream.</p> <p>So, in summary, in terms of both costs and revenue, the current policies of the ENPA make life more difficult for a HA in building an economic case for social rent housing.</p>	<p>of such properties to maximise chances for local people to be aware of housing as it becomes available and minimise or avoid housing being empty between tenants.</p>
Adrian Maunders	Agree	-	Noted
Jo Dawson	Disagree	<p>You cannot only have affordable housing and as the new housing at Barnsclough Mead in Dulverton show there is not the need for local families as half of these properties have been given to people from well outside the area.</p>	<p>The affordable housing at Barnsclough Mead, Dulverton is a mix of local need affordable and affordable housing without a local need occupancy tie. The latter do not have to be lived in by people with a local connection. It is therefore not a reflection of a lack of local housing need if they have been offered to people in housing need from elsewhere in Somerset.</p>
J Atherton	Strongly disagree	<p>Over the last 50 years there has been a trend from tourists using hotels to using self catering. At the same time use of holiday homes as second homes has increased. We now have a major housing crisis where we have low wages but high house prices. At the same time existing rental properties have been made into Air B&B / holiday lets.</p> <p>We need an urgent change in policy to firstly allow the building of more affordable housing, and a change to planning law to limit the use of rental accommodation as holiday homes. We also need to lobby central government to increase Council Tax on holiday homes, such that it is twice the charge made on normal residential homes; stopping completely the loophole under which such homes can currently avoid paying any Council Tax at all.</p>	<p>The Local Plan records concern about the high percentage of second/holiday or empty homes on Exmoor. We are also aware of the move to self-catering and the growth of Air B&Bs.</p> <p>Local Plan policies / planning can only control new development. Monitoring shows the gap between wages / income and average house prices has continued to increase. The Local Plan allows only for new housing needed by the local community and has reflected affordability issues by prioritising affordable housing with a local need occupancy tie. This must be lived in by someone with a local housing need and cannot be a second or holiday home.</p> <p>The figure of 10 local need affordable houses a year is an indication not a limit. In practice, evidence from local housing need surveys sent to households in a parish / group of parishes is used as evidence for planning proposals for</p>

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		<p>The current five year plan envisages building about 10 affordable home a year; based on local conditions in the Lynton area, we almost need that number in Lynton, let alone across the rest of Exmoor.</p> <p>A change in housing policy is needed now.</p>	<p>new local need affordable housing. More than 10 a year can be permitted if there is evidence of a need for it.</p> <p>Existing market housing (the majority on Exmoor as elsewhere) can become a second / holiday home because there is no distinction in planning law between permanently occupied and second/holiday homes as they are in the same residential “use class”. It is therefore not possible for a local planning authority to prevent the purchase or use of such housing as second/holiday homes. The high percentage of second / holiday homes led to Exmoor’s Local Plan being the first in the country to introduce a policy that where new market housing is permitted to deliver new affordable housing or new units through sub-division it has to have a “Principal Residence” condition - it must be lived in as a main or principal residence.⁵ This followed a similar policy in the Lynton & Lynmouth Neighbourhood Plan. It can only apply to new housing not existing.</p> <p>Responsibility for council tax falls to North Devon District Council. There may be some flexibility for councils to vary council tax.</p>
<p>Rosamund Griffin/ Wootton Courtenay Parish Council</p>	<p>Disagree</p>	<p>Need more flexibility in housing. HC-D3 Should allow more options for example, a principal house or single dwelling in one parish and then supplying affordable housing in another parish on Exmoor. The plan doesn’t allow for all Exmoor locals, it discriminates against young people who want a bit more as it is restricted to 93m².</p>	<p>The Local Plan ensures that if Principal Residence housing is permitted where it is essential to deliver needed new affordable housing that it is delivered alongside it. In such cases, Principal Residence is only permitted to deliver the affordable housing. There is a risk with “off-site” provision of affordable housing. It is also considered, in terms of social cohesion, that it is beneficial to deliver different tenures together.</p> <p>The Local Plan explains that the affordability of owner occupied dwellings will be achieved through a) the local</p>

⁵ Local Plan (p153 [Part 6 Achieving a Thriving Community \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk) or (p20-21 [Local Plan 2011-2031 Summary \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)).

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			occupancy tie, which will reduce house values; and b) through size - ensuring they have a gross internal area of 93 square metres (sqm) or less and recognising the role of the property to meet future community needs for affordable housing. Floor space is measured internally and applies to living space e.g. it excludes staircases. This size is considered by the Government to equate to a 3 bedroom 5 person house. It is necessary to ensure that new owner occupied local need affordable housing will remain within range of future local households.
Gary Parsons/ Sport England	Neither agree or disagree	n/a	Noted
Roger Watts	Strongly disagree	Imagine the UK delegation at the COP15 Summit trying to explain our position on Protected Areas: "The UK is different. In our Protected Areas we have tens of thousands of residents, lots of businesses and farmers, and an unlimited number of visitors. We have carried out a major review.....we intend to increase the number of residents, promote more businesses and farmers, and encourage more farmers."	In working towards National Park purposes, National Park Authorities have a statutory duty to further the social and economic well-being of local communities. Evidence gathered for the adopted Local Plan and updated as part of the 5-year Local Plan review continues to show there is a significant "affordability gap" between wages/income and house prices and a continuing local need for affordable housing. It is important that policies enable housing that is affordable for balanced communities including people of working age.
Mandy Rose/ Dulverton Town Council	Agree	-	Noted
Emily Catford	Strongly disagree	There are, of course factors outside the planning system that will contribute to the lack of homes been built. However, fundamentally if locals who run their businesses here on Exmoor cannot afford to live here, they will be lost, therefore more opportunities need to be made to provide housing and this primarily sits with planning. The system is	Evidence shows the need for more affordable housing with local occupancy ties. The Topic Papers acknowledge our concern about the level of affordable housing delivery. Planning has a very important role to play and the adopted Local Plan seeks to maximise opportunities to enable locally needed affordable housing to come forward. We are aware of continued and recent increases in house prices and we

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		<p>much too rigid. Since Covid-19 house prices have risen considerably while salaries etc have not, therefore what was considered affordable is now not. Housing on Exmoor has also been brought by non-locals as second homes (1 in 5, 2011 census) or a bolt hole to escape Covid in built up places. The paper comments that there are less than 1500 residents in each Parish, how many of these people are bonafide locals? Alot of properties have been brought as rentals and while renting is an option for some people, rental rates are enormous. Planned new build developments such as Rockfield Homes in Porlock are only offering a few homes for local people which will be highly competitive to get.</p> <p>I also believe times have changed, where focus is put upon housing been near amenities such as the local shop and bus routes etc. and it is generally not needed in these times. Most shopping for the majority of people is done online or in a town especially in a working modern family. Working from home is now the norm for some and it is highly unlikely if you have grown up on the moor that you have to rely on a bus service. And I don't know anyone my age that goes to Church!</p> <p>The recent housing survey which provided potential plots in local villages for local development were mainly unsuitable - either not actually for sale or would entail a huge amount of expense and headache to build upon. In my local</p>	<p>are reviewing the latest information on housing costs and local wages/incomes. Updated evidence shows an increasing “affordability gap” which indicates that the priority for local need affordable housing is still needed. Rental levels / maximum sale prices on new affordable housing / existing local need affordable housing are controlled. However, the planning system cannot control all the issues related to the delivery of local need affordable housing.</p> <p>Occupancy of existing market housing cannot be controlled through the planning system and it can also become a second / holiday home. There is no distinction in planning law between permanently occupied and second/holiday homes as they are in the same residential “use class”. It is therefore not possible for a local planning authority to prevent the purchase or use of such housing as second/holiday homes. The high percentage of second / holiday homes led to Exmoor’s Local Plan being the first in the country to introduce a policy that where new market housing is permitted to deliver new affordable housing or new units through sub-division it has to have a “Principal Residence” condition - it must be lived in as a main or principal residence.⁶ This can only apply to new housing not existing.</p> <p>The settlement strategy – which defines villages and towns as settlements and thereby the remaining areas as “open countryside” - includes places which are small compared to settlements in other planning authority areas but which for Exmoor were considered important to include. In this way the approach provides opportunities and flexibility because new affordable housing can be in but also adjoining</p>

⁶ Local Plan (p153 [Part 6 Achieving a Thriving Community \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk) or (p20-21 [Local Plan 2011-2031 Summary \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)).

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		<p>villages there is an agreement among residents that there is a need for more affordable housing, however space for building within villages is limited and likely to cause objections and potential land on the outskirts of villages is been protected by planning.</p>	<p>settlements. It has been longstanding national policy that new housing in the open countryside should be exceptional to meet the essential needs of a rural worker in agriculture or forestry. Exmoor’s Local Plan housing strategy however also allows for conversions to local need affordable in farmsteads and hamlets in the open countryside where there is an existing dwelling. Additionally, new build local need affordable housing can also be considered in places which meet the definition of rural communities. This option was introduced in the 2017 Local Plan to extend rather than restrict opportunities in the open countryside. It is not possible to allow in principle for new build housing in the open countryside as this would conflict with national planning policy.</p> <p>We understand the challenges involved with self-build, not least finding suitable plots. The planning system and the local planning authority cannot solve all issues, but we are continuing to work with partners including the housing authorities and Rural Housing Enabler and other local groups to provide support where we can and to produce further guidance.</p>
Sally Bastock	Disagree	<p>HC-S1: Housing - 1a) / HC-S2 - 5 / HC-S3 - I have concerns whether it is necessary to strengthen what is meant by "will remain so in perpetuity", and whether the suitable gross internal area in HC-S2 - 6 takes into account individual special requirements that both young rural workers and the elderly needing to downsize may reasonably require? HC-S3 5 - should there be a better defined limit on the final area that falls under the criteria?</p>	<p>Local need housing is required to remain so in perpetuity. This is achieved through a legal agreement which requires such the housing to be lived in by both the initial and future occupier who meets the local need definition.</p> <p>The Local Plan explains that the affordability of owner occupied dwellings will be achieved through a) the local occupancy tie, which will reduce house values; and b) through size - ensuring they have a gross internal area of 93 square metres (sqm) or less and recognising the role of the property to meet future community needs for affordable housing. Floor space is measured internally and applies to</p>

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			<p>living space e.g. it excludes staircases. This size is considered by the Government to equate to a 3 bedroom 5 person house. It is necessary to ensure that new owner occupied local need affordable housing will remain within range of future local households. There are also policies which allow for outbuildings and for home-based businesses which can be an option to provide additional space within the curtilage of dwellings where needed. Criteria 5 of HC-S3 limits the area to the district council outside the national Park. For Somerset, at the point of plan adoption this was parishes in the former West Somerset part of the district. It is the final part of the “cascade” defining a local connection and applies only for relets of housing association housing when no-one can be found who meets the criteria for local connection through residency or work in a parish adjoining parish extending to the National Park boundary before people in the district outside the National Park can be considered.</p>
<p>Claire Wright/ CLA South West</p>	<p>Disagree</p>	<p>whilst there are a range of factors affecting delivery of affordable homes it would be complacent to state they are all outside of the control of the National Park.</p>	<p>Planning has a very important role to play and the adopted Local Plan seeks to maximise opportunities to enable locally needed affordable housing to come forward. However, the planning system / local planning authority cannot solve all issues related to the delivery of local need affordable housing. We are continuing to look at ways that, in our role as the local planning authority, we can support the delivery of local need affordable housing. This includes working with partners, including the housing authorities and Rural Housing Enabler and local groups and communities, to provide support where we can and to produce further guidance.</p>
<p>Scilla Barney</p>	<p>Strongly disagree</p>	<p>The problem lies within Exmoor and the inability therein to support the housing needs for local families</p>	<p>Evidence shows the need for more affordable housing with local occupancy ties. The Topic Papers acknowledge our concern about the level of affordable housing delivery. The</p>

Name/Organisation	Response	Comment	ENPA Officer Response
			adopted Local Plan seeks to maximise opportunities to enable locally needed affordable housing to come forward. However, the planning system / local planning authority cannot solve all issues related to the delivery of local need affordable housing. We are continuing to look at ways that, in our role as the local planning authority, we can support the delivery of local need affordable housing. This includes working with partners, including the housing authorities and Rural Housing Enabler and local groups and communities, to provide support where we can and to produce further guidance.
Rosamund Griffin/ Selworthy and Minehead Without Parish Council	Strongly disagree	The authority has failed to help enough for the housing needs of local people, particularly affordable housing for young people.	Evidence shows a need for more affordable housing with local occupancy ties. The Topic Papers acknowledge our concern about the level of affordable housing delivery. The adopted Local Plan seeks to maximise opportunities to enable locally needed affordable housing to come forward. However, the planning system / local planning authority cannot solve all issues related to the delivery of local need affordable housing. We are continuing to look at ways that, in our role as the local planning authority, we can support the delivery of local need affordable housing. This includes working with partners, including the housing authorities and Rural Housing Enabler and local groups and communities, to provide support where we can and to produce further guidance.
Bernard Peacock	Strongly agree	-	Noted
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We have no comment to make for Question 10.	Noted
Sarah Buchanan / Brompton Regis PC	Strongly disagree	Policy HC-S1 and S2 and D1 and D2. Implementation lacks responsiveness to particular situations. The affordable housing policy does not allow sufficient flexibility to allow for variation in	Noted. The Local Plan explains that the affordability of owner occupied dwellings will be achieved through a) the local occupancy tie, which will reduce house values; and b) through size - ensuring they have a gross internal area of 93

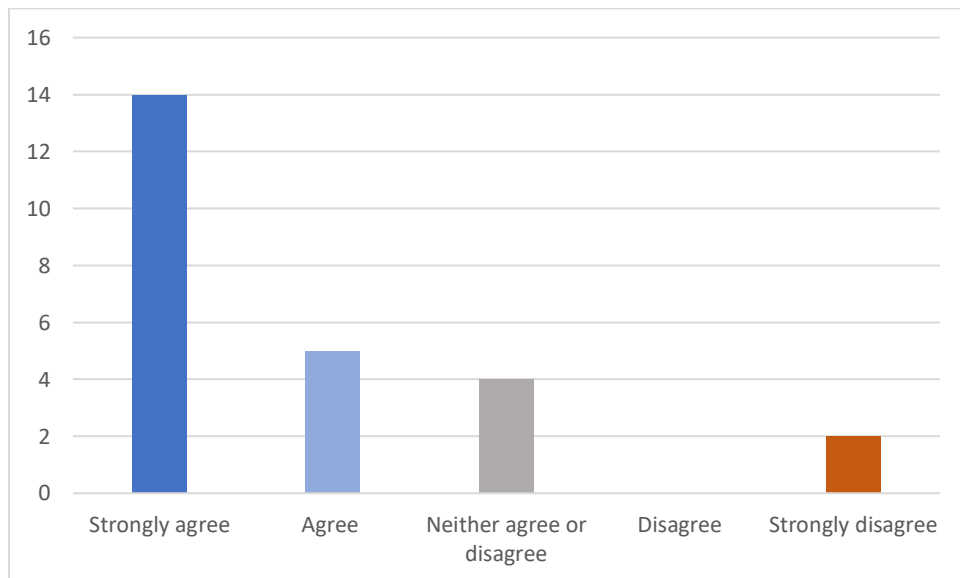
Name/Organisation	Response	Comment	ENPA Officer Response
		<p>circumstances of applications and proposals which make the best use of opportunities but do not fit exactly to the parameters defined in the policy such as the size of affordable housing units. The policy should therefore be changed.</p> <p>There is a wider issues in the EMPA drive to sustainable building products. While this is understandable it increases the prices of 'affordable;' homes. An example is the refusal of UPVC windows in conversions.</p> <p>We fully understand the need to use sustainable products but in making housing less affordable it is not a sustainable policy for communities or the life and livelihood of the national park. We do not know how this contradiction of policies might be managed but perhaps in the context of affordable housing ENPA could offer grants to offset the higher costs of sustainable materials vis a vis non sustainable.</p>	<p>square metres (sqm) or less and recognising the role of the property to meet future community needs for affordable housing. Floor space is measured internally and applies to living space e.g. it excludes staircases. This size is considered by the Government to equate to a 3 bedroom 5 person house. It is necessary to ensure that new owner occupied local need affordable housing will remain within range of future local households.</p> <p>The Local Plan provides opportunities for people to come forward with proposals for new local need affordable housing including through conversions. This is because Local Plan policies prioritise local need affordable housing. We are aware there are challenges associated with e.g. self-build - not least building costs. We note the suggestion of grants. The area is designated as a National Park and the statutory purposes include the conservation & enhancement of natural beauty and cultural heritage which provide the framework for design policies which reflect local distinctiveness including through traditional materials. The plan provides some flexibility for the use of non-traditional materials in some circumstances - however this is not considered to be appropriate for traditional buildings.</p>
Angela Percival	Disagree	I feel that many people feel that there is little chance of them being able to get housing on Exmoor if they have a small budget	<p>Evidence shows that there is a continuing need on Exmoor for more affordable housing with local occupancy ties. The Topic Papers acknowledge our concern about the level of affordable housing delivery. The adopted Local Plan seeks to maximise opportunities to enable locally needed housing to come forward.</p> <p>However, the planning system / the local planning authority cannot solve all issues related to the delivery of local need affordable housing. We are continuing to look at ways that, in our role as the local planning authority, we can support</p>

Name/Organisation	Response	Comment	ENPA Officer Response
			the delivery of local need affordable housing. This includes working with partners, including the housing authorities and Rural Housing Enabler and local groups and communities, to provide support where we can and to produce further guidance.
George Curry/ Lyn Climate Action	Disagree	Along with the problem of greater need for carbon neutral, new affordable housing, one of the major "factors outside the planning system" is the fact that B&Bs, and in particular holiday lets, are taxed at a lower rate than long term lets, thus encouraging landlords not to provide housing for local people and creating a hugely disproportionate number of houses that are empty outside of the holiday seasons. Under "Duty to Cooperate" the ENPA needs to coordinate with local Councils to resolve this issue, in the first place by taxation policies which encourage landlords to let houses to local people, both in the National Park and the surrounding areas. (HC-S1, HC-S3, HC-S4).	There is concern over affordability and the need for more housing that is affordable to local people. Exmoor National Park Authority will continue to raise the issue of second/holiday homes, but it is considered that duty to cooperate with local councils cannot solve this issue. Local councils are aware of the high number of second/holiday homes As noted, responsibility for council tax falls to the District Councils and while there may be some flexibility for councils to vary council tax, they themselves operate within a taxation regime that is set nationally. The Department of Housing and Levelling Up recently announced changes to taxation for holiday lets including they are let for a minimum number of days.
Philip Griffin	Strongly disagree	There is not enough flexibility in the housing policies. It doesn't stimulate opportunities for young and old. I don't think you can control the supply of housing by making it so limited.	Updated evidence indicates there continues to be a need for affordable housing for local people. The Local Plan prioritises affordable housing but also provides for other housing needed by local communities including for land based businesses and extended family dwellings. Principal residence can also be considered where it is needed to deliver local need affordable housing and this can include accessible and adaptable housing (which can also come forward as affordable housing). A framework which provides a bespoke approach for Exmoor - prioritising local affordable housing and other housing needed by the community - enables proposals for

Name/Organisation	Response	Comment	ENPA Officer Response
			the kinds of housing needed locally to come forward which might not otherwise be possible if a e.g. additional market housing was acceptable in principle.
Nathan Price/ Tetlow King Planning, representing South West Housing Association Planning Consortium	Disagree	<p>The SWHAPC disagrees with this statement. It is the role of the Council and the Local Plan to enable and accommodate sufficient housing growth, both market and affordable. The residents of Exmoor should not be reliant on other factors outside of the planning system to deliver affordable homes. There is too much uncertainty and reliance on others highlights poor performance from the Council in delivering enough affordable homes.</p>	<p>In working towards National Park purposes (including the conservation & enhancement of natural beauty, wildlife & cultural heritage) National Park Authorities have a statutory duty to further the social and economic well-being of local communities. National policy for National Parks is clear that the focus should be on affordable housing. Evidence shows a continuing need on Exmoor for affordable housing with local occupancy ties. The adopted Local Plan seeks to maximise opportunities to enable locally needed housing to come forward. The Topic Papers acknowledge our concern about the level of affordable housing delivery.</p> <p>However, National Park Authorities are not housing authorities and the planning system / as the local planning authority we cannot solve all issues related to the delivery of affordable housing. We are continuing to look at ways, in our role as the local planning authority, that we can support the delivery of local need affordable housing. This includes guidance and working with partners, including the housing authorities and Rural Housing Enabler as well as local communities.</p>
Rachel Thomas/ Exmoor Society	Strongly agree	<p>There are many factors outside planning that affect the delivery of housing. ENPA is not the housing deliverer, there are limited sites for suitable housing within Exmoor settlements or the open countryside and the settlements themselves have populations below 1,500. There is a danger that over the plan period and beyond that new affordable housing for local people will be lost.</p>	Noted.

Question 12: Updated evidence (summarised in the interim housing and community topic paper) shows there have been continued rises in house prices and an increased affordability gap between house prices and wages within the National Park, and therefore affordable housing for local communities remains a priority.

To what extent do you agree or disagree with this statement?



25 responses were received with 16 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Strongly agree	As above. House prices are being driven up by people buying second homes to escape to for a few weeks of the year.	Noted
Andrew Milne	Strongly agree	-	Noted
Nicola Kemp/ Rural Housing Enabler at Somerset West and Taunton	Strongly agree	Local intelligence supports this answer - also is a national problem as house prices continue to rise faster than wages	Noted

Name/Organisation	Response	Comment	ENPA Officer Response
James Holbrook/ Somerset West and Taunton	Agree	-	Noted
Michael Harrison	Strongly agree	-	Noted
Adrian Maunders	Agree	-	Noted
Jo Dawson	Neither agree or disagree	It is the same country wide, house prices are going up faster than wage increases!	Noted
J Atherton	Strongly agree	See answer to Q11.	See response to Question 10.
Rosamund Griffin/ Wootton Courtenay Parish Council	Strongly disagree	<p>I am concerned that ENP is relying on 2011 Census data under the heading "New and Updated Evidence" in relation to second/holiday homes. The English Housing Survey 2018-19, Second Homes" provides more up-to-date evidence of current trends. There is also a publication entitled "A Place in the country: the cost of second homes", published by the Economic and Research Council, a study which was conducted by Exeter University on behalf of North Devon Council. Purbeck in Dorset (AONB) has also published a second homes evidence paper in 2018 (44 pages). "The NPA has a duty to promote the economic and social well-being of local communities." (ENP's Economy Topic paper) and to that end, the ever increasing impact on local communities of second home ownership requires serious consideration and an urgent policy review.</p> <p>HC-D3 Flexibility on housing policies to encourage higher earning people to live and</p>	<p>Updated evidence (interim topic paper) shows there have been continued rises in house prices, consequently an increased affordability gap between house prices and wages / income in the National Park, and therefore affordable housing for local communities remains a priority.</p> <p>Thank you for the references to information on second homes which is noted. It is acknowledged that the 2011 census data is over 10 years old. As the 2021 census data has not yet been released, more recent information from council tax records was sought as part of the evidence review. This is set out in a report available on the Local Plan 5-Year Review webpage and was summarised in the 5-Year Review Housing & Community Interim Topic Paper.⁷ It suggests the proportion of second / holiday or empty homes in the part of Exmoor National Park within Somerset West & Taunton is similar to that in 2011. Restriction on local need affordable housing means it cannot be a second or holiday home. Occupancy of existing market housing cannot be controlled through the planning system: market housing can become a</p>

⁷ [Local-Plan-Review-Interim-Housing-Topic-Paper.pdf \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/local-plan-review-interim-housing-topic-paper.pdf) (section 5)

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>work in Exmoor from a principal home. The lack of houses pushes up prices but also there is a need for affordable housing.</p> <p>Various articles in the press have shown house prices have risen particularly due to demand caused by the coronavirus issues. Need more work space.</p>	<p>second / holiday home because there is no distinction in planning law between permanently occupied and second/holiday homes as they are in the same residential “use class”. It is therefore not possible for a local planning authority to prevent the purchase or use of such housing as second/holiday homes and a review of the Local Plan would not change this. The high percentage of second / holiday homes led to a new policy in the adopted Exmoor Local Plan that if new market housing is permitted to deliver new affordable housing / new units through sub-division, it has to have a “Principal Residence” condition requiring that it is lived in as a main or principal residence.⁸ This can only apply to new housing not existing.</p> <p>The Local Plan housing strategy provides for new housing. However it took account of the 5k + existing houses in the National Park most of which are market houses which do not have occupancy ties and can therefore be lived in anyone – (those who can afford to) - including high earning households who wish to live / work in the National Park.</p> <p>Working from home does not need planning permission where ancillary to a residential use. Local Plan Policies provide flexibility for additional space for work purposes in a number of ways: an extension where it complies with the residential extensions policy; an additional policy for home-based businesses enabling additional work space through a conversion or a new building; and a policy on</p>

⁸ Local Plan (p153 [Part 6 Achieving a Thriving Community \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk) or (p20-21 [Local Plan 2011-2031 Summary \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)).

Name/Organisation	Response	Comment	ENPA Officer Response
			outbuildings which can also provide additional work space e.g. a garden office.
Gary Parsons/ Sport England	Neither agree or disagree	n/a	Noted
Roger Watts	Strongly disagree	The degree to which public funds should be used to subsidise new housing. Like many other Exmoor families mine moved away in the 1840s, and benefitted in many ways. I've been lucky enough to move back. It is a very common phenomenon in rural areas of France.	Noted
Mandy Rose/ Dulverton Town Council	Strongly agree	-	Noted
Emily Catford	Strongly agree	As above but to add, most locals will be self employed which makes getting a mortgage much harder. Brokers want to take a average of three years profit. Those who took out the government's SEISS payments during Covid are also penalised by brokers for doing so. The covid year for some such as myself goes down as a black mark financially and reduces how much you can afford to borrow even after recovering. This makes it even more important that affordable housing is prioritized on Exmoor.	Noted. The challenges facing those in need of housing on Exmoor are understood.
Sally Bastock	Strongly agree	HC-S2 - should a balanced local housing stock include restrictions on second home occupation and holiday accommodation (eg Air B&Bs) as this impacts stock availability for rental and purchase.	Restriction on local need affordable housing means it cannot be a second or holiday home. Occupancy of existing market housing cannot be controlled through the planning system: market housing can become a second / holiday home because there is no distinction in planning law between permanently occupied and second/holiday homes which are in the

Name/Organisation	Response	Comment	ENPA Officer Response
			same residential “use class”. It is therefore not possible for a local planning authority to prevent the purchase or use of such housing as second / holiday homes and a review of the Local Plan would not change this. The high percentage of second / holiday homes led to a new policy in the adopted Exmoor Local Plan that if new market housing is permitted to deliver new affordable housing / new units through sub-division, it has to have a “Principal Residence” condition requiring it to be lived in as a main or principal residence. ⁹ This can only apply to new housing not existing.
Claire Wright/ CLA South West	Strongly agree	The fallout from the covid pandemic and the rise of home working has pushed house prices in desirable areas of the country further out of reach of local people. There is no easy answer to this dilemma.	Noted
Scilla Barney	Agree	We need social housing plus affordable housing designated to local people only in order to maintain a working and sustainable community on Exmoor	Noted
Rosamund Griffin/ Selworthy and Minehead Without Parish Council	Strongly agree	Local communities can only be maintained if there is affordable housing. There needs to be flexibility in the housing policies. The policy of enabling local affordable housing is not working. Giving £10,000 for land for local needs housing isn't working and needs to be broader.	A framework which provides a bespoke approach for Exmoor - prioritising local affordable housing and other housing needed by the community such as rural worker and extended family housing - enables proposals for the kinds of housing needed locally to come forward which might not otherwise be possible e.g. with a less targeted approach to housing
Bernard Peacock	Neither agree or disagree	-	Noted

⁹ Local Plan (p153 [Part 6 Achieving a Thriving Community \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk) or (p20-21 [Local Plan 2011-2031 Summary \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)).

Name/Organisation	Response	Comment	ENPA Officer Response
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We are unable to locate within the housing topic paper, the results of the housing need assessment for the Devon section of the National Park. We recommend that the whole housing need is outlined to better understand whether the local plan review is likely to require site allocations.	The Exmoor National Park Local Plan housing strategy contains an indicative figure for local need affordable housing projected for the Somerset part of Exmoor. This is because, through Duty to Cooperate as part of the adopted Plan's preparation, the housing need arising in the North Devon part of Exmoor was included in the housing requirement of the North Devon & Torridge Local Plan. The review of the affordable housing need in the Somerset part of Exmoor, and the evidence referred to, reflects Local Plan Policy M1-S1 which required a review of the indicative affordable housing need figure (for the Somerset part of Exmoor as explained above). No current issues have been identified with North Devon Council as part of the 5-year review.
Sarah Buchanan/Brompton Regis PC	Strongly agree	It is clear that local residents are being priced out of the local housing market therefore affordable housing must remain a priority. This applies to all housing policies.	Noted
Angela Percival	Agree	-	Noted
George Curry/ Lyn Climate Action	Strongly agree	The evidence quoted in 12 above reinforces the need for a change to the housing policy to place an even greater priority on the creation of affordable housing. A special local tax strategy, based on profits earned from housing and on property left unoccupied, needs to be created to finance sustainable social housing. ENPA should be working in collaboration with local Councils in this respect. (HC-S1, HC-S4). HC-D3 talks about allowing the building of market houses where they are necessary to subsidise affordable housing: 'Principal Residence	The National Park Authority is working jointly with partners to support, as the local planning authority, the delivery of more affordable housing including the district councils who are the housing authorities for the area and responsible for the collection of council tax. They operate within a taxation regime that is set nationally. The Department of Housing and Levelling Up recently announced changes to taxation for holiday lets including that they are let for a minimum number of days. For affordable housing by Registered Providers, Homes England grant funding, including for social

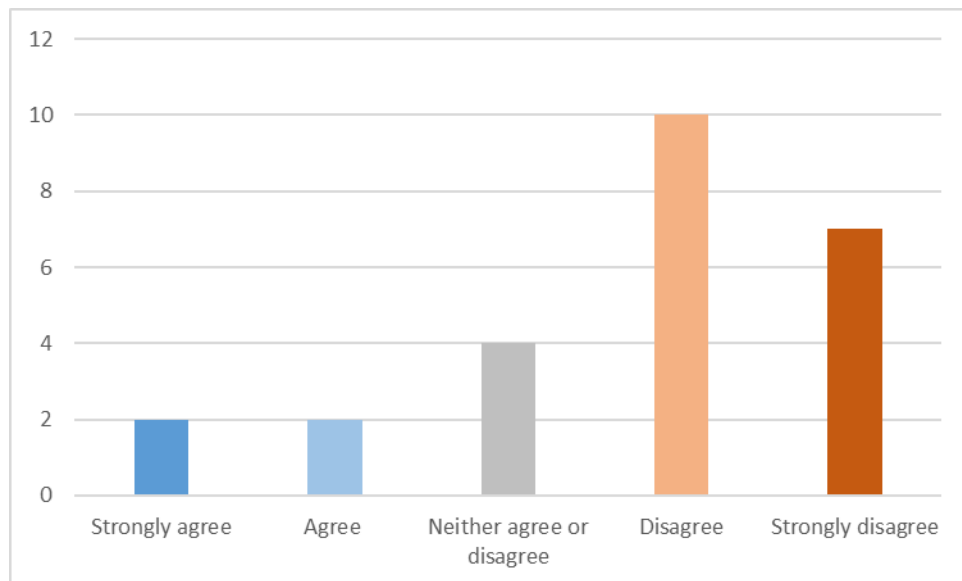
Name/Organisation	Response	Comment	ENPA Officer Response
		<p>housing must be the minimum number required to help deliver two or more affordable homes'. This is a vague statement with no criteria for what constitutes 'minimum number'. Support for the creation and development of community land trusts, such as at Parracombe, could be strengthened.</p>	<p>rented housing is again available for the district areas covering Exmoor. This means that no Principal Residence housing would be needed. Proposals including Principal Residence (PR) as cross subsidy, would be subject to a viability assessment on a case by case basis to ensure the PR housing would be the minimum number required in order to deliver the needed local affordable housing.</p> <p>The adopted Local Plan refers to community land trusts as a way to deliver local need affordable housing.¹⁰</p>
Philip Griffin	Agree	<p>HC -D£ Flexibility on housing policies is needed to encourage higher earning people to live and work in Exmoor from a principal home. The lack of houses pushes the prices up therefore making them unaffordable for local people and there should be provision to help local people in every need.</p>	<p>A framework which provides a bespoke approach for Exmoor - prioritising local affordable housing and other housing needed by the community such as rural worker and extended family housing - enables proposals for the kinds of housing needed locally to come forward which might not otherwise be possible e.g. with a less targeted approach to housing</p>
Nathan Price/ Tetlow King Planning, representing South West Housing	Strongly agree	<p>The SWHAPC strongly agrees with this statement. The SWHAPC believes that affordable housing should be given substantial priority given the findings of the REE research. The vision identifies a number of issues: high house prices due to demand from people moving to the area and second/holiday homes; the loss of skilled people and the effect on communities of local people moving away; population decline continuing to affect the viability of local services and businesses; and the effects of Covid accelerating trends towards</p>	Noted

¹⁰ [Part 6 Achieving a Thriving Community \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/part-6-achieving-a-thriving-community) paras 6.48 & 6.128

Name/Organisation	Response	Comment	ENPA Officer Response
		more flexible working and the attractiveness of Exmoor to live and work. All are issues that would be addressed through the delivery of additional affordable housing.	
Rachel Thomas/ Exmoor Society	Strongly agree	Special circumstances exist in planning for new development including housing in national parks because they have a different legal and policy framework from other areas. It is important that affordable housing for local people remains a priority.	Noted

Question 14: Our analysis to date (in the summary paper and housing and community topic paper) suggests that changes are not needed to the housing strategy and housing policies.

To what extent do you agree or disagree with this statement?



25 responses were received with 18 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Strongly disagree	See Qn 11 answer	See response to Question 10.
Andrew Milne	Agree	-	Noted
Nicola Kemp/ Rural Housing Enabler at Somerset West and Taunton	Disagree	We don't believe the policies within the Local Plan are too restrictive, however, more quantitative details such as including plot values to provide clear guidance to potential	Noted. ENPA is preparing additional guidance to support affordable housing delivery.

Name/Organisation	Response	Comment	ENPA Officer Response
		landowners and developers, and a regular review process for values could be helpful.	
James Holbrook/ Somerset West and Taunton	Disagree	Changes may not be required to housing policies but the strategy may need to be updated to include reference to the Exmoor National Park climate emergency and the importance of biodiversity net gain. Please see additional points in Somerset West and Taunton Councils response to Question 11.	Noted
Michael Harrison	Strongly disagree	See response to Q 11 above	See response to Question 10.
Adrian Maunders	Agree	-	Noted
Jo Dawson	Disagree	More open plan housing should be allowed if people can find a plot, not to be restricted to such a small size. I am not saying loads of massive houses no where near a community to be allowed but local people should be allowed to try and find somewhere suitable and of a decent size.	The Local Plan explains that the affordability of owner occupied dwellings will be achieved through a) the local occupancy tie, which will reduce house values; and b) through size - ensuring they have a gross internal area of 93 square metres (sqm) or less and recognising the role of the property to meet future community needs for affordable housing. Floor space is measured internally and applies to living space e.g. it excludes staircases. This size is considered by the Government to equate to a 3 bedroom 5 person house. It is necessary to ensure that new owner occupied local need affordable housing will remain within range of future local households. Open plan housing can come forward – the internal layout of new housing is not controlled through the planning system.
J Atherton	Strongly disagree	There are no rental properties locally, nor hardly any to buy (whatever the price). There is a housing crisis which needs to be addressed by a change in the current ultra restrictive policy which limits more housing.	Evidence shows a continuing need on Exmoor for more affordable housing with local occupancy ties. The Topic Papers acknowledge our concern about the level of affordable housing delivery. The adopted

Name/Organisation	Response	Comment	ENPA Officer Response
			<p>Local Plan seeks to maximise opportunities to enable locally needed housing to come forward.</p> <p>The figure of 10 local need affordable houses a year is an indication not a limit. In practice, evidence from local housing need surveys sent to households in a parish / group of parishes is used as evidence for planning proposals for new local need affordable housing. More than 10 a year can be permitted if there is evidence of a need for it.</p>
<p>Rosamund Griffin/ Wootton Courtenay Parish Council</p>	<p>Disagree</p>	<p>The Interim Report states, ""By adopting this approach, the plan provides certainty and the value of land for housing remains reasonable - within reach of people with a local connection in housing need." The Report uses an average salary figure of £28 000 for the Park, however, I feel that this figure does not truly reflect the income of people with a local connection in housing need which in West Somerset is £18 000 p.a.</p> <p>Flexibility on the size of the house, buildings for people's specific needs look at the individual applications 93m² isn't enough to encourage locals to build.</p> <p>Housing strategy needs to allow for workspace requirements and also larger families.</p> <p>This suggests that the housing strategy and policies do not need changing.</p> <p>The main concern here is the size restriction of 93m².</p> <p>In policy HC-S2 (balanced housing stock) point 2 says any new housing will offer a good standard</p>	<p>Comments on local wage levels are noted. The NPA is looking to review data on local wages and incomes. This can be challenging as data is often produced for wider local authority areas.</p> <p>The Local Plan explains that the affordability of owner occupied dwellings will be achieved through a) the local occupancy tie, which will reduce house values; and b) through size - ensuring they have a gross internal area of 93 square metres (sqm) or less and recognising the role of the property to meet future community needs for affordable housing. Floor space is measured internally and applies to living space e.g. it excludes staircases. This size is considered by the Government to equate to a 3 bedroom 5 person house. It is necessary to ensure that new owner occupied local need affordable housing will remain within range of future local households.</p> <p>Working from home became the norm during the pandemic for many jobs and a change to more flexible working provides an opportunity for people</p>

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>of accommodation by being constructed to be neither too large or too small, but point 6 states that the size will be no greater than 93m² for custom / self-built HC-D6 , accessible HC-D4 or extended family use HC-D5.</p> <p>The current 93 m² does not allow room for a home-office for rural workers or accommodate young people with careers that will need a home-office.</p> <p>The home office is more and more important for the rural worker. Future farms will only be efficient and beneficial to the environment if farmers get their paperwork and data recording correct.</p> <p>Allowing for home working is vital for young people who want to live on Exmoor whilst developing careers/professional jobs in the post-COVID workplace (working from home 2 or 3 days a week). This could stop the follow of young people to surrounding towns who I am sure would want to bring children up on Exmoor whilst maintaining careers off Exmoor. I think there should be more flexibility built into this policy both within affordable and open market housing to allow for different family/ working circumstances</p> <p>In the last 2 years house prices have increased enormously making it even more difficult for local people and families coming to the area to fill job vacancies (often jobs to support the local communities).</p>	<p>to live and work on Exmoor. Working from home does not need planning permission where it is ancillary to a residential use. If more space is needed then Local Plan Policies provide flexibility for additional space for work purposes in a number of ways: an extension where it complies with the residential extensions policy; for home-based businesses enabling additional work space through a conversion or a new building; and for outbuildings which can also provide additional work space e.g. a garden office.</p>

Name/Organisation	Response	Comment	ENPA Officer Response
Gary Parsons/ Sport England	Neither agree or disagree	n/a	-
Roger Watts	Strongly disagree	as Q13 above.	See response to Question 12.
Mandy Rose/ Dulverton Town Council	Disagree	Planning Policies need to be more responsive to current conditions in order to achieve the planning objectives. It is critical that the details and explanatory notes that support the policies need to be revisited. As an example, the underlying text with regards self - build housing contains a clause on whether the applicants are already housed. If this is applied too restrictively, the applicants will have difficulty progressing with their perfectly understandable desire to better their housing situation	Noted. The policies prioritise local people in affordable housing need. The National Park Authority is considering evidence including for affordable housing assessment and guidance to help with the implementation of Plan policies.
Emily Catford	Strongly disagree	There is still a housing need not been met by these policies. I am full agreement that the rural landscape of Exmoor should be ruined with new modern housing but I feel policies should be promoting greener more rural homes that fit in with the landscape. Once a upon a time, planning for housing was accepted on some smaller hamlets for example, Huntscott. The housing that was built here doesn't really fit it with the rest of the hamlets aesthetic yet a new build home that would is not accepted. There is a huge need to protect Exmoor however there is a need to keep locals here and prevent it from becoming a retirement/holiday home for incomers. There are rental properties available, yet monthly rental rates are levelling up with what	The National Park Authority is aware of the challenges facing households in affordable need on Exmoor. The Local Plan policies enable new affordable housing to come forward via a range of affordable tenures: rented, shared ownership and owner occupied including self-build. There is existing housing at Huntscott. However, since the introduction of the planning system in the late 1940s in England, there has been a national policy that new build housing in the open countryside is exceptional and only where new housing is justified by an essential need for a rural worker farming or forestry. The Exmoor Plan strategy is to maximise the opportunities for where new local affordable housing can be considered within the national policy approach set out above.

Name/Organisation	Response	Comment	ENPA Officer Response
		you would pay monthly for a mortgage. There is no ability to save for deposit if you rent and you have less security. The policies should be encouraging locals to buy not rent.	The “named settlements” include places which are small compared to other planning authority areas. The remaining areas are classed as “open countryside”. In this way the approach provides opportunities and flexibility because new affordable housing can be in and also adjoining settlements. The Plan also allows for conversions to local need affordable in farmsteads and hamlets in the open countryside where there is an existing dwelling. Additionally, new build local affordable housing can be considered in places which meet the definition of rural communities. This option extends opportunities in the open countryside. It is not possible to allow in principle for new build housing in the open countryside, other than for an essential need for land-based rural workers, as this would conflict with national planning policy.
Sally Bastock	Disagree	See answers above	See previous responses above.
Claire Wright/ CLA South West	Disagree	-	Noted
Scilla Barney	Neither agree or disagree	providing that they can allow sufficient affordable houses to be built for local people I agree with the above	Noted
Rosamund Griffin/ Selworthy and Minehead Without Parish Council	Strongly disagree	The failure to even provide the number of new homes forecast is clear evidence of the need for substantial change.	Planning has an important role to play and the adopted Local Plan seeks to maximise opportunities to enable locally needed affordable housing to come forward. The figure in the Local Plan is indicative and the Plan makes clear it is not a target. Evidence shows the need for more affordable housing with local occupancy ties. The Topic Papers acknowledge our concern about the level of affordable housing delivery. However, the planning system / local

Name/Organisation	Response	Comment	ENPA Officer Response
			planning authority cannot solve all issues related to the delivery of local need affordable housing. We are continuing to look at ways that, in our role as the local planning authority, we can support the delivery of local need affordable housing. This includes working with partners, including the housing authorities and Rural Housing Enabler and local groups and communities, to provide support where we can and produce further guidance.
Bernard Peacock	Strongly agree	-	Noted
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We have no comment to make for Question 14.	Noted
Sarah Buchanan/Brompton Regis PC	Neither agree or disagree	While housing policies may appear sufficient on paper, our experience is that there is a lack of consistency in what is happening in practice. Therefore the policies need to change. We agree with the statement that 'a key principle [of the housing strategy] is that the level of development should be compatible with conserving Exmoor's landscape by planning, not for external demand, but instead for housing needed locally. Housing for people who cannot afford market housing is the priority so they can live near family, work or move to Exmoor to work.	Noted. We are not aware of a lack of consistency and, if so, the reasons why this would lead to a need to change policies given the continued issue of and need for local need affordable housing in the National Park.
Angela Percival	Disagree	-	Noted
George Curry/ Lyn Climate Action	Disagree	The emphasis on the use of traditional materials and community involvement in the aesthetics of housing is good, but there is no detail in the plan on rendering housing in the park carbon neutral, or even reducing carbon emissions (CE-S6). All the reports from IPCC, CCC and other	The Local Plan should be read as a whole. Policies on climate change and carbon reduction are elsewhere in the Plan. Policy GP1, which applies to all proposals including housing, requires that opportunities must be taken:

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>respected climate change bodies have evidenced the accelerating adverse effects over recent years since the Local Plan was published. This evidence surely indicates an update to the plan is required to place much greater emphasis on carbon reduction, both on the energy use of buildings but also on building methods, materials etc. E.g. timber as a construction material for buildings locks up carbon for many years whereas concrete block production produces massive quantities of greenhouse gasses.</p>	<ul style="list-style-type: none"> - to use sustainable building techniques and materials, and minimise energy/waste; and - for the needs of future generations through sustainability and resilience to and adaption & mitigation of climate change impacts. <p>Policy CC-S1 Climate Change Mitigation & Adaptation & CE-S6 Design & Sustainable Construction Principles require sustainable designs and encourage climate measures through incorporating sustainable construction methods:</p> <ul style="list-style-type: none"> - the sustainable use of resources - encouraging the use of local materials; and - encouraging carbon reductions beyond Building Regulations e.g. through improving energy efficiency. The supporting text for the design policy refers to sustainable and local building materials particularly timber.
Philip Griffin	Strongly disagree	<p>Houses need to be allowed to be more than 93 sqm. Building for peoples specific needs and look at applications on an individual basis and flexibility is needed.</p>	<p>The Local Plan explains that the affordability of owner occupied dwellings will be achieved through a) the local occupancy tie, which will reduce house values; and b) through size - ensuring they have a gross internal area of 93 square metres (sqm) or less and recognising the role of the property to meet future community needs for affordable housing. Floor space is measured internally and applies to living space e.g. it excludes staircases. This size is considered by the Government to equate to a 3 bedroom 5 person house. It is necessary to ensure that new owner occupied local need affordable housing will remain within range of future local households.</p>

Name/Organisation	Response	Comment	ENPA Officer Response
<p>Nathan Price/ Tetlow King Planning, representing South West Housing</p>	<p>Disagree</p>	<p>We are pleased that the survey addresses this issue, however, given our comments above, we suggest that the Council considers re-thinking its affordable housing delivery strategy and its reliance on rural exception sites in meeting its affordable housing needs. Whilst the policies are not out-of-date in terms of the NPPF, they are not effective enough at enabling the delivery of a sufficient affordable housing in Exmoor, as demonstrated through the Council's own admission in the Housing and Community Topic Paper that the permissions and completions of affordable housing since the Local Plan adoption have been lower than hoped. We therefore disagree with the statement at question 14.</p>	<p>Noted. The statutory purposes of National Parks, including to conserve and enhance the landscape and the NPA duty for local socio/economic wellbeing, set the framework for the housing strategy: to prioritise affordable housing because it is most needed by local communities.</p> <p>The Exmoor Local Plan contains an indicative figure for local need affordable housing not a target. Parish local need surveys provide evidence of need for planning proposals. These shows a continuing need on Exmoor for more affordable housing with local occupancy ties. The Topic Papers acknowledge our concern about the level of affordable housing delivery.</p> <p>The NPA is a local planning authority, not the housing authority and the planning system cannot solve all issues. For example grants for Registered Providers to deliver rented housing were significantly reduced for a number of years and did not support social rented housing (now reinstated) resource constraints led to the loss of the Exmoor Rural Housing Enabling post (a RHE post for Exmoor in Somerset is reinstated) and at least one housing association active on Exmoor halted all development.</p> <p>It is not clear from the response how a change of approach would result in an increase in affordable housing given the small scale of most suitable housing sites on Exmoor and as Homes England grants would not be available where cross subsidy was proposed to fund the affordable. Current policies provide flexibility for Principal Residence housing on rural exception sites where essential to fund</p>

Name/Organisation	Response	Comment	ENPA Officer Response
			affordable and it is the minimum number needed. We are continuing to look at ways that, in our role as the local planning authority, we can support the delivery of local need affordable housing. This includes working with partners, including the housing authorities and Rural Housing Enabler and local groups and communities, to provide support and produce further guidance. There appear to be some positive signs as a result.
Rachel Thomas/ Exmoor Society	Strongly agree	The definition of affordable local housing is very wide indeed, includes other possibilities such as self-build. ENPA has a duty to cooperate with Local Authorities and joint working groups have been set up. Homes England can give grants for affordable rented housing	Noted

Question 16: The Rural Enterprise Exmoor (REE) Vision talks about more housing for local people in general, which would widen the focus of the current Plan which is for local people who need affordable housing. A link to information on the vision can be found on the Local Plan 5-Year Review webpage. As well as prioritising local affordable housing including for local workers and through self or custom build, the Local Plan has policies enabling a variety of other housing for local people such as rural workers, succession farming, extended family and accessible and adaptable housing. Widening the policies further to consider any local (but not affordable) housing could have consequences in terms of the ability to deliver affordable housing for local people.

What do you see as the potential negative or positive consequences of allowing more local housing?

25 responses were received with 23 responses having an accompanying comment as shown below.

Name/Organisation	Comment	ENPA Officer Response
L Webb	We have neighbours who would like to build a downsized house on their plot of land and move in to it, freeing up their larger family house for others to live in. They are prevented from doing this by the current policy. They will not build an affordable house on this land so no house at all will be built. Exceptions should be made to the policy to enable cases such as this to build a non affordable house if it frees up other housing.	Noted. Given house prices on Exmoor, existing market housing without occupancy ties even if it becomes available may not be affordable for local households in housing need.
Andrew Milne	The development or indeed retention of local communities and the infrastructure to support the community. If the housing is constructed in a sympathetic manner to the local environment, then it could enhance the housing community.	Noted
Nicola Kemp/ Rural Housing Enabler at Somerset West and Taunton	Widening the policies may have an impact on plot and property values which could have a detrimental effect on affordable housing availability. However, if the policies were widened, we would like to see a restriction to homes being available for local people as their principal residence to mitigate the impact.	Agreed
James Holbrook/ Somerset West and Taunton	The two significant 'drivers of change' which include an increasingly green agenda in response to the climate and nature emergencies are a positive consequence.	Noted
Michael Harrison	I do not see any negative consequences	Noted
Adrian Maunders	None	Noted
Jo Dawson	Only positive to make it easier for local people to build their own decent size houses. By local I do not mean only neighbouring parishes but Exmoor wide.	Noted

Name/Organisation	Comment	ENPA Officer Response
J Atherton	<p>I support the views of REE. Exmoor is a protected National Park where new housing is few and far between. This has contributed to the current lack of housing both for local people (affordable) and for people wanting to move into the area, to bring (post COVID) much needed economic diversification of our tourist / agricultural focused economy. We need to attract people from the big cities who want to work from home. We can do this without spoiling the National Park (and its beautiful countryside which we all enjoy) by limiting housing expansion to the current 3 towns of Dulverton, Porlock and Lynton & Lynmouth.</p>	<p>Noted. The Local Plan housing strategy provides for new housing. It took account of the 5k + existing houses in the National Park most of which are market houses without occupancy ties which can therefore be lived in anyone – including people moving to the area who wish to work from home. Policies provide for new housing for local needs and employment in all named settlements. This bespoke approach based on rural exceptions means housing can only be built where there is evidence of a local need and where the scale of development is commensurate with the settlement and it will conserve the National Park including its landscape. Although larger, settlements like Lynton & Lynmouth are not less constrained in terms of suitable sites than some of the villages.</p>
Rosamund Griffin/ Wootton Courtenay Parish Council	<p>This follows on from the above. Rural Enterprise Exmoor Vision looks at housing generally for local people (not just affordable in the Local Plan). I think there are definite advantages in this approach to encourage people (families) to the area if they are providing a service/ job. This may reduce the number of affordable homes, but the reduction would be very limited as there are only a small number of jobs available to be filled. I therefore feel the Housing policies also need reviewing.</p>	<p>Noted</p>

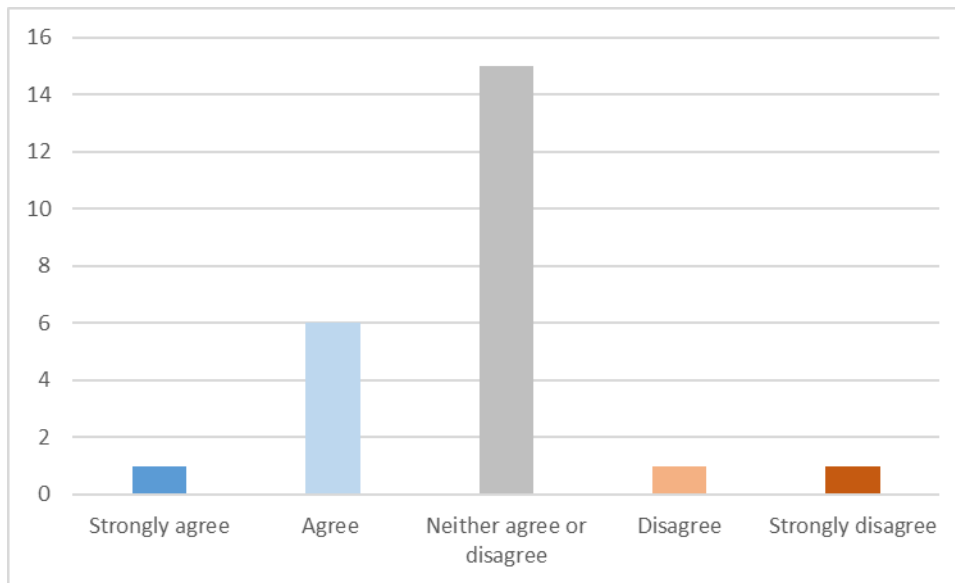
Name/Organisation	Comment	ENPA Officer Response
	<p>HC-D6 To encourage local people to build a house to be a long term investment with a local principal tie lasting approx. 20 years. If the house is sold within that time then the property could revert back to local need affordable housing.</p> <p>A limited amount of additional housing in appropriate locations would help support village facilities such as shops, pubs and schools. It would also support public transport.</p>	
Gary Parsons/ Sport England	n/a	-
Roger Watts	<p>Exmoor is facing a sadly declining state of wildlife. In part because of earlier agricultural practices and subsidies, but perhaps more importantly because of traffic, commerce, expanding outdoor recreational facilities and events, big shoots, new house building and ever growing visitor amusements and accommodation.</p> <p>Urgent action is required so that the trends which have exacerbated biodiversity loss will stabilise by 2030 by:</p> <p>(i) providing space dedicated for Nature, and</p> <p>(ii) identifying and addressing the drivers of declining biodiversity.</p>	Noted
Mandy Rose/ Dulverton Town Council	The provision of affordable housing will allow young people to not only work in the area but live in the area, without the need to seek cheaper accommodation miles away. Benefiting the local economy and overall sustainability of the area.	Noted
Emily Catford	Personally I feel this about balance, there is a need for local housing and a need for affordable housing. Not everyone will want to self build or custom build and it is more likely that these houses will use smaller plots not suitable for large scale development. If larger scale developments take place then a proportion should be set aside for affordable housing. Although I feel affordable housing is important, housing for actual locals is also important.	Noted. The adopted Exmoor Plan requires that all new affordable housing has a local need tie – i.e. it has to be lived in by someone with a local connection.
Sally Bastock	Positive would be to attract more people. Negative would be that there will always be fluctuations in population and the requirement for adequate employment opportunities to take into account. So how much housing and where needs careful consideration.	Noted
Claire Wright/ CLA South West	Allowing limited level of housing for local people that is not strictly affordable will allow more people with a genuine connection to Exmoor to be able to continue	Noted

Name/Organisation	Comment	ENPA Officer Response
	living here and ensuring that Exmoor remains a vibrant living landscape not one that is preserved in aspic.	
Scilla Barney	The positive would mean that more young working families could remain in the area . The negative is that affordable housing may go for holiday homes in the future .	Noted. All new local need affordable housing has a legal (Section 106) agreement which requires that they are lived by someone in local affordable housing need in perpetuity.
Rosamund Griffin/ Selworthy and Minehead Without Parish Council	The positive consequence of allowing more local housing would cater for varying housing needs and would help the local economy. Need housing for elderly and disabled people and then that would free up existing homes for families.	Noted. Given house prices on Exmoor, existing market housing, without occupancy ties even if it becomes available, may not be affordable for local families in housing need.
Bernard Peacock	Adverse effect on the landscape. Is there an actual need or is it more like a wish for?	Noted
Naomi-Beth Dixon/ Natural England	Without detail of housing allocations, it is difficult to assess specifically what the positive or negative consequences of allowing more local housing would be in terms of the natural environment. Potential impacts include, but are not limited to, changes to landscape and visual characteristics, change/gain/loss of biodiversity, change/loss/gain of habitat connectivity, changes to land use leading to impacts on protected species, etc. Any allocations should avoid development on designated sites/priority habitats; protected landscapes; Best and Most Versatile (BMV) agricultural land; areas of coastal erosion or undeveloped coast; or brownfield sites of high environmental value.	Noted
Sarah Buchanan/Brompton Regis PC	We support the idea of community land trusts in the area, viz: "local land trusts or community development trusts as a way of building and protecting local homes. ... homes owned in trust on behalf of the community is one of the most effective ways of keeping housing for local people in perpetuity".	Noted
Angela Percival	Positive:to widen the types of people who can live here, making communities more vibrant.However need to keep the wild feel of Exmoor without houses sprawling across the countryside	Noted

Name/Organisation	Comment	ENPA Officer Response
George Curry/ Lyn Climate Action	The priority should remain affordable housing, housing for local workers and accessible housing. Any precedent for market housing could open flood gates that would undermine these priorities. The only exception could be the experimental building of housing which meets the landscape and visual impact criteria but is carbon negative in both construction and energy usage. E.g. Timber houses with mycelium insulation, etc. with integrated wind turbines, solar pvcs etc. that will generate surplus power to feed into neighbourhood energy demands.	Noted
Philip Griffin	HC-D6 The positive consequences of allowing more local housing is to encourage locals to build a house as a long term investment with a local /principal tie lasting 20 years . If the property is sold within that time then it reverts back to be local only affordable housing. This is to stimulate local self builders that could create a house for life.	Noted
Nathan Price/ Tetlow King Planning, representing South West Housing	The SWHAPC supports the REE and more affordable housing in Exmoor	Noted
Rachel Thomas/ Exmoor Society	The recent report called Rural Enterprise Exmoor discussed the possibility of more housing for local people even though the Local Plan has other categories such as rural worker, adaptable housing etc. This could have unintended consequences of undermining the key priority of local affordable housing, particularly for the young. Putting extra pressure on the Park's biodiversity, lack of suitable sites because of the topography and landscape assets, its special qualities of remoteness, rurality, wildness and tranquility will be further negative consequences.	Noted

Question 17: Monitoring suggests there has been some loss of community facilities due to permitted development changes, but that policies have enabled some to be replaced or diversified to help with their long-term viability. Our analysis to date suggests that changes are not needed to policies to continue supporting community facilities.

To what extent do you agree or disagree with this statement? *



24 responses were received with 8 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Neither agree or disagree	-	Noted
Andrew Milne	Neither agree or disagree	-	Noted
Nicola Kemp/ Rural Housing Enabler at Somerset West and Taunton	Neither agree or disagree	No comment	Noted
James Holbrook/ Somerset West and Taunton	Agree	-	Noted
Michael Harrison	Neither agree or disagree	-	Noted
Adrian Maunders	Agree	-	Noted
Jo Dawson	Neither agree or disagree	There has been a loss of community facilities eg terrible bus service but this is not due to permitted development changes, just councils deciding to spend their money in bigger towns and totally forgetting or not giving a damn about the rural communities.	Noted
J Atherton	Neither agree or disagree	The reason for the loss of community facilities (Schools, shops, police, etc..) has been the changing demographic of the population (i.e older) and the increasing number of holiday homes. This has had a greater impact than permitted development changes most of which make planning rules less restrictive, which is positive.	Noted
Rosamund Griffin/ Wootton Courtenay Parish Council	Neither agree or disagree	-	Noted
Gary Parsons/ Sport England	Neither agree or disagree	does sport and recreation form part of 'community facilities'?	Policy HC-S6 Local Commercial Services and Facilities applies to former D2 uses e.g. indoor and outdoor sports and recreation facilities and gyms

Name/Organisation	Response	Comment	ENPA Officer Response
			now split between Classes E(d) F2(c) F2(d) and public amenity space. Policy HC-D19 safeguards local services and facilities from changes of use.
Roger Watts	Strongly disagree	I generally disagree with the policy of developing settlements in order "to sustain and improve the wide range of services and facilities" etc. The boundaries of Exmoor National Park were drawn to exclude larger settlements. Being a resident, or a visitor, means making sacrifices if biodiversity is to be restored.	Noted
Mandy Rose/ Dulverton Town Council	Agree	-	Noted
Emily Catford	Neither agree or disagree	As I previously mentioned, local amenities will probably suit the older generation rather than the younger generations. The more remote villages will rely on them more but for a modern working family who are close to towns, i'm not sure how useful they are.	Noted
Sally Bastock	Neither agree or disagree	-	Noted
Claire Wright/ CLA South West	Neither agree or disagree	n/a	Noted
Scilla Barney	Neither agree or disagree	I think that we need more clarification as to how many facilities have been lost and the reason why . We would then know how well the current policies are working .	Section 12 of the Interim Housing and Community Topic Paper sets out some details and the numbers of gains and losses. Planning permissions for community services and facilities are set out in Appendix B of the Paper. ¹¹

¹¹ [Local-Plan-Review-Interim-Housing-Topic-Paper.pdf \(exmoor-nationalpark.gov.uk\)](https://www.exmoor-nationalpark.gov.uk/local-plan-review-interim-housing-topic-paper.pdf)

Name/Organisation	Response	Comment	ENPA Officer Response
Rosamund Griffin/ Selworthy and Minehead Without Parish Council	Neither agree or disagree	-	Noted
Bernard Peacock	Agree	-	Noted
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We have no comment to make for Question 17.	Noted
Sarah Buchanan/Brompton Regis PC	Neither agree or disagree	There is a need for sensitivity to local circumstances as these change and as commercial and community opportunities also change. New diversified uses are preferable to derelict or abandoned buildings but 'change of use' permissions should be considered in the context of benefits to the local community and opportunities taken to encourage and support uses that can be of benefit, such as community facilities.	Noted. Local Plan policies encourage new community services & facilities, consider sharing of facilities and options (within a community service such as an ancillary cafe) to improve viability and to safeguard existing services & facilities from a change of use with flexibility to consider e.g. whether a facility is still needed, alternative / replacement provision. There are marketing tests to enable consideration of evidence for change of use proposals. Where changes of use are accepted the policy requires the change is be to other community uses, employment or local need housing.
Angela Percival	Disagree	N/A	Noted
George Curry/ Lyn Climate Action	Agree	N/A	Noted
Philip Griffin	Agree		Noted

Name/Organisation	Response	Comment	ENPA Officer Response
Rachel Thomas/ Exmoor Society	Strongly agree	See the answer to question 21	Noted

Question 19: Please indicate from the following options which statement is closest to your views on the Local Plan policies on housing and community. *



25 responses were received with 16 responses having an accompanying comment as shown below.

I support the housing and community policies in the Local Plan but would like ways to improve their delivery

Name/Organisation	Comment	ENPA Officer Response
Nicola Kemp/ Rural Housing Enabler at Somerset West and Taunton	Staff shortages have put pressure on implementation. More resources would support the delivery.	Noted. The RHE post plays a vital role in supporting delivery of affordable housing on Exmoor and SWT funding for this five year post is very welcome.
James Holbrook/ Somerset West and Taunton	-	Noted
Sally Bastock	HC-S2 - housing with conditions, whether affordable or occupancy restrictions, are there to help and protect the local population that contributes to the ENPA and delivery of these policies is vital to maintain public wellbeing and confidence in the planning system.	Noted
Nathan Price/ Tetlow King Planning, representing South West Housing	-	Noted

I generally support the intentions of the policies in the Local Plan on housing and community but feel that they may need some updating and fine tuning to make them more effective

Name/Organisation	Comment	ENPA Officer Response
L Webb	See answers above	Noted
Andrew Milne	Policies should enable further building to support local communities and reduce road traffic.	Noted
Michael Harrison	See answer to Q 11 above	See response to Question 10.
Rosamund Griffin/ Wootton Courtenay Parish Council	HC-D6 Policies should be put in place that encourage people to stay in the area, work from home in bespoke, self-build interesting homes. HC-D16 Conversions of barns, out buildings etc. encouraged not restricted to size or use	Noted

Name/Organisation	Comment	ENPA Officer Response
	Local needs, affordable housing shouldn't be restricted to 93m ² and should allow additional storage/workshop facilities for residents working in the National Park.	
Mandy Rose/ Dulverton Town Council	As per No. 15	See response to Question 14.
Claire Wright/ CLA South West	-	Noted
Scilla Barney	I would like to see permission given to allowing extensions to be built to existing properties in order to house elderly relatives .In general though I do not feel that there is enough affordable housing for local people of all age groups .	Noted
Naomi-Beth Dixon/ Natural England	We require further detail of site allocations before we are able to determine the impacts on designated and protected sites.	The adopted Plan does not contain allocated housing sites. The strategy is to address local housing needs including prioritising local need affordable housing through a rural exceptions approach without allocations.
Sarah Buchanan/Brompton Regis PC	As in our earlier comments, we feel that implementation is a serious problem. Discretion within limits should be allowed in particular in the context of conversion of existing buildings to affordable housing.	Noted
Angela Percival	N/A	Noted
George Curry/ Lyn Climate Action	See answers above	See responses above

I fully support the policies in the Local Plan on housing and community

Name/Organisation	Comment	ENPA Officer Response
Adrian Maunders	-	Noted
Bernard Peacock	-	Noted
Rachel Thomas/ Exmoor Society	There are many examples of planning permissions for diversification activities such as farm shops, menage facilities and community run facilities. Change of use classes have also encouraged other activities.	Noted

I consider that the policies on housing and community are out of date when considered against the latest national policies and up to date evidence

Name/Organisation	Comment	ENPA Officer Response
Jo Dawson	-	Noted
J Atherton	<p>In my previous answers I have outlined the need for more housing (mainly affordable, but also full market price as well), coupled with what is now a desperate need for more local rented accommodation.</p> <p>Expecting developers to reduce their own profits so that they can build more affordable housing will just not work. It is the high price of building land which restricts the ability of developers to build affordable house. A possible solution is for Planning guidelines to be changed so that land currently not available for housing etc.. can be made available but ONLY for social housing and key infrastructure (schools, doctors surgeries, dentists etc...). This will reduce the value of the land as it cannot be sold for full market price housing. It will however allow what is most needed which is low cost housing and social rental housing through local Community land Trusts and Housing Associations. It will however necessitate the freeing up of green field sites for such developments.</p>	<p>The Local Plan housing strategy provides for new housing that addresses the needs of the local community – prioritising affordable housing through a rural exceptions approach across the National Park. This helps ensure the value of land for new build / existing buildings for changes of use to affordable housing remain more reasonable and in reach of local households, housing associations and community land trusts. It also manages the level of development to conserve Exmoor’s landscape. Market housing can be permitted but only where it is needed by Exmoor’s communities: rural worker & extended family dwellings, Principal Residence housing can be permitted to deliver affordable or additional smaller units from the subdivision of existing larger houses.</p>
Roger Watts	Many initiatives are currently justified on the grounds that they "help the local economy" - but with no countervailing balance sheet adjustment for the fact that Exmoor is being exploited and diminished as a Natural asset.	Noted
Emily Catford	All my answers to the above really.	Noted

Name/Organisation	Comment	ENPA Officer Response
Rosamund Griffin/ Selworthy and Minehead Without Parish Council	-	Noted
Philip Griffin	HC-D6 Policies should be put in place that encourage people to stay in the area, work from home in bespoke, self-build interesting homes. HC-D16 Conversions of barns, outbuildings etc should be encouraged and not be restricted to size or use.	Noted

I am neutral on the policies in the Local Plan on housing and community

Name/Organisation	Comment	ENPA Officer Response
Gary Parsons/ Sport England	n/a	Noted

Question 21: Please provide additional comments on the questions above or other policies in the housing and community topic. Please tell us which policies your comment refers to, be as specific as possible, providing examples and a brief outline of your reasons. If you have no further comments to make, please indicate this by entering 'N/A' into the text box.*

Name/Organisation	Comment	ENPA Officer Response
L Webb	N/A	-
Andrew Milne	N/A	-
Nicola Kemp/ Rural Housing Enabler at Somerset West and Taunton	N/A	-
James Holbrook/ Somerset West and Taunton	In relation to sustainable development and in reference to the Duty to Cooperate meeting held with Local Authority partners on 27th September 2021, Somerset West and Taunton would like to reiterate the importance of considering neighbouring settlements, such as Minehead as a named settlement in the Local Plan. This specifically relates to Policy SE-D2 and the impacts of biodiversity net gain, economic development opportunities and flood management.	This issue was raised via a SWT office email following the meeting in September 2021. The built area of Minehead lies within the Somerset West & Taunton local planning authority area and Minehead is a named settlement in the West Somerset Local Plan. It is considered that a change to the Exmoor National Park Local Plan spatial strategy to classify land in the National Park between Minehead and Dunster as a named settlement would be inappropriate because of the likely landscape impacts/harm resulting from new development between Minehead and Dunster. There are significant concerns about the principle of amending the spatial strategy to enable new development / the growth of Minehead into a nationally protected landscape given

Name/Organisation	Comment	ENPA Officer Response
		the statutory purposes of, and national policy for, National Parks. Policy SE D2 seeks to safeguard existing employment sites in the National Park.
Michael Harrison	N/A	-
Adrian Maunders	N/A	-
Jo Dawson	-	-
J Atherton	<p>I fully support the limitation of new housing in a National Park, but NOT to the extent dictated by current planning policy. Policy needs to be relaxed for sites in and adjoining the current centres of population (Dulverton,, Porlock, Lynton & Lynmouth) BUT new developments need to be focused on quality social housing and low cost housing so that existing residents and local workers do not have to move away from Exmoor.</p> <p>Finally, we should on Exmoor be supporting modern design houses in select rural locations (e.g where permission is granted to replace an existing dwelling with a new one). Recent planning approvals have not supported modern architecture, and we are losing out in the diversity and range of our housing. Visiting National Parks and AONB in the North of England, I see that modern buildings are permitted and they look great. I then look at what has been agreed in recent years on Exmoor and much of it is architecturally dreadful. It will be the ambitious designs in modern homes built today which will be the listed buildings of the future, not some sort of halfway house which is neither one thing nor the other. Be brave, be bold in what you allow. Our children will in the future thank you.</p>	<p>The Local Plan housing strategy provides for new housing for local needs (based on a rural exceptions approach) in all named settlements. Where there is evidence of a local need for affordable housing, it can come forward through housing providers e.g. housing associations or as owner occupied housing such as self/custom build affordable housing. The scale of development should be proportionate to the settlement. The larger settlements of Lynton & Lynmouth are more constrained in terms of suitable new build sites than some of the villages. The Plan's design policies do not prevent modern designs and a number have been permitted in the National Park. The supporting text says that innovative / contemporary design should be of the highest quality respond to local character and fit in with its surroundings.</p>

Name/Organisation	Comment	ENPA Officer Response
Rosamund Griffin/ Wootton Courtenay Parish Council	The 2011 census showed that almost 20% of dwellings in ENP are second or holiday homes or empty (one in five !) I am sure the 2021 census will continue this trend. 6 hotels or guest houses closed in the last four years but 17 new holiday lets. 81% of Sites of Special Scientific Interest are in an unfavourable and recovering condition. This is, apparently, due to land management issues outside planning. The Rural Enterprise Exmoor vision sums up the need for affordable housing, fit for purpose public transport and a far better internet connectivity. These will always be in the Plan but are reliant upon government funding for the pace of change. It is good to see that the documents now use “truly affordable housing” as a subset of the usual “Affordable Housing “ definition. This is what the Park needs for local communities to survive and thrive and I would like us up to mention a greater support and use of Community Land Trusts as a way to provide truly affordable housing in perpetuity which will be outside the dead hand of the Right to Buy scheme which has destroyed affordable housing nationwide.	Noted. The Plan refers to the use of community land trusts as a way of achieving local needed affordable housing.
Gary Parsons/ Sport England	N/A	-
Roger Watts	Nature is currently seen as a free good. But as the recent Dasgupta Review explained: "Truly sustainable economic growth and development means recognising that our long-term prosperity relies on rebalancing our demand on Nature's goods and services with its capacity to supply them. It also means accounting fully for the impact of our interactions with Nature across all levels of society."	Noted
Mandy Rose/ Dulverton Town Council	N/A	-
Emily Catford	N/A	-
Sally Bastock	N/A	-
Claire Wright/ CLA South West	N/A	-
Scilla Barney	N/A	-
Rosamund Griffin/ Selworthy and Minehead Without Parish Council	N/A	-

Name/Organisation	Comment	ENPA Officer Response
Bernard Peacock	N/A	-
Naomi-Beth Dixon/ Natural England	N/A	-
Sarah Buchanan/Brompton Regis PC	N/A	-
Angela Percival	N/A	-
George Curry/ Lyn Climate Action	N/A	-
Philip Griffin	<p>HC-D3 New Build Dwellings in settlements</p> <p>The proportion of affordable housing needed for a principal home on Exmoor was a ratio three affordable homes to one principal home, shouldn't Exmoor be in line with other National Parks or the other National Park in the South-West, Dartmoor. I understand that any housing development on Dartmoor NP has to have 45% affordable housing, this almost makes the ration 1 to 1. Shouldn't this be a policy taken up by Exmoor NP. It might do away with the need for government funding with smaller developments being funded privately, this might stimulate the need for social housing in the private sector as they would get a better return.</p> <p>If affordable housing can be provided in one parish can a principal house then be built in another parish. This could provide opportunities for affordable housing where there isn't any or not enough.</p>	<p>The Plan provides flexibility by enabling the consideration of Principal Residence housing (for new builds) where essential to deliver two or more local need affordable homes. Registered [housing] providers (including housing associations) can access Homes England grant funding for affordable housing. This is not the case for builders/developers</p>
Rachel Thomas/ Exmoor Society	N/A	-

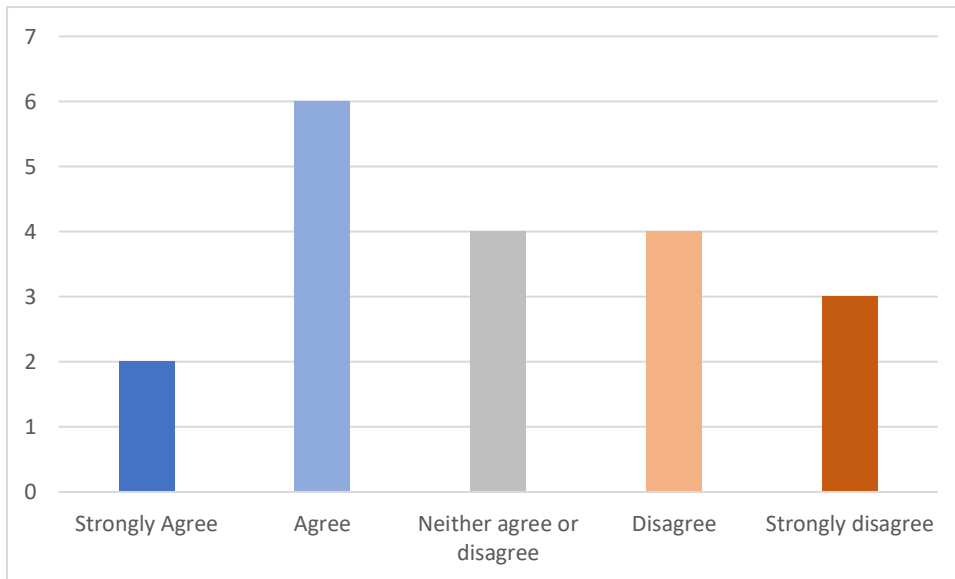
Local Plan Survey Results: Environment

19 individual responses were received for the Environment section of the Local Plan 5-Year Review Survey.

The questions within the Environment section are listed below with the comments received for each question.

Question 23: Biodiversity net gain (BNG) is a new legal requirement for development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.

The interim environment topic paper explains that current Local Plan policies refer to biodiversity enhancement rather than net gain, but it is considered that the legal requirement for BNG can be implemented within current policy, and no changes are necessary. To what extent do you agree or disagree with this statement? *



19 responses were received with 13 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Agree	The current policies seem fine for BNG	Noted
Andrew Milne	Neither agree or disagree	-	Noted
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	Given that Exmoor National Park have declared a climate emergency, ENP will need to ensure that they are satisfied that their policy approach takes into account the emerging legal requirements of Biodiversity Net Gain (BNG).	Noted. The current Local Plan policies enable BNG and ENPA is working on Planning Guidance to support delivery of the new legal requirements. It is not necessary for national legislation and policy to be repeated in Local Plans.
Michael Harrison	Neither agree or disagree	-	Noted
Jo Dawson	Agree	-	Noted
Kathryn Willox	Disagree	CC-S1 (climate change policy) is simply not strong enough when it comes to the most important issue of the day, namely carbon emissions. Words like "encouraged" and "promoting" need to be replaced by words like "mandated / mandating", when it relates to carbon emissions from new development. By strengthening this over-arching policy, it will flow through into all other areas. Paragraph 5.5 on page 95 is a good example of language that allows too much wiggle room. The wording states that all development will need to demonstrate how it "has had regard" to the energy hierarchy. This should be strengthened to something at least like how "it strictly adheres to".	Question 23 relates to biodiversity net gain. The Local Plan contains a number of policies to mitigate and adapt to climate change. This includes GP1 which applies to all proposals. It requires that opportunities must be taken for sustainable building, materials, minimise energy/waste, the needs of future generations for resilience, adaption & mitigation of climate change impacts.
Rosamund Griffin/ Wootton Courtenay Parish Council	Agree	I agree to looking after the environment but the design guide shows National Trust properties in Stoney Close, Luccombe and previously Horner, building new properties like this would be completely impossible to replicate and too expensive.	Noted
Lee Willox	Strongly disagree	I believe the reinstatement of the Lynton to Barnstable Rail line and associated traffic and pollution is 180 degrees in comparison	Question 23 relates to biodiversity net gain. The Plan should be read as a whole. The Local Plan

Name/Organisation	Response	Comment	ENPA Officer Response
		to the direction we should be moving in regards to carbon pollution, how can this be working towards a better natural state than it was beforehand	contains a number of policies to mitigate and adapt to climate change and are considered when considering planning proposals.
Gary Parsons/ Sport England	Neither agree or disagree	n/a	Noted
Roger Watts	Strongly disagree	<p>I understand that BNG is out for consultation. It is clearly important that the policy is effective in protecting Nature not just in bounded wildlife habitats but across the National Park as a whole. The Dasgupta Review makes very clear that Nature is mobile and it makes no sense to think about enhancing Nature only in bounded areas. On Exmoor the restoration of Nature in and around settlements needs as much attention.</p> <p>I have to say that I find the Environment topic paper unbalanced and far too optimistic in tone (eg "Exmoor is already rich in Nature" and "great progress has been made") particularly on Nature Recovery. I hope the anticipate State of the Park Report will be more thorough and realistic? The paper pays little or no attention to the Dasgupta Review or to commitments already made by HMG in the discussions in the COP 26 and COP15. I'd suggest that far greater attention be given to drawing up a possible Post-2020 Biodiversity Framework for Exmoor ahead of the 15th meeting of the Conference on Biological Diversity (COP15).</p>	<p>Noted. The interim Topic Paper focuses on matters specific to planning. Details of biodiversity net gain are awaited</p> <p>ENPA is working on Planning Guidance to support delivery of the new legal requirements.</p> <p>The NPA will consider whether there could be further opportunities for enhancement of nature e.g. linked to small developments. The planning system does not control all activities e.g. land management. Other work is ongoing in the National Park to restore nature.</p>
Sally Bastock	Disagree	<p>CE-S3 / CC-S5 1e) / HC-D1 / RT-D8 d) / RT-D10 g) - Enhancement is open to interpretation whereas Net Gain sends a clear message which is vital in the current climate emergency.</p> <p>CC-S7 - BNG will require measurement targets including air quality, waste and water - should this policy be strengthened in line with legal requirements/metrics. Should there be a specific reference in this policy or a separate policy for Air Quality?</p>	<p>Noted. Biodiversity net gain will require a measurement of a site's baseline - details are awaited. ENPA is working on Planning Guidance to support delivery of the new legal requirements and is considering whether there could be further opportunities for enhancement of nature e.g. linked to small developments. The Plan contains a number of references to air / water quality</p>

Name/Organisation	Response	Comment	ENPA Officer Response
			including for habitats and nitrogen deposition. Specific references are included in paras 5.137-5.140 (supporting text to Policy CC-S7 Pollution) and air quality is also linked to transport in paras 9.2 and 9.13 (Policy AC-D1 Transport) which an air quality assessment in certain circumstances. Para 174 e) of the NPPF includes reference to air and water pollution and water quality. Plans do not need to replicate national policy which is a material planning consideration in planning decisions.
Andrew Gunn/ Somerset County Council	Agree	-	Noted
Claire Wright/ CLA South West	Strongly agree	-	Noted
Bernard Peacock	Strongly disagree	It should include net gain. Agriculture buildings should have conditions attached for the inclusion of barn owl boxes and provision for nesting swallows. All new housing should have swift bricks.	Noted – current policies do not prevent implementation of biodiversity net gain (BNG) as a legal requirement. Details of BNG including the national small sites metric, are awaited. ENPA is considering whether there are ways to achieve gain for smaller proposals.
Naomi-Beth Dixon/ Natural England	Agree	We agree that clause 3 of CE-S3 in the local plan remains appropriate, with BNG being able to be implemented under the current policy wording. However, please refer to our response to question 26 for our further comment on the development of BNG policy within, or alongside the Exmoor Plan. Policy CE-S3: We note that the plan takes a strategic approach to natural environment issues, including ecosystem services, landscape, designated sites, priority habitats, ancient and veteran trees, priority habitats and species, protected species, geodiversity, green infrastructure, climate change adaptation, and environmental enhancement. We advise that this policy	Noted. There are references in the Plan to soil including in the vision and objectives and within associated with policies, including for climate change and pollution. The NPPF (para 174 a) refers to protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils. It is a material consideration in decision making. Plans do not need to replicate national policy. The Plan was prepared prior to the widespread use of the terms

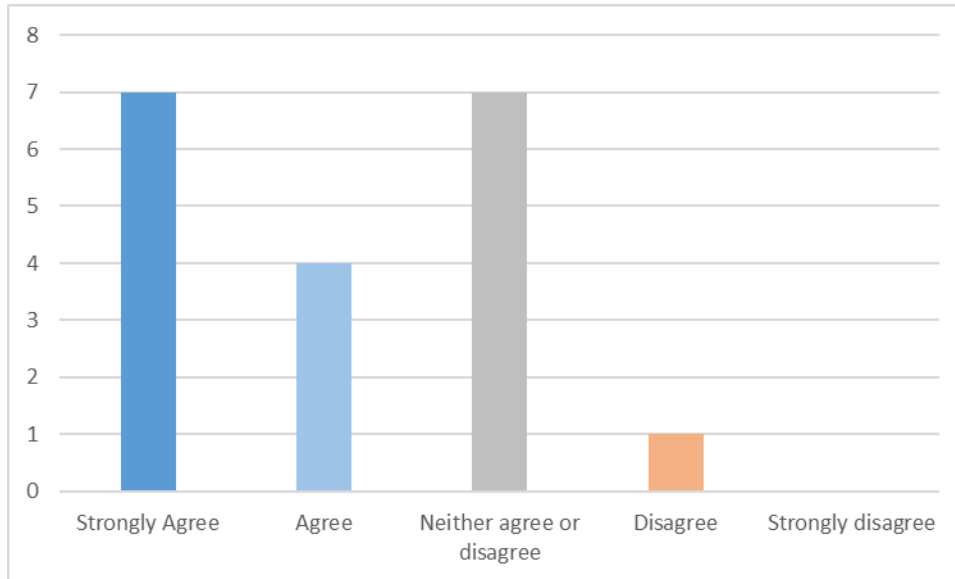
Name/Organisation	Response	Comment	ENPA Officer Response
		<p>could be expanded to include wording that considers soils, natural capital, nature recovery and wider environmental benefits.</p> <p>Green Infrastructure: We recognise that current Exmoor Plan contains a green infrastructure policy (CE-S3), however we recommend that there is opportunity to develop Exmoor’s approach to future green infrastructure delivery. We would welcome the formation of a dedicated green infrastructure strategy to underpin and add further detail to the vision of the Exmoor Plan. As well as improving air quality, aiding flood risk management, reducing noise pollution, and enhancing biodiversity and ecological resilience, effective incorporation and management of green infrastructure can improve local aesthetic, provide space for health and wellbeing, and encourage people’s connection with nature. Any green infrastructure strategy should consider people’s access to nature as a core focus – an ANGSt assessment would help identify this for the plan area and can inform the delivery of green/blue infrastructure going forward. Whilst the Green Infrastructure Framework is set for full launch in autumn 2022, the released mapping system provides a useful tool to aid the identification of areas for opportunity and delivery (https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx).</p> <p>Irreplaceable habitats: Where policy CE-S3 affords the highest level of protection to irreplaceable woodland, we recommend that this policy is updated to afford protection to all irreplaceable habitats. Additionally, guidance noting suitable compensation strategies could be included, although this could be expanded upon further within an SPD. Please find further information regarding potential appropriate mitigation at https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#avoid-</p>	<p>natural capital and nature recovery. However it does refer to ecosystem services and to the enhancement of wildlife and promotes opportunities for habitat management, restoration, and expansion that strengthens the resilience of the ecological network.</p> <p>The NPA is considering ways to further biodiversity and green infrastructure as well as access opportunities including through guidance and opportunities for future joint working across the National Park boundary. Both are integral to National Park statutory purposes.</p> <p>The reference to all irreplaceable habitats in addition to woodland is noted. Para 4.67 of the Plan (Policy CE-S3) says: “As a principle in the National Park, all development should avoid harm to biodiversity or geological interest. ... The irreplaceable nature of some habitats (e.g. ancient woodland or veteran trees) means that loss or damage cannot simply be rectified by mitigation and compensation measures, and in circumstances where harm cannot be adequately mitigated or compensated for, planning permission will be refused. Ancient woodland is given as an example but it is not the case that this only applies to ancient woodland.</p> <p>Policy CE-S3 specifies ancient woodland as an irreplaceable habitat. However the policy gives great weight to the conservation and enhancement of the National Park’s wildlife & habitats in line with national policy and requires the conservation,</p>

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort.</p> <p>Air Quality: We would expect the Exmoor plan to address the impacts of air quality on the natural environment. In particular it should address the traffic impacts associated with any new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment and suggest appropriate avoidance or mitigation measures where applicable. Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.</p> <p>Coast: Point 5 of policy CC-S3 'Porlock Weir Coastal Change Management Area' advises that a strategy will be developed to guide adaptation and relocation at Porlock Weir. We recommend that should this strategy now be developed, CC-S3 is updated to reflect this.</p> <p>Soils: The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. We strongly advise that at a minimum, the plan includes core policies for:</p> <ul style="list-style-type: none"> • the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and • for the protection of and sustainable management of soils as a resource for the future. 	<p>restoration and re-creation of priority habitats / species.</p> <p>The NPPF Para 180 c) says "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. The NPPF is a material consideration in determining planning applications.</p> <p>The Plan contains a number of references to air quality including references to habitats and nitrogen deposition. Specific references are included in paras 5.137-5.140 (Policy CC-S7 Pollution) and also linked to transport in paras 9.2 and 9.13 (Policy AC-D1 Transport) which requires an air quality assessment in certain circumstances. Policy GP4 seeks to prevent loss of best and most versatile agricultural land (Grades 1, 2 and 3a) Both wetland and peatland are referenced in the Plan. They are included in the glossary definition of ecosystem services which are referred to throughout the plan. There are specific references to wetlands in Table 4.1 Priority Habitats (Policy CE-S3 Biodiversity & Green Infrastructure) and para 4.86 (CE-D2 Green Infrastructure). Peat is included in para 4.14 (Policy CE-S1) and para 5.7 (CC-S1 Climate Change Mitigation & Adaptation).</p>

Name/Organisation	Response	Comment	ENPA Officer Response
		Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).	
Sarah Buchanan/Brompton Regis PC	Agree	Biodiversity enhancement will almost inevitably lead to biodiversity net gain. However to prove a BNG there will need to be a qualitative assessment of biodiversity before and after any changes. How will this be achieved?	Biodiversity net gain will require a site's existing biodiversity or baseline is assessed in order to calculate net gain. ENPA is working on Planning Guidance to support delivery of the new legal requirements. Details are awaited including the "small sites metric" The NPA will consider these as they become available.
Angela Percival	Disagree	The management of farmland needs a totally new approach. Too much of the land is an ecological desert.	Noted
George Curry/ Lyn Climate Action	Disagree	<p>Policies CE-S3 and CE-D2 appear to emphasise the conservation of biodiversity rather than biodiversity net gain. Maybe the emphasis in these policies can be amended in view of the evidence of accelerating biodiversity loss including:</p> <ul style="list-style-type: none"> • State of Nature Report 2019. https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-summary.pdf • Rewilding and Climate Breakdown: how restoring nature can help decarbonise the UK (Rewilding Britain, April 2019). https://www.rewildingbritain.org.uk/our-work/resources/rewilding-and-climate-breakdown • IPBES Global Assessment on Biodiversity and Ecosystem Services (UN, 2019). https://ipbes.net/global-assessment • Living Planet Report (WWF/Zoological Society of London, Sept 2020). https://livingplanet.panda.org/en-us/ • Lost Decade for Nature (RSPB Sept 2020). ww2.rspb.org.uk/Images/A%20LOST%20DECADE%20FOR%20NATURE_tcm9-481563.pdf 	<p>Noted. Thank you for the references to reports and assessments.</p> <p>The Environment Act places a legal duty on local planning authorities for biodiversity net gain (BNG). Details are still awaited.</p> <p>It is considered that Policy CE-S3 remains appropriate, with BNG being able to be implemented under the current policy wording. ENPA is working on Planning Guidance to support delivery of the new legal requirements</p> <p>We are advised that it is best practise for Supplementary Planning Documents (SPDs), containing detailed information that expand upon and support the policy e.g. to set out further detail on the approach to environmental enhancement and to detail the Exmoor strategy for BNG.</p>

Name/Organisation	Response	Comment	ENPA Officer Response
		<ul style="list-style-type: none"> Global Biodiversity Outlook 5 (Secretariat of the Convention for Biological Diversity [UN], Sept 2020). https://www.cbd.int/gbo/gbo5/publication/gbo-5-spm-en.pdf <p>The published Nature Recovery Vision is a great step forward in achieving BNG. However, the Vision needs to be developed into a full Nature Recovery Plan before any meaningful comments can be made. Programmes such as the Exmoor Non-Native Invasive Species project are vital to the conservation and enhancement of biodiversity but this project was largely funded by the EU. There is little mention in the plan of a fund-raising policy for the continuation of such BNG projects.</p>	<p>Planning cannot control matters which fall outside the planning system e.g. land management. Other actions are needed. Work is ongoing to restore nature in the National Park.</p>
<p>Rachel Thomas/ Exmoor Society</p>	<p>Strongly agree</p>	<p>The 2021 Environment Act makes it a legal requirement to set targets and outcomes for biodiversity net gain with a timetable to achieve this. Natural England is working on the definition of Biodiversity Net Gain and the government has a National Landscapes paper out for consultation that includes reference to biodiversity net gain. When there is clarity on its meaning it would be helpful for an Exmoor specific approach. Meanwhile, there is already a vision for Exmoor's nature recovery that includes priorities and sets targets and a time frame.</p>	<p>Noted</p>

Question 25: It has been suggested that the Authority should prepare an Exmoor-specific approach and guidance to implementing BNG as this could be helpful for applicants and landowners. To what extent do you agree or disagree with this statement?



19 responses were received with 12 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Agree	It may save time and money if people have helpful point to consider before applying	Noted
Andrew Milne	Neither agree or disagree	-	Noted
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	Given that Exmoor National Park have declared a climate emergency, ENP will need to ensure that they are satisfied that their guidance takes into account the emerging legal requirements of Biodiversity Net Gain (BNG). Emerging guidance	Noted. The current Local Plan policies enable BNG and ENPA is working on Planning Guidance to support delivery of the new legal requirements. It is not necessary for national

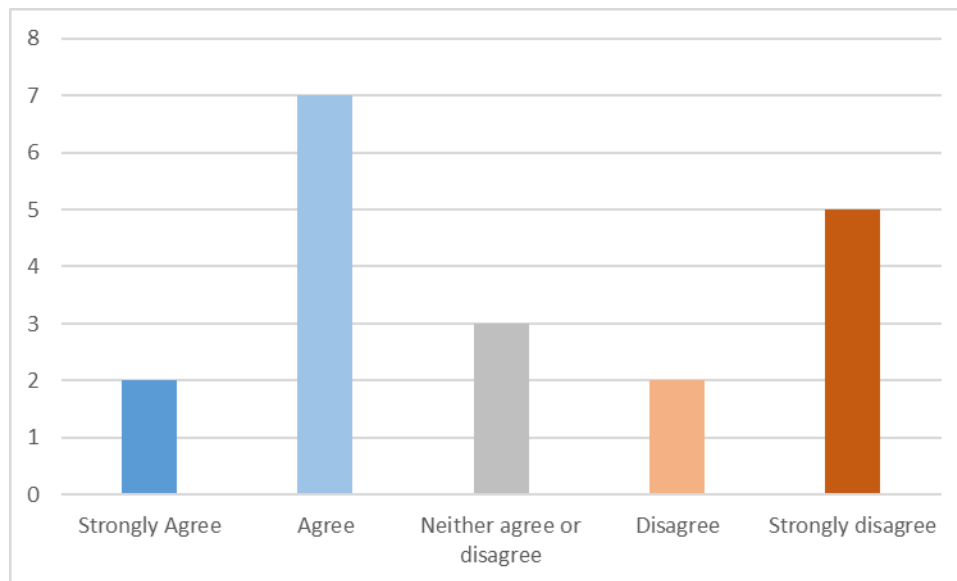
Name/Organisation	Response	Comment	ENPA Officer Response
		nationally may provide enough suitable guidance to help applicants and landowners in the National Park.	legislation and policy to be repeated in Local Plans
Michael Harrison	Neither agree or disagree	-	Noted
Jo Dawson	Neither agree or disagree	-	Noted
Kathryn Willox	Disagree	-	Noted
Rosamund Griffin/ Wootton Courtenay Parish Council	Neither agree or disagree	-	Noted
Lee Willox	Agree	guidance and maybe legislation will confirm that Exmoor Buisness and residents are doing all we can and mandated direction will accelerate the outcome	Noted
Gary Parsons/ Sport England	Neither agree or disagree	n/a	Noted
Roger Watts	Agree	Not just implementing BNG - see my answer to Q24 above.	Noted – see response to Question 23.
Sally Bastock	Strongly agree	CC-S1 / CE-S3 - should relate to Nature Recovery Plan and provide guidance. CC policies - clear guidance on metrics, management and mitigation. In particular CC-S7pollution RT-S1 - to ensure Recreation and Tourism is compatible.	It is considered that Policy CE-S3 remains appropriate, with biodiversity net gain (BNG) being able to be implemented under the current policy wording. National details of BNG are awaited. ENPA is working on Planning Guidance to support delivery of the new legal requirements.
Andrew Gunn/ Somerset County Council	Neither agree or disagree	If it is considered that there are specific characteristics that pertain to the NP, and that other guidance is not sufficient to explain what is required, a specific guidance document may well be useful.	Noted. The current Local Plan policies enable BNG and ENPA is working on Supplementary Planning Guidance which will customise the requirements to Exmoor. ENPA and other Somerset local authorities have collaborated

Name/Organisation	Response	Comment	ENPA Officer Response
			on a joint Somerset response to the BNG consultation.
Claire Wright/ CLA South West	Agree	Exmoor specific guidance will add further clarity.	Noted
Bernard Peacock	Strongly agree	-	Noted
Naomi-Beth Dixon/ Natural England	Strongly agree	<p>Natural England strongly supports the development of an Exmoor specific approach to implementing Biodiversity Net Gain (BNG). It is best practise for relevant strategic policies to be expanded within Supplementary Planning Documents (SPDs), containing detailed information that expand upon and support the policy. The SPD could be an opportunity to set out further detail on your Authority's approach to environmental enhancement and to detail the Exmoor strategy for BNG. This could include setting a target for BNG, the requirements for onsite and offsite provision, and specify the use of a metric for calculating BNG (The Biodiversity Metric 3.0 - http://nepubprod.appspot.com/publication/6049804846366720). It is unlikely that the SPD could identify, or specify areas for delivering BNG, but it could establish strong links with the emerging Local Nature Recovery Strategies (LNRS) for Devon and Somerset. It could also shape and detail the expected relationship between the Local Plan, delivery of BNG and the Devon and Somerset LNRS.</p>	Noted. National details of BNG are awaited. ENPA is working on Planning Guidance to support delivery of the new legal requirements.
Sarah Buchanan/Brompton Regis PC	Strongly agree	<p>There should be guidance in place that is relevant and informative to those living and working in the national park. However a wider moorland / upland approach would be better suited, drawing on experience and knowledge from other national parks of similar landscapes and, if in place, such generic guidance should be supported by targeted information relevant</p>	Noted. It is considered that Policy CE-S3 remains appropriate, with biodiversity net gain (BNG) being able to be implemented under the current policy wording. National details of BNG are awaited. ENPA is working on Planning Guidance to support delivery of the new legal requirements.

Name/Organisation	Response	Comment	ENPA Officer Response
		to each national park and address issues that affect other policies and priorities And see para 24 above.	
Angela Percival	Strongly agree	Exmoor has some rare ecosystems and so the approach should reflect this.	Noted
George Curry/ Lyn Climate Action	Strongly agree	Policy CE-D2 requires development proposals to integrate elements of green infrastructure for wildlife. These requirements must be made clear and explicit to applicants at an early stage in any planning application with clear guidelines and examples of what positive BNG elements can be incorporated.	National details of BNG are awaited. ENPA is working on Planning Guidance to support delivery of the new legal requirements. It is also reviewing the local list of validation requirements which should raise awareness and provide applicants with more clarity on what is needed to support planning proposals.
Rachel Thomas/ Exmoor Society	Strongly agree	See the answer to question 24	Noted – see response to Question 23.

Question 27: Exmoor National Park Authority has declared a climate emergency and there is greater awareness of the urgency to respond to climate change. Contributions to date include responding via land management e.g. through peatland restoration and woodland creation. Whilst there is a limit to what planning can control and the scale of development in the National Park, there are positive Local Plan policies enabling renewable energy schemes, adaptation to flood risk and coastal change.

Therefore, it is considered that at this stage there is no need to amend the policies to respond to the climate emergency. To what extent do you agree or disagree with this statement?



19 responses were received with 18 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Strongly agree	The current policies seem fine	Noted
Andrew Milne	Agree	There is no reference to trying to reduce road traffic. In particular, if affordable housing is built near places people work (Wheddon Cross) that reduces travel from outside the park, this should be considered as a positive benefit being generated from any proposal.	The spatial strategy (Policy GP3) lists towns and villages which are “named settlements” where new development is considered to be acceptable so that development such as new housing can be closer to services and jobs thereby reducing the need to travel. Other Plan policies refer to traffic and transport. E.g. Policy GP1 requires opportunities to be taken to contribute to the sustainable development of the area including affordable needs and to help accessibility to services, and facilities, jobs and technology, enabling, where appropriate, the use of sustainable transport. Policy AC-S1 encourages sustainable transport including through working with highways & transport authorities, transport providers & local communities, to encourage public & community transport, car sharing and provision for walking, cycling, horse-riding and low carbon travel.
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	Given that Exmoor National Park have declared a climate emergency, ENP will need to ensure that they are satisfied that their policy approach takes this into account.	Noted. ENPA’s interim conclusions are set out in the Topic Papers. While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies e.g. GP1 provide the means to seek action on climate change. GP1 requires that all development proposals must take

Name/Organisation	Response	Comment	ENPA Officer Response
			<p>opportunities to contribute to the sustainable development of the area including particular attention to:</p> <ul style="list-style-type: none"> - using sustainable building techniques, materials and minimise energy use and waste; and - the needs of future generations through sustainability and resilience to climate change and adapting and mitigating the impacts of climate change. <p>It is considered that more action is however needed to ensure that opportunities are taken including updating the local list of validation requirements and producing further planning guidance.</p>
<p>Michael Harrison</p>	<p>Strongly disagree</p>	<p>CC-S1 is simply not strong enough when it comes to the most important issue of the day, namely carbon emissions. Words like "encouraged" and "promoting" need to be replaced by words like "mandated / mandating", when it relates to carbon emissions from new development. By strengthening this over-arching policy, it will flow through into all other areas.</p> <p>Paragraph 5.5 on page 95 is a good example of language that allows too much wiggle room. The wording states that all development will need to demonstrate how it "has had regard" to the energy hierarchy. This should be strengthened to something at least like how "it strictly adheres to".</p> <p>ENPA adopted a Climate Emergency Action Plan in August 2021. As well as looking to reduce the carbon footprint of the ENPA itself, the Action Plan states that the ENPA wish to ""lead action to respond to the climate emergency within the National Park as a whole"". That sounds good, but in the entirety of the rest of the</p>	<p>In addition to Policy CC-S1, the plan includes other policies related to climate change. GP1 requires that opportunities must be taken to contribute to the sustainable development of the area. Particular attention will be paid to:</p> <ul style="list-style-type: none"> - using sustainable building techniques, materials and minimising energy use and waste; and - the needs of future generations through sustainability and resilience to climate change and adapting and mitigating the impacts of climate change. <p>While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies</p>

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>Action Plan document there is not a single word on how this will be achieved. The Local Plan is surely the vehicle to achieve this leadership role. Therefore, put simply, the Local Plan needs updating to reflect this new imperative and the desire of ENPA to take this leadership role.</p> <p>Another example of a policy that would benefit from a strengthening of CC-S1 is RT-S2 relating to the reinstatement of the Lynton & Barnstaple Railway. RT-S2 stipulates the conditions under which a reinstatement of the railway will be considered by ENPA. When one considers that this is relates to a coal fired steam railway (ie: extreme carbon emissions), it is remarkable that there is no stipulation within the RT-S2 policy that says the railway must demonstrate how it will adhere to the energy hierarchy described in CC-S1. I can only ask why this is the case? If ENPA were serious about the statements it makes in its Climate Emergency Action Plan, adopted only in August 2021, then it is surely blindingly obvious that the provisions in the Local Plan relating to climate change in general, and carbon emissions in particular, need to be updated.</p>	<p>provide the means to seek action on climate change. Material planning considerations can also be taken account of in relation to planning decisions e.g. national policy in the NPPF (Meeting the challenge of climate change flooding and coastal change)</p> <p>It is considered that more action is needed including updating the local list of validation requirements and producing further planning guidance.</p> <p>A report to the Authority on the Lynton & Barnstaple Railway considered climate change. It concluded that there would be an impact on climate as a result of the reinstatement of the railway. A condition was attached to the permission requiring a carbon emissions plan to be submitted and approved prior to the operation of the railway commencing to demonstrate how the operation of the Lynton and Barnstaple Railway will become carbon neutral and reporting on measures to reduce carbon emissions.</p>
Jo Dawson	Agree	There is more than enough management from the national park, do not add any more restrictions on the communities, let them decide	Noted
Kathryn Willox	Disagree	ENPA adopted a Climate Emergency Action Plan in August 2021. As well as looking to reduce the carbon footprint of the ENPA itself, the Action Plan states that the ENPA wish to "lead action to respond to the climate emergency within the National Park as a whole". That sounds good, but in the entirety of the rest of the Action Plan document there is not a single word on how this will	Noted. The Local Plan contains a number of policies to related to climate change including CC-S1, and GP1 which requires that opportunities must be taken to contribute to the sustainable development

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>be achieved. The Local Plan is surely the vehicle to achieve this leadership role. Therefore, put simply, the Local Plan needs updating to reflect this new imperative and the desire of ENPA to take this leadership role.</p>	<p>of the area. Particular attention will be paid to:</p> <ul style="list-style-type: none"> - using sustainable building techniques, materials and minimising energy use and waste; and - the needs of future generations through sustainability and resilience to climate change and adapting and mitigating the impacts of climate change. <p>While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies provide the means to seek action on climate change.</p> <p>It is however considered that more action is needed including updating the local list of validation requirements and producing further planning guidance.</p>
<p>Rosamund Griffin/ Wootton Courtenay Parish Council</p>	<p>Agree</p>	<p>ENPA have agreed that a climate change emergency exists and claim that the Local Plan encourages small scale renewable energy, however there are many caveats to allowing these to happen.</p> <p>I understand the need to protect the amenities of a National Park but feel the policy CC-S1 should be more proactive in encouraging renewable energy.</p> <p>In the Environment Topic Paper there is specific mention that the 2012 and 2021 NPPF's both require planning authorities to be proactive in increasing the use and supply of renewable and low carbon energy and heat.</p> <p>I feel this area of the plan could be revisited to perhaps give a more positive approach.</p>	<p>In addition to Policy CC-S1 (Climate Change Mitigation and Adaptation) there are other policies in the Plan relating to renewable energy. Policy CC-S5 Low Carbon and Renewable Energy Development enables small scale renewable energy proposals that assist in contributing to reducing greenhouse gas emissions and moving towards a carbon neutral National Park. CC-D3 can enable small scale turbines and CC-D4 solar arrays. In all cases other criteria including e.g. impacts on landscape need to be considered.</p>

Name/Organisation	Response	Comment	ENPA Officer Response
Lee Willox	Strongly disagree	It cannot be left as a choice which is the current situation , legislation will confirm that Exmoor Buisness and residents are doing all we can and mandated direction will accelerate the outcome, however I appreciate cost will affect most circumstances of choice but to state that the response to an Emergency is to keep current policy surely isn't the answer	While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies provide the means to seek action on climate change. E.g. Policies CC-S6, CE-S6 and GP1 which require that opportunities must be taken to contribute to the sustainable development of the area: - using sustainable building techniques, materials & minimising energy use & waste; and - the needs of future generations through sustainability & resilience to climate change & adapting & mitigating the impacts of climate change.
Gary Parsons/ Sport England	Agree	Sport England has yet to develop a formal statement on this but the benefits active travel should be highlighted.	Noted
Roger Watts	Strongly disagree	Many hope that by January 2023 new ambitious outcomes will have been agreed for the role of protected landscapes in delivering Nature recovery and climate.	Noted
Sally Bastock	Strongly disagree	All policies should be responsive to climate change and the changing political/legal landscape.	Noted
Andrew Gunn/ Somerset County Council	Agree	From a mineral and waste perspective, agree that current policies are fit for purpose.	Noted. Both ENPA and SCC have declared climate emergencies and are collaborating on the response to climate change including via the Somerset Climate Change Strategy.
Claire Wright/ CLA South West	Agree	Local plan policies and government environmental schemes already target these objectives.	Noted
Bernard Peacock	Neither agree or disagree	-	Noted

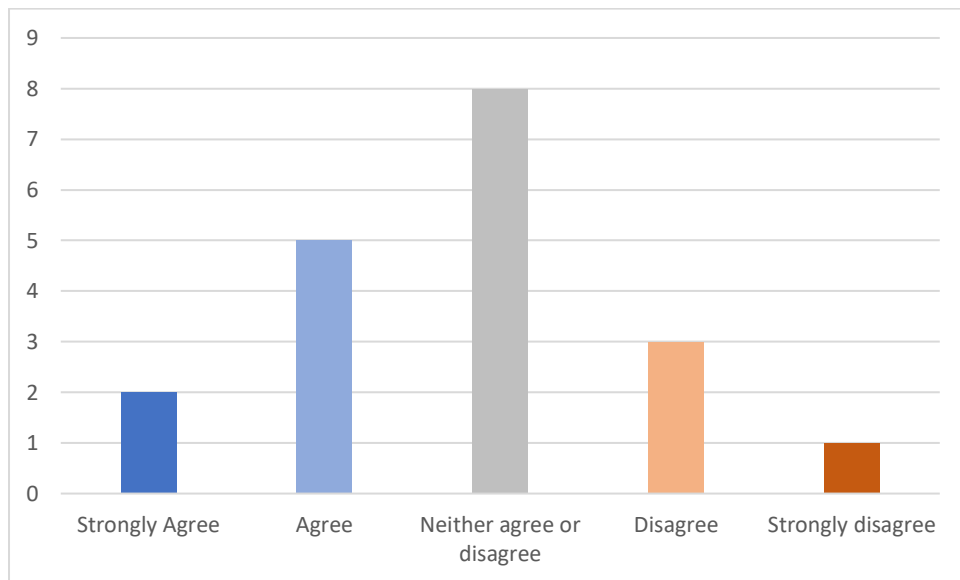
Name/Organisation	Response	Comment	ENPA Officer Response
Naomi-Beth Dixon/ Natural England	Agree	Again, we encourage the development of a separate, specific approach to developing these aspects of the plan. The vision of the plan could be strengthened with an SPD that would add further detail to existing policy hooks within the Local Plan – linking to the Devon and Somerset LNRS, how development can contribute to woodland creation and peat restoration through net gain, etc.	Noted. ENPA is working on Planning Guidance to support delivery of the new legal requirements.
Sarah Buchanan/Brompton Regis PC	Neither agree or disagree	Clarification is required regarding the siting, position and impact of all types of renewable energy / green energy schemes at all scales. There has been confusion and inconsistent information provided to residents in the past regarding, for example, development control on solar panels and air heat pumps for domestic / residential properties within the national park. The statement by ENPA at Q 27 appears to focus only on high / large scale level of development options to address climate change. There is also a need for an approach to smaller scale commercial, domestic, community and residential options. Also, there needs to be clear policy and practice regarding provision of charging points for electric vehicles. And see para 26.	Noted. ENPA is updating the local list of validation requirements which may raise awareness, link with Plan policies and clarify what is needed by applicants. Additionally, guidance is being reviewed and ways to signpost people to advice and good practice are being considered. The NPA offers free pre-application advice. Some measures may be permitted development. There is information on the ENPA website on domestic solar panels Exmoor - Guidance for domestic solar PV (exmoor-nationalpark.gov.uk) .
Angela Percival	Strongly disagree	Ideas relating to climate change need to be publicised more. Some people understand a lot, but others including some farmers, understand little.	Noted
George Curry/ Lyn Climate Action	Disagree	The relevant policies (CCS5, CC-D3, CC-D4) appear to place a greater emphasis on the visual and landscape impacts of renewable energy schemes at the expense of climate change mitigation and carbon reduction. Since 2017 there is much evidence that this balance requires re-evaluating. The accelerating impacts of climate change (as reported by IPCC and the UK Committee for Climate Change), the declaration of a climate emergency by ENPA, NDC, DCC, LLTC and the growing	Noted. The climate emergency necessitates action and the Plan contains policies to mitigate and adapt to climate change. National Park statutory purposes including the conservation and enhancement of natural beauty, wildlife and cultural heritage and the NPA duty underpin the Local Plan. Public authorities including the NPA have a

Name/Organisation	Response	Comment	ENPA Officer Response
		public awareness that climate change is the greatest existential threat we face, have all happened since 2017 and are therefore reasons to re-examine the wording of these polices.	legal duty to have regard to the purposes when carrying out their duties.
Rachel Thomas/ Exmoor Society	Strongly agree	There are policies for encouragement of renewable energy schemes, resilience to flooding and coastal change. There will be a few areas where renewable energy will not be suitable because of the size and the nature of the landscape for example vertical features that do not fit well into smooth horizons a special quality of Exmoor, and the cumulative impact of several schemes, such as solar panel farms in open countryside, close together. If telecommunication network masts could be identified as whole rather than as individual planning applications, then the few ones having a significant negative impact could be identified and avoided at an early stage. The 2018 Exmoor National Park Landscape Character Assessment provides supplementary planning guidance that helps fit alternative energy into the different landscape types.	Noted

Question 29: There is now a much greater emphasis on design in national policy. As a National Park, the Local Plan already has detailed policies on design and the Authority is also working on an updated Design Guide which will expand upon the policies.

The analysis to date in the interim environment topic paper has not identified a need for policies to be changed.

To what extent do you agree or disagree with this assessment?



19 responses were received with 13 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Neither agree or disagree	The current policies seem fine	Noted
Andrew Milne	Agree	However CE-S6 seems to focus on the architecture of the building rather than the mitigation of more or less any design by suitable landscaping. The inclusion of a paragraph emphasising good	CE-S6 criterion 1c) relates to landscaping: <i>Design should reinforce landscape character and the positive arrangement of landscape features through planting and landscaping</i>

Name/Organisation	Response	Comment	ENPA Officer Response
		landscaping could allow greater flexibility in building design and location.	<i>schemes, boundary treatments, and surfacing. Existing features such as trees, hedges and stone walls should be retained particularly where they are characteristic of the streetscape and/or the local area.</i>
James Holbrook/ Somerset West and Taunton	Agree	-	Noted
Michael Harrison	Neither agree or disagree	-	Noted
Jo Dawson	Neither agree or disagree	Stop making changes, there is no need and it is just a waste of money employing people just to tweak the odd bit. Majority of people on Exmoor want what is best for the environment but also have to live here.	Noted
Kathryn Willox	Disagree	Another example of a policy that would benefit from a strengthening of CC-S1 is RT-S2 relating to the reinstatement of the Lynton & Barnstaple Railway. RT-S2 stipulates the conditions under which a reinstatement of the railway will be considered by ENPA. When one considers that this is relates to a coal fired steam railway (ie: extreme carbon emissions), it is remarkable that there is no stipulation within the RT-S2 policy that says the railway must demonstrate how it will adhere to the energy hierarchy described in CC-S1. I can only ask why this is the case? If ENPA were serious about the statements it makes in its Climate Emergency Action Plan, adopted only in August 2021, then it is surely blindingly obvious that the provisions in the Local Plan relating to climate change in general, and carbon emissions in particular, need to be updated.	Existing policies are considered to provide the means to seek action on climate change. Material planning considerations can also be taken account of in relation to planning decisions e.g. national policy in the NPPF (Meeting the challenge of climate change flooding & coastal change). A report to the Authority on the Lynton & Barnstaple Railway considered climate change. It concluded that there would be an impact on climate as a result of the reinstatement of the railway. A condition was attached to the permission requiring a carbon emissions plan to be submitted and approved prior to the operation of the railway commencing to demonstrate how the operation of the Lynton and Barnstaple Railway will become

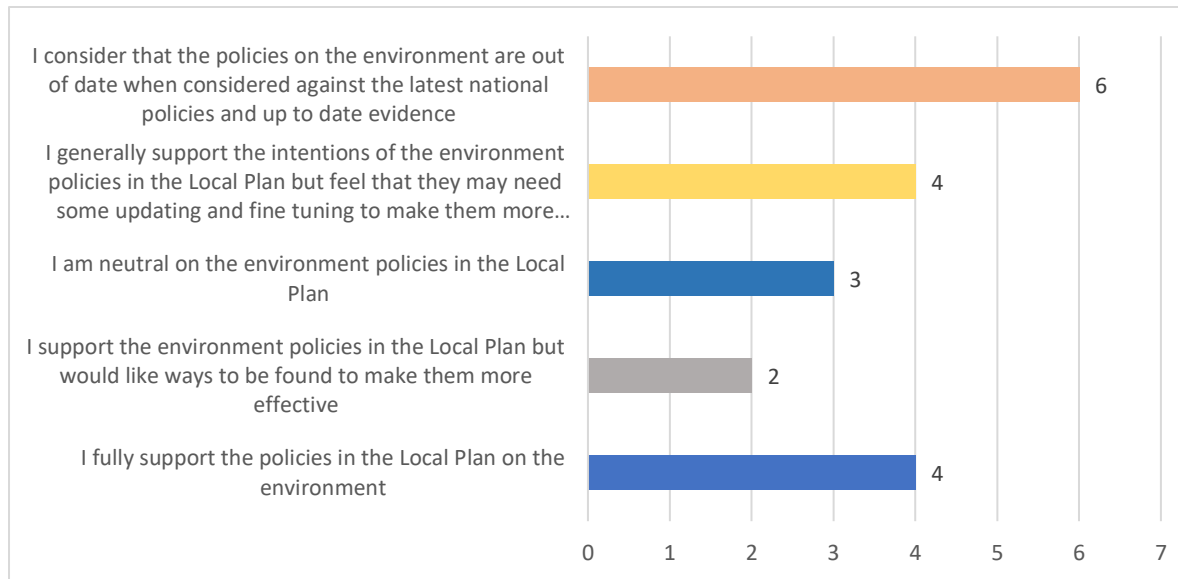
Name/Organisation	Response	Comment	ENPA Officer Response
			carbon neutral and reporting on measures to reduce carbon emissions.
Rosamund Griffin/ Wootton Courtenay Parish Council	Agree	Be more adventurous, allow interesting bespoke housing to be built in the right places as a principal home. This needs to evolve and not set in aspic, The last two design guides showed pretty National Trust cottages on the cover and inside.	Noted
Lee Willox	Strongly disagree	policies that aren't enforceable become no more than a wish list.	Noted
Gary Parsons/ Sport England	Agree	<p>Sport England have devised Active Design guidance and continues to promote the benefits of design of where we live and work can play a vital role in keeping us active. We know sport isn't for everyone, but embracing a lifestyle change to be more active can have real benefits. As part of our drive to create an active environment, Active Design wraps together the planning and considerations that should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice.</p> <p>Active Design is a combination of 10 principles that promote activity, health and stronger communities through the way we design and build our towns and cities. That's why we, in partnership with Public Health England, have produced the Active Design Guidance which works as a step-by-step guide to implementing an active environment.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p>	Noted
Roger Watts	Neither agree or disagree	-	Noted

Name/Organisation	Response	Comment	ENPA Officer Response
Sally Bastock	Neither agree or disagree	As long as design guides have realistic and sympathetic expectations regarding what is possible according to age, style, location etc.	Noted
Andrew Gunn/ Somerset County Council	Agree	The proposed revised design guide will be able to support those existing policies. Moreover, the government is making beautiful design a key issue and the design guide should take account this by for eg encouraging use of local natural stone.	Agreed. The Local Plan policies encourage use of local materials. ENPA is also preparing a Design SPD and will engage with SCC on this through Duty to Co-operate and wider officer discussions
Claire Wright/ CLA South West	Strongly agree	-	Noted
Bernard Peacock	Neither agree or disagree	-	Noted
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We have no comment to make for question 29.	Noted
Sarah Buchanan/Brompton Regis PC	Disagree	<p>"The NPPF does not define beauty or beautiful places, instead this is described as a 'policy ambition' rather than a test and planning authorities are expected to work with local communities and developers to decide what this should look like in their areas".</p> <p>We feel that the ENPA should consult on this matter. Beauty and good design are subjective, change in time and place. We do not want to see a planning authority, officer or policy imposing definitions without proper and wide consultation.</p> <p>Until we have considered the updated design guide we are here being asked to comment on the unknown and therefore cannot agree with it.</p>	The Local Plan contains design policies which were the subject of consultation including with local communities. Consultation is a requirement of adoption of planning guidance such as design guides as a supplementary planning document (SPD).
Angela Percival	Disagree	N/A	Noted
George Curry/ Lyn Climate Action	Neither agree or disagree	Policy CE-S6 states that the policy 'also encourages developments that reduce carbon emissions further than required by Building Regulations such as through improving energy efficiency or	CC-S5 Low Carbon and Renewable Energy Development is the strategic policy for renewable energy development. It enables

Name/Organisation	Response	Comment	ENPA Officer Response
		renewable energy technologies'. This is excellent but there is an apparent contradiction here with policies CCS5, CC-D3 and CC-D4 which emphasise visual impacts of design over carbon reduction.	development proposals for small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park. It is important that policies for renewable energy proposals in the National Park ensure that they do not harm Exmoor's landscape– in line with statutory National Park purposes including the conservation and enhancement of natural beauty, the legal duty for public bodies to have regard to National Park purposes and national policy that National Parks have the highest level of protection in landscape terms.
Rachel Thomas/ Exmoor Society	Strongly agree	Good design of Exmoor buildings in terms of their style, materials, scale features and layout all help to fit development into the landscape and settlements. The Authority is updating its design guidance.	Noted

Question 31: Please indicate from the following options which statement is closest to your views on the Local Plan policies on the environment.

19 responses were received with 12 responses having an accompanying comment as shown below.



I consider that the policies on the environment are out of date when considered against the latest national policies and up to date evidence

Name/Organisation	Comment	ENPA Officer Response
Michael Harrison	CC-S1 is simply not strong enough when it comes to the most important issue of the day, namely carbon emissions. Words like ""encouraged"" and ""promoting"" need to be replaced by words like ""mandated / mandating"", when it relates to carbon emissions from new development. By strengthening this over-arching policy, it will flow through into all other areas.	In addition to Policy CC-S1, the plan includes other policies related to climate change. GP1 requires that opportunities must be taken to contribute to the sustainable development of the area. Particular attention will be paid to:

Name/Organisation	Comment	ENPA Officer Response
	<p>Paragraph 5.5 on page 95 is a good example of language that allows too much wiggle room. The wording states that all development will need to demonstrate how it ""has had regard"" to the energy hierarchy. This should be strengthened to something at least like how ""it strictly adheres to"".</p> <p>ENPA adopted a Climate Emergency Action Plan in August 2021. As well as looking to reduce the carbon footprint of the ENPA itself, the Action Plan states that the ENPA wish to ""lead action to respond to the climate emergency within the National Park as a whole"". That sounds good, but in the entirety of the rest of the Action Plan document there is not a single word on how this will be achieved. The Local Plan is surely the vehicle to achieve this leadership role. Therefore, put simply, the Local Plan needs updating to reflect this new imperative and the desire of ENPA to take this leadership role.</p> <p>Another example of a policy that would benefit from a strengthening of CC-S1 is RT-S2 relating to the reinstatement of the Lynton & Barnstaple Railway. RT-S2 stipulates the conditions under which a reinstatement of the railway will be considered by ENPA. When one considers that this is relates to a coal fired steam railway (ie: extreme carbon emissions), it is remarkable that there is no stipulation within the RT-S2 policy that says the railway must demonstrate how it will adhere to the energy hierarchy described in CC-S1. I can only ask why this is the case? If ENPA were serious about the statements it makes in its Climate Emergency Action Plan, adopted only in August 2021, then it is surely blindingly obvious that the provisions in the Local Plan relating to climate change in general, and carbon emissions in particular, need to be updated.</p> <p>Please see my response to Q 28 above.</p>	<ul style="list-style-type: none"> - using sustainable building techniques, materials and minimising energy use and waste; and - the needs of future generations through sustainability and resilience to climate change and adapting and mitigating the impacts of climate change. <p>While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies provide the means to seek action on climate change. Material planning considerations can also be taken account of in relation to planning decisions e.g. national policy in the NPPF (Meeting the challenge of climate change flooding and coastal change)</p> <p>It is considered that more action is needed including updating the local list of validation requirements and producing further planning guidance.</p> <p>A report to the Authority on the Lynton & Barnstaple Railway considered climate change. It concluded that there would be an impact on climate as a result of the reinstatement of the railway. A condition was attached to the permission requiring a carbon emissions plan to be submitted and approved prior to the operation of the railway commencing to demonstrate how the operation of the Lynton and Barnstaple Railway will become carbon neutral and</p>

Name/Organisation	Comment	ENPA Officer Response
		reporting on measures to reduce carbon emissions.
Kathryn Willox	-	Noted
Lee Willox	I believe the reinstatement of the Lynton to Barnstable Rail line is a good example of policies needing to change so similar considerations and schemes for planning that are environmentally destructive and unnecessary can be assessed and refused upon at the findings of a negative outcome to the environment of ENP	<p>The plan includes policies related to climate change. GP1 requires that opportunities must be taken to contribute to the sustainable development of the area. Particular attention will be paid to:</p> <ul style="list-style-type: none"> - using sustainable building techniques, materials and minimising energy use and waste; and - the needs of future generations through sustainability and resilience to climate change and adapting and mitigating the impacts of climate change. Other policies include CC-S1 and CE-S6 <p>While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies provide the means to seek action on climate change. Material planning considerations can also be taken account of in relation to planning decisions e.g. national policy in the NPPF (Meeting the challenge of climate change flooding and coastal change)</p> <p>A report to the Authority on the Lynton & Barnstaple Railway considered climate change. It concluded that there would be an impact on climate as a result of the reinstatement of the railway. A condition was attached to the permission requiring a</p>

Name/Organisation	Comment	ENPA Officer Response
		carbon emissions plan to be submitted and approved prior to the operation of the railway commencing to demonstrate how the operation of the Lynton and Barnstaple Railway will become carbon neutral and reporting on measures to reduce carbon emissions.
Roger Watts	UK National Parks have long had an admirable underlying mission to enable people to access and benefit from Nature. But National Parks are increasingly sold as another commodity to exploit for holidays, for outdoor and recreational events and as a place to earn money. To my eyes this culture is incompatible with the restoration of biodiversity on anything like the scale required by the crises the world faces.	Noted
Bernard Peacock	-	Noted
Angela Percival	As said above, there is a lot of work to be done to make people aware of the best way to manage land...farms and gardens	Noted

I generally support the intentions of the environment policies in the Local Plan but feel that they may need some updating and fine tuning to make them more effective

Name/Organisation	Comment	ENPA Officer Response
James Holbrook/ Somerset West and Taunton	-	Noted
Rosamund Griffin/ Wootton Courtenay Parish Council	I would like to see a more proactive approach to engaging with the residents who live on Exmoor. It's not just about applicants and landowners. Many Exmoor residents may be keen to make contributions to BNG and/or may welcome advice on low carbon energy solutions	Noted. ENPA is updating the local list of validation requirements which may raise awareness, link with Plan policies and clarify what is needed by applicants. Additionally, guidance is being reviewed and ways to

Name/Organisation	Comment	ENPA Officer Response
		signpost people to advice and good practice are being considered. The NPA offers free pre-application advice. Some measures may be permitted development. There is information on the ENPA website on domestic solar panels Exmoor - Guidance for domestic solar PV (exmoor-nationalpark.gov.uk) .
Naomi-Beth Dixon/ Natural England	Please see answer to Q24.	See responses to Q23, Q25 & Q27 above
George Curry/ Lyn Climate Action	See reasons outlined in response to previous questions	Noted

I am neutral on the environment policies in the Local Plan

Name/Organisation	Comment	ENPA Officer Response
Jo Dawson	-	Noted
Gary Parsons/ Sport England	Could Active Design be promoted more in the Plan?	This will be considered including as part of any Local Plan review.
Claire Wright/ CLA South West	-	Noted

I support the environment policies in the Local Plan but would like ways to improve their delivery

Name/Organisation	Comment	ENPA Officer Response
Sally Bastock	The political environment is rapidly changing and policies need to be flexible and robust to ensure they remain clear and relevant.	Noted

Name/Organisation	Comment	ENPA Officer Response
Sarah Buchanan/Brompton Regis PC	Proper funding and effective coordination between the ENPA and landowners /tenant famers is essential for effective implementation of this policy.	Noted

I fully support the policies in the Local Plan on the environment

Name/Organisation	Comment	ENPA Officer Response
L Webb	The current policies seem fine	Noted
Andrew Milne	-	Noted
Andrew Gunn/ Somerset County Council	-	Support welcomed
Rachel Thomas/ Exmoor Society	Protection of Exmoor's natural environment including its landscape, wildlife and cultural heritage is given great weight nationally when considering development proposals.	Noted

Question 33: Please provide additional comments on the questions above or other policies in the environment topic. Please tell us which policies your comment refers to, be as specific as possible, providing examples and a brief outline of your reasons. If you have no further comments to make, please indicate this by entering 'N/A' into the text box. *

Name/Organisation	Comment	ENPA Officer Response
L Webb	N/A	-
Andrew Milne	N/A	-
James Holbrook/ Somerset West and Taunton	N/A	-
Michael Harrison	<p>The direction of travel with regard to carbon emissions is clear. All the news from COP26; the PM sounding "the death-knell for coal"; the mandate to countries to meet in 2022 and make further cuts to carbon dioxide. All of these means that policy is moving fast in this area, and yet ENPA say they do not need to make updates to a Local Plan that was written 5 years ago.</p> <p>NPPF 2021 places a statutory duty to include policies in Local Plans to tackle climate change. I am afraid that ENPA is sadly lacking in this regard.</p>	<p>While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies provide the means to seek action on climate change. Material planning considerations can also be taken account of in relation to planning decisions e.g. national policy in the NPPF (Meeting the challenge of climate change flooding and coastal change)</p> <p>It is considered that more action is needed including updating the local list of validation requirements and producing further planning guidance.</p>
Jo Dawson	N/A	-
Kathryn Willox	<p>The direction of travel with regard to carbon emissions is clear. All the news from COP26; the PM sounding "the death-knell for coal"; the mandate to countries to meet in 2022 and make further cuts to carbon dioxide. All of these means that policy is moving fast in this area, and yet ENPA say they do not need to make updates to a Local Plan that was written 5 years ago.</p> <p>NPPF 2021 places a statutory duty to include policies in Local Plans to tackle climate change. I am afraid that ENPA is sadly lacking in this regard.</p>	<p>While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies provide the means to seek action on climate change. Material planning considerations can also be taken account of in relation to planning decisions e.g. national policy in the NPPF</p>

Name/Organisation	Comment	ENPA Officer Response
		(Meeting the challenge of climate change flooding and coastal change) It is considered that more action is needed including updating the local list of validation requirements and producing further planning guidance.
Rosamund Griffin/ Wootton Courtenay Parish Council	N/A	-
Lee Willox	ENP can do more. most of the papers policies as I have stated previously are choices or statements with no directive attached, there needs to be a more mandated approach with a cut off when our influences have ANY negative implications on our environment to be in better state than it was beforehand.	Noted.
Gary Parsons/ Sport England	N/A	-
Roger Watts	Nature is an asset. Exmoor is an asset. Neither the Glover Review - nor the recent DEFRA response to it - seem yet to understand this. Let's hope the upcoming COP15 Summit helps find an answer.	Noted
Sally Bastock	N/A	-
Andrew Gunn/ Somerset County Council	From a mineral and waste perspective, supportive of the proposed approach.	Noted. Support welcomed
Claire Wright/ CLA South West	N/A	-
Bernard Peacock	You recently gave planning approval for the demolition of two barns at Thorne farm. Although you did resist it strongly. Those barns contained a good mix of important ecology. We need to have policy to protect and if not mitigate against its loss. The loss of these lovely EXMOOR barns is also a shame.	The Authority cannot prevent the demolition of the barns in question because the demolition has already been granted planning permission under the nationally set General Permitted Development Order (which is a general planning permission granted by central

Name/Organisation	Comment	ENPA Officer Response
		government) ¹² . It sets out criteria where development is not permitted. There is a prior notification period. The barns in question are not listed.
Naomi-Beth Dixon/ Natural England	Please see answer to Q24.	Noted – see response to Question 23.
Sarah Buchanan/Brompton Regis PC	Wildlife corridors across the region need to be strategically planned. Landowners and tenant farmers cannot do this alone. The ENPA can lead and can access funding at strategic landscape and wildlife levels to support the successful delivery of this and other such schemes.	Noted
Angela Percival	N/A	-
George Curry/ Lyn Climate Action	A greater emphasis is needed on carbon reduction rather than visual impact and a greater emphasis on biodiversity net gain rather than the conservation of biodiversity	Noted. Plan policies enable development proposals to mitigate and adapt to climate change including small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park. Similarly policies enable and encourage biodiversity enhancement which includes biodiversity gain. It is important that policies for proposals in the National Park ensure that they do not harm Exmoor’s landscape– in line with statutory National Park purposes including the conservation and enhancement of natural beauty, the legal duty for public bodies to have regard to National Park purposes and national policy that National Parks have the highest level of protection in landscape terms. The planning system does not control all activities

¹² The Town and Country Planning (General Permitted Development) (England) Order 2015 Schedule 2 Part 11 Class B

Name/Organisation	Comment	ENPA Officer Response
		e.g. land management. Other work is ongoing in the National Park to restore nature.
Rachel Thomas/ Exmoor Society	Protection of Exmoor's natural environment including its landscape, wildlife and cultural heritage is given great weight nationally when considering development proposals.	Noted

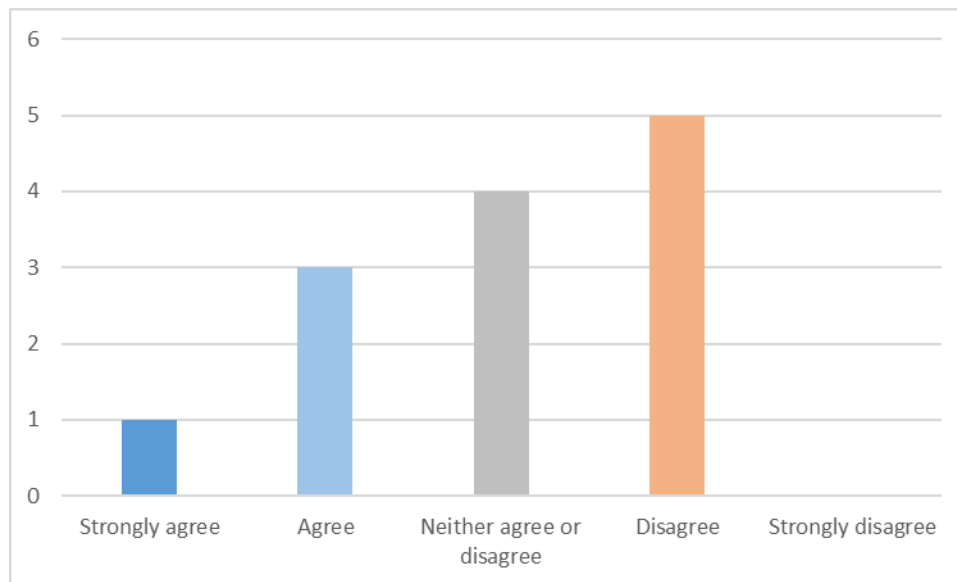
Local Plan Survey Results: Economy

13 individual responses were received for the Economy section of the Local Plan 5-Year Review Survey.

The questions within the Economy section are listed below with the comments received for each question.

Question 35: The Rural Enterprise Exmoor evidence highlights the very high proportion of micro-businesses on Exmoor. Local Plan policies provide for a flexible approach to business development in settlements and the open countryside as well as home-based businesses. The analysis to date in the interim economy topic paper has not identified a need for policies to be changed.

To what extent do you agree or disagree with this statement?



13 responses were received with 9 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Agree	The current policies seem fine	Noted
Andrew Milne	Agree	-	-
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	In relation to sustainable development, consider whether Minehead should be a 'named' settlement in the ENP local plan? Whilst being on the ENPA boundary, Minehead is not currently a named settlement in the Local Plan but this could address issues with biodiversity net gain, economic development and flood management. Applicable policy is SE-D2.	The built area of Minehead lies within the Somerset West & Taunton local planning authority area and Minehead is a named settlement in the West Somerset Local Plan. It is considered that a change to the Exmoor National Park Local Plan spatial strategy to classify land in the National Park between Minehead and Dunster as a named settlement would be inappropriate because of the likely landscape impacts/harm resulting from new development between Minehead and Dunster. There are significant concerns about the principle of amending the spatial strategy to enable new development / the growth of Minehead into a nationally protected landscape given the statutory purposes of, and national policy for, National Parks. Policy SE D2 seeks to safeguard existing employment sites in the National Park.
Jo Dawson	Agree	Micro businesses need to be encouraged as it helps keep the young on the Moor rather than having to move away to make a living.	Noted
J Atherton	Disagree	It is impossible not to link our policy on economic development with our housing policy which is extremely restrictive and	Noted. In/adjoining settlements, the plan policies provide for business development through conversions and as new build

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>consequently it is holding back the needed diversification of the local economy.</p> <p>Tourism and agriculture will always be principle drivers to our local economy. Unfortunately both sectors have their problems. Agriculture may be in decline and tourism is erratic in nature. We need Post Covid to be welcoming those people currently in towns and cities who work from home, possibly employing a few people (so-called micro-businesses). To do this we will need top quality broadband, relaxed planning policy and better roads.</p> <p>I accept that current economic policy is supposed to support the establishment of these sorts of enterprises, however we need to do more so that we diversify our local economy and welcome people who will bring new wealth into the area.</p> <p>If I could give one rather petty example. In Lynton we tried to establish a business hub last year; with the full support of Devon County Council. The planners did not want us to increase the height of the building which we were proposing to use. Lets stand back and ask the question. What is more important, getting a business hub up and running or refusing to allow the height of the building to be raised by a couple of feet? It seemed to us that the planners were preoccupied with their own issues rather than taking a wider perspective as to what is needed to develop our local economy. Its a matter of priorities, unfortunately current priorities are wrong.</p>	<p>without allocations to provide flexibility. Policies provide for housing for local communities where it is needed prioritising local need affordable housing. Evidence shows that most new affordable housing is lived in by younger age groups - working age households and families. It is recognised that post-Covid there are increased opportunities for home-working. Plan Policies provide for residential extensions which can enable additional space for home working as well for home based businesses and outbuildings e.g. for a garden office. Local Plan policies are enabling appropriate proposals for digital communications technology to come forward.</p>
<p>Rosamund Griffin/ Wootton Courtenay Parish Council</p>	<p>Disagree</p>	<p>-</p>	<p>Noted</p>

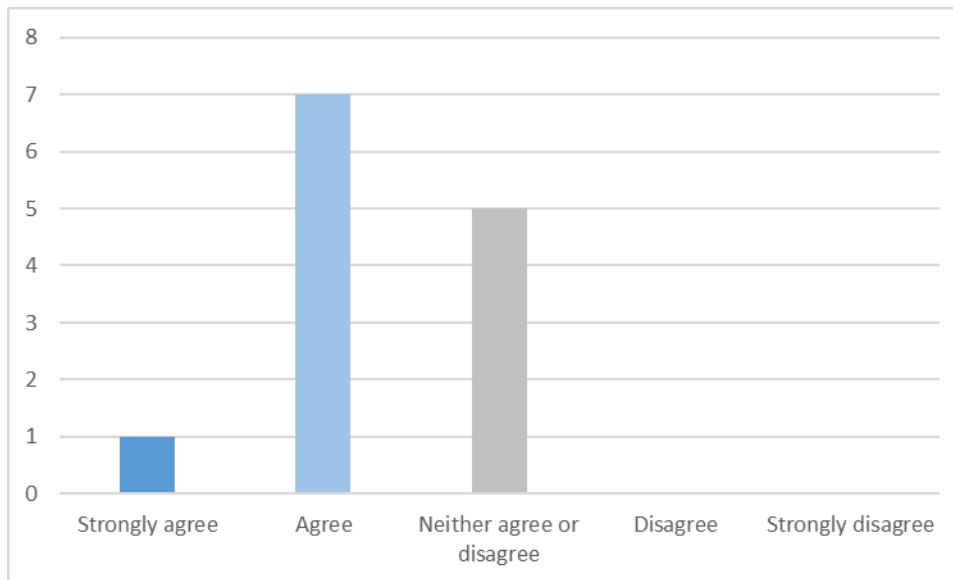
Name/Organisation	Response	Comment	ENPA Officer Response
Roger Watts	Neither agree or disagree	-	Noted
Claire Wright/ CLA South West	Disagree	consideration should be given to altering policies to allow new-build for economic purposes where this would aid community vitality and fit with the local vernacular.	Policy SE-S3 allows for new build employment development in and adjoining settlements – some settlements would be considered very small relative to areas elsewhere. Policy SE-S4 enables new buildings required for agriculture or forestry purposes where: it can be demonstrated there is a functional need.
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We have no comment to make for question 35.	Policy SE-S3 Business Development in the Open Countryside provides for the diversification of an existing agricultural, or other primary business responsible for land management. This can be through the re-use/change of use of existing traditional buildings or additionally for non-traditional buildings for business development which supports an existing agricultural or primary land-based business and which does not conflict with the existing farming or land management activity.
Sarah Buchanan/Brompton Regis PC	Disagree	Where appropriate, reasonable and sympathetic development of farms and other rural businesses should allow for commercial new builds or conversions that meet the needs of the residents/ businesses. For example: offices and stores that are needed to support the effective running of the existing business or its appropriate development to support their continuation and sustainability.	Plan policies provide for business development: <ul style="list-style-type: none"> - in and adjoining settlements through extensions to existing businesses, conversions, new build or redevelopment; - in the open countryside through extensions to existing businesses,

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>Policies should prevent ad hoc economic development that is intrusive to local communities and / or landscapes.</p> <p>Sustainable local economic development should be supported. This includes but is not limited to:</p> <ul style="list-style-type: none"> - support for diversity in the local job and skills market (such as Shearwell) - support for variation and extension of an existing business to accommodate variation in the business (perhaps in particular by family members) to provide a local service (such as engineering fabrication on farms where there is sufficient land to do so), including support for small scale units outside larger settlements - a focus on business development that is wider than land management, farming and forestry so that a wider skills base may be supported in the area which may retain (and attract) people who would otherwise move elsewhere for appropriate work. <p>Such steps might include support for: re-use of existing buildings to provide a base for economic activity; new build business units and shared spaces; 'clean' business development.</p> <p>There is a clear need for more support and positive action to ensure effective communication networks across the national park. The recent storms may have highlighted the vulnerability of all forms of communication with landlines, mobile phones and wifi internet out of action for many days for many residents and businesses, but those issues are an everyday challenge for many residents and businesses in the national park that places them at a disadvantage in the wider economy.</p>	<p>conversions or the redevelopment of existing business sites.</p> <ul style="list-style-type: none"> - There are also policies for home based businesses - Local Plan Policies provide flexibility for additional space for work purposes through an extension, or through a conversion or a new building usually in the curtilage of a dwelling; and/or for outbuildings which can also provide additional work space e.g. an office. <p>Policy SE-S4 enables new buildings required for agriculture or forestry where: it can be demonstrated there is a functional need and SE-S3 enables the reuse of existing buildings for farm diversification.</p> <p>The importance of digital communications for local communities and businesses is recognised. Local Plan policies are enabling telecommunications proposals to come forward though it is understood that roll out has been challenging.</p> <p>The Local Plan/planning system does not have all the powers to deal with economic issues and continued joint working with Local Authorities within the Somerset and Devon parts of Exmoor, including through Rural Enterprise Exmoor is needed.</p>

Name/Organisation	Response	Comment	ENPA Officer Response
George Curry/ Lyn Climate Action	Disagree	A greater emphasis needs to be placed on carbon neutrality or, at the very least, minimal carbon generation for all business development. This applies to the majority of SE and RT policies in the Economy section.	Noted. The Local Plan should be read as a whole and it includes policies to address climate change.
Philip Griffin	Neither agree or disagree	-	Noted
Rachel Thomas/ Exmoor Society	Strongly agree	REE identified a 60% increase in the number of businesses than had been previously identified indicating that there is a flexible approach to business development generally in the park Further, 40% of businesses thought that the national Park designation provided positive opportunities. The Local Plan does not have all the powers alone to deal with economic issues and Local Authorities still operate within the Somerset and Devon sides of Exmoor. Comments were made under housing about closer working between the ENPA and LAs and this applies to other economic policies.	Noted

Question 37: The coronavirus pandemic has impacted on the tourism sector and it is difficult to predict what the long-term effects will be and therefore changes that might be considered in the future to respond to these effects. From the evidence to date, the Local Plan policy approach is considered to be sufficiently flexible to enable future recovery.

To what extent do you agree or disagree with this statement?



13 responses were received with 8 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Agree	The current policies seem fine	Noted

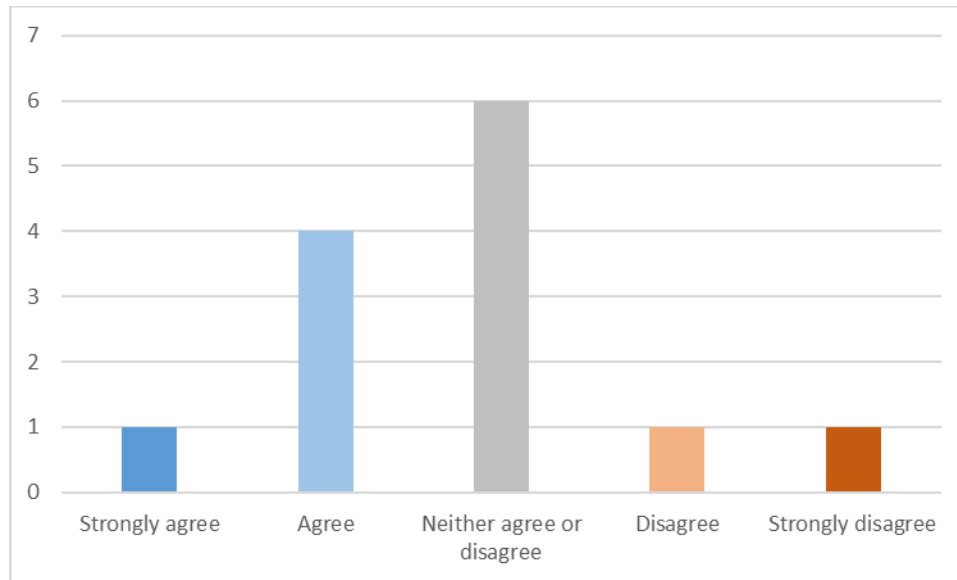
Name/Organisation	Response	Comment	ENPA Officer Response
Andrew Milne	Agree	-	Noted
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	-	Noted
Jo Dawson	Neither agree or disagree	I believe in the long run the pandemic will have increased the tourism on Exmoor. This needs to be carefully managed when the visitors are out and about so that they do not damage sensitive areas and park in responsible places so that they can enjoy Exmoor as much as possible without harming it. Decent places to park up without extortionate prices.	Noted. Plan policies seek to ensure that new development for recreation and tourism is appropriate and conserves or enhances the National Park. The Local Plan / planning system does not have powers to deal with all economic issues and many activities such as parking (other than as development e.g. car parks) or land management cannot be controlled by the planning system.
J Atherton	Agree	Tourist sector did very well last year. The problem will be getting back the tourists this year who last year found rip-off pricing and exorbitant car parking fees etc... Sometimes we are our own worst enemies.	Noted
Rosamund Griffin/ Wootton Courtenay Parish Council	Agree	ENPA acknowledges the high proportion of 'micro-business' on Exmoor. But we do not feel the Local Plan accommodates these well nor the other important growing category of 'Work from home' whilst employed away from Exmoor. ENPA must encourage young employees and all employees that work for Companies off Exmoor, e.g. Taunton, Exeter or Bristol, by ensuring planners allow for the need for a home office or an office in the garden. Post-COVID, many employees will be able to work from home 2 to 3 days a week. This will be an important way for ENPA to keep younger people on Exmoor who want to bring children up on Exmoor whilst developing their careers off Exmoor. Also, help young Exmoor mums (or principal childcarer) to maintain careers, whilst living on Exmoor.	Plan policies provide a flexible approach for business development which also is appropriate given the small scale of many businesses: <ul style="list-style-type: none"> - in and adjoining settlements through extensions to existing businesses, conversions, new build or redevelopment; - in the open countryside through extensions to existing businesses, conversions or the redevelopment of existing business sites.

Name/Organisation	Response	Comment	ENPA Officer Response
		This need to be coupled with the ongoing need for ever-improving board band connection and/or 4G mobile phone signals.	Working from home does not need planning permission where ancillary to a residential use. Local Plan Policies provide flexibility for additional space for work purposes in a number of ways: for working from home or for home based businesses an extension where it complies with the residential extensions policy; additional work space through a conversion or a new building; and a policy on outbuildings which can also provide additional work space e.g. a garden office. The importance of digital communications for local communities and businesses is recognised. Local Plan policies are enabling telecommunications proposals to come forward though it is understood that roll out has been challenging.
Roger Watts	Neither agree or disagree	Altogether too flexible.	Noted
Claire Wright/ CLA South West	Agree	-	Noted
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We have no comment to make for question 37.	Noted
Sarah Buchanan/Brompton Regis PC	Neither agree or disagree	see 36. While we recognise the importance of the tourism sector to the local economy we are also aware that the national is unlike many national parks in not having or being able to support large scale visitor	Noted

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>attractions. It is a small and domesticated national park with a significant visitor following. To maintain this and the intrinsic character of the national park policies should not seek to support or encourage the scale of tourism and tourism services that thrive in other national parks.</p> <p>Development of the sector and steps to attract increased numbers of tourists will, we feel, be ineffective in the medium term because the landscape and land use of Exmoor cannot offer any competition with the range and number of attractions and supporting services in other national parks.</p>	
George Curry/ Lyn Climate Action	Agree	N/A	Noted
Philip Griffin	Agree	-	Noted
Rachel Thomas/ Exmoor Society	Strongly agree	<p>See the above answer to question 39</p> <p>Sustainable tourism that respects the character of the countryside and the national park status is a key sector in the Exmoor economy</p>	Noted

Question 39: There are many challenges and changes facing the farming and land management sector including the coronavirus pandemic and leaving the European Union and it is difficult to predict what the long-term effects will be and therefore any changes that might be considered in the future to respond to these effects. From the evidence to date, the Local Plan policy approach is considered to be sufficiently flexible to respond to future needs and changes in this sector.

To what extent do you agree or disagree with this statement?



13 responses were received with 9 responses having an accompanying comment as shown below.

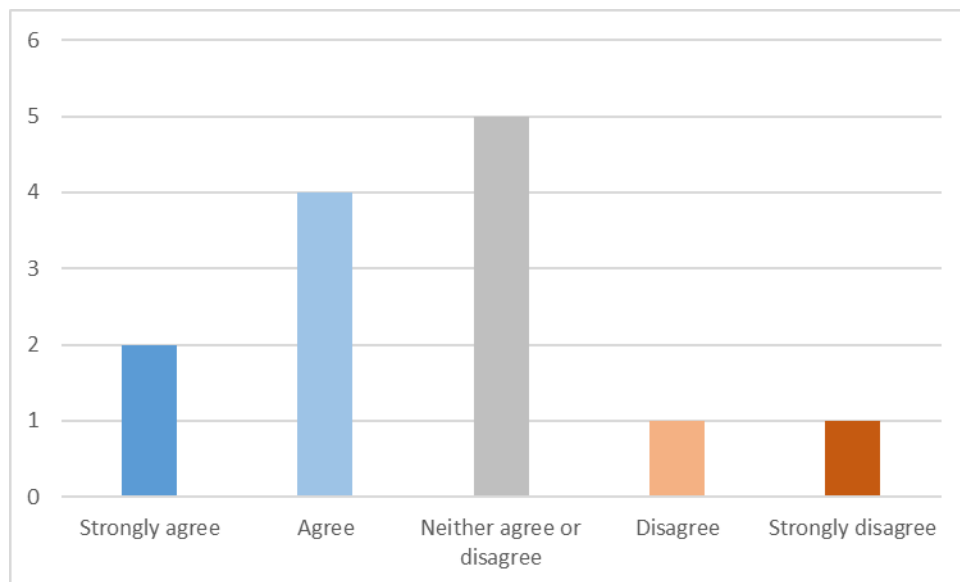
Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Agree	The current policies seem fine	Noted
Andrew Milne	Agree	-	Noted
James Holbrook/ Somerset West and Taunton	Agree	-	Noted

Name/Organisation	Response	Comment	ENPA Officer Response
Jo Dawson	Neither agree or disagree	There has not been time to evaluate the effects of Brexit especially with the pandemic so changes should not be made until these effects have had time to be noticed	Noted
J Atherton	Agree	As a farmer myself I am only too aware of the uncertainty attached to current government policy to the sector. The local plan is supportive of local agriculture, however looking forward flexibility in that policy may be key, as national policy unfolds.	Noted
Rosamund Griffin/ Wootton Courtenay Parish Council	Neither agree or disagree	-	Noted
Roger Watts	Strongly disagree	Altogether too flexible.	Noted
Claire Wright/ CLA South West	Disagree	This is going to be a hugely challenging time for land based businesses and having policies that further support diversification opportunities will allow businesses to plan for further change and upheaval.	Noted. Policy SE-S3 Business Development in the Open Countryside provides for the diversification of an existing agricultural, or other primary business responsible for land management. This can be through the re-use/change of use of existing traditional buildings or additionally for non-traditional buildings for business development which supports an existing agricultural or primary land-based business and which does not conflict with the existing farming or land management activity.
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We have no comment to make for question 39.	Noted
Sarah Buchanan/Brompton Regis PC	Neither agree or disagree	see 36 and 38	See response to Questions 35 and 37.

Name/Organisation	Response	Comment	ENPA Officer Response
George Curry/ Lyn Climate Action	Neither agree or disagree	Leaving the EU, future trade deals, the lack of clarity about ELMs all create enormous uncertainty and a huge threat to the future for agriculture on Exmoor. It is likely that trade deals allowing meat raised to lower standards will undermine the viability of traditional farming on Exmoor for the mass market. The way forward may be to implement the Exmoor Nature Recovery Vision, along with lobbying for sufficient ELMs payments to fully compensate farmers and landowners. This would need to be combined with agricultural production designed for specialised markets, e.g. 'eat local', organic, supplying local tourism, high welfare standards etc. Some Exmoor farmers are already taking this approach. When the effects of these factors are better understood, revisions to the policy may be required in the future. (SE-S3, SE-S4)	Noted. It is recognised that the farming sector is facing a period of uncertainty and it is therefore a challenging time for land-based businesses and it is difficult to predict changes long-term effects & the future responses that may be needed.
Philip Griffin	Neither agree or disagree	-	Noted
Rachel Thomas/ Exmoor Society	Strongly agree	There is much work being undertaken locally such as Exmoor's Ambition to influence national farming policies. Until there is greater certainty and details from ELM schemes it is difficult to predict the future farming sector. There are particular concerns over the survival of the smaller Exmoor hill farmer key to finding solutions to the challenges of landscape change.	Noted

Question 41: The Rural Enterprise Exmoor Vision highlights digital connectivity as a key objective. Monitoring data shows a high number of permissions granted for telecommunications masts and mobile communications infrastructure. The analysis to date suggests that the Local Plan policies provide an appropriate basis to support the future roll out of digital connectivity in the National Park.

To what extent do you agree or disagree with this statement?



13 responses were received with 9 responses having an accompanying comment as shown below.

Name/Organisation	Response	Comment	ENPA Officer Response
L Webb	Agree	Good connectivity is essential even if it means a few masts on view.	Noted. Local Plan policies are enabling proposals to come forward. Careful consideration is needed in considering proposals to ensure development is appropriate in line

Name/Organisation	Response	Comment	ENPA Officer Response
			with National Park statutory purposes including to conserve and enhance natural beauty and national policy which is that National Parks have the highest status of protection in landscape terms.
Andrew Milne	Agree	-	Noted
James Holbrook/ Somerset West and Taunton	Neither agree or disagree	It is noted that a long-term vision for rural enterprise on Exmoor (REE) has been developed and that one of the significant 'drivers of change' is 'a technologically driven digital world'.	Noted. ENPA's conclusions are set out in the interim Topic Papers. It is recognised that digital connectivity is a significant driver of change. However, the monitoring, evidence and analysis carried out for the review indicate that the Local Plan policies are enabling appropriate development within the National Park.
Jo Dawson	Disagree	Need to make it easier for networks to put up masts for the general public not just for emergency services.	Noted. It is recognised that digital connectivity is vital for local communities and businesses. Local Plan policies are enabling proposals to come forward. Careful consideration is needed to ensure development is appropriate in line with National Park statutory purposes including to conserve and enhance natural beauty and national policy which is that National Parks have the highest status of protection in landscape terms.
J Atherton	Strongly disagree	The planning restrictions imposed on essential telecommunication kit needed to develop connectivity has in some cases been frankly	Noted. It is recognised that digital connectivity is vital for local

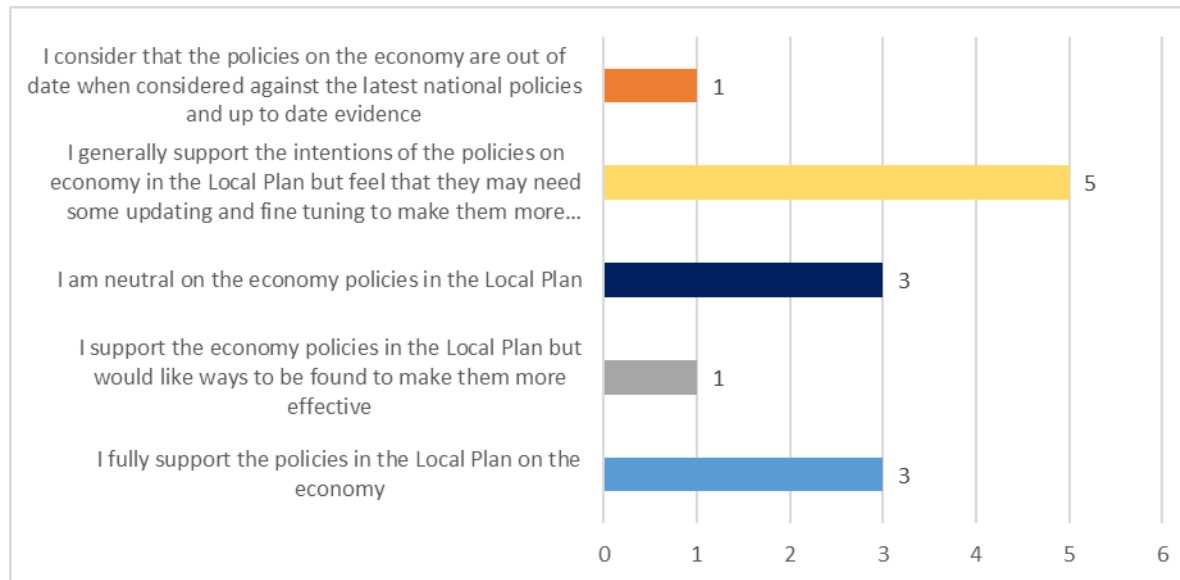
Name/Organisation	Response	Comment	ENPA Officer Response
		<p>ridiculous. Limiting the height of a local Airband mast (Near Brendon) to the height of the nearby hedge meant that several homes, farms etc.. (Including our own) can not now be reached by the Airband system.</p> <p>The mast was only a taller telegraph pole with a small dish on top. Such short-sightedness in decision making holds back technical development and the needed expansion of local communication. This holds back our local economy.</p> <p>Recent government policy to support the roll out of 5G etc.. is welcome. There is still too much of Exmoor where there is no mobile phone signal.</p>	<p>communities and businesses. Local Plan policies are enabling proposals to come forward. Careful consideration is needed to ensure development is appropriate in line with National Park statutory purposes including to conserve and enhance natural beauty and national policy which is that National Parks have the highest status of protection in landscape terms.</p>
Rosamund Griffin/ Wootton Courtenay Parish Council	Neither agree or disagree	-	Noted
Roger Watts	Neither agree or disagree	-	Noted
Claire Wright/ CLA South West	Agree	A keen eye must be kept on this policy to ensure that it remains fit for purpose so that Exmoor doesn't get left behind.	Noted
Naomi-Beth Dixon/ Natural England	Neither agree or disagree	We note that landscape character is highlighted as a determining factor in the siting of such communications infrastructure. We support this and advise that the landscape impacts of any proposals for further infrastructure should be carefully considered before permission is granted.	Noted
Sarah Buchanan/Brompton Regis PC	Agree	We support this public policy objective. However the practice by private providers is a separate matter. While the ENPA cannot control private providers could it do more to encourage and support implementation of the policy. This is a particular problem for properties outside, but not very far from, villages: a settlement pattern which is characteristic of parts of Exmoor. Many of those properties do not have a sufficient service because they are 'too far from a green box' for fibre (or even a sound landline service) and do not offer any economy of scale to	Noted. It is recognised that digital connectivity is vital for local communities and businesses and that roll out has been challenging. The ENPA has been working proactively to support roll out and there have been improvements on Exmoor but coverage remains patchy. The Local

Name/Organisation	Response	Comment	ENPA Officer Response
		<p>commercial providers, including that in partnership with 'Connecting Devon and Somerset'. In those circumstances, where a service is provided it costs a great deal more than its equivalent in a village and is often poorer in quality. This can only inhibit the implementation of other ENPA policies around economy and landscape.</p> <p>While the ENPA cannot solve this broad issue it could do more to encourage better provision, perhaps working with other national parks to seek action on digital inclusion in rural areas.</p> <p>Also, we have seen examples where delays in processing of applications by both ENPA and private providers led to very long delays in or loss of a commercial provision and also seen inconsistent information provided by ENPA regarding the permissions required for communications infrastructure such as wifi or satellite dishes.</p>	<p>Plan / planning system does not have powers to deal with all economic issues.</p>
George Curry/ Lyn Climate Action	Strongly agree	<p>The pandemic has encouraged home working, thus avoiding the need to travel and the associated carbon emissions. As an example, if one person living in Lynton and working in Barnstaple, was to work from home 2 or 3 days a week, they would save one tonne of CO2 emissions annually. A strong high speed digital infrastructure is therefore essential. (AC-S1, AC-S4, AC-D5 to D7)</p>	<p>Noted. It is recognised that digital connectivity is vital for local communities and businesses and that roll out has been challenging. The ENPA has been working proactively to support roll out and there have been improvements on Exmoor but coverage remains patchy. The Local Plan / planning system does not have powers to deal with all economic issues.</p>
Philip Griffin	Neither agree or disagree	-	Noted
Rachel Thomas/ Exmoor Society	Strongly agree	<p>There are an increasing number of telecommunication masts appearing on Exmoor. The roll out is challenging on Exmoor in such a remote rural area with challenging topography.</p>	<p>Noted. Local Plan policies are enabling proposals to come forward. Careful consideration is needed to</p>

Name/Organisation	Response	Comment	ENPA Officer Response
			<p>ensure development is appropriate in line with National Park statutory purposes including to conserve and enhance natural beauty and national policy which is that National Parks have the highest status of protection in landscape terms.</p>

Question 43: Please indicate from the following options which statement is closest to your views on the Local Plan policies on the economy.

13 responses were received with 6 responses having an accompanying comment as shown below.



I consider that the policies on the economy are out of date when considered against the latest national policies and up to date evidence

Name/Organisation	Comment	ENPA Officer Response
<p>Roger Watts</p>	<p>A gap now between two incompatible universes:</p> <p>1). there’s the 1949 vision still held by DEFRA, the national parks collectively and individually, the Landscape Review, and the Campaign for National Parks. It is perfectly possible to have more tourism, more “vibrant” communities and settlements, more building of affordable housing and at the same time to “boost” biodiversity. For example, look at the foreword The Rt Hon Lord Benyon, Parliamentary Under Secretary of State at the Department for Environment, Food and Rural Affairs.</p> <p>2). the Dasgupta review and various UN groups ahead of the COP 15 summit expected later this year. We are disrupting Nature’s processes to the detriment of our own and our descendants’ lives. In recent decades humanity has been degrading our most precious asset, Nature, at rates far greater than ever before - to a point where the demands we make of its goods and services (eg climate regulation, pollination, nitrogen fixation, decomposition of waste) far exceed its ability to meet them on a sustainable basis.</p>	<p>Noted</p>

I generally support the intentions of the economy policies in the Local Plan but feel that they may need some updating and fine tuning to make them more effective

Name/Organisation	Comment	ENPA Officer Response
<p>James Holbrook/ Somerset West and Taunton</p>	<p>-</p>	<p>Noted</p>
<p>J Atherton</p>	<p>Please see my previous answers in this section.</p>	<p>See previous responses</p>
<p>Rosamund Griffin/ Wootton Courtenay Parish Council</p>	<p>See comments above about new working patterns post-COVID and need to consider young Exmoor people that develop careers off Exmoor whilst wanting to live on Exmoor.</p>	<p>See previous responses</p>

Name/Organisation	Comment	ENPA Officer Response
Sarah Buchanan/Brompton Regis PC	Encouraging business development is a good idea, across relevant sectors and in appropriate locations. But to meet the ENPA policy commitments (and national park purposes) re landscape and environment such development needs to go hand in hand with those policies and with support for appropriate facilities, such as: road access, digital inclusion, basic visitor facilities (toilets, dog fouling facilities and car parking in popular places).	Noted
George Curry/ Lyn Climate Action	See answers to previous questions	See previous responses

I am neutral on the economy policies in the Local Plan

Name/Organisation	Comment	ENPA Officer Response
Jo Dawson	-	Noted
Naomi-Beth Dixon/ Natural England	N/A	Noted
Philip Griffin	-	Noted

I support the economy policies in the Local Plan but would like ways to improve their delivery

Name/Organisation	Comment	ENPA Officer Response
Claire Wright/ CLA South West	-	Noted

I fully support the policies in the Local Plan on the economy

Name/Organisation	Comment	ENPA Officer Response
L Webb	-	Noted
Andrew Milne	-	Noted

Name/Organisation	Comment	ENPA Officer Response
Rachel Thomas/ Exmoor Society	ENPA has worked closely with the local business community setting up an advisory group for the Partnership Plan, taking part in the LEP for part of the national park, encouraging Visit Exmoor and supporting the Exmoor Hill Farming Network, using the apprenticeship scheme and supporting many other business initiatives.	Noted

Question 45: Please provide additional comments on the questions above or other policies in the economy topic. Please tell us which policies your comment refers to, be as specific as possible, providing examples and a brief outline of your reasons. If you have no further comments to make, please indicate this by entering 'N/A' into the text box.

Name/Organisation	Comment	ENPA Officer Response
L Webb	N/A	-
Andrew Milne	N/A	-
James Holbrook/ Somerset West and Taunton	N/A	-
Jo Dawson	N/A	-
J Atherton	N/A	-
Rosamund Griffin/ Wootton Courtenay Parish Council	N/A	-
Roger Watts	<p>The recent Dasgupta Review which will be on the agenda of various Summits was prompted by a growing body of evidence that in recent decades humanity has been degrading our most precious asset, the natural environment, at rates far greater than ever before.</p> <p>“This is a massively important piece of work. Unless economic decisions properly and fully take into account the natural world, we will never turn today’s depressing trajectory of destruction around.” (Zac Goldsmith)</p>	Noted
Claire Wright/ CLA South West	N/A	-
Naomi-Beth Dixon/ Natural England	N/A	-
Sarah Buchanan/Brompton Regis PC	N/A	-
George Curry/ Lyn Climate Action	The NPPF talks about ‘An increased focus on walking and cycling.’ Dartmoor has had a speed limit on all roads for many years. I believe the same should apply to Exmoor with a 40mph limit on A roads and 30mph on all other roads. This would	Noted. The Local Plan / planning system does not have powers to deal with all economic issues.

Name/Organisation	Comment	ENPA Officer Response
	improve access for cyclists, horse riders and walkers who are currently discouraged by the danger. Exmoor has a fantastic network of PROWs but the danger of walking along the roads to gain access from one path to another is great. The provision of e-bike hire could be a great addition to the local economy but safety has to be improved. Speed reductions also have a major effect in reducing carbon emissions. (AC-S1, AC-S2, AC-D1).	
Philip Griffin	N/A	-
Rachel Thomas/ Exmoor Society	N/A	-

Local Plan Survey Results: General and Additional Responses

From the launch of the Local Plan 5-Year Review Survey on the 11th January 2022, a total of 44 responses were received. Of these 33 responded to specific questions within the survey, either in whole or partly, while a further 11 responses were more general comments in relation to the Local Plan and its policies. Six responses were received via email which did not refer directly to the online survey. Consent is required before they can be included in the schedule and considered as part of the 5-Year Local Plan Review process. They will be added to the schedule if consent is provided.

Where responses were received that directly referred to questions within the Local Plan 5-Year Review Survey, they have been included in a separate document relevant to the three topics of: Housing and Communities, the Environment and the Economy.

Additional responses that did not specifically refer to questions with the survey are detailed within the document in Table 1 below. Table 2 includes comments received to Question 46 of the survey was an open question in relation to any other areas of the Plan or other evidence for consideration.

Table 1: Responses received on the subject of the Local Plan 5-Year Review

Name/Organisation	Comments	ENPA Officer Response
<p>Deb Roberts/ The Coal Authority</p>	<p>Thank you for your email below regarding the Exmoor Local Plan 5 Year Review Survey.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, Exmoor National Park Authority lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as</p>	<p>Noted</p>

Name/Organisation	Comments	ENPA Officer Response
	evidence for the legal and procedural consultation requirements at examination, if necessary.	
Chantal Bland/ South West Water	Thank you for notifying South West Water of the above upon which we have no comment at present but are happy to provide further comment as and when development proposals are formalised.	Noted
Rebecca Harfield/ Historic England	<p>Thank you for contacting Historic England regarding the Exmoor Local Plan 5 Year Review Survey.</p> <p>We have provided comments about the Local Plan Review under the Duty to Co-operate in August 2021. I also attended the workshop on the 2nd December 2021 on behalf of Historic England.</p> <p>We can see how some of our advice has fed through into the interim topic papers, especially the Environment one, and the interim report. We note the broad findings in relation to the NPPF and the historic environment, the progress on conservation areas and appraisals as well as heritage at risk, and the intentions to consider the implications of the update to the Exmoor Historic Environment Research Framework and progress a Design Guide SPD.</p> <p>Given this, we are comfortable with the proposed direction of travel for the Local Plan Review and do not wish to offer further comment through the survey.</p> <p>Just a minor point on the Environment topic paper though regarding heritage at risk (page 5) though. I was not sure if you were referring to Historic England's Heritage at Risk Register and the year the data was coming from. There was fairly recent update to our Heritage at Risk Register and the 2021 version is the latest. Here's a link to it in case this helps: https://historicengland.org.uk/advice/heritage-at-risk/.</p>	Response noted and welcomed.

Name/Organisation	Comments	ENPA Officer Response
	<p>There is also quite a lot of general information about the state of the historic environment more generally that may be of use on our website here: https://historicengland.org.uk/research/heritage-counts/indicator-data/.</p> <p>If you do wish to discuss any historic environment matters related to the Local Plan Review though, please do not hesitate to contact me.</p> <p>We look forward to hearing how the Review progresses from here.</p>	
Lorraine Brooks/ Gloucestershire County Council Minerals and Waste Planning Authority	<p>M&W officers have reviewed the consultation information and have no comments to make.</p>	<p>Noted</p>
Acoustics Officer/ Somerset County Council	<p>Background</p> <p>Looking back at my previous consultation contributions I note in 2013 I considered the Exmoor Local Plan (ELP) provided “<i>good opportunity to stress the importance of protecting tranquillity and consider noise impact from development</i>”. However, I also noted that it lacked a definition of tranquillity or a way noise might be considered as detrimental to tranquillity. I suggested an approach quantifying noise and note this that has been adopted within 5.151. On 16/8/17 I also commented on the May draft of the Exmoor Landscape Character Assessment SPD (ELCA) and noted it made many appropriate references to the importance of tranquillity but, Part 3 of the ELCA, intended to be used by planners, developers, land agents, and members of the public when submitting planning applications, made no direct reference to noise and the adverse impact it might have on the tranquillity, and the landscape character of sites or nearby areas. At that time I suggested reference should be made to information contained in the Landscape Institute Technical Information Note 2017 : Tranquillity – An Overview.</p>	

Name/Organisation	Comments	ENPA Officer Response
	<p>Comment on Local Plan summary information</p> <p>I note ELP documentation is supported by “Local Plan Summary - A guide to the Local Plan 2011-2031 and summary of the policies” as found Exmoor - Local Plan Summary 2011-2031 (exmoor-nationalpark.gov.uk) and this only includes a single reference to noise and two policy references to tranquillity. However, the full version of the Exmoor Local Plan, as downloaded from Part 1 Cover contents and introduction (exmoor-nationalpark.gov.uk), is found to contain more comprehensive references to a need to control noise (4.186, CE-S7, CE-S8, CE-D7, 5.77, CC-S5, CC-D3, CC-D5, 5.136, <u>5.151</u>, 5.153, 6.246, 7.31, 7.39, <u>8.12</u>, 8.76, 8.80, 9.17, 12.25) and preserve tranquillity (1.2, 1.4, 2.2, 2.3, 3.3, 3.22, 4.0, 4.4, 4.5, CE-D1, CE-S2, CE-S7, 5.29, 5.68, 5.70, 5.77, 5.87, CC-S5, 5.95, 5.97, CC-D3, 5.133, 5.151, 6.212, 6.223, 8.5, 8.11, 8.12, RT-S1, RT-D4, 8.72, 8.76, 8.94, Glossary). In my opinion the summary of the ELP does not identify the extent of consideration given by the ELP to the topics of noise and tranquillity. In my opinion, attention needs to be drawn to the potential impacts noise can have on the aural quality of places when either developed to serve the public or maintained to provide areas natural beauty and tranquillity. The ELP summary of CE-S1 highlights several physical attributes of landscape as worthy, but fails to identify the importance of overall aural quality however, the details in the ELP strive to identify tranquillity as an attribute worthy of special protection against the gradual encroachment from manmade noise. While the ELP summary identifies that new roads are considered inappropriate in the National Park, recognition of the long distance impacts of any road development on these tranquil areas should feature in the consideration of highways along with other environmental gains or community benefits.</p> <p>Comment on Local Plan information</p> <p>The consideration of noise found within CC-S5 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT is recognised as necessary to protect local amenity, tranquillity and also visual impact. I note that 5.77</p>	<p>Noted. The summary is a non-statutory informal guide to assist applicants and is not part of this five year review of the Local Plan. The full Local Plan policies are used to determine planning applications.</p> <p>Noted</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>recognises the increased use of heat pump technology and this view may be supported by the recent Institute of Acoustics (IOA) concern over the failings of the Microgeneration Certification Scheme in addressing associated noise impacts. The IOA urges the government review of the MCS and the following IOA responses may support this consideration within the ELP - ioa response - off grid - non-domestic.pdf ioa response - off grid heating - domestic.pdf</p> <p>As identified in previous consultation responses, I still note the absence of any definition of Tranquillity within the Glossary and the reason for this is not understood. There would appear justification for inclusion based on the frequent references made to tranquillity and the “Landscape Institute Technical Information Note 2017 : Tranquillity – An Overview” may be helpful in providing a definition.</p> <p>An additional aspect of noise consideration arising from cattle grids might be included in AC-S2 - TRANSPORT INFRASTRUCTURE or supporting text. Decisions concerning the selection and maintenance of cattle grid crossings can have consequence to the noise effecting nearby residential development, or areas of tranquillity.</p> <p>Consideration of sound quality in design The need for Local Plans to set out clear design visions and provide maximum clarity about design expectations provides opportunity to stress the importance that aural quality plays in achieving functional development intended for public use. Poor acoustics can be a failing with public spaces, such as village hall developments, and this can lead to difficulties in their use, impact on their sustainability and present additional costs to rectify. In my opinion the summary assessment of policy CE-S6 fails to note ‘Functionality’ as an important component of design, noting only “form, character and layout”. In my opinion Policy CE-S6 needs to highlight a need for acoustic consideration to achieve</p>	<p>Noted. This is something that will be considered when the Local Plan is reviewed, but is not considered to trigger the need for a review.</p> <p>Noted. This is something that will be considered when the Local Plan is reviewed, but is not considered to trigger the need for a review.</p> <p>Noted. This will be considered as part of the preparation of the Design Supplementary Planning Document</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>functionality and aural accessibility, so supporting the aspects of physical accessibility and sustainability.</p> <p>The requirement for appropriate acoustic design of public spaces should, in my opinion, also feature in HC-S6 - LOCAL COMMERCIAL SERVICES & COMMUNITY FACILITIES. The consideration of the impact and mitigation of noise within housing design (ProPG Professional Practice Guidance on Planning & Noise - New Residential Development and building control procedure under Building Regulations Part E - Resistance to the passage of sound) might be expected to be covered in the application and building control processes. The ELP might however, need to highlight an expectation for appropriate acoustics to be achieved within public spaces that arise from either new development proposals, or during the conversion of existing buildings. The ELP may also need to identify that the introduction of new noise sensitivity with residential development, should not constrain existing or allocated commercial land uses or conflict with ELP intentions.</p> <p>Conclusion In conclusion I think my response to Q31 of the consultation is <i>"d) I generally support the intentions of the environment policies in the Local Plan but feel that they may need some updating and fine tuning to make them more effective"</i>.</p>	<p>Noted. It is considered that these issues can be addressed within current policy and Building Control requirements</p>
<p>Jo Collier/Lynton and Lynmouth Town Council</p>	<p>Lynton and Lynmouth Town Council would like to provide feedback on the papers relating to the review of the current five-year plan. We hope that you will excuse us for not completing the questionnaire. It is our view that the sections on Housing and the Economy are indivisible in that each depends on and influences the other. As such we prefer to comment in a coordinated manner on both areas.</p> <p>Looking back to press cuttings relating to Lynton in the nineteenth century we see that even then there was considerable concern and comment relating to local house prices, lack of rental properties and the</p>	<p>Comments noted . Thank you for the response providing historical context, a description and analysis of current issues that are faced by Lynton and Lynmouth. We recognise that these are also affecting other parishes in the National Park and other rural areas as well as other protected landscapes.</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>squeezing out of residents and workers, who could no longer afford to live locally. One could I suppose say that nothing has changed, and Lynton has survived and prospered over the past two hundred or so years. This to us is very much the gist of the ENPA current five-year plan. We regard this view as dangerous complacency and will now explain why. Looking forward to what will hopefully be a post-covid situation we are already seeing the trends of the last fifty years being extended and amplified.</p> <p>After the last war in an austerity driven environment the hotels and guest houses in Lynton and Lynmouth attracted tourists from elsewhere in the UK, who could not afford the then expensive overseas trips that are nowadays commonplace. Lynton and Lynmouth always aimed to attract the more sophisticated traveller. Partly because the local Lynton and Barnstaple Railway had closed before the 1939 war, the resort was dependent on visitors arriving by stagecoach, steamer and eventually the motor car. We never experienced the massed holiday crowds seen elsewhere along the coast, although the steamers still caused concern locally that the “riffraff” were able to get in on day trips. We did however have a handful of top hotels including the Royal Castle, The Valley of Rocks, and The Tors. These attracted the wealthy tourist and the local economy flourished. Agriculture has always been another important sector to Lynton, along with the rest of Exmoor.</p> <p>The last sixty years have seen the British tourist taking cheap package holidays abroad. Lynton and Lynmouth reacted to this by broadening its appeal to cover the second holiday seasons in Spring and Autumn; the latter being particularly popular with the elderly with the Autumn colours in our oak woods. However, the appeal of the hotels waned, and visitors wanted self-catering holidays instead. Most of our previously well-regarded hotels and guest houses have now been converted to flats or self-catering apartments. Linked to this the local restaurants and pubs flourished. Private homes (particularly in Lynmouth) have also been made into holiday homes and so called second homes. The remaining B&B</p>	<p>We note the change in visitor patterns and visitor accommodation and the change in the number of tourists visiting the area once lockdowns ended in 2020/ and 2021.</p> <p>We recognise that Lynton & Lynmouth have faced particularly high demand for existing housing. We monitor land registry sale prices and trends within the National Park. Anecdotally we understand there are no or very few properties available in the parish.</p> <p>We note the wish to diversify the local economy. The National Park Authority (NPA) is the local planning authority. Plan policies provide flexibility to enable business development:</p> <ul style="list-style-type: none"> - <u>in and adjoining settlements</u> (Lynton & Lynmouth & Barbrook) through extensions to existing businesses, conversions, new build or redevelopment (could enable a “business hub). - in the open countryside through extensions to existing businesses, conversions or the redevelopment of existing business sites. <p>There are also policies for home based businesses - Policies provide flexibility for additional space for work purposes through an extension, a conversion or a new building usually in the curtilage of a dwelling; and/or for outbuildings which can also provide additional work space e.g. an office.</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>accommodation now caters much more for short breaks, rather than full weeks.</p> <p>This trend to self-catering was before Covid amplified by the creation of Airbnb, and increasingly we started to see rental properties changed into holiday accommodation. Once the initial shock of Covid had been taken onboard, we (along with the rest of the Southwest) saw a significant increase in tourists again wanting to holiday in the UK. At the same time there was a noticeable increase in demand for local property as people in the larger towns and cities wanted to move to more remote locations. So, as the number of people living in London dropped, demand for properties here rocketed.</p> <p>These trends resulted last year in a total absence of properties both to rent and to buy. Indeed, now on Rightmove there are no rental properties available in Lynton, Lynmouth, or the surrounding area. Last autumn Lynton and Lynmouth Town Council declared a local “housing emergency” and it is our aim to do everything possible to come up with solutions to resolve the current crisis. We accept that this will involve lobbying our planning authority (ENPA), North Devon District Council and national government as you and they control much of the policy in this area.</p> <p>In Lynton and Lynmouth we have 116 properties on the Council Tax register as second homes. In addition, there are a further 87 self-catering units on the Business Rates register but some contain more than one unit. From perusing Airbnb, we believe there are some 130 or so properties being marketed in Lynton and Lynmouth. Depending on the extent of the overlap here it does seem that based on a total housing stock of some 735 properties, between 20% and 33% of our housing stock is currently used for holiday accommodation and second homes. We suspect that the true figure is in the region of 25%. These are houses which are no longer being lived in by local working families.</p>	<p>In the open countryside, Policy SE-S4 enables new buildings required for agriculture or forestry where it can be demonstrated there is a functional need. SE-S3 enables the reuse of existing buildings for farm diversification.</p> <p>The Local Plan records concern about the high percentage of second/holiday or empty homes on Exmoor. We are also aware of the move to self-catering and the growth of Air B&Bs. Existing market housing (the majority on Exmoor as elsewhere) can become a second / holiday home because permanently occupied and second/holiday homes are in the same residential “use class”. It is therefore not possible for a local planning authority to prevent the purchase or use of such housing as second/holiday homes. The high percentage of second / holiday homes led to Exmoor’s Local Plan being the first in the country to introduce a policy where new market housing permitted to deliver new affordable housing or new units through sub-division has to have a “Principal Residence” condition to be lived in as a main or principal residence.¹³ This followed a similar policy in the Lynton & Lynmouth Neighbourhood Plan. We note your request with lobbying government on the issue of second homes –National Park Authorities have previously raised the issue with central</p>

¹³ Local Plan (p153 [Part 6 Achieving a Thriving Community \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk) or (p20-21 [Local Plan 2011-2031 Summary \(exmoor-nationalpark.gov.uk\)](http://exmoor-nationalpark.gov.uk)).

Name/Organisation	Comments	ENPA Officer Response
	<p>The Town Council is also concerned at our continued reliance here on the tourism and agricultural sectors. We spent a lot of time last year trying to establish a “business hub” with small rental offices and hot desking. Following the rollout of ultrafast broadband in Lynton and Lynmouth, giving us the fastest broadband speeds in the UK, we aimed to attract the smaller sole traders or micro-businesses whose owners may live locally but want somewhere where they can run their business from. From our research elsewhere in Devon and in Somerset we would have attracted a multitude of different firms in IT, consultancy, finance, to name just a few. Despite generous financial support offered by DCC we were unable to conclude the purchase of a property before the deadline for getting a DCC grant had expired. Reluctantly we had to withdraw from the project. Our wish to seek new business into the town remains, and it is thus important to us that the planning regime is supportive and that people looking to come to the area will not be prevented by the lack of availability of accommodation.</p> <p>Linked to the accommodation issue we live in a town where property prices are high (and getting higher), and where wages are well below the national average figures. We therefore need both good quality social housing to rent and affordable housing to buy. There is little existing space in either Lynton or Lynmouth available to us, so almost all new housing will need to be on what is currently agricultural land near of adjacent to the existing town. The area in Lynton above Grattons Drive moving towards Deen Steep may be such an area where a development could take place if planning rules allowed. The current five-year plan envisages just 10 affordable houses being built each year in the whole of Exmoor, and virtually no market value houses. We on Lynton and Lynmouth Town Council fully support the policy of not seeking large developments on Exmoor and we are fully behind the need to preserve and foster the local environment and countryside on Exmoor. We accept that this is a prime objective of the National Park Authority. We do not however see it as inconsistent to seek a more progressive housing policy</p>	<p>government and through consultations on housing policy.</p> <p>The “affordability gap” described is recognised. Monitoring shows the gap between wages / income and average house prices has continued to increase. The Local Plan provides for new housing needed by the local community and has reflected affordability issues by prioritising affordable housing with a local need occupancy tie. This must be lived in by someone with a local housing need and cannot be a second or holiday home. This approach recognizes the need to maintain living and working communities. Affordable housing (with a local need occupancy tie) has been permitted in the parish. Most has been delivered through the reuse of existing buildings.</p> <p>The average figure of 10 local need affordable homes a year in updated evidence is an indication not a limit. In practice, evidence from local housing need surveys sent to households in a parish / group of parishes is used as evidence for planning proposals for new local need affordable housing. More than 10 a year can be permitted if there is evidence of a need for it. The most recent local housing need information for Lynton and Lynmouth indicated that, of the households who responded, 13 households were in local</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>than we have now, particularly in the main towns of Lynton & Lynmouth, Dulverton and Porlock. Small scale developments of just fifty homes will be transformational and will help contribute to stopping the demise of the local economy, the ever-reducing number of local schoolchildren, disappearing community services and it will enable local workers to once again be able to afford to live locally. Such developments should be restricted to just social and low-cost housing, thus limiting the purchase price of the land needed to build on. We also intend to run this in conjunction with our Community Land Trust and a Housing Association. Current planning policy makes such a development impossible, and as such we want to see a full review of the ENPA five-year plan with the aim of supporting such a project.</p> <p>We have already referred to the trend for converting rental accommodation into holiday homes. This is a significant contributor to current social decline and decreased use of local amenities. We have in Lynton already lost our butchers, greengrocers, our banks, our police station, and our hospital. We learnt last week that our local scout group is being disbanded because of a lack of local children. If the trend to convert more properties into holiday homes continues, we will place under threat our pharmacy, school, and post office. Indeed, the whole economic core of our town will eventually be destroyed. We will end up being an empty ghost town. There must be legislation to allow planning authorities to limit the number of holiday homes in our towns and villages. As our local planning authority, we seek your support in lobbying central government to grant you planning powers to control the number of holiday homes. With ever decreasing numbers of hotels and guest houses, holiday homes which are occupied are needed to attract the tourists. Again, it is a matter of balance and what the correct balance is should we feel be left to the local planning authority, in conjunction with local Town and Parish Councils.</p>	<p>housing need at that time. This is now due to be updated. A scheme can, in principle, be permitted if a suitable site can be found.</p> <p>The Local Plan includes a policy for the conversion of holiday let conditions to local need affordable housing.</p> <p>The Plan's design policies do not prevent modern designs and a number have been permitted in the National Park. The supporting text says that innovative / contemporary design should be of the highest quality, respond to local character and fit in with its surroundings.</p> <p>The importance of digital communications for local communities and businesses is recognised. Local Plan policies are enabling telecommunications proposals to come forward and though it is understood that roll out has been challenging, there have been improvements on Exmoor following proactive working with other authorities.</p> <p>The NPA is not a housing authority and although it has a duty to local communities in meeting National Park statutory purposes, it does not have an economic development duty. Continued joint working is needed with Local Authorities within the Somerset and Devon parts of Exmoor as they have a specific</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>We are also concerned that Council Tax on unoccupied second homes should be reviewed and increased, an issue which we will be taking up with NDDC.</p> <p>Recent central government policy has seemingly penalised property owners who want to rent their properties to local workers. Interest income is no longer fully tax deductible, increased bureaucracy is hindering landlords. Policy needs to change so that it is an attractive option to convert existing holiday homes back to rented accommodation. Legislation which inhibits a switch from holiday homes to rental homes needs to be reviewed.</p> <p>We also want to support the idea of permitting some examples of quality modern architecture on Exmoor. This could enhance the appearance of the moor in situations where an existing isolated property needs to be demolished. Recent planning approvals seem to have shied away from permitting this type of modern house to be built. They are permitted in National Parks and AONB in the North of England and many are stunning to look at and blend in with their surroundings. It is these quality examples of modern architecture which will be the listed buildings of the future. We should be willing to experiment with initially just a very small number of modern design homes in appropriate locations on Exmoor; policy can then evolve depending on how these are received and accepted locally.</p> <p>We are also concerned that current policy is overly restrictive when it comes to supporting local initiatives which are supporting the local economy. By way of an example when we had discussions about increasing the height by just a few feet on the roof in the building which we wanted to convert into our business hub, our architect was told that this would not be possible because of planning restrictions. What is more important to us and indeed to Exmoor, having a vibrant economy or not allowing the height of a roof to be increased. Yes, it's a matter of priorities, however to us the priorities appear to be wrong.</p>	<p>economic / housing duty , including through Rural Enterprise Exmoor.</p> <p>Although the Local Plan/planning system does not have all the powers to deal with economic and housing issues, there are existing Local Plan policies which could enable, in principle, sympathetic kinds of development highlighted in your response. The NPA provides free pre-app advice for planning enquires.</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>We are still in a situation where there is not full mobile phone coverage in our area. Partly this is down to the restrictive planning regime. Such coverage is essential and again this is another example where the economic imperative must be treated as more important than blind adherence to historic planning rules.</p> <p>Lynton and Lynmouth Town Council is therefore arguing that a fundamental review of both the housing and economic parts of the current five-year plan is needed.</p>	

Question 46: The content of this survey has been structured around the three topics of housing and community, the environment and the economy. If you wish to provide comments on other areas of the Plan or wish to draw our attention to other evidence, please do so below. If you have no further comments to make, please indicate this by entering 'N/A' into the text box.

Table 2: Responses received to Question 46 of the Local Plan 5-Year Review Survey

Name/Organisation	Comments	ENPA Officer Response
<p>James Holbrook/ Somerset West and Taunton</p>	<p>Thank you for providing Somerset West and Taunton Council with the opportunity to comment on the three topic papers and Exmoor National Parks five year local plan review. SWT are keen to ensure that we continue to support each other in aligning evidence base and any joint work and hope that the comments, predominantly relating to Biodiversity Net Gain and phosphates are of benefit.</p>	<p>Noted and the comment on joint working is welcomed. ENPA and SWT will continue to work together on these topics and in relation to the Duty to Co-operate.</p>
<p>Michael Harrison</p>	<p>Related to Climate Change and policy CC-S1 is RT-S2 relating to the reinstatement of the Lynton & Barnstaple Railway. RT-S2 stipulates the conditions under which a reinstatement of the railway will be considered by ENPA. When one considers that this is relates to a coal fired steam railway (ie: extreme carbon emissions), it is remarkable that there is no stipulation within the RT-S2 policy that says the railway must demonstrate how it will adhere to the energy hierarchy described in CC-S1. I can only ask why this is the case?</p>	<p>The Plan contains Policy CC-S1 and other policies related to climate change. GP1 requires that opportunities must be taken to contribute to the sustainable development of the area. Particular attention will be paid to:</p>

Name/Organisation	Comments	ENPA Officer Response
		<ul style="list-style-type: none"> - using sustainable building techniques, materials and minimising energy use and waste; and - the needs of future generations through sustainability and resilience to climate change and adapting and mitigating the impacts of climate change. <p>While it is acknowledged that there is scope to strengthen Plan policies, it is considered that this does not trigger the need for a Local Plan review because existing policies provide the means to seek action on climate change. Material planning considerations can also be taken account of in relation to planning decisions e.g. national policy in the NPPF (Meeting the challenge of climate change flooding and coastal change)</p> <p>It is considered that more action is needed including updating the local list of validation requirements and producing further planning guidance. A report to the Authority on the Lynton & Barnstaple Railway considered climate change. It concluded that there would be an impact on climate as a result of the reinstatement of the railway. A condition was attached to the</p>

Name/Organisation	Comments	ENPA Officer Response
		permission requiring a carbon emissions plan to be submitted and approved prior to the operation of the railway commencing to demonstrate how the operation of the Lynton and Barnstaple Railway will become carbon neutral and reporting on measures to reduce carbon emissions.
Adrian Maunders	I welcome continued support for the re-instatement of the Lynton and Barnstaple Railway.	Noted
Sharon Hunt	Nice to be closer to family	Noted
Jo Dawson	Make life easier to live and survive by being able to make a decent living on Exmoor.	Noted
J Atherton	I have had the opportunity to amply express my views, thank you.	Noted
Lee Willox	your numbering system is out of sync when quoting the previous agree/disagree statements	Thank you for the feedback.
Gary Parsons/ Sport England	<p>Note an up to date playing pitch and built sports facilities strategy (carried out in accordance with a methodology approved by Sport England) https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=assessing_needs_and_playing_pitch_strategy_guidance</p> <p>By up to date Sport England means undertaken within the last 3 years for a Playing Pitch Strategy, and within the last 5 years for a Built Facilities Strategy.</p>	Noted
Roger Watts	<p>A group of the world’s top ecologists have issued a stark warning about the snowballing crisis caused by climate change, population growth, and unchecked development.</p> <p>“In the 1960s, humans took about three-quarters of what the planet could regenerate annually. By 2016 this rose to 170 percent, meaning that the planet cannot keep up with human demand, and we are running the world down.”</p>	Noted

Name/Organisation	Comments	ENPA Officer Response
	<p data-bbox="557 237 1559 341">https://e360.yale.edu/features/avoiding-a-ghastly-future-hard-truths-on-the-state-of-the-planet?fbclid=IwAR1z0S1iWqhRnDDogp2S9w4Gzuf-XzbCoyMstCqIVQZo-1wjze8rXIFpK-8</p> <p data-bbox="557 384 1559 592">Researchers and policymakers have been writing biodiversity action plans since the 1990s, and most of these strategies have failed to make a lasting impact on two of the three key demands: that global biodiversity be conserved and that natural resources be used sustainably. Some of these failures are to do with governance, which is why it is important to involve not just researchers in the biological sciences, but also people who study organizations and how governments work.”</p> <p data-bbox="557 635 1559 842">Governance of National Parks a good example. DEFRA is preoccupied with visitors. Access was at the heart of the 1940s model of national parks but this was a modest and small-scale version of worthy town dwellers getting a trip on the train for healthy days walking in the open-air. This has been transformed into a mega worldwide tourist industry with many actors including national and international companies.</p> <p data-bbox="557 885 1559 1054">Other parts of Government became involved in 1995 in pressing that in pursuing their primary objectives the National Parks “have regard to the economic and social well-being of local communities”. Sounds worthy enough, but in practice means much time and public money being channelled towards promotion of business and commerce.</p>	
<p data-bbox="203 1070 535 1129">Sophie Kendall/ Marine Management Organisation</p>	<p data-bbox="557 1070 1559 1098">All comments kept together to encapsulate prior sections of survey:</p> <p data-bbox="557 1141 1559 1375">All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South West Inshore and Offshore Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Since the ENPA Local Plan was published prior to the plan creation, it would be important to consider the South West Marine Plan within a review going forward.</p>	<p data-bbox="1581 1070 1659 1098">Noted</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>Although I cannot offer advice on how to use the marine plan, please feel free to contact me to discuss potential policies that may be of more relevance within the ENPA Local Plan. Alternatively, I will provide further clarification on the plan review.</p> <p>Thank you for giving us the opportunity to complete this survey.</p>	
<p>Sarah Buchanan/Brompton Regis PC</p>	<p>The loss of power, phones and internet communications to the houses and businesses in our parish during the consultation period highlights the fragility of these services. While those were extreme weather events it would seem possible that such events will increase in number and intensity as a consequence of climate change and its effects. The ENPA may wish to consider policies and other ways of supporting critical infrastructure.</p>	<p>Noted</p>
<p>Angela Percival</p>	<p>Covid has obviously stifled communication between people in person but I do think that talks given locally can really inspire people re conservation and diversity and recycling and buying local etc.</p> <p>Re housing, I do think that provision of small, simple eco/efficient homes maybe wooden/rustic for young people and others with low incomes would be a good way of keeping people here and giving them independence, rather than prioritising family homes, which are more expensive to provide and so less are provided.</p>	<p>Noted. Plan policies do enable timber eco efficient housing in principle where its design is appropriate to Exmoor.</p>
<p>George Curry/ Lyn Climate Action</p>	<p>Climate change mitigation and adaptation must be at the forefront of every policy and decision made by ENPA. ENPA has declared a climate emergency so all policies need to reflect the reality of that emergency.</p>	<p>Noted</p>
<p>Alex Skidmore, Highways Authority (Somerset County Council)</p>	<p>The Highway Authority would ask that the following comments and observations be taken into consideration:</p> <ul style="list-style-type: none"> • Suggested use of the word ‘cycle’ rather than ‘bicycle’ (AC-D3). Cycle is preferred, as this includes vehicles with more than two wheels such as nonstandard cycles which have been adapted for accessibility purposes, • Government policy (Department for Transport) puts a greater significance on active travel and segregated cycleways (Cycle Infrastructure Design (LTN 1/20) and Gear Change), as well as decarbonisation (Transport Decarbonisation Strategy). 	<p>These comments are noted and will be considered when the Local Plan is reviewed. They are not considered to trigger the need for review. ENPA will continue to work with the Highways Authorities and partners to support active travel, walking and cycling, and the provision of EV charge points.</p>

Name/Organisation	Comments	ENPA Officer Response
	<p>Work with local authorities to consider road space reallocation schemes where appropriate, for example Quiet Lanes. Acknowledgment that active travel needs to be balanced with public transport and car use in rural areas – strategic approach will be set out under Local Transport Plan,</p> <ul style="list-style-type: none"> • Local Cycling and Walking Infrastructure Plans (LCWIPs) will play an important role in strategic connectivity planning in rural areas. When planning new developments, active travel and public transport links need to be considered from the outset to reduce traffic impacts, • In reference to electric charging points, work with Local Authorities to ensure strategic delivery of assets which are standardised across Somerset (Somerset Electric Vehicle Strategy). • To include a requirement for EV charging facilities within the Parking Standards. 	
<p>Rebecca Tomalin/ Withypool and Hawkridge Parish Council</p>	<p>The Withypool & Hawkridge Parish Council would like to note that Planning Policies must be responsive to the housing, economic and environmental conditions at the time the application is made. These factors are constantly changing, as such the guidance and advice notes which support the Planning Policies should be suitably flexible to adapt to the evolving situation. These explanatory notes should be reviewed to ensure they are still appropriate and maintain the right balance between protecting the natural beauty, landscape and wildlife of the National Park whilst ensuring the sustainability and development of our local communities.</p>	<p>Noted. The NPA is working on and considering guidance to aid implementation of policies and to provide clear information and support local communities in ways which conserve and enhance Exmoor. Guidance would take account of the most up to date information available.</p>
<p>Rebecca Tomalin/ Exmoor Parish Council</p>	<p>The Exmoor Parish Council would like to note that they believe the advice and guidance notes which support the Planning Policies should be reviewed. This information should be appropriate for current conditions but should also be flexible such that it can be adapted for future requirements. Planning objectives can only be achieved if the Planning Policies are more responsive to the current housing and environmental situation which is constantly changing. This guidance and advice must reflect a balance between conserving the natural beauty and cultural heritage of the National Park and supporting the needs and aspirations of our local communities.</p>	<p>Noted. The NPA is working on and considering guidance to aid implementation of policies and to provide clear information and support local communities in ways which conserve and enhance Exmoor. Guidance would take account of the most up to date information available.</p>

Name/Organisation	Comments	ENPA Officer Response
<p>Rachel Thomas/ Exmoor Society</p>	<p>It is important that the Local Plan is read as a whole, particularly as this five year review has selected three important current issues only. National Parks are an exception in being responsible for the Local Plan which is the responsibility of the relevant Local Authority. National Park purposes are focussed on conservation of the natural and cultural assets of their area and people's understanding and diverse experiences of enjoying them. In this period of great transition and state of flux it is extremely difficult to predict the future especially as the purposes of national parks are under review with greater challenges of biodiversity loss and adapting to climate change. At the same time there are other national park values related to landscape character and quality, wildlife, and cultural heritage all of which include education, access, perceptual qualities and recreation that need to be enhanced. The present Exmoor Local Plan went through a long and thorough process of consultation, inspection, and changes to make sure that flexibility was built into it for which the planning team showed much insight. This, no doubt, will be needed in the future to retain Exmoor's unique special qualities.</p>	<p>Noted</p>