

EXMOOR NATIONAL PARK AUTHORITY

5 April 2016

SUBMISSION OF THE EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031 FOR EXAMINATION

Report of the Head of Planning and Sustainable Development

Purpose of the report: To present to Members the proposed changes to the Draft Local Plan for Submission and accompanying documentation.

RECOMMENDATIONS: The Authority is recommended to:

- (1) APPROVE the Schedule of Proposed Changes to the Draft Local Plan for Submission;
- (2) APPROVE the Duty to Co-operate Statement for Submission;
- (3) APPROVE the Regulation 22 Representations Statement for Submission;
- (4) NOTE the timetable for the Local Plan set out in the Local Development Scheme;
- (5) DELEGATE to the Chief Executive / Officers authority to:
 - (a) Make any factual corrections or updates to the Schedule of Proposed Changes, Duty to Co-operate Statement or Representations Statement prior to Submission;
 - (b) Represent the Authority at the Examination in Public;
 - (c) Agree through the Chairman and Deputy Chairman (Planning) any main modifications required as a result of the Examination to make the Local Plan sound; and
 - (d) Undertake the sustainability appraisal of any main modifications required and consult on these.

Authority Priority: *Achieve* by providing core services; getting best value from our resources, and improving our performance.

The Draft Local Plan for Submission shares the vision and objectives of the Exmoor National Park Partnership Plan and will assist with the delivery of many Partnership Plan targets.

Legal and Equality Implications: The National Park Authority has a statutory duty, as Planning Authority, to produce a Local Plan for the planning authority area. The Local Plan will form the development plan for the area of Exmoor National Park. The development plan guides and is the first consideration in determining planning applications for land use and development. Legally, planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework.

The Localism Act 2011 (Section 110) introduces the 'duty to cooperate' in relation to planning of sustainable development. This includes engaging constructively with neighbouring planning authorities and other interested bodies in relation to strategic matters in the preparation of development plan documents.

The equality impact of the recommendation(s) of this report has been assessed as follows: The Local Plan is subject to an equalities impact assessment as part of the sustainability appraisal. There are no equality impact considerations.

Consideration has been given to the provisions of the Human Rights Act 1998 and an assessment of the implications of the recommendation(s) of this report is as follows: Planning policies can have a considerable impact on an individual's ability to use their land and property and this may be considered to infringe human rights. In particular, in relation to Article 1 (Protection of Property) of Part II of the First Protocol, the policies of the Draft Local Plan for Submission are considered to be proportionate and control the use of land and property in accordance with the general public interest.

Financial and Risk Implications: The financial and risk implications of the recommendation(s) of this report have been assessed as follows: The production of the Local Plan through to adoption is a considerable project and involves related expenditure. Care is being taken to ensure that all procedures are followed and the evidence base is established to help minimise the risk that the Local Plan will be found unsound at Public Examination.

1. INTRODUCTION

- 1.1. Exmoor National Park Authority, as the Planning Authority for the area, has a statutory duty to prepare, monitor and review a Local Plan for Exmoor National Park. The Local Plan (once adopted), along with Neighbourhood Plans will form the statutory development plan for Exmoor National Park for 2011-2031, including for minerals and waste development. It contains both strategic planning policies and development management policies and takes forward the long term Vision and objectives set out in the Exmoor National Park Partnership Plan (the Management Plan). It has been developed on the basis of extensive consultation and a detailed evidence base, including working with neighbouring authorities in accordance with the Duty to Co-operate.
- 1.2. This report seeks approval from the Authority to submit the draft Local Plan and associated documents to the Secretary of State to commence the Local Plan Examination in Public process in accordance with section 20 of the Planning and Compulsory Purchase Act 2004.

2. PREPARATION OF THE EXMOOR NATIONAL PARK LOCAL PLAN

- 2.1. The Plan has been developed on the basis of extensive consultation and a detailed evidence base, including jointly commissioned studies with neighbouring authorities in accordance with the Duty to Co-operate. Members have been closely involved throughout the preparation of the Plan through the Local Plan Advisory Group who have considered the development of the draft Plan policies in detail and made recommendations to the Authority Committee for approval.

- 2.2. The policies in the Draft Local Plan are intended to ensure that Exmoor has a sustainable future, socially, economically and environmentally. Exmoor is a National Park and conserving and enhancing the high quality environment is an overriding statutory purpose.
- 2.3. The Plan promotes sustainable development which enables communities and businesses to thrive, whilst conserving and enhancing the National Park's special qualities through making the best use of existing land and buildings, focusing new development in settlements, encouraging high quality design and sustainable construction, and protecting the open countryside. The Plan has an emphasis on local needs affordable housing but also seeks to support the wider community through specialist housing, extended family housing, principal residence housing, rural workers housing and succession farming. The Plan also seeks to foster a diverse and resilient local economy through locally generated growth and sustainable development, giving flexibility for business development including home based businesses, agricultural and forestry development, and helping to ensure the roll-out of broadband and mobile phone infrastructure. In accordance with the National Park's statutory purposes, the Plan supports understanding and enjoyment of the National Park through providing for a range of holiday accommodation, safeguarding the rights of way and access network, and ensuring that development in relation to outdoor recreation activities is compatible with the quiet enjoyment of Exmoor's special qualities.

3. PROPOSED CHANGES TO THE PUBLICATION DRAFT LOCAL PLAN FOLLOWING CONSULTATION AND GOVERNMENT POLICY ANNOUNCEMENTS

- 3.1. The Publication draft Local Plan was approved at the Authority meeting on 24 March 2015 and went out to consultation from 15 June to 31st July 2015 (under sections 19/20 of the Town and Country Planning Regulations, 2012). In total there were 120 responses to the Publication Draft Local Plan consultation generating 394 separate comments; of these 181 comments raised concerns in relation to the Local Plan. A summary of the consultation comments was prepared by officers and the suggested response was agreed with members at a series of meetings of the Local Plan Advisory Group from November 2015 to March 2016 (Appendices 1a & 1b). These changes have been incorporated into the Schedule of Proposed Changes (see paragraph 3.4 below).
- 3.2. Since the Authority meeting in March 2015, a number of Government policy announcements have been made which are relevant to the Local Plan, including a Written Ministerial Statement 25 March 2015 which set out a range of measures including support for the provision of car parking, changes to Permitted Development Rights, changes to housing standards (subsequently set out in the National Space Standards and the Deregulation Act 2015). A Written Ministerial Statement on Wind Energy 18 June 2015 sets out two tests for proposals for wind turbines, that they are sited within suitable areas identified in Local Plans, and that there is demonstrable local support for them.
- 3.3. Further work on the evidence base underpinning the Plan has also been carried out including an updated Viability Study, updated Northern Peninsula Strategic Housing Market Assessment, updated Spatial Strategy Topic Paper, updated Employment Land Review and a Landscape Sensitivity Assessment for Wind and Solar Energy.

- 3.4. Suggested amendments to the draft Local Plan arising from the consultation responses, Government announcements and updated evidence base are set out in the Schedule of Proposed Changes (Appendix 2) for approval by the Authority. This will then be submitted alongside the Publication Draft Local Plan for consideration by the Inspector at the Examination in Public.
- 3.5. A successful legal challenge by Reading and West Berkshire Councils led to the Government quashing its decision to introduce thresholds on affordable housing provision through S106 agreements on sites of less than 10 dwellings (less than 5 dwellings within National Parks). As a consequence, it is proposed to remove from the draft Local Plan clause 4 in Policy HC-S1 Housing and accompanying text box on page 133, along with Policy HC-D6 on The Change of Use of Serviced Accommodation to Housing, as set out in the schedule of proposed changes. The Government has appealed against the court's ruling, and their appeal is currently being heard. If the decision is reversed and the S106 thresholds are reinstated, then these changes will not be made and the policies and text box will remain as set out in the Publication draft Local Plan.
- 3.6. There are also a number of national policy changes proposed through the Housing and Planning Bill and consultation on the National Planning Policy Framework (NPPF), although the exact nature of these changes will not be known until the legislation is passed and the updated NPPF is issued. This includes the Government's proposals for Starter Homes, and a definition of Exmoor Starter Homes has been drafted (following discussion with Local Plan Advisory Group Members) for inclusion in the Schedule of Proposed Changes¹ (or as a modification to the Plan) if necessary once the legislation is passed. An assessment of the implications of the Bill and other policy changes for the Local Plan will be made by officers once the details are confirmed and it may be necessary to propose other modifications to the Local Plan during the Examination (with the agreement of the Authority Chairman and Deputy Chairman (Planning)) to address these.

4. **REPRESENTATIONS STATEMENT (REGULATION 22 STATEMENT)**

- 4.1. A Representations Statement has been prepared in accordance with Regulation 22(1c) of the Town and Country Planning Regulations 2012 (see Appendix 3). This sets out how the Authority has involved the local community, stakeholders and statutory bodies in the development of the Exmoor National Park Local Plan. It explains how consultation has been carried out at key stages in the preparation of the Local Plan, in accordance with the Statement of Community Involvement, which methods of communication were used and how the responses received have influenced the preparation of the Local Plan. It also summarises key issues raised in relation to the stages of engagement and consultation through to the Publication Draft consultation (June-July 2015). This will help to demonstrate how these matters have been considered by the Authority and accounted for; illustrating that the consultation process has positively influenced the Local Plan.

¹ Schedule of Proposed Changes – reference number 157

5. DUTY TO CO-OPERATE

- 5.1. The duty to cooperate was established through the Localism Act 2011. This places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 5.2. The Authority has agreed an Exmoor-wide Duty to Co-operate Protocol (2015) with neighbouring planning authorities and other relevant bodies to guide co-operative working on strategic and cross-boundary issues affecting Exmoor. Regular DtC meetings are held at officer level to discuss such issues and input to Plan preparation including through commissioning joint evidence.
- 5.3. A Duty to Co-operate Statement was issued for consultation along with the Publication draft Local Plan. This has now been updated to reflect duty to co-operate activity since then, including updates to the Northern Peninsula Strategic Housing Market Assessment and officer discussions regarding a Joint Housing Topic Paper. The revised Duty to Co-operate Statement is given in Appendix 4. This will be submitted for Examination as part of the documentation to accompany the Local Plan.
- 5.4. A key issue for the Duty to Co-operate relates to housing provision. Members are aware that there has been ongoing discussion and correspondence with West Somerset Council and North Devon and Torridge Councils regarding the distribution of housing across the Housing Market Area. This has recently been discussed at the Examination hearings for the West Somerset Local Plan, at which officers presented Exmoor National Park Authority's position. The outcome of the Examination hearings was not known at the time of writing this report, an update will be provided at the Authority meeting if the Inspector's conclusions have been issued by that point. Any significant implications for the submission of the Exmoor National Park Local Plan arising from the West Somerset Local Plan Inspector's report will be brought back to Members at a subsequent meeting.

6. LOCAL DEVELOPMENT SCHEME

- 6.1. The timetable for the production of the Local Plan is specified in the Local Development Scheme on the Authority's [website](#) as set out in the table below:

| Milestone | Date |
|---|-------------------------------------|
| Preparation (Regulation 18) Draft Local Plan Consultation | Completed: November - December 2013 |
| Publication (Regulation 19) Draft Local Plan Consultation | Completed 15 June - 31 July 2015 |
| Submission (Regulation 22) of the Local Plan to the Secretary of State | Spring 2016* |

| Milestone | Date |
|---|----------------------|
| Examination of the Local Plan by an independent inspector (Regulation 24) | Summer/Autumn 2016** |
| Inspectors Report (Regulation 25) | Winter 2016/17** |
| Adoption of the Local Plan (Regulation 26) | Spring 2017*** |

* Indicative dates – timing dependent on the number and significance of consultation comments and whether further amendments and consultation are required

** Indicative dates – timing determined by the Planning Inspector

*** Indicative dates – timing dependent on the outcome of the public examination

7. DRAFT LOCAL PLAN FOR SUBMISSION

7.1. This Report seeks Members' approval to submit the draft Local Plan and associated documents to the Secretary of State to commence the Local Plan Examination in Public process. This comprises the following documents in accordance with Regulation 22 of the Town and Country Planning Regulations 2012:

- Publication draft Exmoor National Park Local Plan 2011-2031
- Policies Maps
- Schedule of Proposed Changes
- Representations Statement
- Sustainability Appraisal Report.

7.2. All the background documentation including evidence base studies, Authority Reports, details of Duty to Co-operate discussions and consultation responses will be made available for the Examination via the Authority's website.

8. LOCAL PLAN EXAMINATION

8.1. Once the Local plan is submitted, an Inspector will be appointed to conduct the Examination into legal compliance of the Local Plan, compliance with the Duty to Co-operate, and to test the soundness of the Plan. The tests of soundness are set out in the National Planning Policy Framework, and require the Plan to be positively prepared, justified, effective and consistent with national policy. A Programme Officer has been appointed who will support the Inspector in carrying out the Examination.

8.2. The Inspector will first address the legal compliance and Duty to Co-operate tests. Failure to comply with the Duty to Co-operate is not something that the Inspector can rectify through proposed modifications. If issues relating to the soundness of the Local Plan are identified through the Examination, then the Authority can propose main modifications to the Local Plan to address these. These will be included in the Inspector's report, and the Authority will then be required to carry out a sustainability appraisal and consult on the main modifications.

- 8.3. Delegated responsibility is sought for the Chief Executive / Officers to represent the Authority at the Examination in Public; to propose modifications that are considered to be necessary for the soundness of the Local Plan with the agreement of the Chairman and Deputy Chairman (Planning); and to carry out a sustainability appraisal and consult on the main modifications.

**Clare Reid, Ruth McArthur, Tessa Saunders (Policy/Community Team)
April 2016**

Background papers on which this report, or an important part of it are based, constitute the list of background papers required by Section 100 D (1) of the Local Government Act 1972 to be open to members of the public comprise:

Appendices

- Appendix 1: Summary of main consultation comments (Appendix 1a) and proposed Authority response, for Local Plan Advisory Group meeting 3 November 2015 (Appendix 1b)
- Appendix 2: Schedule of Proposed Changes
- Appendix 3: Representations Statement
- Appendix 4: Duty to Co-operate Statement

LPAG 3rd November 2015

ITEM 1A

The following table lists key respondents to the Plan who responded with a number of key comments. Those organisations which are signatories to the Exmoor National Park Duty to Cooperate Protocol are denoted by (DtC).

| Key issues raised by Respondents | |
|----------------------------------|--|
| Somerset County Council (DtC) | <p>Minor comments in relation to wording of supporting text and policies relating to minerals and waste – so that minerals and waste local plans are consistent.</p> <p>Plan makes no reference to the Noise Policy Statement of England 2010, which may benefit any intention to ensure development noise impacts are kept below the lowest observed adverse effect level (LOAE) in regions of valued tranquillity (CC-S7 Pollution).</p> |
| Devon County Council (DtC) | <p>A number of comments received including supporting statements for minerals and waste policies. Other comments raising some concerns include:</p> <ul style="list-style-type: none"> • In terms of planning contributions, Combe Martin primary school is noted as nearing capacity and contributions towards education provision may need to be sought if any significant growth is proposed within the school catchment. If a significant need arises from housing development in and around Lynton, developer contributions may be sought towards library provision. • Retaining or replacing like for like street furniture may be challenging in their current/future funding and maintenance policy context • Considered that 'local freight routes' may not be suitable for 'local access only' as A and B roads in the Park are important for local freight movements - suggest this is clarified to ensure local access is encouraged but not fully restricted to just local access. • Suggest that policy AC-S3 incorporates text in 9.24 relating to the principle of avoiding adverse impacts from parking on the highway. |
| North Devon Council (DtC) | <p>Clarification regarding the wording of some of the policies in the Plan – regarding the association with certain clauses (HC-S1 Housing, HC-S2 A Balanced Local Housing Stock, RT-S1 Recreation and Tourism, RT-D2 Staff Accommodation, RT-D6 Camping Barns, CC-D1 Flood Risk, AC-S3 Traffic Management and Parking).</p> <p>Include reference to the Biosphere Reserve in the text relating to international and national wildlife designations.</p> |

| Key issues raised by Respondents | |
|---|--|
| | Minerals Safeguarding Areas should be shown on the Policies Maps. |
| Natural England (DtC) | No further comment on the Plan. |
| Historic England (DtC) | A number of supportive comments received, and some minor amendments suggested to policies in relation to the protection of the historic environment. |
| Environment Agency (DtC) | Some minor amendments suggested to policies in relation to section 5 Responding to Climate Change and monitoring indicators. |
| Homes and Building Federation | <p>Query in relation to the OAHN – the selection of a preferred OAHN at the lower end of the range is considered questionable (identified in the Housing Topic Paper), and querying how this figure was derived. The unresolved matter of unmet housing need should be agreed before submission.</p> <p>Other comments include:</p> <ul style="list-style-type: none"> • Query in relation to whether National Space Standards will be adopted (all policies where 90sqm internal floor space is stated). • Whether the pooling restrictions for S106 planning obligations have been considered. • Query regarding car parking standards and if the approach is consistent with updated national guidance. • Concern regarding precedence of the Lynton & Lynmouth Neighbourhood Plan and these should not usurp the strategic policies in the Plan. |
| South West HARP (Housing Associations and Registered Providers) Planning Consortium | <p>HC-D3 Specialist Housing for Exmoor’s Communities - criterion 1.a) (a sequential approach to consider other opportunities) is considered to be unnecessarily restrictive given the large proportion of elderly people within the National Park.</p> <p>Councils across the North Devon Peninsula Housing Market Area have failed to demonstrate how the Objectively Assessed Housing Need (OAHN) has been derived. The March 2015 SHMA unfortunately does not reflect release of the 2012-based household projections from February 2015 to be in accordance with planning practice guidance.</p> <p>Up to date assessments of viability in relation to the policy approach in the Plan are important considerations.</p> |
| Exmoor Uprising | A number of comments and evidence of previous correspondence with ENPA were submitted in relation to the approach to housing in the open countryside proposed by Exmoor Uprising. |

| Key issues raised by Respondents | |
|----------------------------------|--|
| | <ul style="list-style-type: none"> • Concerned that local people, and their important rural skills, that help conserve and enhance Exmoor, will be lost unless affordable homes can be provided at low cost in locations outside the named settlements which help to sustain family and employment networks. • Concerned that plots for self build homes will not be affordable to local people, and other small communities (other than rural communities with a one service) should be considered as locations for self build as they give and receive services too. • Potential solutions to providing low cost affordable housing for local people which includes: wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves. |
| Business Exmoor | <p>A number of concerns were raised throughout the Local Plan including:</p> <ul style="list-style-type: none"> • Plan should be encouraging of inward migration and skills – it is considered to restrict rather than enable development. Comments seek to relax the criteria for employment development and encourage housing to meet business needs. • All policy references to small scale should be deleted (including in relation to renewable energy). • 90sqm limit for affordable housing and rural worker homes is considered to be restrictive and prevent delivery and/or live-work provision. • Land for housing should be allocated to enable settlements to remain viable. • Affordable housing provision should not be sought through conversions of existing buildings within settlements and in the open countryside. • Seek to delete policies for principal residence housing and extended family dwellings. • Seek to enable new build business development in the open countryside. • Extensions to dwellings for home based businesses should not correspond to the residential extensions policy. • Delete policy criteria that aim to manage issues regarding isolated agricultural buildings. |
| Woodland Trust | <p>Would like to see a separate policy relating to ancient woodland and veteran trees.</p> |

| Key issues raised by Respondents | |
|---|--|
| | Consider that policy CC-S1 Climate Change Mitigation and Adaptation should specifically reference the benefits trees and woodlands can provide in terms of improving water quality and reducing flood risk. |
| National Trust | <p>Further consideration recommended to be given to the local context and potential for development to harm the National Park - in relation to the supporting text to GP2 Major Development.</p> <p>Policies CE-S1, CE-D1 and CC-S2 relating to landscape and seascape character and coastal development are considered unsound – further cross-referencing needed between the policies to ensure the protection of the Heritage Coast including reference to the emerging Seascape Assessment.</p> <p>Criterion 4 of the policy should require a systematic approach to the assessment of the impact of development proposals on the setting of heritage assets (CE-S4 Cultural Heritage & Historic Environment).</p> |
| Lynton & Lynmouth Town Council | Request the designation of a Coastal Change Management Area in Lynmouth. |
| Monksilver Parish Council | Support the delivery of affordable housing for local people in housing need, but consider that the 90sqm threshold does not adequately meet the space requirements for larger families needing affordable housing. |
| Nigel Furze | Opposes the Local Plan approach to business in the open countryside. Considers that the Plan should allow for redevelopment of brownfield land for business use - specifically in the case of camping barns. Concerned that brownfield sites in the open countryside could have a negative visual amenity impact if neglected. |
| Representatives from Exmoor Rivers and Streams Strategic Overview Group | <p>Concern raised in relation to the absence of the biodiversity importance of rivers and streams in the Plan.</p> <p>Main concern is the links between protection of priority species and habitats and the planning system which is not conveyed - need further clarity relating to how these species and habitats will be considered in practice.</p> <p>Further information relating to hydropower required – in relation to that available on the National Park website.</p> |
| Richard Briden | <p>The following points were raised:</p> <ul style="list-style-type: none"> Concern that the policy encourages homes that would have little or no resale value (HC-D5 Custom/Self Build Local Need Housing in Rural Communities) – such dwellings should have no occupancy ties. |

| Key issues raised by Respondents | |
|---|--|
| | <ul style="list-style-type: none"> • No opportunity has been taken to restrict the number of second/holiday homes using a park-wide Article 4 direction. • Concern that finance will not be available for principal residence dwellings • The approach to the change of use of guesthouses/hotels and the subdivision of existing dwellings is questioned, as change of use requires the provision of affordable housing and units created through subdivision of dwellings would be principal residence housing. • Considers that the policy to safeguard serviced accommodation would oblige owners to enter into an illegal contract to sell the property which owners have no intention of fulfilling – policy should be more flexible in terms of those hotels/guesthouses that are only open 6/7 months a year. |
| The Crown Estate (TCE) | <p>TCE submitted a range of comments in relation to the Local Plan including a number of supportive comments. Those that raise key concerns include:</p> <ul style="list-style-type: none"> • Consider that Withycombe is worthy of inclusion as a Village within the hierarchy. • In relation to GP5 Securing Planning Benefits – Planning Obligations, the type of development that would require a CIL payment or level of charge that would be incurred is not included. There is a need for a charging schedule. • Policy restrictions (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings) are too strict and likely to stifle development that would allow for the preservation and enhancement of traditional buildings – particularly in relation to the provision of affordable homes. • HC-D5 Custom/Self Build Housing for Exmoor’s Communities - TCE recognise the need for a local occupancy tie but considers that the condition that they must be affordable units is too restrictive would decrease the value of the asset - tie should be removed and provide for affordable homes at another site. • TCE consider that the costs of conversion in the open countryside would mean the conversion to an affordable home would be unviable. • Succession farm dwellings are likely to prove unviable without some form of cross subsidy from market housing. • TCE would encourage the amendment of the policy for business development in the open countryside so it is less restrictive by not constraining new build to solely within Local Service Centres and Villages - to enable strong rural communities. • Policy for home-based businesses should provide scope for the conversion of rural buildings to live-work units to offer a |

| Key issues raised by Respondents | |
|--|---|
| | range of benefits to the economy and environment, and reduce the need to travel by car. |
| Four individual responses raise a number of collective issues. | <p>Regarding the safeguarding of former railway lines and reinstatement of the Lynton & Barnstaple Railway several concerns are raised in relation to:</p> <ul style="list-style-type: none"> • Viability – misuse of public and private funds • Speculative tourist attraction • Not an effective transport system – not sustainable • Topographical and flood risk challenges • Safety standards • Impacts on western gateway to the National Park • Impacts of farming practices • Impacts on local amenity regarding noise, smell etc. • Impacts on protected species • Safeguard the existing line as a heritage asset • No suitable access or parking infrastructure in Parracombe |
| National Grid | <p>Plan is not consistent with national policy in relation to policy AC-S4 Electricity and Communications Networks, as it contradicts National Policy Statement EN1 and NPPF para. 116 where major infrastructure may be granted in protected landscapes in exceptional circumstances.</p> <p>Plan is not consistent with national policy in relation to policy AC-D6 Fixed Line Transmission Infrastructure, as it contradicts National Policy Statements EN1 and EN5 where there is no general rule about when an overhead line should be considered unacceptable.</p> |
| Western Power | <p>Requirements of AC-S4 Electricity and Communications Networks, must be considered alongside legal obligations to offer economic connections and operate an economic and efficient network.</p> <p>Requirements of AC-D6 Fixed Line Transmission Infrastructure, must be considered alongside legal obligations to offer economic connections and operate an economic and efficient network.</p> |

ITEM 1B: PUBLICATION DRAFT LOCAL PLAN CONSULTATION RESPONSES

Summary of Publication Draft Local Plan consultation regarding those representations considered to be raising key concerns and our proposed response.

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|--|---|---|
| Whole Plan | | |
| The plan is felt to be unnecessarily prescriptive, very long and difficult to follow and apply and is considered to restrict rather than enable development. | | The Plan incorporates both strategic policies (previously incorporated within Regional Planning Guidance [regional spatial plans] and structure plans, and development management policies). NO CHANGE REQUIRED |
| The words 'small scale' throughout the plan is contrary to the NPPF and is recommended to be deleted where they relate to a policy context. | | The words 'small-scale' are used to ensure that development does not have unacceptable adverse impacts on the natural beauty, wildlife and cultural heritage of the National Park; whilst ensuring that policies are flexible to enable local communities and businesses to thrive. |
| Concern over whether the Local Plan could override the statutory purposes of the National Park and how this could be reconciled. | | Policy GP1 is the overarching policy for the Local Plan, bringing the statutory purposes and sustainable development principles together to ensure that new development is consistent with National Park purposes and defining sustainable development in the National Park. NO CHANGE REQUIRED |
| 1. Introduction | | |
| No key issues to consider. | | Minor amendments only. |
| 2. Vision, Objectives and Strategic Priorities | | |
| Whole section (page 8) | Suggestion that additional wording is added to apply a presumption in favour of sustainable development as contained in the NPPF. | The 'presumption in favour of sustainable development' is set out in the NPPF (para. 14) and therefore is a material consideration in planning decisions. There is no longer a requirement for Local Plans to include this presumption. NO CHANGE REQUIRED |

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|--|--|--|
| 3. General Policies | | |
| Whole section (page 14) | Reference to historic environment would be more appropriate than the broad term cultural heritage - to ensure consistency with the NPPF. | It is noted that the term historic environment should be clearly explained in the context of 'cultural heritage' - this will be explained in relation to policy GP1 National Park Purposes and Sustainable Development Principles. The term 'cultural heritage' will be included in the glossary, linking with the historic environment. |
| GP1 National Park Purposes And Sustainable Development (page 18) | Reference to enabling businesses to grow and develop. | GP1 criterion 3c includes reference to strengthening employment opportunities. SE-S1 A Sustainable Exmoor Economy is the strategic policy for business development and encourages economic development, including the growth of existing businesses where it will not have an adverse impact on the National Park. Strategic Priority 3 is also relevant. NO CHANGE REQUIRED |
| GP2 - Major Development (page 20) | Supporting text not NPPF compliant. | The supporting text to GP2 provides additional clarification to define the term major development within National Parks as set out in para 116 of the NPPF. The NPPF does not define 'major development' in this context. The text is based on evidence arising from case history. NO CHANGE REQUIRED |
| | Further consideration recommended to be given to the local context and potential for development to harm the National Park. | It is considered that the suggested amendment to paragraph 3.26 to provide clarification to major development in a 'local context' and 'the potential impacts on the National Park' is helpful and similar wording will be incorporated. |
| GP3 - Spatial Strategy (page 26) | Concern that development will be channelled from Villages to Local Service Centres which may be counter to the intentions of establishing National Parks and ultra vires. Modifications seek to delete 'service centres' | The policy approach in policy GP3 Spatial Strategy is exactly the same for Local Service Centres and Villages. Paragraph 3.39 explains that development should be of a scale that does not harm their form, setting or character – consistent with clause 2 of GP3 spatial Strategy. The term 'Local Service Centres' is considered to reflect the |

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|---|--|---|
| | and describe them as 'attractive small historic towns'. | role of Dulverton, Lynton & Lynmouth and Porlock in the National Park context. NO CHANGE REQUIRED |
| | The final criterion of GP3 should not refer to rural land-based businesses but all types of business in rural areas [including new build]. | New build business development is considered to be more suitable in sustainable locations identified in the spatial strategy as Local Service Centres, Villages and Porlock Weir. The Plan provides flexibility for new buildings within the curtilage of dwellings to meet the needs of home-based businesses. NO CHANGE REQUIRED |
| | Suggestion that Withycombe is worthy of inclusion as a Village within the hierarchy. | The Settlement Hierarchy Technical Paper 2015 shows that Withycombe, like many other small communities on Exmoor has relatively few local services, and in addition to this, only a very small proportion of the settlement lies within the National Park boundary. The remainder of the settlement lies within West Somerset local planning authority area and is not recognised as an identified settlement within their Publication Draft Local Plan. However, clause 3d of policy GP3 Spatial Strategy does provide opportunities for self-build local affordable housing in sustainable locations and references policy HC-D5 Custom/Self Build Housing in Rural Communities accordingly. NO CHANGE REQUIRED |
| GP5 - Securing Planning Benefits - | By deciding not to have a CIL the implications of pooling restrictions on Section 106 contributions should be considered. | Consideration will be given to the need to provide more detailed S106 schedules for specific projects to address the pooling issue. |

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|---|---|--|
| Planning Obligations (page 30) | Policy is vague and the potential for a cross boundary approach has not been explored. The policy little information on the type of development that would require a CIL payment or level of charge that would be incurred. | The current intention is not to have a CIL as the Infrastructure Delivery Plan does not identify any particular infrastructure needs to be funded over the Plan period. The policy provides the flexibility to review the need for CIL subject to changing circumstances. The main financial contributions from development will be required for affordable housing where in exceptional circumstances, it cannot be feasibly provided on site. Further guidance will be provided in the forthcoming Housing supplementary planning document (SPD). NO CHANGE REQUIRED |
| | Contributions towards education provision may need to be sought for Combe Martin primary school. | It is considered unlikely that level of development in the Combe Martin primary school catchment area of the National Park would trigger such a contribution. NO CHANGE REQUIRED |
| 4. Conserving and Enhancing Exmoor | | |
| CE-S1 - Landscape Character (page 37) | As the settlements have no development boundaries there are implications for the protection of the undeveloped coast which are solely reliant on policy CE-D1 | Policy GP3 Spatial Strategy ensures that new development within or well related to settlements is of a scale proportionate to the settlement size and positively responds to surrounding landscape character, settlement form and pattern. A reference to policy CE-D1 Protecting Exmoor's Landscapes and Seascapes will be included in paragraph 4.15 as an 'additional modification'. |
| CE-D1 - Protecting Exmoor's Landscapes and Seascapes (page 38) | Seascape should be included in the plan objectives and the seascape character assessment commissioned by key partners should be referenced through CE-S1. | The Seascape Character Assessment has only been recently commissioned and is not in a form which can be accurately referenced or provide evidence to inform the policy approach. ¹ However as the National Park Authority is a key partner in commissioning this assessment it would be prudent to include the term 'seascape' within the title of policy CE-S1, and to reference any |

¹ March 2016 Update: The North Devon and Exmoor Seascape Character Assessment has been published

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | | extant Seascape Character Assessment in clause 2 of the policy - as an 'additional modification'. |
| CE-S3 - Biodiversity And Green Infrastructure (page 51) | Concern raised in relation to the absence of the biodiversity importance of rivers and streams in the Plan. | Rivers are identified as a Priority Freshwater Habitat in Table 4.1 Exmoor's Priority Habitats, of which there are 29 priority habitats in total. The supporting text also references the Exmoor Wildlife Research and Monitoring Framework which lists Exmoor's priority habitats and species. Consideration will be given to whether additional text is required regarding rivers and streams. |
| | Given the importance of trees and woodlands a separate policy for trees and woods is suggested. | Policy CE-S3 Biodiversity and Green Infrastructure is considered to adequately afford a high level of protection to these biodiversity assets within clause 3 specifically and paras 4.49-50 and 4.64. NO CHANGE REQUIRED |
| | Main concern is the links between protection of priority species and habitats and the planning system which is not conveyed - need further clarity relating to how these species and habitats will be considered in practice. | It is noted that further clarity may be required to enable planning proposals to have adequate regard to priority habitats and species in the National Park, with reference to advice on our website about the wildlife checklist and how to fill it in. |
| CE-S4 - Cultural Heritage And Historic Environment (page 57) | Criterion 4 of the policy should require a systematic approach to the assessment of the impact of development proposals on the setting of heritage assets. | Policy CE-D3 Conserving Heritage Assets specifically has regard to the setting of heritage assets in clause 3. The Historic England good practice advice note relating to the setting of heritage assets is referenced in the supporting text. It is considered that this could be more specific and the text suggested by the Trust could be reflected in the supporting text (paras. 4.107 - 4.110). |
| CE-S5 - Principles For The Conversion Or Structural Alteration Of Existing Buildings | Restrictions are too strict and likely to stifle development that would allow for the preservation and enhancement of traditional buildings. It is important that the long term viability of these buildings is secured through | The policy sets out the key principles relating to the conversion or structural alteration of existing buildings but the use of such buildings is determined by other policies in the Plan. It is clear that the expectation in national policy specifically for National Parks is that new housing should be focused on affordable |

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| (page 65) Also relevant to HC-D7 Conversions to Dwellings in the Open Countryside (page 157) | conversion to an alternative use (specific reference to conversions to dwellings and NPPF isolated homes in the open countryside). | housing needs. Policy HC-D7 Conversions to Dwellings in the Open Countryside ensures that existing buildings in the most sustainable locations are an important resource which can be utilised to provide for the housing needs of Exmoor's communities through the provision of local affordable housing, extended family dwellings, rural worker dwellings or succession farm dwellings. It is not considered appropriate to provide for open market dwellings in the open countryside when the priority is addressing the housing needs of local people. Local need affordable homes in the open countryside have been delivered through adopted Local Plan policies. |
| CE-S6 - Design & Sustainable Construction Principles (page 71) | Criterion 2 of policy CE-S6 should clarify how a developer should demonstrate a reduction in carbon emissions. | It is considered that the word 'demonstrate' may require more detailed guidance and consideration in relation to the sub-clause 2.b) to reduce carbon emissions, which would not be appropriate to include in the Local Plan. Further consideration needs to be given to the Deregulation Act 2015 which has the intended consequence that additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings cannot be applied. The policy will need to be amended to reflect this change. |
| CE-D5 - Advertisements and Private Road Signs (page 74) | Some concern regarding whether there are sufficient controls in the policy in relation to signage in the open countryside. | The policy intends to ensure that the impact of advertisements and private roads signs is minimised. Clause 1.c) has particular regard to any individual, cumulative, or sequential impact on landscape character and local distinctiveness of the area. Furthermore, policies that seek to conserve and enhance landscape will also to apply to any proposals. NO CHANGE REQUIRED |
| CE-S7 - Small Scale Working Or Re-Working For | Criterion 1.f) (can be sourced locally elsewhere) should be deleted as it would be inconsistent with the policy enabling the use of locally sourced materials. | This criterion ensures that where there are existing quarries close to the National Park boundary that may provide a 'locally distinctive' source of stone that is similar geologically to the area where it is required; a sequential approach would be a more sustainable and |

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| Building And Roofing Stone (page 77) | | suitable alternative to working a new small scale quarry within the Park. NO CHANGE REQUIRED |
| CE-S8 - Minerals Safeguarding Areas (page 78) | The extent of safeguarded areas needs to be shown more clearly on the Policies Map. | Policy considerations regarding minerals safeguarding areas will need further discussion. ² |
| CE-S9 - Major Mineral Extraction (page 79) | It is requested that text is included to ensure fracking of any scale would not be permitted within the National Park. | Regulations preclude any fracking operations within National Parks to the depth of 1200m. However, as research is ongoing in this field it would be prudent to include mineral exploration in the supporting text (para. 4.177) and in policy CE-S9 Major Mineral Extraction. Para. 4.177 will be moved to immediately precede policy CE-S9. ³ |
| 5. Responding to Climate Change | | |
| CC-S2 - Coastal Development (page 89) | As the settlements have no development boundaries there are implications for the protection of the undeveloped coast which are solely reliant on policy CE-D1 which is not cross-referenced in para. 5.31 relating to the undeveloped coast and policy CC-S2. | A reference to policy CE-D1 Protecting Exmoor's Landscapes and Seascapes will be included in paragraph 5.32 as an 'additional modification'. |
| CC-S3 - Porlock Weir Coastal Change Management Area (page 91) | Request to include Lynmouth within policy CC-S3 and the designation of a coastal change management area (CCMA) following impacts of 2013/14 floods. | A CCMA has been designated in Porlock Weir in response to the North Devon & Somerset Shoreline Management Plan for Hartland Point to Anchor Head which changes the coastal policy from a 'Hold the Line' policy to 'No Active Intervention' which implies that assets at Porlock Weir would become at risk of flooding and erosion. However the SMP continues a 'Hold the Line' policy at Lynmouth, implying that the defences will be maintained and eventually |

² March 2016 Update: Policy CE-S8 Minerals Safeguarding Areas is proposed to be deleted (see Schedule of Proposed Changes for justification)

³ March 2016 Update: Policy CE-S9 Major Mineral Extraction is proposed to be amended to Policy CE-S9 Minerals Development (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | | replaced with larger structures to continue to provide protection to Lynmouth (see para. 5.37). The Authority has not designated a CCMA at Lynmouth due to this long term policy approach. NO CHANGE REQUIRED |
| CC-S5 - Low Carbon And Renewable Energy Development (page 102) | The test for large scale renewable energy should be deleted and the word small scale removed from the policy. | For the avoidance of doubt is it considered necessary to include clause 2 and the words 'small-scale' in clause 1 (defined in paragraph 5.62) so the policy intention is clear to ensure such development will not result in significant environmental harm. |
| | Text in the Plan does not differentiate between hydro schemes on main rivers and those on streams. | Noted - reference will be made in para 5.65 to detailed guidance available on the website regarding hydropower at http://www.exmoor-nationalpark.gov.uk/planning/planning-advice/hydropower |
| | Support subject to referring to a maximum height for wind turbines in the supporting text - the test in the policy is unnecessary if all other criteria are satisfied. | This policy has been extensively debated by Officers and Members and it is felt that criterion 1.a) is essential to the policy reflecting the maximum height of wind turbines permitted to date which have reference to existing vertical features. |
| CC-S6 - Waste Management (page 109) | The restriction of allowable sources of waste for anaerobic digestion from local sources is unworkable and would restrict the viability of such schemes. | The policy was amended following the Draft Local Plan consultation to provide flexibility regarding the area where feedstock for anaerobic digesters can be sourced extending to the whole of the National Park and parishes adjoining the National Park. Having no restrictions in place may result in adverse traffic safety and environmental issues. NO CHANGE REQUIRED |
| CC-S7 – Pollution (page 118) | Plan makes no reference to the Noise Policy Statement of England 2010, which may benefit any intention to ensure development noise impacts are kept below the lowest observed adverse effect level (LOAE) in regions of valued tranquillity. | AGREE to include reference to the Noise Policy Statement of England 2010 and consider whether to insert text to ensure that the protection of areas valued for their tranquillity that noise impacts do not exceed the lowest observed adverse effect level to ensure that the effects of noise are not intrusive and do not adversely impact on behaviour or attitude of individuals. |

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| 6. Achieving a Thriving Community (Housing) | | |
| Housing topic paper (supporting evidence) | The 2011 Housing Viability Assessment is considered to be out of date and contrary to the NPPF (para.158). Up to date assessments of viability in relation to the policy approach in the Plan are important considerations. | It is recognised that viability data relating to housing provision in the National Park will require updating and further evidence will be sought. ⁴ |
| | The selection of a preferred Objectively Assessed Housing Need (OAHN) at the lower end of the range is questionable and its derivation is not clear. Unresolved matter of unmet housing needs should be agreed prior to submission. | Reiterate the justification for the preferred OAHN. Further clarification regarding the derivation of the OAHN will be set out in the Housing Topic Paper and the Joint Housing Topic Paper with North Devon, Torridge and West Somerset councils, which will demonstrate that the housing needs of the Housing Market Area will be met. ⁵ |
| | The March 2015 SHMA unfortunately does not reflect release of the 2012-based household projections from February 2015 to be in accordance with planning practice guidance. | Further evidence has been commissioned in relation to the 2012 household projections released in February 2015. Consideration will be given to whether there are impacts on the OAHN for the Northern Peninsula Housing Market Area in the Housing Topic Paper and the Joint Housing Topic Paper with North Devon, Torridge and West Somerset councils. ⁶ |
| Housing section | Include a further policy within the Local Plan which would provide greater flexibility for | Policies within the Plan enable the provision of homes in the open countryside to meet the needs of rural working communities through |

⁴ March 2016 Update: An Exmoor Viability Assessment was commissioned and will be published by the submission date of the Local Plan. The conclusion shows that the housing policies in the plan are deliverable.

⁵ March 2016 Update: The SHMA Review assessing the implications of the 2012 Household Projections has enabled a demographic starting point for the OAHN to be assessed. The West Somerset Local Plan examination has taken place which included consideration of the OAHN across the housing market area. The Inspector's report is awaited.

⁶ March 2016 Update: The Northern Peninsula SHMA Review on the implications of the 2012 Household Projections was published in December 2015.

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | legitimate local needs or local low paid working people with regard to new dwellings where they are located beside or near permanent buildings. | the conversion of existing buildings on farmsteads and in hamlets to local affordable homes, rural workers dwellings or succession farm dwellings - additionally the conversion of existing buildings on farmsteads to extended family dwellings. Options are also available for new build homes for rural workers, succession farm dwellings on farmsteads, and local affordable homes in small rural communities that have at least one service (a shop, pub or community meeting place). |
| Objections to policies relating to 90sqm thresholds including: HC-S2, HC-D2, HC-D3, HC-D5 HC-D6, HC-D9 HC-D10, HC-D15, and HC-D17. | It is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy. | The Authority will consider the implications of the Technical Housing Standards - nationally described space standards included in the Planning Practice Guidance from March 2015. ⁷ |
| | The 90sqm floorspace limit is unnecessarily restrictive and will prevent local affordable housing from being delivered or opportunities for live-work provision. | No evidence is provided to substantiate this assertion. Housing with a 90sqm net internal floorspace has been delivered since 2005 within the National Park. Additional outbuildings are considered to be suitable to provide storage / space for business needs. The Authority will consider the implications of the Technical Housing Standards - nationally described space standards. ⁸ |

⁷ March 2016 Update: The Technical Housing Standards - nationally described space standards are proposed to be included within policy HC-S2 A Balanced Local Housing Stock (see Schedule of Proposed Changes for justification) – these have been subject to viability testing.

⁸ March 2016 Update: 90sqm is proposed to be amended to 93sqm to be consistent with the Technical Housing Standards - nationally described space standards (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | Concern regarding the 90sqm threshold for affordable housing due to this not adequately meeting the space needs for larger families needing affordable housing | Housing controlled by Registered Providers can be larger than 90sqm to provide for larger families in housing need. ⁹ |
| HC-S1 – Housing (page 132) | Policy should allow for housing land to be allocated to enable settlements to remain viable and where there is a need for housing to meet employment demands. | The Employment Land Review 2009 suggests that additional housing does not need to be specifically planned for to meet future employment demands. The focus on the delivery of local need affordable homes through a rural exception site approach will help to ensure that younger people can continue to live and work on Exmoor. NO CHANGE REQUIRED |
| | Concern about the deliverability of the policy – need to allow a proportion of non-affordable housing to be provided to achieve a viable development scheme. | The policy provides flexibility to enable the delivery of local affordable homes through the provision of principal residence market housing (clause 3). Further detail is set out in policy HC-D2 New Build Dwellings in Settlements. NO CHANGE REQUIRED |
| HC-S3 - Local Occupancy Criteria (page 139) | Local connection criteria are unnecessarily restrictive and the policy should allow for those moving to the area to take up employment or set up a business. | The local connection criteria have been supported throughout the preparation of the Local Plan. Clause 1.e) includes those in affordable housing need who need to live close to their place of work or meet the requirements of an Exmoor Worker. NO CHANGE REQUIRED |
| HC-S4 - Principal Residence Housing (page 140) | Concern that finance will not be obtainable for homes with a principal residence condition. | Noted - principal residence homes can be owned by anyone, the only restriction is that they must be occupied as someone's principal (main) residence - this only prevents the dwelling being used as a holiday or second home. It is considered that this should not unduly prevent mortgages being secured on such dwellings. |

⁹ March 2016 Update: 90sqm is proposed to be amended to 93sqm to be consistent with the Technical Housing Standards - nationally described space standards (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | Delete policy HC-S4 which is considered to conflict with the NPPF through use of principal residence conditions. | It is not considered that policy HC-S4 conflicts with the NPPF. The particular circumstances within the National Park; that 19.2 % of all dwellings have 'no usual residents' (approximately 16% second/holiday homes), is considered to be reasonable justification for introducing this policy approach. |
| HC-D1 - Conversions to Dwellings in Settlements (page 143) | Delete criteria from 1.c) to the end of the policy as it is considered to conflict with the NPPF in relation to the change of use of buildings to dwellings. | The policy has been prepared in accordance with the NPPF, and in relation to the specific needs identified within the National Park. The key aim is to maximise the use of existing buildings in addressing the housing needs of Exmoor's communities. NO CHANGE REQUIRED |
| HC-D3 - Specialist Housing for Exmoor's Communities (page 150) | Criterion 1.a) (a sequential approach to consider other opportunities) is considered to be unnecessarily restrictive given the large proportion of elderly people within the National Park. | Noted - this clause is intended to ensure that applicants consider the options for achieving specialist housing needs before considering a new scheme. NO CHANGE REQUIRED ¹⁰ |
| HC-D4 - Extended Family Dwellings Criteria (page 151) | Suggest the policy is deleted as it is not considered to be consistent with the NPPF. | It is considered that the policy does not conflict with the NPPF. The policy has been prepared in accordance with the NPPF, and in relation to the specific needs identified within the National Park. The key aim is to maximise the use of existing buildings in addressing the housing needs of Exmoor's communities, including the needs of local families. NO CHANGE REQUIRED |
| HC-D5 - Custom/Self Build Local Need Housing | Concern that the policy encourages homes that would have little or no resale value and therefore seek to modify the policy so self-build homes are exempt from affordable and principal residence housing conditions. | The rural exception site approach to new build local affordable housing across the National Park is intended to keep land values low so that homes can remain affordable to local people in housing need in perpetuity. The value will also be reduced to a certain extent due |

¹⁰ March 2016 Update: this clause is proposed to be deleted and the policy updated to refer to accessible and adaptable homes (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| in Rural Communities ¹¹ (page 153) | | to the restriction to internal floor space and having a local occupancy tie. Further evidence will be sought with regard to resale values. |
| | <p>Concern that plots for self-build homes will not be affordable to local people, and other small communities (other than rural communities with a one service) should be considered as locations for self-build as they give and receive services too.</p> <p>Suggested wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves.</p> | <p>As above.</p> <p>Greater flexibility has been afforded to new build homes in the open countryside to help address the needs of farming communities including self-build homes¹² in rural communities and succession farm dwellings. Opportunities have also been highlighted regarding the conversion of existing buildings. It is considered that further relaxation would impact on the conservation and enhancement of the National Park.</p> <p>The image of a permitted temporary agricultural dwelling of timber construction highlight the large porch area – however, this porch is included within a floorspace of less than 90sqm.¹³</p> <p>NO CHANGE REQUIRED</p> |
| | <p>The need for a local occupancy tie is recognised but the condition that they must be affordable units is too restrictive and would decrease the value of the asset; therefore delivery as a means of meeting an</p> | <p>The rural exception site approach to new build local affordable housing across the National Park is intended to keep land values low so that homes can remain affordable to local people in housing need in perpetuity. The value will also be reduced to a certain extent due</p> |

¹¹ March 2016 Update: policy title changed to HC-D5 Custom/Self Build Local Need Housing (see Schedule of Proposed Changes for justification)

¹² March 2016 Update: this issue has been considered as part of the Exmoor Viability Assessment 2016.

¹³ March 2016 Update: 90sqm is proposed to be amended to 93sqm to be consistent with the Technical Housing Standards - nationally described space standards (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | objectively assessed housing need may be compromised. | to the restriction to 90sqm ¹⁴ internal floor space and having a local occupancy tie. Further evidence will be sought with regard to resale values. NO CHANGE REQUIRED |
| Supporting text to dwellings in the countryside | The purpose of 6.147 is not clear as it introduces the concept of 'low impact' or 'one planet development' (OPD) which appears incongruous in the section dealing with rural workers. It is considered that open countryside one planet development (OCOPD) utilises land and subsistence based livelihood to contribute to sustainable development. | Noted - it is not considered that a new policy at this stage of the plan is necessary to address this response. The need for a specific policy to address the needs of OCOPD has not been justified through the preparation of the Local Plan -nor is there any existing need identified. The priority for the plan is to address the housing needs of Exmoor's local communities. If such needs arise they will be required to meet the policy approach for housing in the Local Plan. NO CHANGE REQUIRED |
| HC-D7 - Conversions to Dwellings in the Open Countryside (page 157) | Suggest that the policy is deleted or significantly amended to support the change of use of buildings to [open market] dwellings. | The definition of a rural exception site does not exclude existing buildings in the open countryside. It is considered that such an important resource is utilised to address the housing needs of Exmoor's communities and farming communities rather than meeting external demands for housing (including for second/holiday homes). It is clear that the expectation in national policy specifically for National Parks is that new housing should be focused on affordable housing needs. Policy HC-D7 Conversions to Dwellings in the Open Countryside ensures that existing buildings in the most sustainable locations are an important resource which can be utilised to provide for the housing needs of Exmoor's communities through the provision of local affordable housing, extended family dwellings, rural worker dwellings or succession farm dwellings. It is not considered appropriate to provide for open market dwellings in the open |
| | Consider that the costs of conversion would mean the conversion to an affordable home would be unviable. Allowing a proportion to non-affordable [market] dwellings could fund the provision of affordable dwellings elsewhere on site or through contributions towards affordable housing in other areas of the National Park. | |

¹⁴ March 2016 Update: 90sqm is proposed to be amended to 93sqm to be consistent with the Technical Housing Standards - nationally described space standards (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | | countryside when the priority is addressing the housing needs of local people. Local need affordable homes in the open countryside have been delivered through adopted Local Plan policies. |
| <p>HC-D8 - New Build Dwellings in the Open Countryside</p> <p>And</p> <p>HC-D9 - Rural Workers (page 158)</p> | <p>Suggested wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves – to enable affordable homes to be provided at low cost in locations outside the named settlements helping to sustain family and employment networks.</p> | <p>Policies within the Plan enable the provision of homes in the open countryside to meet the needs of rural working communities through the conversion of existing buildings on farmsteads and in hamlets to local affordable homes, rural workers dwellings or succession farm dwellings - additionally the conversion of existing buildings on farmsteads to extended family dwellings. Options are also available for new build homes for rural workers, succession farm dwellings on farmsteads, and local affordable homes in small rural communities that have at least one service (a shop, pub or community meeting place). Local Plan policy provides for temporary homes to enable a rural land-based business to be established for up to 3 years. It is not considered appropriate or suitable to enable the provision of temporary homes to address local affordable needs in the open countryside as a long term prospect, or to establish a residential land use on the site for a 'dwelling'. NO CHANGE REQUIRED</p> |
| <p>HC-D9 - Rural Workers (page 158)</p> | <p>Modifications sought include the deletion of clause 1.b) regarding financial viability.</p> | <p>The essential need for a rural worker to live at or near their place of work in the countryside will be assessed by considering the proposal against a number of tests. New permanent dwellings in the open countryside cannot be justified on agricultural grounds, or other rural land-based enterprises, unless the enterprise is economically viable. We assess this with a financial test. The tests used are set out in Annex 2 of the Local Plan and provide a well-established and understood methodology for assessing whether an essential need exists. The financial test is part of an appropriate framework against which to assess “essential need”, taking a realistic approach to the level of profitability and taking account of the nature of the enterprise concerned.</p> |

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| <p>HC-D10 - Succession Farming – Second Dwellings on Established Farms (page 160)</p> | <p>Concern that the succession farm dwellings are likely to prove unviable without some form of cross subsidy from market housing (delivered through the conversion of buildings on the farmstead).</p> | <p>The policy enables a second dwelling to be built on farms to enable the farm to be transferred to a second generation whilst the older generation continue to provide support (equivalent of 0.5 of a full time worker). This flexible approach is considered to help farming businesses continue to thrive. It is not considered that a cross-subsidy approach is necessary as a suitable plot should not have to be purchased. It is for the farming enterprise to be a viable business to enable the provision of such housing. The restriction on net internal floorspace ensures that the dwelling remains more affordable to build and meets the needs of retiring farmers. NO CHANGE REQUIRED</p> |
| <p>HC-D15 - Residential Extensions (page 167)</p> | <p>Deletion of: the 35% increase in criterion 1.c); and criterion 2.c) in relation to dwellings immune from enforcement.</p> | <p>The 35% increase takes forward an established approach for extensions to existing dwellings. This proportion is considered to help address the needs of homeowners, whilst maintaining a balanced stock of dwelling types and sizes. Dwellings immune from enforcement that were established through a certificate of lawful use rather than planning permission are considered not eligible for extensions, although permitted development rights will still apply.¹⁵ NO CHANGE REQUIRED</p> |
| <p>Local Services and Community Facilities (page 176)</p> | <p>If a significant need arises from housing development in and around Lynton, developer contributions may be sought towards library provision.</p> | <p>The Lyn Plan (Lynton & Lynmouth Neighbourhood Development Plan) is the development plan for Lynton together with the strategic policies within the Local Plan; including those development management policies where the Lyn Plan is silent or indeterminate. The main focus is for affordable housing provision, and significant</p> |

¹⁵ March 2016 Update: proposed change to criterion 2.c) to state residential extensions would not be permitted in this circumstance where they would not otherwise comply with policies in the Local Plan (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | | growth is not consistent with the approach of the neighbourhood plan or the Local Plan. NO CHANGE REQUIRED |
| 7. Achieving a Sustainable Economy | | |
| Whole section (page 187) and policies SE-S1 - A Sustainable Exmoor Economy SE-S3 - Business Development In The Open Countryside | Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF. Such sites are considered to have negative visual amenity impacts if neglected. Amendment suggested to SE-S3 to provide for the redevelopment | Further consideration regarding the potential for, or extent of, redevelopment opportunities of employment buildings in the open countryside is required to ensure consistency between business development policies and the safeguarding policy SE-D2. |
| SE-S1 - A Sustainable Exmoor Economy (page 190) | Modifications are sought to change the wording of policy SE-S1 so that employment sites and buildings are not safeguarded in the open countryside. | It is considered important to safeguard all employment sites, whether they are in settlements or the open countryside as a means to ensure that adequate provision for employment and business continues in the future. NO CHANGE REQUIRED ¹⁶ |
| SE-S2 - Business Development In Settlements (page 192) | Amendment suggested to policy SE-S2 to specify that previously developed applies to brownfield sites. | The supporting text will clarify that brownfield land applies to existing buildings and previously developed land in settlements. ¹⁷ |
| | SE-S2 should not differentiate between traditional and non-traditional buildings and reference to small scale should be deleted. | The policy presents a sequential test to business development within settlements. If applicants/landowners can demonstrate that they cannot provide business development through the change of use of existing buildings as these are not available or not in their ownership/control, then other alternatives including new build will |

¹⁶ March 2016 Update: further justification is proposed to be included in the supporting text to clarify this approach (see Schedule of Proposed Changes for justification)

¹⁷ March 2016 Update: this clarification has not been included as part of the proposed changes to the Plan, as some existing agricultural buildings are classified as 'greenfield'.

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
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| | | be considered. The policy intends that applicants explore all opportunities before considering new build on greenfield sites given the limited landscape capacity for new build. Small scale is used in relation to new build development in Porlock Weir - given the characteristics of this small, attractive harbour settlement, this terminology is justified. NO CHANGE REQUIRED |
| SE-S3 - Business Development In The Open Countryside (page 194) | Policy SE-S3 should not differentiate between traditional and non-traditional buildings, nor should buildings be redundant. Modifications include the deletion of paragraphs 3, 4 and 5. | The policy presents a sequential test to business development in the open countryside. For rural land-based businesses additional flexibility is provided to enable the change of use of non-traditional buildings (e.g. including modern agricultural buildings) to business use. If buildings, such as agricultural buildings, are not redundant then it is considered that they are in use and therefore needed by the agricultural enterprise - NO CHANGE REQUIRED |
| | Encourage the amendment of the policy so it is less restrictive by not constraining new build to solely within Local Service Centres and Villages. | Policy SE-S3 seeks to widen opportunities for rural businesses, and provides scope for business enterprise by making positive use of the significant resource of traditional buildings or modern buildings relating to rural land-based businesses. The policy approach is to primarily provide for new build business development in the named settlements where it can be accommodated within or well-related to the existing built environment. New build business development can be provided in the open countryside in relation to home-based businesses (policy SE-D1) which provides additional scope for business development across the National Park - an appropriate response to the high percentage of working age people working at or from home (37%). NO CHANGE REQUIRED ¹⁸ |

¹⁸ March 2016 Update: Policy SE-D3 is proposed to be amended to provide for the redevelopment of existing employment sites, where existing buildings are replaced with no significant increase in size, and enhancement is achieved (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|--|---|--|
| SE-D1 - Home Based Businesses (page 195) | Deletion of criterion 1.b) in relation to extensions which should be assessed against the needs of the business. | The premise of the policy is to encourage new businesses and entrepreneurship - recognising that a large proportion of the working age population work at/from home and many are self-employed. The policy provides a flexible approach that enables extensions, conversions of outbuildings or provision of new outbuildings for home-based business use - but as these can revert to domestic use, it is aligned with policy HC-D15 Residential Extensions. NO CHANGE REQUIRED |
| | The policy is considered unsound and limited in scope. No consideration is given to converting existing buildings to live-work arrangements. | The conversion of existing buildings in the open countryside enables the provision of extended family dwellings (on farmsteads) and local affordable homes (in hamlets and on farmsteads) - the conversion of additional or the same building(s) as business space is also permitted which would be conducive to a live-work arrangement. Similar schemes have been already been provided in the National Park. NO CHANGE REQUIRED ¹⁹ |
| SE-S4 - Agricultural And Forestry Development (page 200) | Deletion of criterion 1.c) [site related to the business], clause 2 [condition to require removal of buildings if they cease to be used for agriculture] and clause 3 [isolated buildings only permitted in exceptional circumstances] of the policy, as they are considered to be contrary to the NPPF and GPDO. | The preferred approach is to site new agricultural/forestry buildings alongside existing buildings on the enterprise to ensure development is grouped and sited in such a way that landscape impacts are minimised. Isolated barns will only be permitted in exceptional circumstances due to adverse impacts such large isolated buildings can have on landscape character and visual amenity of the National Park. If development is permitted through the GPDO then policy SE-S4 will only apply where prior approval is required in relation to design, siting, and external appearance of the building. Clause 2 will be reviewed in terms of the test of reasonableness. |

¹⁹ March 2016 Update: further clarification is provided on live-work arrangements (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|--|---|---|
| 8. Achieving Enjoyment for All | | |
| Second / holiday homes (para 8.37 – page 210) | Concern that no opportunity to influence the use of existing open market homes as second/holiday homes has not been implemented when advised that an Article 4 direction could be used to ensure that no planning permissions would be granted for such homes. | Any Article 4 direction would have to apply to all existing dwellings in the National Park - as any open market dwelling that does not have an occupancy tie has the potential to become a second home or holiday home. This would be an unduly onerous requirement for many households across the National Park who may wish to extend their home through permitted development rights. NO CHANGE REQUIRED |
| RT-D6 Camping Barns (page 214) | Plan does not enable the redevelopment of brownfield land in the open countryside. RT-D6 is too restricted and does not provide for lawful buildings in the open countryside (other than agricultural buildings) to be redeveloped to a new use as holiday accommodation. | See response to Section 7 Achieving a Sustainable Economy. The policy provides opportunities for isolated traditional barn or building to be converted to simple camping barn accommodation sometimes referred to as stone tents. This is not restricted to agricultural buildings. Traditional buildings are defined in the glossary. NO CHANGE REQUIRED |
| | Meaning of 2.b) needs to be clarified as to its association with 2.a) and c). | Noted - clause two wording will be amended to provide clarification. Sub-clause 2.c) will be removed as this is a policy requirement in AC-D6 Fixed Line Transmission Infrastructure. |

| | | |
|--|---|---|
| <p>RT-D13 Safeguarding Land Along Former Railways and RT-S2 Reinstatement of the Lynton and Barnstaple Railway (pages 229 – 231)</p> | <ul style="list-style-type: none"> • Concern raised regarding the misuse of private and public funds better spent on improving accessibility in other ways and on other tourist initiatives. • The impact this proposed attraction would have on the western gateway to the National Park. Would not enhance the access and enjoyment of area risks alienating more people that it could attract. • The trackbed of the former railway should be preserved as an historic asset. • The railway should not be reinstated as no longer required as a suitable transport link and has failed twice previously – there is nothing sustainable about the proposal. • The Lynton and Barnstaple Railway Trust (L&BRT) do not operate a railway or transport network, it is an unjustified, speculative, tourist attraction without the potential to become a viable or sustainable transport network. • A39 follows part of the former track bed and diversion of the track bed would require substantial building ground works and land reinforcement, also risks of cross | <p>No substantive evidence has been provided to underpin the views made by the respondents.</p> <p>Policy RT-S2 Reinstatement of The Lynton & Barnstaple Railway is within the section relating to recreation and enjoyment of the National Park, it is therefore considered that the reinstatement of the railway, particularly within the National Park will be primarily a tourist attraction, although the longer term aspirations as a transport connection between Lynton and Barnstaple are recognised. The Exmoor National Park Partnership Plan recognises the priority to “maintain high quality rights of way, services and facilities to enable people to explore and experience the special qualities of the National Park”. This includes a strategic activity to “promote and facilitate more sustainable modes of travel to Exmoor and leisure use within the National Park”. Action B2.15 are for partners to “Support opportunities for new an improved access and travel modes including Lynton and Barnstaple Railway...”</p> <p>The dismantled railway is an important heritage asset, so the policy ensures that the reinstatement closely replicates the former railway as far as possible within modern transport and health and safety guidelines/legislative requirements.</p> <p>The Plan should be read as a whole, so other policies in the Plan will also be considered in determining any future proposals including those relating to landscape, biodiversity, historic environment, housing and pollution. The experience of tranquillity is an important special quality of the National Park particularly in relation to wide open areas of moorland, [Exmoor National Park Partnership Plan</p> |
|--|---|---|

| | | |
|--|---|---|
| | <p>winds, woodland and flooding exist along the aspirational extension.</p> <ul style="list-style-type: none"> • Reinstatement would make land (including respondents) unfarmable, other impacts cited include disruptions to the peace and tranquillity of the area from the noise and smell of the trains, as well as the wildlife habitats of protected species, and crowded roads which struggle to support local traffic and make homes and the local community unfavourable. • Does not enhance the enjoyment of Exmoor nor complies with national policy. • The plan has not addressed landowners appropriately and underestimated geological constraints. • A change of use to recreation would fundamentally change the nature of Exmoor – community diluted by railway enthusiasts. • Requirement for owner cooperation or approval for purchase of original/existing buildings or the development of new buildings in association with reinstatement of the railway – distinction needed in relation to historic buildings and temporary buildings. | <p>2012-2017]. Consideration will be given to the impacts of noise pollution in policy CC-S7 Pollution.</p> <p>The provision of access to farmland split by any proposed reinstatement will be a matter for the applicant to demonstrate and will be a consideration the officer determining the application will take into account.</p> <p>It should be noted that the promoter will also need to apply to the Secretary of State to determine a Transport and Works Act (TWA) order in addition to the National Park Authority for planning permission.</p> <p><u>March 2016 Update: Applications relating to the Lynton & Barnstaple Railway have since been submitted to the National Park Authority.</u></p> |
|--|---|---|

| | | |
|--|---|--|
| | <ul style="list-style-type: none">• Concern about new dwellings for railway workers.• The policy would not allow a bridge to be constructed of modern safety standards.• Policy should not allow for the line to become a public right of way.• No suitable parking or highway access in Parracombe.• Concern about the impact on Grade I St Petrocks Church. | |
|--|---|--|

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|--|---|---|
| 9. Achieving Accessibility for All | | |
| AC-S2 Transport and Infrastructure (page 235) | Clause i) [upgrading of existing routes to accommodate high traffic speeds] may be unnecessary and j) [new roads and significant road widening not generally appropriate] may restrict improvements to A39 where schemes could be justified and necessary. | Issues raised by Devon County Council (DCC) – further discussion required with DCC. |
| | Retaining or replacing like for like street furniture may be challenging in their current/future funding and maintenance policy context. | |
| AC-S3 - Traffic Management And Parking (page 240) | Considered that 'local freight routes' may not be suitable for 'local access only' as A and B roads in the Park are important for local freight movements - suggest this is clarified to ensure local access is encouraged but not fully restricted to just local access. | Discuss 'local access' in relation to 'local freight routes' with DCC and SCC highways regarding whether this should specifically mean 'for local access only' or 'are encouraged for local access'. ²⁰ |
| | Suggest policy incorporates text in 9.24 relating to the principle of avoiding adverse impacts from parking on the highway. | Consider the implications of altering wording to the policy – need to ensure that this does not have unintended consequences of too many new car parks. ²¹ |
| AC-D3 - Parking Provision and Standards (page 242) | Check policy compliance with national policy as the Written Ministerial Statement dated 25th March 2015 that "Local Planning Authorities should only impose local parking standards for residential and non-residential | Policy AC-D3 states that " appropriate provision for parking including for bicycles, motorcycles, disabled users and car sharing, guided by the standards set out in Table 9.1". It is considered that the policy approach complies with national policy as minimum or maximum standards are not imposed - the standards provided seek to guide |

²⁰ March 2016 Update: Written justification is proposed to be amended to reflect comments and discussion with the Highways Authorities (see Schedule of Proposed Changes for justification)

²¹ March 2016 Update: proposed changes have been included in policy AC-S3 to reflect this representation (see Schedule of Proposed Changes for justification)

| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|--|--|---|
| | development where there is clear and compelling justification that it is necessary to manage their local road network". | appropriate parking provision in relation to certain use classes. NO CHANGE REQUIRED |
| AC-S4 - Electricity And Communications Networks (page 247) | Plan is not consistent with national policy in relation to policy AC-S4 as it contradicts National Policy Statement EN1 and NPPF para. 116 where major infrastructure may be granted in protected landscapes in exceptional circumstances. | Nationally significant infrastructure has a separate consent regime which has regard to National Policy Statements. Policy AC-S4 seeks to resist major and nationally significant electricity and communications networks, however a cross reference to policy GP2 Major Development is provided which sets out the tests for major development in National Parks consistent with the approach in para. 116 of the NPPF. NO CHANGE REQUIRED |
| | Requirements of AC-S4 must be considered alongside legal obligations to offer economic connections and operate an economic and efficient network. | The duty for statutory undertakers to have regard to National Park statutory purposes under section 62 of the Environment Act 1995. There are specific clauses in policy AC-D6 which would allow for overhead lines where undergrounding would cause harm to the historic environment or biodiversity. Legal advice is that the S.62 of the Environment Act would take precedent and there are caveats in Policy AC-D6 where undergrounding may not be suitable. Economic factors will be dealt with through the recharging of customers which electricity companies tend to do for connections to properties. NO CHANGE REQUIRED |
| AC-D6 - Fixed Line Transmission Infrastructure (page 251) | Plan is not consistent with national policy in relation to policy AC-D6 as it contradicts National Policy Statements EN1 and EN5 where there is no general rule about when an overhead line should be considered unacceptable. | Nationally significant infrastructure has a separate consent regime which has regard to National Policy Statements. Policy AC-S4 seeks to resist major and nationally significant electricity and communications networks including those relating to overhead power lines, however a cross reference to policy GP2 Major Development is provided which |


| Key Issues Raised in Plan Order | | Proposed ENPA Response |
|--|---|---|
| | | sets out the tests for major development in National Parks consistent with the approach in para. 116 of the NPPF. NO CHANGE REQUIRED ²² |
| | Requirements must be considered alongside legal obligations to offer economic connections and operate an economic and efficient network. | The duty for statutory undertakers to have regard to National Park statutory purposes under section 62 of the Environment Act 1995. There are specific clauses in the policy which would allow for overhead lines where undergrounding would cause harm to the historic environment or biodiversity. Legal advice is that the S.62 of the Environment Act would take precedent and there are caveats in the policy (for reasons of biodiversity or historic environment) where undergrounding may not be suitable. Economic factors will be dealt with through the recharging of customers which electricity companies tend to do for connections to properties. NO CHANGE REQUIRED |
| 10. Exmoor's Settlements | | |
| ES-S2 Lynton and Lynmouth Neighbourhood Plan (page 279) | A precedence in favour of the Lynton and Lynmouth Neighbourhood Plan as set out in Policy ES-S2 should not usurp the strategic policies of the Exmoor Local Plan. | Policy ES-S2 does ensure that development proposals are determined in accordance with the neighbourhood plan and the strategic policies of the Local Plan. The policy will be amended to provide further clarification to ensure that strategic policies of the plan have precedence in the determination of planning proposals within the neighbourhood plan area. |

²² March 2016 Update: proposed changes to the policy to introduce a sequential approach that other options of providing the need are sought (low carbon and renewable energy development) and undergrounding is the considered first. If this is not possible then overhead lines would be permitted where these do not cause unacceptable harm to visual amenity or landscape character (see Schedule of Proposed Changes for justification)


Schedule of Proposed Changes

EXMOOR NATIONAL PARK LOCAL PLAN 2011-2031
FOR SUBMISSION - April 2016

If you have any queries or questions relating to this document please get in touch with the Policy & Community Team using the contact details below:

 Exmoor National Park Authority
Exmoor House
Dulverton
Somerset
TA22 9HL

 localplan@exmoor-nationalpark.gov.uk

 01398 323665

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1 Introduction

1.1 As part of the submission of the Exmoor National Park Publication Draft Local Plan, the Authority has included this list of 'Proposed Changes' to the Plan. These are proposed in light of:

- the representations received on the Publication Draft Local Plan (Regulation 19 consultation held during June – July 2015)¹;
- new legislation and national policy changes (including written ministerial statements); and
- new guidance and information arising since the Publication Draft Local Plan was approved by the Authority for consultation (24th March 2015).

1.2 The suggested amendments are listed in the order they appear in the Publication Draft version of the plan. For each amendment, information on the proposed change and the reason for the change is given. Where new text is proposed it has been underlined. Where text is proposed for removal it has been crossed out:

- Insertion of text
- ~~Removal of text~~

¹ Regulation 19 of the Town and Country Planning (Local Plan) (England) Regulations 2012

2 Proposed Changes

Front Cover

No proposed changes.

Contents Page

No proposed changes.

Local Plan Policy Structure

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------|--|---|
| 1 | CE-S1 | LANDSCAPE <u>AND SEASCAPE</u> CHARACTER | Minor modification in relation to the publication of the draft North Devon and Exmoor Seascape Assessment. |
| 2 | HC-S3 | LOCAL OCCUPANCY CRITERIA <u>FOR AFFORDABLE HOUSING</u> | To provide clarity that policy relates to criteria for affordable housing. |
| 3 | CE-S8 | MINERALS SAFEGUARDING AREAS | <p>Policy deleted in response to representation number 0043/16 – with further consideration of available evidence.</p> <p>ENP position is a ‘locally needed building stone resource’ with no active quarries and an extensive building stone resource. Low levels of development are unlikely to sterilise future small scale extraction of</p> |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|----------------------------|--|---|
| | | | building stone. Therefore, minerals safeguarding areas are not considered to be needed. |
| 4 | CE-S 89 | MAJOR MINERAL EXTRACTION DEVELOPMENT | <p>Policy title changed to reflect representation number 0057/02 regarding 'fracking', and the principle of minerals development in the National Park context.</p> <p>Policy numbering changed to reflect the proposed deletion of CE-S8 Minerals Safeguarding Areas.</p> |
| 5 | HC-D5 | CUSTOM/SELF BUILD LOCAL NEED HOUSING IN RURAL COMMUNITIES | For clarification. Delete part of title as policy also provides for self/custom build housing in settlements. |
| 6 | HC-D6 | The Change of Use of Serviced Accommodation to Housing | <p>Policy deleted as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance.</p> <p>Policy tests in clause 2 of HC-D1 Conversions to Dwellings in Settlements will apply (as modified in this schedule).</p> |
| 7 | HC-D 6 <u>7</u> | Conversions to Dwellings in the Open Countryside | Numbering changed due to deletion of policy HC-D6. |
| 8 | HC-D 7 <u>8</u> | New Build Dwellings in the Open Countryside | Numbering changed due to deletion of policy HC-D6. |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|----------------------------|--|--|
| 9 | HC-D 89 | Rural Workers | Numbering changed due to deletion of policy HC-D6. |
| 10 | HC-D 910 | Succession Farming – Second Dwellings on Established Farms | Numbering changed due to deletion of policy HC-D6. |
| 11 | HC-D 101 | Residential Caravans | Numbering changed due to deletion of policy HC-D6. |
| 12 | HC-D 112 | Replacement of Rural Workers Occupancy Conditions | Numbering changed due to deletion of policy HC-D6. |
| 13 | HC-D 123 | Replacement of Holiday Occupancy Conditions and Extended Family Ties | Numbering changed due to deletion of policy HC-D6. |
| 14 | HC-D 134 | Subdivisions of Existing Dwellings | Numbering changed due to deletion of policy HC-D6. |
| 15 | HC-D 145 | Residential Extensions | Numbering changed due to deletion of policy HC-D6. |
| 16 | HC-D 156 | Outbuildings | Numbering changed due to deletion of policy HC-D6. |
| 17 | HC-D 167 | Replacement Dwellings | Numbering changed due to deletion of policy HC-D6. |
| 18 | HC-D 178 | Local Commercial Service Provision | Numbering changed due to deletion of policy HC-D6. |
| 19 | HC-D 189 | Safeguarding Local Services and Community Facilities | Numbering changed due to deletion of policy HC-D6. |
| 20 | HC-D 1920 | Important Visual Amenity Space | Numbering changed due to deletion of policy HC-D6. |

Section 1: Introduction

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|--|---|--|
| 21 | Page 1, para 1.4 | Exmoor National Park is an asset of national, regional and local importance as one of the few upland areas of southern England; the highest point at Dunkery Beacon rising 519m (1704 feet) above sea level. Exmoor provides a unique landscape of moorland, woodland, valleys, farmland, <u>rivers and streams</u> , and a spectacular coast shaped by both natural elements and human activity over thousands of years. Its remoteness, topography and climate have helped to maintain a large extent of well preserved, semi-natural upland landscapes and undeveloped coastline. Darkness is an important component of the <u>night time</u> tranquillity and quality of Exmoor's landscape character and in October 2011 Exmoor became the first National Park to achieve 'Dark Sky Reserve' status and the second Dark Sky Reserve in the world. | To reflect comments made in representation numbers 0047/02 and 0059/02 |
| 22 | Page 2, insert new paragraph after 1.5 | <u>1.5A Exmoor National Park therefore plays a prominent role in the protection of the natural environment not only in the National Park area itself but in the wider context of the South West with associated ecosystem services and biodiversity benefits unconstrained by administrative boundaries. Conversely activity outside the National Park can have both beneficial and detrimental impacts on Exmoor, and the National Park is dependent on surrounding areas support in helping conserve its special qualities and features. The National Park Authority engages with neighbouring authorities on such cross-boundary strategic matters through the Duty to Co-operate.</u> | To reflect comments made in representation number 0059/02 |
| 23 | Page 2, para. 1.8 | Exmoor is a living, working landscape with a resident population of 10,273 people recorded in 2011; a fall of 600 from 2001 ² . Approximately three-quarters of the population are within the West Somerset area of the National Park, and a quarter within the North Devon area. Exmoor's age profile shows the proportion of the | Correction |

² Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|----------------------------|--|-------------------------|
| | | population aged 60 years and over is around 40% with a median age of 53 compared with the national median age of 39. An ageing population is a national issue in terms of the consequences for public services including social care, an issue which is particularly exacerbated on Exmoor. The highest proportion of household type on Exmoor relates to family households the majority of which are two-person households. However, almost a third are single person households with single pensioner households constituting over half of these households, whilst other single person households account for the remainder. | |
| 24 | Page 3, para. 1.10 | Exmoor has one of the highest differentials between local wages and house prices in the country. The average household income in 2010 was £28,668 ³ the lowest for all English National Parks and 15% lower than that for the South West region as a whole. In 2013 the mean average house price ⁴ was £287,227 – 25%% higher than the average house price for the South West region. Evidence shows that households with an average income would not be able to afford the mean average house price (at 10 times average household income) without a significant deposit; whilst households with below average income are even further constrained. Addressing the affordable housing needs of local communities is therefore a key challenge for the Local Plan. | Correction. |
| 25 | Page 3-4, para. 1.12 | The third largest business sector is agriculture and forestry with 11.7% of all employees ⁵ . Agriculture and forestry is essential for the maintenance of the characteristic landscape of the National Park relating to its mosaic of vegetation cover, the wildlife it supports, the pattern and character of Exmoor’s farmsteads. Traditional hill farming and the skills and commitment of the farming community therefore provide economic benefits locally and regionally. Together with tourism, the agricultural and forestry sector and the accommodation and food | Point of clarification. |

³ DEFRA Rural Statistics Unit (2010) National Parks: Economic Comparison

⁴ ENPA (2013) Exmoor National Park Annual House Price Survey 2013 (mean average house price based on Land Registry selling price) - *Exmoor National Park Authority, Dulverton*

⁵ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|----------------------------|---|--|
| | | service sector make up over 40% of employment for those living within the National Park illustrating that tourism and land-based enterprises are the main drivers of the local economy and an important employment resource. Two-thirds of working age people within the National Park are economically active with a high proportion (26%) of self-employed people, which reflects an economy dominated by small-scale businesses. Two thirds of economically inactive persons are retired and there are generally low levels of unemployment despite the low levels of economic activity ⁶ . | |
| 26 | Page 4, para. 1.14 | Within the National Park almost a third 37% of the working age population works at or from home ⁷ and existing telecommunications infrastructure has already benefited those areas with broadband access through: businesses and people relocating to rural areas from urban areas to enjoy a better quality of life, on the basis they can work from home and access online services; and the potential for rural manufacturers and retailers to access worldwide markets ⁸ . Improving and adapting this infrastructure can ensure that the social and economic benefits of accessing digital technology are available across the National Park. Access to superfast broadband is being addressed across the National Park through Connecting Devon and Somerset to help deliver faster broadband to the rural areas of both counties and will help to overcome significant transport constraints experienced by rural upland areas, through increased home working, distance learning and remote access to public services. | Correction, following the release of new census evidence (footnote also updated) |

⁶ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

⁷ Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London, The Stationery Office — 31.35% of people aged 16 — 74 in employment who work mainly at or from home within Exmoor National Park (2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at www.ons.gov.uk

⁸ Commission for Rural Communities (2008) Mind the Gap: Digital England – a rural perspective

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------|---|---|
| 27 | Page 4, para. 1.15 | Due to the rural nature of the National Park and its dispersed settlements, it is not unexpected that just over under half of economically active people commute to work by car with around 60% making journeys of less than 10km the average commuting distance around 13km ⁹ . Relatively few communities have access to a year round daily bus service ¹⁰ , although there are opportunities to use demand responsive transport for parishes within the West Somerset area of the National Park and community transport schemes to help those with no or limited access to transport access shopping or medical and other healthcare needs, including those with limited/impaired mobility. Traffic levels on Exmoor increase particularly during the main summer months when greater numbers of tourists visit the National Park. Although traffic pressures are not severe, there can be specific locations, which face congestion issues and parking problems during the busy holiday periods. | Correction, following the release of new census evidence (footnote also updated). |

Section 2: Vision, Objectives and Strategic Priorities

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|--------------------------------|---|--|
| 28 | Page 8, para. 2.3, Objective 1 | 1. Exmoor's distinct and diverse landscapes and seascapes is <u>are</u> maintained and enhanced, with an increased awareness of its <u>their</u> importance. In 2030, Exmoor's outstanding natural beauty with its mosaic of distinct and diverse landscapes and its dramatic coast and seascape, has been safeguarded and enhanced. Exmoor is still recognised as providing a sense of remoteness, wildness and tranquillity with landscapes predominantly free from and with no | In response to representation number 0044/12 |

⁹ Office for National Statistics (2003) Census 2001: Key Statistics for Local Authorities. London, The Stationery Office — 31.35% of people aged 16 – 74 in employment who work mainly at or from home within Exmoor National Park (2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at www.ons.gov.uk

¹⁰ A daily service running at least on a Monday – Saturday basis

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------|--|---------------|
| | | increase in intrusive structures and large scale development. It is renowned for its views of the night sky and lack of light pollution. ENPA and neighbouring authorities have worked together to ensure that the quality of the environment extends beyond the National Park boundary. | |

Section 3: General Policies

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|---|--|---|
| 29 | Page 19, para. 3.24 | Insert new footnote reference at the end of the paragraph: <u>X Maurici, J. (July 2014) Legal Opinion in the Matter of the National Planning Policy Framework and in the Matter of the South Downs National Park Authority (Landmark Chambers)</u> | Correction – add reference |
| 30 | Page 20, policy GP2 Major Development – clause 3.e) | e) any detrimental effect on the natural and historic environment, the landscape, and recreational opportunities, including the National Park’s special qualities, and the extent to which it could be moderated (through applying the avoidance, mitigation and compensation sequence of tests set out in clause 4 of this policy); | Grammatical correction – insert comma after ‘avoidance’. |
| 31 | Page 19, para. 3.26 | The National Park Authority will therefore consider whether a proposed development is deemed to be ‘major’ on a case by case basis taking into account the potential impacts of the proposed development on: the National Park and in its local context <u>a) the local context – this should include taking into account the nature and sensitivity of the site, including landscape character and the size and form of any local settlements, as well as the degree of change over time in terms of the level and scale of past development; and</u> | Change to provide clarification, in response to representation number 0044/01 |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------------|--|---|
| | | <p><u>b) the potential harm to the natural beauty, wildlife and cultural heritage of the National Park by reason of its scale, character and nature. The decision will not be on the basis of likely impact after that harm is reduced through mitigation. The extent to which harm could be moderated will be considered as part of the assessment process.</u></p> | |
| 32 | Page 21, para. 3.31 | <p>Policy GP3 Spatial Strategy identifies where new development will be focussed, and what type of development is permitted, in principle, within the <u>named</u> settlements identified within the settlement hierarchy as Local Service Centres, <u>and Villages, and Porlock Weir</u>. The overall aim is to ensure that these communities are sustained over the longer term through appropriate development that is of a scale that is proportionate to its location and the socio-economic needs of Exmoor’s communities, within the context of the highly valued landscape of the National Park. Outside of these settlements, the area is defined as the ‘open countryside’ and includes farmsteads, isolated dwellings and hamlets.</p> | Points of clarification and change to footnote to reflect updated evidence. |
| 33 | Page 22, para. 3.34 | <p>It is considered appropriate to retain a settlement hierarchy, whereby <u>NAMED SETTLEMENTS AND OPEN COUNTRYSIDE HIERARCHY</u> The named settlements are divided into categories based on their role and function, but also recognising the constraints that may impact on their ability to accommodate new development. A technical paper has been produced, which objectively assesses each settlement against a range of factors and informs the identification of each <u>settlements within each category the hierarchy</u>¹¹. This approach ensures that communities and their landscape setting are conserved and enhanced whilst providing development opportunities to help sustain their settlements over the long term.</p> | Points of clarification. |

¹¹ ENPA (2015) Settlement Hierarchy Spatial Strategy: Local Plan Topic Paper – Exmoor National Park Authority, Dulverton

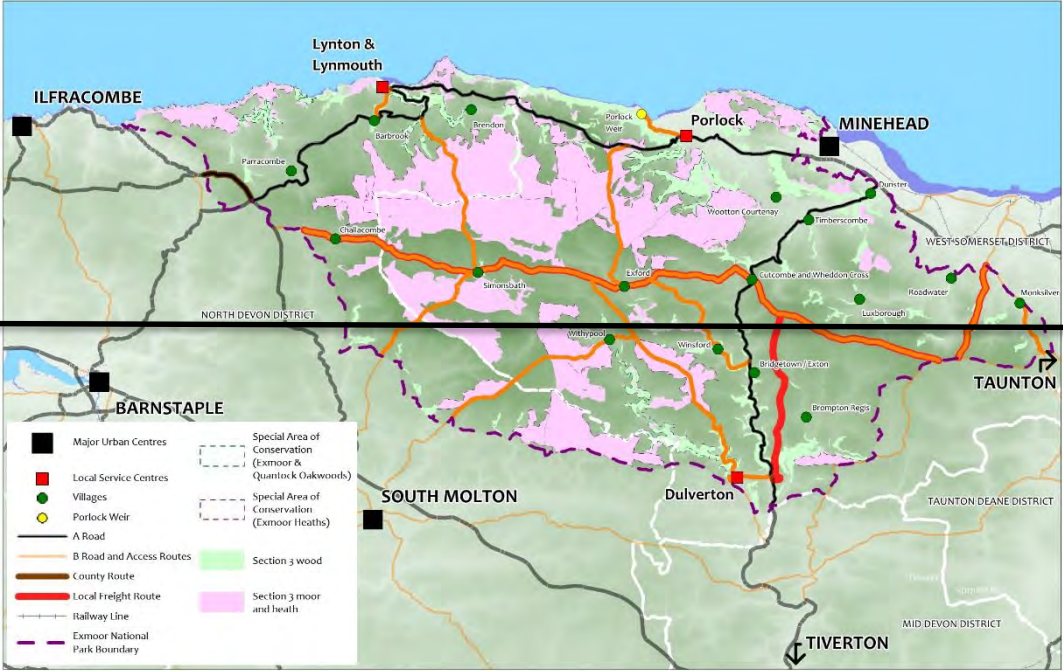
| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
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| 34 | Page 22, para. 3.35 | The development <u>spatial</u> strategy for Exmoor National Park, and the spatial strategy overall, is strongly affected <u>influenced</u> by the close proximity of this <u>the</u> National Park to a number of <u>surrounding</u> towns offering a range of jobs, services, retail and leisure opportunities as shown on the Key Diagram (Map 3.1). The National Park settlements exist at a rural level beneath most conventional settlement hierarchies, within which allocations would not normally be made, and provides scope only for exceptional development requiring a rural location, such as to meet local needs for affordable housing. <u>This can be illustrated by the fact that the three largest settlements within the National Park have populations below 1500.</u> The Authority considers its spatial strategy is consistent with the approach in neighbouring rural areas. | Points of clarification and correction. |
| 35 | Page 22, para. 3.37 | The <u>settlement</u> categories within the hierarchy <u>spatial strategy</u> are: Local Service Centres Villages Porlock Weir Collectively these settlements are referred to in the Plan as the ‘named settlements’. | Point of clarification. |
| 36 | Page 22, para. 3.38 | Local Service Centres: Dulverton, Lynton & Lynmouth and Porlock are the largest settlements within the National Park and provide the most extensive range of services in one place. Therefore, they are the most suitable locations, in principle, for new development to consolidate employment and services to help address the needs of the National Park as a whole, the surrounding area, and the local community. The influence of Dulverton in particular also extends to areas outside the National Park’s southern boundary. It is considered that the <u>local housing</u> needs of the Dulverton parish outside the National Park (including Battleton) should <u>could</u> <u>appropriately</u> be met within Dulverton. | Point of clarification. |
| 37 | Page 22, para. 3.40 | Villages: The settlements identified as Villages are smaller than Local Service Centres and their area of influence is generally smaller <u>more contained</u> , but they do have a number of services and facilities and act as focal points for people living across | Amendment to avoid repetition. |

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| | | Exmoor. Some villages and surrounding communities function collectively by sharing their facilities. Development in the 'Villages' will help maintain or enhance their communities by providing for a diverse economy, help retain and enhance key services and facilities (which are often vulnerable to closure), and address the housing needs of local communities. | |
| 38 | Page 23, para. 3.43 | Development in the open countryside is considered to be exceptional in relation to the reuse of existing buildings for residential use. Buildings in the open countryside are considered to be subject to normal policies of countryside restraint and may only be converted, where they are well related to a hamlet or farmstead, to provide homes for rural workers or people in local affordable housing need, succession farm dwellings and extended family dwellings. Small rural communities that are not identified in the <u>as named settlements hierarchy</u> , but have an established, closely grouped number of dwellings within a contiguous built form, and are separate from other named settlements, plus service provision in the form of a shop, pub or community meeting place/hall, are considered to be appropriate locations for self-build opportunities to meet local affordable housing needs in accordance with HC-D5 Custom/Self Build Local Need Housing in Rural Communities (and subject to other policy considerations). | Point of clarification. |
| 39 | Page 24, para. 3.44 | Development in the open countryside should be in accordance with other policies in this plan and specifically includes development that: <ul style="list-style-type: none"> a) is essential for the operation of rural land-based enterprises (HC-D78 New Build Dwellings in the Open Countryside, HC-D89Rural Workers, HC-D910 Succession Farming – Second Dwellings on Established Farms, SE-S4 Agricultural and Forestry Development); | Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6. |

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|------------------------------|---|--|---|--------------------------------|---------|-----------------|---|---|---------------------|--|--|-------------------------|
| 40 | Page 24, Table 3.1 | <p>TABLE 3.1: SETTLEMENT HIERARCHY CATEGORIES WITHIN THE SPATIAL STRATEGY</p> <table border="1" data-bbox="495 395 1599 879"> <tr> <td data-bbox="495 395 808 475">Local Service Centres</td> <td data-bbox="808 395 1234 475">Dulverton Lynton & Lynmouth</td> <td data-bbox="1234 395 1599 475">Porlock</td> </tr> <tr> <td data-bbox="495 475 808 831">Villages</td> <td data-bbox="808 475 1234 831">Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough</td> <td data-bbox="1234 475 1599 831">Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay</td> </tr> <tr> <td colspan="3" data-bbox="495 831 1599 879">Porlock Weir</td> </tr> </table> | Local Service Centres | Dulverton Lynton & Lynmouth | Porlock | Villages | Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough | Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay | Porlock Weir | | | Point of clarification. |
| Local Service Centres | Dulverton Lynton & Lynmouth | Porlock | | | | | | | | | | |
| Villages | Barbrook Brendon Bridgetown and Exton Brompton Regis Challacombe Cutcombe and Wheddon Cross Dunster Exford Luxborough | Monksilver Parracombe Roadwater Simonsbath Timberscombe Winsford Withypool Wootton Courtenay | | | | | | | | | | |
| Porlock Weir | | | | | | | | | | | | |
| 41 | Page 24, para. 3.45 | Please refer to Section 10: Exmoor’s Settlements for more detailed context and inset maps relating to individual settlements within the hierarchy <u>spatial strategy</u> . | Point of clarification. | | | | | | | | | |
| 42 | Page 26, policy GP3 | <p>GP3 SPATIAL STRATEGY</p> <ol style="list-style-type: none"> 1. The spatial strategy aims to ensure that communities across the National Park continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. To facilitate sustainable development across the National Park, development proposals should accord with the spatial strategy. 2. For the named settlements (listed in Table 3.1), no development boundaries will be drawn. Development proposals should ensure that the scale of development is proportionate to the settlement size and reflects the | Points of clarification. 3.d) Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6. | | | | | | | | | |

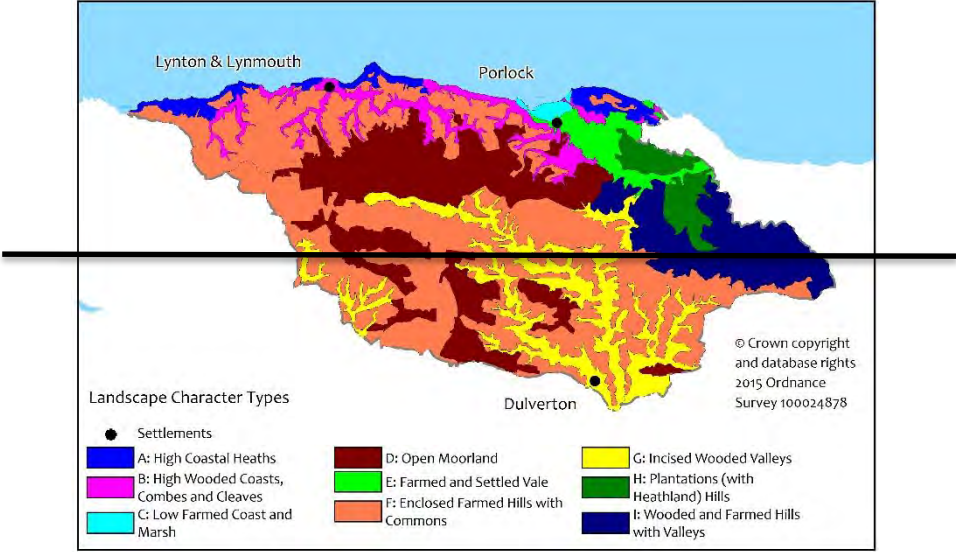
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| | | <p>capacity of each settlement to accommodate new build development; positively responding to the surrounding landscape character, settlement form and pattern, and avoiding areas at risk of flooding.</p> <p>3. Development within the named settlements should address the following:</p> <p>a) Local Service Centres: Development should strengthen the role and function of the Local Service Centres to sustain and improve the wide range of services and facilities, to serve the needs of the settlement and surrounding communities, address locally identified needs for housing and improve employment prospects for the local area. New build development for local need affordable housing, business premises, and community services and facilities will be acceptable in principle where it is well related to existing buildings in the settlements.</p> <p>b) Villages: Development will contribute to and provide opportunities to address locally identified needs for housing and employment and sustain core services and facilities within these communities. New build development for local need affordable housing, business premises, and community services and facilities will be acceptable where it is well related to existing buildings in the settlements.</p> <p>c) Porlock Weir: Any proposals for new development will need to demonstrate that they are consistent with the principles in policy CC-S4 Replacement Development from Coastal Change Management Areas, for the replacement of development through relocation and measures for the management of buildings/facilities at risk of being lost to coastal change. Additional new build development will only be considered to be acceptable in relation to the provision of local need affordable housing and small-scale business premises that directly addresses the needs of</p> | |

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| | | <p>the community; where it can be demonstrated that this will not significantly reduce the landscape capacity for relocating development at risk of being lost to coastal change identified within the Coastal Change Management Area (CC-S3) or reduce the net habitat value available to Barbastelle bats. New build housing schemes that require cross subsidy through ‘Principal Residence housing’ or ‘specialist housing’ <u>accessible and adaptable homes</u> will not be permitted.</p> <p>Outside the named settlements the area is identified as the Open Countryside where the focus of new build development will be on improving the sustainability of rural land-based businesses (<u>HC-D7, HC-D8, HC-D9 and SE-S4</u>) and enabling self-build opportunities for local affordable housing in sustainable locations (HC-D5, HC-D8, HC-D9, HC-D10 and SE-S4).</p> | |

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| 43 | Page 25, Map 3.1 Key Diagram |  <p>Key Diagram</p> <p>Change to ensure the key diagram reflects changes to Map 9.1 Exmoor Route Network and layers are clear – see Appendix 1 for proposed changes to Map 3.1 Key Diagram.</p> | To reflect changes to the Exmoor Route Network (Map 9.1) and ensure the map layers are clear. |
| 44 | Page 27, para. 3.49 | The re-use of traditional agricultural buildings is considered to be greenfield development, <u>but</u> <u>However</u> , it <u>is</u> recognised that such buildings <u>can add to</u> <u>are part of</u> the important resource of existing redundant or under-used buildings within the National Park that may be appropriate for a range of future uses, including local | Grammatical corrections and update to policy numbering. |

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| | | affordable homes where they meet locational criteria (HC-D6 7 Conversions to Dwellings in the Open Countryside). | |
| 45 | Page 29, para. 3.57 | <p>Policies Policy HC-D1 Conversions to Dwellings in Settlements and HC-D6 Change of Use of Serviced Accommodation to Housing sets out the circumstances when, through the change of use of a building to dwellings, a financial contribution may be sought in lieu of an actual on site contribution to affordable housing. These occasions are expected to be exceptional as the National Park Authority will seek all new housing development to address a local affordable need and the needed affordable housing will therefore be provided on site. Where, consistent with Policy HC-D1 and HC-D6, and only where, exceptionally, it can be demonstrated that on site provision of affordable housing through the change of use is not possible or appropriate, alternative off-site provision in the form of a financial contribution will be considered in lieu of the required affordable housing. Such circumstances will include where the scheme would provide more affordable homes than are needed in the parish and adjoining parishes. To enable scrutiny of the different elements and costs of the scheme, including site (building) values, so as to ensure that the affordable housing provision is maximised, an 'open book' approach will be required in all cases.</p> | Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance. |

Section 4: Conserving and Enhancing Exmoor

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|------------------------------------|---|--|
| 46 | Page 31, subheading | EXMOOR'S LANDSCAPES AND SEASCAPES | Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment. |
| 47 | Page 32, Map 4.1 | <p>Map 4.1 Exmoor Landscape Character Types and Seascape Character Areas</p>  <p><i>Insert new map – see Appendix 2</i> (to be moved after Seascape Character Assessment text below)</p> | Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment. See Appendix 2. |
| 48 | Page 33, insert new subheading and | <p><u>SEASCAPE CHARACTER ASSESSMENT</u></p> <p><u>4.9a Seascape is defined by Natural England in the terms of the ELC as: “An area of sea, coastline and land, as perceived by people, whose character results from the actions and interactions of land with sea, by natural and/or human factors”</u></p> | Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment. |

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| | paragraphs after 4.9 | <p><u>this is reinforced by the Marine Policy Statement as ‘landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other’.¹²</u></p> <p><u>4.9b The North Devon and Exmoor Seascape Assessment (SCA) covers 90 miles of coast, including the whole of the National Park coastline. The SCA will help support a number of activities including spatial planning with regard to development at sea and on the coast, complementing published Landscape Character Assessments. There are nine seascape character areas along the Exmoor coastline, including seven coastal areas and two offshore marine areas. The SCA defines the key characteristics, special qualities and key seascape sensitivities for each area.^x</u></p> <p>^x LUC (2015) The North Devon and Exmoor Seascape Assessment</p> | |
| 49 | Page 33-34, para 4.15 | <p>Seascape and Heritage Coast: Seascape is defined as ‘landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other’¹³. Exmoor has some of the most scenic, unspoilt stretches of coastline in England that is also considered as part of its spectacular seascape. Many areas of high coastal heath and woodland are in as natural a condition as possible and are important areas for wildlife. The whole coastline was defined as Heritage Coast in 1991 as identified on the Policies Map. The national purposes of Heritage Coasts are compatible with the statutory purposes for National Parks and also reflect the socio-economic duty. Policies CE-S1 {Landscape and Seascape Character}, CE-D1 Protecting Exmoor’s Landscapes and Seascapes, and CC-S2 {Coastal Development} aim to ensure that development</p> | <p>Deletion of seascape text – to be moved elsewhere following the publication of the North Devon and Exmoor Seascape Character Assessment.</p> <p>Add cross-reference to policy CE-D1 in response to representation 0044/04</p> |

¹² HM Government, et al. (March 2011): UK Marine Policy Statement. *The Stationery Office, London*

¹³ HM Government, et al. (March 2011): UK Marine Policy Statement. *The Stationery Office, London*

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| | | proposals retain the character of the predominantly undeveloped nature of the Heritage Coast and are consistent with national purposes. | |
| 50 | Page 34, para. 4.16 | <p>Marine Plans will help integrate marine and land planning, contributing to vibrant coastal communities and consideration of cultural heritage, seascape and local environmental quality¹⁴. The Authority supports the formation of marine protected areas (including <u>the Bideford to Foreland Point Marine Conservation Zones</u>)^x and will work with the marine planning authority to ensure that Exmoor’s high quality seascape is maintained.</p> <p><i>Insert footnote:</i></p> <p>^x <u>The Bideford to Foreland Point Marine Conservation Zone was designated on 17 January 2016</u> <u>DEFRA (2016) Bideford to Foreland Point MCZ: factsheet</u></p> | Updated in response to the designation of the Bideford to Foreland Point MCZ. |

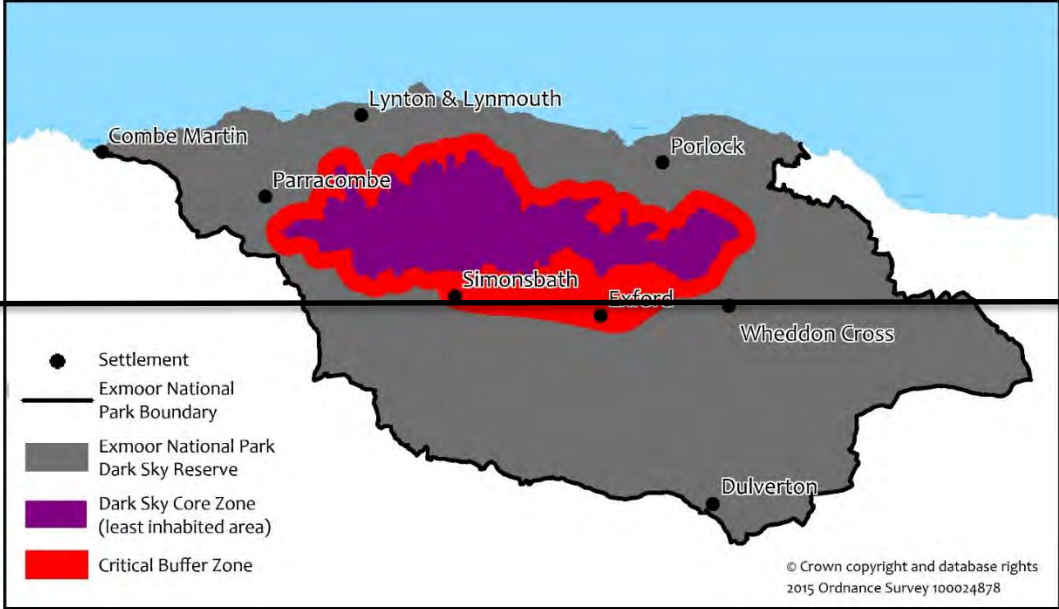
¹⁴ HM Government *et al.* (March 2011) UK Marine Policy Statement (Para 2.5.7). *The Stationery Office, London*

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| 51 | Page 36, para. 4.27 | <p>While often development can and with care be accommodated in the landscape, other developments can potentially have unacceptable adverse impacts on landscape character and visual amenity due to their scale, massing, siting, materials, colour or arrangement and therefore could appear to be incongruous within Exmoor’s landscape. Potential impacts will vary on a case by case basis according the type of development and the sensitivity of the surrounding landscape. Some of these effects may be minimised by addressing the particular landscape or visual amenity issues raised by a proposed development.</p> <p><u>Environmental Impact Assessments (EIA) should also include Landscape and Visual Impact Assessments (LVIA). However, where an EIA is not required, applications which are considered to be significant in terms of scale and/or impact should provide a LVIA. Applicants will be advised at a pre-application stage whether a LVIA is likely to be required.</u></p> | <p>Change in response to representation number 0069/10 regarding terminology in policy CE-D1.</p> |
| 52 | Page 37, CE-S1 Landscape Character | <p>CE-S1 – LANDSCAPE AND SEASCAPE CHARACTER</p> <ol style="list-style-type: none"> 1. The high quality, diverse and distinct landscapes and seascapes of Exmoor National Park will be conserved and enhanced. 2. Development should be informed by and complement the distinctive characteristics of the: <ol style="list-style-type: none"> a) Landscape Character Types and areas identified in the Exmoor National Park Landscape Character Assessment (LCA); and b) <u>Seascape character areas and types identified in the North Devon and Exmoor Seascape Character Assessment.</u> 3. Development proposals should also have regard to, and be appropriate in terms of impact with the conservation of significant landscape and seascape attributes, including: <ol style="list-style-type: none"> a) <u>Section 3 Land;</u> b) <u>Heritage Coast;</u> | <p>Change in response to the publication of the North Devon and Exmoor Seascape Character Assessment.</p> <p>The listing of landscape and seascape attributes responds to representation number 0044/02 (reflects the approach in the Draft Local Plan – November 2013).</p> |

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| | | <p>c) <u>Landscape setting of Exmoor’s settlements;</u> d) <u>Historic field patterns and boundary features;</u> e) <u>Important trees, tree groups and orchards.</u></p> <p>4. Opportunities to conserve, enhance and restore important landscapes, <u>seascapes</u> and <u>their landscape</u> characteristics as identified in the LCA, including minimising existing visual detractions, will be encouraged.</p> | |
| 53 | Page 38, policy CE-D1 | <p>CE-D1 PROTECTING EXMOOR’S LANDSCAPES AND SEASCAPES</p> <p>1. Development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor’s landscapes and seascapes through ensuring that:</p> <p>a) the visual impact of the development in its immediate and wider setting is minimised through high quality design that reflects local landscape character with particular regard to scale, siting, materials, and colour; and</p> <p>b) the cumulative and/or sequential landscape and visual effects of development do not detract from the natural beauty of the National Park and the experience of tranquillity.</p> <p>2. Within Exmoor’s Heritage Coast development should be appropriate to the coastal location and conserve the undeveloped nature of the coast consistent with Heritage Coast purposes.</p> <p>3. Landscaping schemes should reinforce local landscape or seascape character and where these are required, conditions will be attached to protect important landscape characteristics and elements and whether appropriate replacement or additional landscape elements will be required.</p> | Amendment to clause 4 in response to representation number 0069/10 regarding terminology. |

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| | | 4. Proposals which are considered to be significant in terms of scale and/or impact should provide a professional landscape appraisal <u>Landscape and Visual Impact Assessment</u> as part of the application submission. | |
| 54 | Page 39, para. 4.32 | The remote, open landscapes of the moorland and lack of human habitation have helped to define a ‘core dark sky area’ within the National Park as part of the on Exmoor been designated as an International Dark Sky Reserve, which Exmoor National Park was awarded by the International Dark-sky Association (IDA) in 2011. The Dark Sky Reserve status has provided an important boost to tourism, attracting visitors to experience Exmoor’s dark night sky and inspiring interest in astronomy. | Points of clarification regarding the Exmoor Dark Sky Reserve terminology. |
| 55 | Page 39, para. 4.33 | <u>An IDA International Dark Sky Reserve possesses an exceptional quality of starry nights and nocturnal environment that is specifically protected for its scientific, natural, educational, cultural, heritage and/or public enjoyment.</u> The reserve consists of a core zone and a A-critical buffer zone around it which supports the preservation of dark sky in the core. ¹⁵ this core area. <u>The critical buffer zone has also been established which and only includes minor four relatively small settlements. The identification of these areas, as shown on the Policies Map, has informed the Lighting Management Plan that specifies appropriate lighting methods and management within the National Park (see Map 4.2 Dark Sky Core Area and Core Buffer Zone).</u> | Points of clarification regarding the Exmoor Dark Sky Reserve terminology. |
| 56 | Page 41, map 4.2 | Map 4.2 Dark Sky Reserve Core Area <u>Zone</u> and Core <u>Critical</u> Buffer Zone | Corrections to terminology on the Map. See Appendix 3 for the proposed Map 4.2. |

¹⁵ <http://darksky.org/idsp/reserves/>

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| | |  <p>Map legend to be amended to read: Dark Sky Reserve Core Zone Dark Sky Reserve Critical Buffer Zone Exmoor National Park [Settlements to be shown include: Barbrook, Challacombe, Exford, Simonsbath and Wootton Courtenay]</p> | |
| 57 | Page 41, policy CE-S2 | CE-S2 PROTECTING EXMOOR'S DARK NIGHT SKY | Points of clarification regarding the Exmoor Dark Sky Reserve terminology. |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
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| | | <ol style="list-style-type: none"> 1. The tranquillity and dark sky experience of <u>the Exmoor National Park Dark Sky Reserve and the National Park as a whole, and its status as an International Dark Sky Reserve</u>, will be maintained and improved. 2. Development proposals should seek to reduce light spillage and eliminate all unnecessary forms of artificial outdoor lighting in the National Park by ensuring that: <ol style="list-style-type: none"> a) The Dark Sky <u>Reserve</u> Core Zone is protected from permanent illumination. b) External lighting within the Dark Sky <u>Reserve</u> Critical Buffer Zone is strictly controlled. c) Good lighting management and design is applied throughout the National Park to avoid unacceptable adverse impacts on: <ol style="list-style-type: none"> i) the visual character of the landscape, seascape, and historic built environment; ii) wildlife and habitats; and iii) local visual amenity and safety. 3. Development proposals that involve external lighting, outside the Dark Sky <u>Reserve</u> Core Zone, will only be permitted where it can be demonstrated that they are required for safety, security or community reasons and where the details minimise light spillage; having regard to the Lighting Management Plan guidance. | |
| 58 | Page 44, para. 4.53 d) | d) National priority habitats and species ⁹⁴ are identified on the England Biodiversity List ⁹⁵ and those relevant to Exmoor are included within the priority habitats and species lists for Exmoor. | Correction – superscript the footnote reference number. |
| 59 | Page 46, para. 4.60 | The hierarchy of <u>international, national and local</u> wildlife sites on Exmoor is shown on the Policies Map. <u>Exmoor’s Priority Habitats are not shown on the</u> | For clarification. |

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| | | <p><u>Policies Map, but many of these will be protected by existing designations; however applicants can seek advice from officers if it is considered that proposals may impact on priority habitats listed in Table 4.1.</u> In considering applications affecting the natural environment, the National Park Authority will seek to minimise impacts on biodiversity and provide net gains in biodiversity, where possible.</p> | |
| 60 | Page 46, para. 4.61 | <p>Applications for development should ensure that sufficient information is provided regarding the wildlife sites or species that may be affected by a proposal. Pre-application discussions can prevent delays and help ensure that planning applications are submitted with adequate information on biodiversity and geological impacts. In some cases (for example if proposals may affect a SSSI), it may be appropriate to include third parties, such as Natural England, in these discussions. Pre-application enquiries can help ascertain whether a European protected species, species identified as important or rare in a national context, or locally important on Exmoor, is present on site. Where such a species may be present, the application should be informed by an ecological survey prepared by a suitably qualified consultant to assess this. The re-use of buildings and previously developed land (GP4 The Efficient Use of Land and Buildings) in particular would require careful assessment of any existing wildlife interest.</p> <p><i>[Split to create new paragraph 4.61a]</i></p> <p>The National Park Authority has produced an Biodiversity Exmoor Wildlife Checklist and guidance to assist the preparation of a planning application in considering whether a proposal is likely to affect any priority or protected species/habitats and if further surveys are necessary. Applications should show how the proposal has taken this evidence into account through its design and any mitigation or compensation proposed. The re-use of buildings and previously developed land (GP4 The Efficient Use of Land and Buildings) in particular would require careful assessment of any existing wildlife interest.</p> | For clarification in response to representation number 0059/02. |

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| 61 | Page 47, para. 4.63 | The National Park Authority will work in close collaboration with Natural England, <u>the Environment Agency</u> and non-statutory conservation agencies such as the Somerset and Devon Wildlife Trusts, the RSPB, and recognised local experts as appropriate, as well as using its own specialist knowledge in assessing the likely impact of development proposals. | In response to representation number 0033/01 |
| 62 | Page 48, para. 4.68 | The ecological network comprises core areas, stepping stones, the matrix <u>dispersal areas</u> and sustainable use areas. <ul style="list-style-type: none"> a) Core areas are patches of priority habitat that are at least as big as the minimum area a species population needs in order to survive. b) Stepping stones are areas of priority habitat that are smaller than the minimum viable area but provide important intermediary areas of habitat, which may help to connect up core areas across the landscape. c) The matrix is <u>Dispersal areas</u> are a flexible buffer that represents where species are able to move to in the landscape, and this area can contract or be extended according to how hospitable, or permeable, a surrounding land use is. d) Sustainable use areas comprise the majority of the landscape, and this is where real advances can be made in improving the permeability of the land around core areas and stepping stones. | Points of clarification raised by representation number 0119/01 |
| 63 | Page 48, para. 4.70 | Sustainable development in the National Park should strengthen the resilience of the ecological network by avoiding direct and indirect impacts through sensitive site location and design. Sustainable development will not lead to the loss, damage, deterioration or disturbance of Core Areas, or Stepping Stones, and will generate a net gain for biodiversity by enhancing Restoration Areas and matrix habitats <u>dispersal areas</u> . | Points of clarification raised by representation number 0119/01 |
| 64 | Page 50, para. 4.78 | <u>Green infrastructure can also provide opportunities to enhance the historic environment.</u> | In response to representation number 0120/03 |

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| 65 | Page 51, Policy CE-S3 Biodiversity and Green Infrastructure | <p>CE-S3 BIODIVERSITY AND GREEN INFRASTRUCTURE</p> <ol style="list-style-type: none"> 1. The conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight. 2. Development delivery, management agreements and positive initiatives will conserve, restore and re-create priority habitats and conserve and increase priority species identified for Exmoor in the Exmoor Wildlife Research and Monitoring Framework (or successor publication). 3. Sites designated for their international, national or local importance, <u>priority habitats, priority or protected species, ancient woodland, and</u> or <u>veteran trees, will be protected from development likely to have direct or indirect adverse effects <u>including on their conservation objectives of designated sites, including notified features,</u> and ecological functioning of cited habitats and species.</u> 4. Regionally important geological sites (RIGS) will be safeguarded for their geological and geomorphological interest. 5. Where, in exceptional circumstances, the wider sustainability benefits of the development are considered to outweigh the harm to habitats, species or the geological interest of sites, then measures will be required to first avoid such impacts, and if they cannot be avoided, then to mitigate damage <u>harm</u> and provide appropriate compensatory measures. 6. The enhancement of biodiversity and creation of multi-functional green infrastructure networks at a variety of spatial scales, including cross-boundary connectivity to areas adjacent to the National Park, that help support ecosystem services will be encouraged. 7. Opportunities will be promoted for habitat management, restoration, expansion that strengthens the resilience of the ecological network, and | <p>Changes to clauses 3 and 5 are points of clarification - to include priority species and habitats within the list of habitats and species where planning proposals should avoid harm.</p> <p>Amendment to clause 8 in response to representation 0119/01</p> |

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| | | <p>enables habitats and species adapt to climate change or to mitigate the effects of climate change.</p> <p>8. Green infrastructure that incorporates measures to enhance biodiversity, including matrix dispersal areas identified within the ecological network, should be provided as an integral part of new development.</p> | |
| 66 | Page 51, para. 4.82 | <p>Policy CE-D2 Green Infrastructure Provision encourages the provision of green infrastructure as an essential component of new development¹⁶ that also incorporates benefits for biodiversity on a scale that is commensurate with the nature, scale and activity of any development proposal. <u>Green infrastructure provision should be considered at the earliest stage of preparing development proposals.</u></p> | In response to representation number 0069/11 |
| 67 | Page 55, para. 4.94 | <p>In considering applications likely to affect locally important assets, the National Park Authority will assess their significance and the desirability of their preservation. Applicants will be required to provide adequate information to enable the National Park Authority to assess the significance of a site or feature. Adverse impacts on <u>Harm to</u> heritage assets of local importance should be avoided and development will only be permitted where the archaeological/historic interest is capable of being preserved in situ. Where, in exceptional circumstances, an application is approved which will result in the loss (wholly or in part) of heritage assets, then developers must record and make publically available this information to advance understanding of the significance of the assets. However the ability to record evidence of the assets will not be a factor in deciding whether loss of the asset should be permitted.</p> | In response to representation number 0120/05 |

¹⁶ Natural England (2009): Green Infrastructure Guidance (NE176)

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| 68 | Page 56, para. 4.99 | Where heritage assets are likely to be affected by development proposals, these should be identified at pre-application stage. Applications should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance, in order to understand the potential impact of the proposal on their significance. The Exmoor Historic Environment Record should be consulted as a minimum to determine whether or not a heritage asset is likely to be affected and its significance; however the National Park Authority should be contacted if data is required in support of a planning application. In some circumstances, a Heritage Assessment may be required. The National Park Authority can provide further guidance and early discussion with officers is also encouraged. <u>Further advice is provided in Historic England's good practice advice note on Managing Significance in Decision-Taking in the Historic Environment (or successor guidance).</u> ¹⁷ | In response to representation number 0120/06. Footnote references updated. |
| 69 | Page 59, para. 4.110 | Development proposals should seek to avoid adverse cumulative impacts on the setting of the heritage assets, and the erosion of its aesthetics. The National Park Authority will encourage the enhancement of heritage assets and their setting, including the repair or restoration of important features, the improvement or removal of unsightly features, and measures that better reveal the significance of the asset. <u>Further detailed guidance is set out in the Historic England good practice advice note for The Setting of Heritage Assets¹⁸ (or any replacement guidance) to provide and understanding of the potential impact of the proposal on the significance of the asset and contribution made by its setting. This will help inform any Heritage Statement that may be required when submitting a planning application.</u> | In response to representation numbers 0044/06 and 0120/07. Footnote references updated. |

¹⁷ Historic England (March 2015) Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment

¹⁸ Historic England (March 2015) Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets

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| 70 | Page 62, para. 4.121 | Where a traditional building is regarded as structurally unsound unsatisfactory for conversion, i.e. if or would require substantial reconstruction, extension or alteration is proposed or where the building is derelict, has no roof or is structurally unsound ; the proposal will be classified as a 'new build' rather than 'conversion' and will need to accord with the relevant policies set out in this Local Plan. Such proposals should still seek to retain the embodied energy in the building and the historic fabric of the structure. It may be preferable for some ruined buildings to remain <u>as ruins</u> with measures in place to stabilise their structure where they are of landscape or historic value. | Points of clarification. |
| 71 | Page 63, NEW para. 4.125a | <p><u>4.125a In terms of the conversion of buildings to a residential use, it is recognised that the floorspace of existing buildings will occasionally be larger than the required gross internal area for certain occupancy restrictions (HC-S2 A Balanced Housing Stock). Where the proposed gross internal area exceeds the policy requirement, the application should demonstrate how the following points have been considered:</u></p> <ul style="list-style-type: none"> a) <u>The desirability of converting all the existing structure in terms of achieving conservation and enhancement of the building and its setting.</u> b) <u>Whether the building can be converted to more than one dwelling unit.</u> c) <u>Whether part of the building can remain unconverted, or used as ancillary storage/garaging to ensure the habitable space does not exceed the required gross internal area.</u> <p><u>For any dwelling with a floor space restriction, but particularly local affordable dwellings, any increase in the gross internal area should be reasonable in relation to the policy requirement, as the size of the dwelling will have a substantial bearing on its value and affordability over the longer term.</u></p> | New paragraph to clarify the approach for converting an existing building to a residential use (where a floorspace restriction is required). |
| 72 | Page 64, para. 4.132 | Buildings that have been constructed for less than 10 years would not normally be considered for conversion and/or change of use. In such circumstances, the degree to which the building has been used for the intended agricultural purpose | Correction to policy cross-reference and additional text to |

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| | | <p>will be taken account of. Where the National Park Authority has reasonable cause to believe that an applicant has, with the benefit of permitted development rights constructed a new farm building, with the intention of early conversion to another use, it will be appropriate to investigate the history of the building to establish whether it was ever used for the purpose for which it was claimed to have been built (SE-S3 Business Development in the Open Countryside <u>SE-S4 Agricultural and Forestry Buildings</u>). <u>Part 3, Class R of the General Permitted Development Order 2015 permits the change of use of agricultural buildings to a flexible commercial use. To meet these requirements, the buildings should be solely for an agricultural use as part of an established agricultural unit on 3rd July 2012 or when it was last in use before that date (see policy SE-S3 Business Development in the Open Countryside).</u></p> | <p>provide explanation of permitted development rights.</p> |
| 73 | Page 65, policy CE-S5 | <p>CE-S5 PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS-</p> <p>1. The conversion or structural alteration of any existing building will be permitted where the proposal:</p> <ul style="list-style-type: none"> a) accords with the relevant policies in this Plan in terms of <u>sustainability and</u> the intended use; b) clearly demonstrates that the building is capable of conversion without substantial reconstruction; c) is suitable for the existing building in terms of the intended use and the intensity of that use, in relation to its capacity, structure and character without substantial alteration; where the conversion of a building relates to a change of use to a dwelling, sufficient curtilage space should be provided where the delineation of this space would | <p>In response to representation number 0043/13.</p> |

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| | | <p style="text-align: center;">not individually or cumulatively result in harm to the character of the building or its setting; and</p> <p>d) bat and barn owl roosts are maintained or replaced.</p> <p>2. In addition to clause 1, proposals for the conversion or structural alteration of traditional buildings, should also:</p> <p>a) ensure the historic fabric, and architectural interest of the building and its setting including the retention of existing traditional and historic features are conserved and enhanced; <u>and</u></p> <p>b) reflect the character and significance of the building and conserve its traditional appearance through sensitive design and the use of traditional materials, detailing and construction principles; and</p> <p>e)-e <u>Conditions will be attached to remove permitted development rights granted by the General Permitted Development Order 1995 to ensure the character and appearance of traditional buildings are conserved.</u></p> <p>3. In addition to clause 1, proposals for the conversion or structural alteration of non-traditional buildings, will only be considered if traditional buildings are demonstrated to be incompatible with the intended use or no such buildings are present, and where:</p> <p>a) the building is of permanent and substantial construction; and</p> <p>b) measures to provide environmental and visual enhancement to the building and its setting are incorporated.</p> | |
| 74 | Page 69, paras. 4.153 - 154 | 4.153 The treatment of individual design elements is of critical importance to a successful overall design and should be considered once the character of an area has been assessed and key principles of scale, massing and form | Points of clarification regarding materials for windows and conservatories. |

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| | | <p>have been addressed. The use of materials and detailing of elements such as doors and windows will have a significant bearing on how well a new development complements its surroundings. The National Park Authority will seek to ensure that such detailing will enhance the design of the development in a style and arrangement which contributes to and strengthens the local character. The National Park Authority expects that windows and doors should be constructed of timber since this is a both a traditional and sustainable material which has the potential to be grown locally. Timber detailing (windows, doors, weatherboards etc.) when in hardwood or pre-treated, can <u>also</u> be repaired and have a long lifespan. There are examples of wooden windows on Exmoor which have lasted for well over 100 years. Metal-framed windows may be considered where it is clearly part of the local character of the area or reflects the elements of an original building to be replaced.</p> <p>4.154 Some building materials are not considered appropriate in the National Park for aesthetic and environmental reasons, <u>meaning that they can appear incongruous when used in traditional buildings or historic settings and can erode the character and appearance of the building, local area or street scene. For example, as well as the surface finish, some uPVC window and conservatory designs can also have much thicker, unmoulded frames than timber, and the designs and detailing (applied glazing bars, joints, non-traditional forms of openings and/or wider frames for opening elements in comparison with the fixed panes) are for the most part limited in terms of being effective replacements for traditional timber designs. The Authority wishes to see the use of timber for window frames as the primary approach to fenestration. However, uPVC window frame / conservatory design has improved and some products now have a closer resemblance to the character, profile and appearance of a traditional</u></p> | |

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| | | <p><u>timber window. Such Alternative materials may be considered in exceptional certain circumstances for non-traditional buildings in areas outside Conservation Areas (e.g. in the case of some minor extensions to, or replacement windows in, post-war/non-traditional buildings) where existing materials and the age, form and setting of the building may indicate such consideration). Particular attention will be paid to the fenestration of the principal elevation of any building as well as any elevations which are publicly visible. It will be necessary to demonstrate that a non-timber window or conservatory would have the same high quality appearance as a traditional timber one - that the design and form has a character and appearance that complements the building: the frame and glazing bars are slim; each pane is individually glazed; the openings operate in a traditional form (including sliding sashes where that form of window is proposed); and the frame and glazing bars have appropriate mouldings. The design must be of the highest quality and the proposal will not where it can be demonstrated that there will be no adversely impact on local character or heritage assets and their settings (CE-S4), and the design is of the highest quality.</u></p> | |
| 75 | Page 70, paras. 4.158 | <p>Design principles should therefore incorporate and support sustainable building methods that help reduce carbon emissions and future proof against the impacts of climate change⁴⁹. National policy advises that when setting local requirements for sustainable construction, Local Planning Authorities must be consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards²⁰. The Government's subsequent approach is for local planning</p> | <p>To comply with Section 43 of the Deregulation Act 2015.</p> <p>Footnotes amended to update references.</p> |

⁴⁹ DCLG (2012) National Planning Policy Framework (Paragraphs 94, 95). Department of Communities and Local Government

²⁰ Zero Carbon Hub (2013) Zero Carbon Strategies

The Government's aim is to achieve higher sustainable building standards through amendments to building regulations which will result in Zero Carbon Homes standard by 2016.

DCLG (2012) National Planning Policy Framework (Paragraphs 94, 95). Department of Communities and Local Government

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| | | <p>authorities not to set in policy any additional local standards relating to the construction, layout or performance of new dwellings.²¹ Energy efficiency standards to be met through Building Regulations and measures to increase standards will be kept under review. Adopting these standards not only improves the sustainability of buildings in the long term but also impacts on affordability by reducing/lowering the running costs. Where ‘allowable solutions’ are required to account for emissions that are not expected to be achieved on a site, the National Park Authority will consider opportunities for off-site carbon abatement within the National Park either where the developer can provide their own off-site abatement, through a third party or by payment into a fund²².</p> | |
| 76 | Page 70, paras. 4.159 | <p>Proposed c Changes to Building Regulations will consolidate technical standards for housing²³ to ensure that they are high quality, accessible and sustainable. Given the low levels of development within the National Park, it is not considered to be practical to set local standards for sustainable construction. However, pProposals for new residential and non-residential development are encouraged to incorporate sustainable construction and passive design methods which not only address energy efficiency and seek to incorporate renewable energy technologies, but consider other sustainability issues such as waste, pollution, resource use, and health and well-being. Consultation has demonstrated clear support for incorporating sustainability requirements in new development, and reusing existing buildings and recycling materials where appropriate (policies GP4 The Efficient Use of Land and Buildings and CE S5 Principles for the Conversion and Structural Alteration of Existing Buildings).</p> | <p>To comply with Section 43 of the Deregulation Act 2015.</p> <p>Last sentence moved to a new paragraph below.</p> |

²¹ HM Government (2015) Deregulation Act 2015 – section 43 Amendment of Planning and Energy Act 2008

²² DCLG (2014) Next steps to zero carbon homes – Allowable Solutions – Government response and summary of responses to the consultation

²³ DCLG (2014) Written Ministerial Statement – Building Regulations. Minister for Communities (Stephen Williams – March 2014) [Online] www.publications.parliament.uk, accessed 27/8/14

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| 77 | Page 70, insert new paragraph after 4.159 | <p><u>The design of new development should incorporate adequate access for waste collection vehicles and storage for recycling waste. The Somerset Waste Partnership, as waste collection authority has produced guidance on the requirements for domestic properties²⁴, and applicants within the Somerset area of the National Park are encouraged to contact them for advice. Consultation has demonstrated clear support for incorporating sustainability requirements in new development, and reusing existing buildings and recycling materials where appropriate (policies GP4 The Efficient Use of Land and Buildings, CE-S5 Principles for the Conversion and Structural Alteration of Existing Buildings, and CC-S6 Waste Management).</u></p> | Text moved from para 5.112 as more appropriate here in relation to clause 2d of CE-S6, and cross-reference back to CC-S6 Waste Management (SCC comments). To reflect the updated Building Regulations Approved Document H which has been revised to include size specifications for waste storage. New reference inserted. |
| 78 | Page 71, policy CE-S6 | <p>CE-S6 DESIGN AND SUSTAINABLE CONSTRUCTION PRINCIPLES</p> <p>1. Development proposals should deliver high quality sustainable designs that conserve and enhance the local identity and distinctiveness of Exmoor’s built and historic environment and landscape character and in doing so applicants will be expected to demonstrate the following design principles:</p> <p>a) All development should positively contribute to its setting in terms of siting, massing, scale, height, orientation, density and layout.</p> <p>b) The materials and design elements of a building should complement the local context through the use of traditional and natural sustainable building materials. The use of locally-sourced sustainable building materials will be encouraged.</p> <p>c) Design should reinforce landscape character and the positive arrangement of landscape features through planting and landscaping</p> | <p>Amendment to clause 1 responds to representation number 0120/08.</p> <p>Changes to clause 2 and insertion of clause 3 are to comply with Section 43 of the Deregulation Act 2015.</p> |

²⁴ Somerset Waste Partnership (2011) Design requirements for residential properties – recycling and waste management

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| | | <p>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.</p> <p>d) Design should have regard to health and well-being and ensure that sufficient public and/or private space is provided or available, and footpaths and cycleways are incorporated where appropriate.</p> <p>e) The design and layout of new development should have regard to improving safety, inclusivity and accessibility for those who live, work and visit there.</p> <p>f) The layout and design of new streets and associated infrastructure, required as part of development proposals, should respond to local character and the scale, and proportions of the historic street pattern. Opportunities for streets to be used as social spaces will be encouraged.</p> <p>g) The use and activity of the new development should not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance, or other adverse environmental impacts.</p> <p>2. Proposals for new development should also demonstrate how they will incorporate sustainable construction methods that:</p> <p>a) promote the sustainable use of resources;</p> <p>b) reduce carbon emissions by improving or generating energy efficiencies including through renewable and low carbon technologies (CC-S5)</p> <p>c) Future proof against climate change impacts in accordance with CC-S1; and</p> <p>d) Provide adequate storage for recycling waste.</p> | |

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| | | <p><u>2. To incorporate sustainable construction methods, proposals for new development should:</u></p> <p><u>a) promote the sustainable use of resources;</u> <u>b) provide adequate access to and storage for recycling waste; and</u> <u>c) future proof against climate change impacts, including flood risk, in accordance with CC-S1.</u></p> <p><u>3. Proposals that reduce carbon emissions by improving or generating energy efficiencies above those required by Building Regulations, including through renewable and low carbon technologies (CC-S5), will be encouraged.</u></p> | |
| 79 | Pages 75-76, para. 4.176 | <p>The Government adopts a sustainable approach to minerals development and recognises the importance of a sufficient supply of material to provide infrastructure, buildings, energy and goods that are required. The National Planning Policy Framework (NPPF) recognises that since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation. This can be achieved by adopting a hierarchical approach to minerals supply, which aims firstly to reduce as far as practicable the quantity of material used and waste generated, then to use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction. <u>National Parks are not expected to designate Preferred Areas or Areas of Search given their statutory purposes.</u>²⁵</p> <p><i>[split to create a new paragraph]</i></p> <p>Minerals development is different from other forms of development because minerals can only be worked where they naturally occur. Potential conflict can</p> | Points of clarification regarding minerals development in the context of the National Park. |

²⁵ Planning Practice Guidance Paragraph: 008 Reference ID: 27-008-20140306

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| | | therefore arise between the benefits to society that minerals bring and impacts arising from their extraction and supply. | |
| 80 | Page 76, para. 4.177 | Large scale mineral extraction is not appropriate in the National Park as it would have an adverse impact on National Park purposes. The Exmoor National Park Authority seeks to ensure sufficient levels of permitted <u>non-energy mineral reserves</u> are available from outside National Parks owing to the major impact of modern mineral extraction on the landscape, wildlife, cultural heritage, public enjoyment and the <u>health and amenity of local</u> communities. The National Park Authority has worked with both Devon and Somerset County Councils to ensure <u>that</u> the needs of the Exmoor National Park are taken into account in their minerals planning including that the Local Aggregate Assessments (LAAs) for Somerset and Devon includes the relevant areas of the National Park as appropriate. | Points of clarification regarding minerals development within the context of the National Park. |
| 81 | Page 76, insert two new paragraphs after 4.177 | <u>National planning practice guidance states that in terms of planning for hydrocarbons, mineral planning authorities are expected to include petroleum licence areas on their policies map.²⁶ Only a small area of the National Park is included within a Block ST04 (a 10km by 10km area based on the national ordnance survey grid) offered under 14th Onshore Licensing Round. This area has been subject to appropriate assessment under the habitats regulations.²⁷ However, the Petroleum Act 1998 (as amended) sets out certain safeguards in relation to onshore hydraulic fracturing (fracking) to ensure that this does not take place in “other protected areas”; these areas are identified in draft</u> | Points of clarification regarding minerals development within the context of the National Park, and to reflect representation number 0057/02 regarding ‘fracking’. New references inserted. |

²⁶ Planning Practice Guidance Paragraph: 106 Reference ID: 27-106-20140306

²⁷ Oil & Gas Authority (2015) Habitats Regulations Assessment 14th Onshore Oil and Gas Licensing Round Appendix D completed assessment proformas – URN: 15D/401 18th August 2015

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| | | <p><u>regulations to include the area of National Parks at a depth of less than 1200m.²⁸</u> <u>Hydraulic fracturing can only take place below 1200m.</u></p> <p><u>Policy CE-S9 Minerals Development will therefore apply to all types of mineral development, other than the small scale extraction of local building and roofing stone (CE-S7), including exploration, appraisal, extraction and processing. Apart from small-scale extraction of building and roofing stone, minerals development is not considered to be appropriate in the National Park as it would have an adverse impact on National Park purposes. There are no known mineral reserves of national importance and the lack of active mineral workings within the National Park supports this policy approach.</u></p> | |
| 82 | Page 76, para. 4.179 | <p>Small scale minerals extraction <u>of building and roofing stone</u> in the National Park would enable the provision of materials necessary for preserving traditional buildings and for maintaining and enhancing the character of settlements and the landscape character of the National Park. Consultation has indicated the need for local building material for the conservation and repair of buildings and structures of historic and cultural importance. Both national policy and policies within this pPlan encourage developers to use traditional local materials in development proposals. Some materials can be salvaged and reused, while quarries just outside the National Park are another valuable source. However, these options are not always practicable, economic or suitable. Stone, for instance, is most appropriate when it is of the same composition as nearby traditional building stone. To achieve a supply of local building stone the National Park Authority will <u>policy CE-S7 provides</u> for the small-scale mineral <u>extraction of this mineral resource</u> or the reopening of disused quarries in appropriate circumstances. Consideration will need to be given on how to meet any demand for small scale extraction of building stone at, or close to, relic quarries needed for the repair of</p> | Points of clarification relating to small scale extraction of building stone. |

²⁸ The Onshore Hydraulic Fracturing (Protected Areas) Regulations 2015

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| | | heritage assets, taking account of the need to protect designated sites (CE-S3). In accordance with government guidance it is recognised that there will be a need for a flexible approach to the potentially long duration of planning permissions reflecting the intermittent or low rate of working at many sites. | |
| 83 | Page 76, para. 4.178 | Small scale minerals extraction in the National Park would enable the provision of materials necessary for preserving traditional buildings and for maintaining and enhancing the character of settlements and the landscape character of the National Park. Consultation has indicated the need for local building material for the conservation and repair of buildings and structures of historic and cultural importance. Both national policy and policies within this plan encourage developers to use traditional local materials in development proposals. Some materials can be salvaged and reused, while quarries just outside the National Park are another valuable source. However, these options are not always practicable, economic or suitable. Stone, for instance, is most appropriate when it is of the same composition as nearby traditional building stone. To achieve a supply of local building stone the National Park Authority will provide for the small-scale mineral extraction or the reopening of disused quarries in appropriate circumstances. Consideration will need to be given on how to meet any demand for small scale extraction of building stone at, or close to, relic quarries needed for the repair of heritage assets, taking account of the need to protect designated sites (CE-S3). In accordance with government guidance it is recognised that there will be a need for a flexible approach to the potentially long duration of planning permissions reflecting the intermittent or low rate of working at many sites. <u>Such mineral development will be associated with some short term noisy activities, which may otherwise be regarded as unacceptable, but are necessary to facilitate the extraction of minerals. However, mitigation and planning conditions will be</u> | Points of clarification to reflect deleted policy text (see policy CE-S7 below). |

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| | | <u>used to ensure that unavoidable noise, dust and blasting vibrations are controlled.</u> | |
| 84 | Page 76, para. 4.179 | All proposals will be subject to a requirement to include a scheme for high quality restoration and aftercare of the worked land. Such schemes should seek to achieve the conservation and enhancement of the National Park including for geodiversity and biodiversity, in accordance with policy CE-S3 Biodiversity and Green Infrastructure, native woodland, historic environment and quiet enjoyment of its special qualities. Large scale <u>Other types of mineral extraction development</u> will be regarded as major development and will therefore be considered against policies CE-S98 <u>Major Mineral Extraction Development</u> and GP2 Major Development. In the past the National Park Authority has received proposals for mineral exploration which generally have involved drilling. Such proposals will need to be assessed against the General Policies in Section 3 and Policy CE-S7 below. | Points of clarification regarding minerals development within the context of the National Park. |
| 85 | Page 77, policy CE-S7 | <p>CE-S7 SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE</p> <p>1. Proposals for small scale quarries or the reworking of existing small quarries to provide building or roofing stone, including for the repair of heritage assets, will be permitted where it can be clearly demonstrated that:</p> <ul style="list-style-type: none"> a) there is a demonstrable need within the National Park and any minerals won will be for use within the National Park; b) proposals would help to provide local employment and reduce ‘stone’ miles; c) there is suitable access and it is of a scale appropriate for its location in the National Park; | Point of clarification/correction. |

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| | | <p>d) it would not adversely affect the landscape character, wildlife, cultural heritage, geodiversity, special qualities, tranquillity of the National Park, or the health or amenity of local communities;</p> <p>e) there are no suitable sources of previously used or banked materials that are reasonably available;</p> <p>f) the local building material cannot be sourced sustainably from elsewhere, including from outside the National Park, and the loss of supply would result in the devaluing of the built fabric of the National Park;</p> <p>g) permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account any cumulative effects of multiple impacts of individual sites; and</p> <p>h) recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction. But ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties.</p> <p>2. Any waste materials from extraction will be re-used or recycled. A scheme for restoration and after-use of the site should be submitted with the application to ensure that it will be carried out to high environmental</p> | |

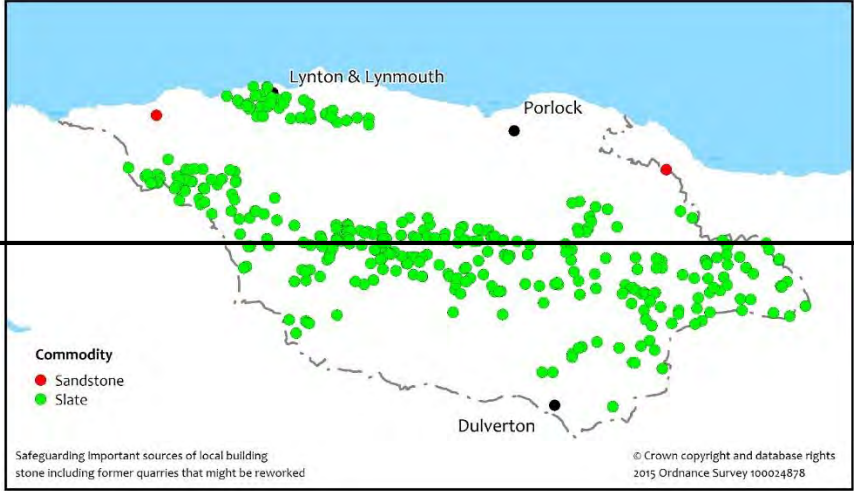
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| | | <p>standards, based upon conservation and enhancement of landscape character, geodiversity, biodiversity, and the historic environment.</p> <p>3. Conditions may be applied to limit the annual extraction rate.</p> | |
| 86 | <p>Pages 77-78, para. 4.180</p> <p>To be moved to precede policy CE-S7</p> | <p>MINERALS SAFEGUARDING AREAS</p> <p>In accordance with Government policy²⁹, the National Park Authority has not defined Minerals Safeguarding Areas³⁰, which are known locations of specific minerals resources of local and national importance, and are identified to ensure that they are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked. However, there is no presumption that applications to extract the mineral resources defined in Minerals Safeguarding Areas will be granted permission. Neither does a Minerals Safeguarding Area automatically preclude other forms of development. What it does, is draw attention to the presence of important mineral resources and make sure that they are adequately and effectively considered in land use planning decisions. Within the National Park the safeguarded minerals are sources of the local resource of building stone as are identified in the Building Stone Atlas of Somerset and Exmoor³¹ and include consist of a large number of small derelict building stone quarries. While a few of these derelict quarries may retain the appearance of a quarry, many others will have been reclaimed by vegetation or in-filled. Policy CE-S8 will be applied in all decisions where an application for non-mineral development is proposed within defined Minerals Safeguarding Areas (see Map 4.3). In the National Park, the need for minerals safeguarding is not considered to be as significant as it is in locations with higher expectations of mineral working and general development. Since new development in the</p> | <p>In response to representation number 0043/16 – with further consideration of available evidence.</p> <p>ENPA position is a ‘locally needed building stone resource’ with no active quarries and an extensive building stone resource. Low levels of development are unlikely to sterilise future small scale extraction of building stone. Therefore, minerals safeguarding areas are not considered to be needed.</p> |

²⁹ DCLG (2012) National Planning Policy Framework (Paragraph 143). Department of Communities and Local Government

³⁰ DCLG (2012) National Planning Policy Framework (Paragraph 143). Department of Communities and Local Government

³¹ English Heritage *et al.* (2011) Strategic Stone Study – A Building Stone Atlas of Somerset & Exmoor

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| | | <u>National Park is extremely limited and the demand for local building stone is low, there is very little risk of sterilising the available mineral resource given the extent of the resource across the National Park.</u> | |
| 87 | Page 78, policy CE-S8 | <p>CE-S8 MINERAL SAFEGUARDING AREAS</p> <p>1. Development proposals for non-mineral development within minerals safeguarding areas will be permitted where it will not compromise the future extraction of important building stone at existing or former quarries unless:</p> <p>a) the mineral can be extracted satisfactorily prior to the development taking place; or</p> <p>b) the development is of a temporary nature, can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or</p> <p>c) there is an overriding need for the development.</p> | Policy deleted. ENP position is a 'locally needed building stone resource' with no active quarries and an extensive building stone resource. Low levels of development are unlikely to sterilise future small scale extraction of building stone. Therefore, minerals safeguarding areas are not considered to be needed. |
| 88 | Page 78, Map 4.3 Minerals Safeguarding Areas | Map 4.3 Minerals Safeguarding Areas | Map deleted (see reason stated above) |

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| 89 | Page 79, policy CE-S9 | <p><u>CE-S89 MAJOR MINERAL EXTRACTION DEVELOPMENT</u></p> <ol style="list-style-type: none"> 1. Proposals for <u>large scale mineral extraction development, other than that prescribed by policies CE-S7 and CE-D7</u>, will not be permitted in the National Park unless in exceptional circumstances, Such proposals will be considered against the major development tests set out in policy GP2: major development, and should be <u>and where it is demonstrated to be in the public interest before being allowed to proceed in accordance with the tests for GP2 Major Development.</u> 2. If the tests for major development are met, the development and all restoration will be subject to a planning obligation to ensure: <ol style="list-style-type: none"> a) the development should be carried out to high environmental standards and respond to the local landscape character including its natural topography; | <p>To reflect representation number 0057/02 regarding ‘fracking’, and the principle of minerals development in the National Park context.</p> <p>Policy numbering to change to reflect the proposed deletion of CE-S8 Minerals Safeguarding Areas.</p> |

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| | | <p>b) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;</p> <p>c) any waste materials from extraction <u>the mineral development</u> will be re-used or recycled <u>consistent with CC-S6 Waste</u>; and</p> <p>d) a scheme for restoration and after-use of the site should be submitted with the application to ensure it will be carried out to high environmental standards based upon conservation and enhancement of landscape character, geodiversity and biodiversity, and the historic environment.</p> | |

Section 5: Responding to Climate Change and Managing Resources

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| 90 | Page 87, para. 5.29 | Exmoor has a wild, undeveloped coast, characterised by high cliffs, headlands and uninterrupted views giving a sense of tranquillity and remoteness. It also has a level of coastal vulnerability associated with it due to the impact of coastal change. The coast is important for its natural beauty, historic assets and supports a range of habitats and species. A significant proportion of the coast has a number of designations including Sites of Special Scientific Interest, Special Areas of Conservation, Heritage Coast and areas identified on the Section 3 Conservation Map. Furthermore the coast is a tourism asset; the South West Coast Path is a national trail which follows the Exmoor coast for part of its length and it makes an important contribution to the local economy. Proposals at the coast will need to be consistent with other policies in this plan which reflect these | Amendment to policy title |

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| | | coastal interests including: GP3 Spatial Strategy, CE-S1 Landscape <u>and Seascape</u> Character, CE-S3 Biodiversity and Green Infrastructure, CE-S6 Design and Sustainable Construction Principles, CE-S4 Cultural Heritage and Historic Environment, RT-S1 Recreation and Tourism, RT-D12 Access Land and Rights of Way. | |
| 91 | Page 88, Para 5.32 | Development at the coast has the potential to be visually intrusive, for example by affecting the skyline and views along the coast including undeveloped stretches (CE-S1 Landscape <u>and Seascape</u> Character). Proposals must demonstrate that there will be no adverse impact on the coastline, <u>landscape character and seascape in accordance with CE-D1 (protecting Exmoor's Landscapes and Seascapes)</u> . Any coastal issues that may arise will need to be carefully considered including direct, indirect, cumulative, long-term and short-term impacts. Proposals must also demonstrate they are appropriate to the coastal location and that they will not affect natural coastal processes ³² or result in coastal water pollution (CC-S7 Pollution) to the detriment of surrounding areas including those outside the National Park. | Clarification in response to representation number 0044/05. |
| 92 | Page 91, para 5.42 | GP4 3 | Correction to policy number. |
| 93 | Page 91, para 5.43 | It is envisaged that a strategy for Porlock Weir and surrounding area will be produced to manage the overall sustainability of the community likely to be affected by physical changes at the coast. The strategy will set out how development at risk from coastal change can be relocated away from the CCMA. <u>As Porlock Weir is a Conservation Area with a number of listed buildings, including some within the CCMA, the strategy will consider how changes to the historic environment will be managed, in accordance with CE-S4 (Cultural Heritage and Historic Environment) and CE-D3 (Conserving Heritage Assets)</u> . The | In response to representation number 0120/10 |

³² DCLG (2012) National Planning Policy Framework (Paragraph 106). Department for Communities and Local Government

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| | | relocation of development at risk to 'safer' areas could be achieved in a number of different ways, including the relocation further inland or to neighbouring settlements. Any proposals for adaptation and relocation at Porlock Weir should accord with this strategy. | |
| 94 | Page 93, para. 5.46 | <i>Change policy numbering: HC-D167</i> Replacement Dwellings | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 95 | Page 93, policy CC-S4 | <i>Change policy numbering in clause 1.d): HC-D167</i> | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 96 | Page 94, para 5.50 | In some cases, in more remote areas, there may be private water supplied from sources such as springs, wells and boreholes where access to public water supply is too expensive to connect due to distance. These supplies can be sourced from the more shallow aquifers, making them more prone to water scarcity during periods of extreme dry weather. It is therefore important that any proposals for new development ³³ on a private water supply are able to demonstrate that sufficient water supplies are available, and that existing water supplies and the environment are not adversely affected by the additional demand for water. <u>Local building control and environmental health teams (in the district councils) can provide further advice regarding appropriate pressure and flow to support sufficient water availability.</u> | In response to representation number 0053/02 |
| 97 | Page 99, para 5.73 | The impact of renewable energy schemes on the local ecology should be carefully assessed and where possible, result in an overall benefit for wildlife. The potential impacts depend on the type of technology and its location. Wind | In response to representation number 0059/03 |

³³ This applies to water supplies for drinking, washing and cooking or used in businesses (dwellings and commercial premises such as holiday accommodation, restaurants and so on)

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| | | <p>turbines may have direct impacts on habitats in relation to their siting and any access tracks required, and also potential impacts on species particularly birds and bats which can be struck by the moving blades. Care is needed to ensure that turbines are not located on migratory routes or on commuting routes between roosts and foraging areas for example. Hydro schemes also have potential ecological impacts through disturbance to the river bed and bank; impact on the watercourse as a habitat for fish and other aquatic creatures including through water abstraction; and impact on ecological value of other land affected by the development. <u>A number of rivers are designated or are important for migratory fish such as salmon and sea trout, and any barriers to movement such as new weirs are unlikely to be approved by the Environment Agency.</u> The demand for woodfuel for biomass could also lead to the loss of deadwood habitats if wood is cleared from the forest floor. Domestic renewable energy schemes such as PV panels also need to ensure that there is no disturbance during installation or maintenance to species such as bats or barn owls which may be using the roof space. There is also emerging evidence that the reflection of polarised light from solar panels can be damaging to aquatic insects³⁴. Such impacts will need to be judged on a case by case basis and will need to be kept under review.</p> | |
| 98 | Page 103, para 5.95 | <p>Whilst the National Park Authority is supportive of renewable energy, wind turbines are, by their very nature, often intrusive in the landscape. The Exmoor National Park Landscape Character Assessment (LCA) identified intrusive development as one of the main threats to landscape character. The LCA recognises that Exmoor National Park <i>“is small in extent and as such is fragile in relation to change – not least small cumulative issues that, collectively, can have a significant impact on the landscape”</i>. The Exmoor National Park Partnership Plan</p> | To comply with the Written Ministerial Statement on wind energy development 18 June 2015 |

³⁴ Buglife (2011) A Review of the Impact of Artificial Light on Invertebrates

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| | | <p>2012-17³⁵ recognises that wind turbines can, individually and cumulatively, erode the unspoilt, uncluttered nature of the landscape and they can have a detrimental impact on tranquillity³⁶. The potential for exploiting the wind resource in Exmoor is therefore likely to be limited by the need to ensure that turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. Some landscapes, such as moor and heath, including in coastal locations, are so sensitive to intrusive development from vertical structures due to their open vistas and wild character, that it may not be acceptable to have any turbines. <u>Areas not considered to be suitable for wind energy development are Landscape Character Types A: High Coastal Heaths and D: Open Moorland as shown in Map 5.2.</u> However, in other landscape types in the National Park, it may be possible for individual small scale wind turbines that are similar in scale to existing buildings and trees, against a backdrop or suitably screened and in an appropriate colour, to be assimilated into the landscape.</p> | |
| 99 | Page 103, para 5.98 | <p>In order to judge whether the potential impacts of a proposal are likely to be acceptable, applicants should consider the impacts of the wind turbine along with any required infrastructure, such as road access, on site-tracks, turbine foundations, hard standings, anemometer masts, a construction compound, electrical cabling and an electrical sub-station and control building. Some of these features are permanent and others are required only in the construction phase and as such are temporary. Applications should include any necessary supporting information regarding the assessment of impacts on landscape, wildlife, cultural heritage, historic environment and other resources as set out under the issues to be considered in proposals for renewable energy development (CC-S5) paragraphs 5.65 to 5.94. Applicants will be expected to demonstrate that,</p> | To comply with the Written Ministerial Statement on wind energy development 18 June 2015 |

³⁵ ENPA (2012) Exmoor National Park Partnership Plan 2012-2017

³⁶ The Exmoor National Park Partnership Plan recognises a special quality of Exmoor National Park as “A timeless landscape mostly free from intrusive development with striking views inside and out of the National Park and where the natural beauty of Exmoor and its dark night skies can be appreciated”

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| | | <p><u>following consultation, the planning impacts identified by affected local communities and 'communities of interest' such as users of the National Park have been fully addressed and therefore the proposal has their backing^x. Proposals within any areas of search allocated in a Neighbourhood Plan will be considered to have the backing of that local community.</u></p> <p>^x <u>Footnote reference: House of Commons (2015) Written Statement (HCWS42) made by Secretary of State for Communities and Local Government on 18 June 2015. Local Planning (wind energy development)</u></p> | |
| 100 | New: Map 5.2 Suitable Areas for Small Scale Wind Turbines and Freestanding Solar Arrays | <p>Map showing areas unsuitable for wind energy and solar PV: Landscape Character Types A: High Coastal Heaths and D: Open Moorland</p> <p><i>See Appendix 3</i></p> | To comply with Written Ministerial Statement on Wind Energy 18 June 2015 |
| 101 | Page 104, Policy CC-D3 | <p>CC-D3 SMALL SCALE WIND TURBINES</p> <p>Amend policy to read:</p> <p>1. Proposals for individual wind turbines serving individual properties of groups of properties will only be permitted where they are small scale and:</p> <p>a) <u>Are sited within suitable areas of the National Park, excluding Landscape Character Types A: High Coastal Heaths and D: Open Moorland;</u></p> <p>a)b) <u>are appropriate in scale to the property being served, with a maximum height of 20m to rotor tip;</u></p> <p>b)c) <u>there is no unacceptable landscape or visual impact including cumulative impacts; and any residual impacts are minimised by</u></p> | To comply with the Written Ministerial Statement on wind energy development 18 June 2015 Informed by the Landscape Sensitivity Assessment |

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| | | <p>locating the turbine close to any associated development or features and by screening and colour of the turbine;</p> <p>e) d) there is no unacceptable adverse impact on tranquillity or amenity including the effects of shadow flicker and noise on nearby properties or access routes;</p> <p>d) e) the location does not conflict with the use of the area for recreation and access, and public safety is not compromised; and</p> <p>e) f) access to the site for construction and maintenance can be provided without damage to rural roads or historic bridges and fords.</p> | |
| 102 | Page 105 | <p>CC-D4 FREESTANDING SOLAR ARRAYS</p> <p>1. Small scale freestanding solar arrays to serve the needs of individual properties, groups of properties, community buildings such as village halls, agricultural properties or other businesses will be permitted where:</p> <p>a) <u>They are sited within suitable areas of the National Park, excluding Landscape Character Types A: High Coastal Heaths and D: Open Moorland;</u></p> <p>b) they are appropriate in scale and in proportion to the size of the property they are intended to serve;</p> <p>c) they are suitably sited and screened to avoid any intrusive visual or landscape impact, and where they are clearly associated with the buildings or properties that they are intended to serve;</p> <p>d) they are sensitively sited to avoid impacts on wildlife and land of high ecological interest;</p> <p>e) the design, colour and choice of materials minimises any visual impact; and</p> <p>f) they do not detract from the <u>harm the significance and</u> setting of listed buildings or other heritage assets, or cause damage to archaeological interests.</p> | For consistency with proposed change reference number 101 (wind turbines). Informed by the Landscape Sensitivity Assessment. |

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| | | 2. Proposals for ground mounted solar arrays that are sited in isolation away from existing built forms will not be permitted. | |
| 103 | Page 104, para 5.100 | Small-scale freestanding solar arrays that are well screened in enclosed gardens or closely linked to existing buildings with no or minimal visual impact may be preferable to visually intrusive roof mounted panels. There may also be some circumstances where ground mounted solar arrays to serve groups of properties, community buildings, such as village halls, agricultural properties or other businesses are acceptable, where these are well screened within existing building complexes or by other landscape features such as hedgerows, walls or trees, and do not detract from any architectural or historic interest. However, freestanding arrays should be sensitively sited to avoid impacts on wildlife and land of high ecological interest. Applicants should highlight the benefits of a ground-mounted array in comparison to a roof-mounted array in these cases. Proposals should consider the potential impacts on the issues listed for renewable energy development (CC-S5), paragraphs 5.65 to 5.94, and provide relevant information to support the application. Flood Risk implications should also be considered (CC-D1). <u>Given the sensitivity of Landscape Character Types A: High Coastal Heaths and D: Open Moorland as shown in Map 5.2 these are not considered to be suitable locations for freestanding solar arrays.</u> | For consistency with proposed change reference number 101 (wind turbines). Informed by the Landscape Sensitivity Assessment. |
| 104 | Page 105, after Policy CC-D4 Freestanding Solar Arrays | Insert Map 5.2 Suitable Areas for Small Scale Wind Turbines and Freestanding Solar Arrays <i>(see Map 5.2 in Appendix 4)</i> | To identify the suitable areas for small-scale wind energy and solar PV development. See Appendix 4. |
| 105 | Page 106, 5.109 | Given the overlap of administrative boundaries, the relevant waste planning authorities of Exmoor National Park Authority and the County Councils of Somerset and Devon, have agreed to work together closely in order to continue to achieve sustainable waste management. <u>The Somerset Waste Core Strategy and Devon Waste Plan articulate this relationship with Exmoor National Park,</u> | Points of clarification in response to representation number 0046/03. |

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| | | <p>acknowledging Both County Councils agree with the National Park Authority that the provision of large scale waste facilities for disposal, processing, recovery and recycling is inappropriate on Exmoor due to the area's designation as a National Park. Large scale Ffacilities for the disposal of domestic, industrial and commercial waste are incompatible with National Park purposes because of potential adverse impacts and because they may require the importation of waste which is deemed inappropriate in a National Park. Exmoor National Park policy will therefore presume against new waste facilities within the National Park, and no sites will be allocated. Large scale sSpecialised processing sites, such as commercial composting and recycling plants, will also be inappropriate, because of the potential adverse impacts including on the landscape and the potential for air, land and water contamination (CC-S7 Pollution). Small scale re-use, recycling, and compositing facilities will be permitted to serve the needs of individual local communities, but only where they are well related to named settlements (GP3) and do not include importation of waste from outside the community.</p> | |
| 106 | Page 107, para 5.112 | <p>It is important to integrate waste management considerations into non waste developments, particularly by seeking to minimise the generation of waste in new developments, alterations and extensions, and encouraging sustainable construction methods including the use of recycled materials. Construction and demolition waste should be minimised and must be managed and re-used on site, providing that there will be no harmful impacts. However, where re-use on site may result in a risk to biodiversity, the historic environment (such as archaeology or the setting of a heritage asset), local communities or the water environment, appropriate off-site waste management or disposal will be required. <u>In these circumstances, off-site recovery or reuse will be sought in preference to off-site disposal.</u> The design of new development should incorporate adequate storage for recycling waste (CE S6). The Somerset Waste Partnership, as waste collection</p> | <p>In response to representation number 0046/04.</p> <p>Deleted text moved to new paragraph after 4.159 (proposed change reference 77)</p> |

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| | | authority has produced guidance on the requirements for domestic properties³⁷, and applicants within the Somerset area of the National Park are urged encouraged to contact them for advice. | |
| 107 | Page 107, para 5.113 | <p>Construction and demolition waste arising in the Exmoor National Park area is not expected to be significant given the level of current development in the National Park. However, (small-scale) major* planning applications for developments i.e. e.g. for 10 or more dwellings or buildings greater than 1000sqm, are likely to generate a considerable volume of waste compared to the majority of minor developments in the National Park. Policy CC-S6 therefore requires that these applications should demonstrate how waste will be minimised and sustainably managed, both through the construction phase of the development, and its subsequent operation. This should include the potential for appropriate local reuse of topsoil and other relevant materials, in order to reduce transport miles. A waste audit will be required and included as part of the planning application and should provide the following information:</p> <p><u>*footnote reference: Major development as defined in: Statutory Instrument 2010 No.2184 The Town and Country Planning (Development Management Procedure) (England) Order 2010 Article 2</u></p> | To clarify the distinction between ‘major development’ in National Parks in relation to GP2 (NPPF para 116), and the Development Management Procedure Order definitions of ‘major development’ and in response to representation number 0058/02 |
| 108 | Page 108, para 5.118 | Waste from sewage can harm the environment where capacity is exceeded and as a result of its transportation. To safeguard ed environmental quality and the health and amenity of the National Park’s residents, sewerage capacity and sewage disposal (including the process of disposal) must be appropriately managed. Exmoor National Park will seek to continue discussions around sewage arisings and capacity with South West Water and Wessex Water as service providers. Policies CC-S6 Waste Management and CC-D5 Sewerage Capacity and | Grammatical correction |

³⁷Somerset Waste Partnership (2015) Developer Guidance

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| | | Sewage Disposal seek to ensure that these impacts are avoided and to provide appropriately for new or extended sewage infrastructure. | |
| 109 | Page 109, Policy CC-S6 | <p>CC-S6 Waste Management</p> <ol style="list-style-type: none"> 1. The National Park Authority will work with the waste collection and disposal authorities, partner organisations and local communities to promote sustainable management of waste through the waste hierarchy. 2. Large scale waste facilities, including landfill sites and specialised processing plants, will not be permitted in the National Park. 3. Construction and demolition waste should be minimised and must be managed and re-used on site where there will be no harmful impacts. Where re-use on site may result in an environmental risk to biodiversity, the historic environment (such as archaeology or setting of a heritage asset), local communities or the water environment, appropriate off-site waste management or disposal will be required. 4. Applications for all major developments (for 10 or more dwellings or buildings greater than 1000sqm as defined in the <u>Development Management Procedure Order</u>) must demonstrate how the construction and operational phases of the development will be consistent with the principles of sustainable waste management through a waste audit. 5. Waste facilities for small scale reuse, recycling, and composting will only be permitted to meet the identified needs of, and serve individual local communities, where they do not include importation of waste from outside that community. Community waste facilities should be well-related to settlements, in accordance with GP3 Spatial Strategy, to avoid the need to travel, any unacceptable adverse impact on local communities and the amenity, landscape, wildlife and cultural heritage of the National Park. | To clarify the distinction between ‘major development’ in National Parks in relation to GP2 (NPPF para 116), and the Development Management Procedure Order definitions of ‘major development’ |

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| | | <p>6. Small scale anaerobic digesters and waste management facilities on farms will only be permitted where they source feedstock and waste from within the National Park and/or from parishes adjoining the National Park. Farm facilities should be suitably located on the farm to avoid impacts on the natural and cultural environment and traffic generation. Proposals for anaerobic digesters should also accord with policy CC-S5 (low carbon and renewable energy development).</p> <p>7. Proposals relating to waste water and sewage facilities for storage and disposal should ensure that such infrastructure is appropriate in terms of its location, scale and design to avoid adverse impacts on the National Park and surrounding area (policy CC-D5).</p> <p>8. The National Park Authority will require the appropriate restoration and after-use of waste sites, through the application of appropriate conditions where necessary, based upon conservation and enhancement of landscape character, geodiversity and biodiversity, the historic environment and quiet enjoyment of the National Park.</p> | |

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| 110 | Page 117, para 5.151 | <p>The proliferation of artificial lighting has led to the deterioration of the night sky in some areas. Proposals should therefore demonstrate management of light pollution is consistent with CE-S2 Protecting Exmoor’s Dark Night Sky. Proposals that are likely to result in unacceptable light pollution will not be appropriate in the National Park including from illuminated advertisements (CE-D5 Advertisements and Private Road Signs). Tranquillity which results from the experience of a combination of low noise and dark night sky is a special quality of Exmoor. The quiet enjoyment of the National Park is supported by Policy RT-S1 Recreation and Tourism. Noise is defined as ‘unwanted sound’ and its impact is a material consideration in determining planning applications. Unacceptable intrusive noise generating development is inappropriate in the National Park context and will not be permitted where it would have a significant adverse impact on Exmoor’s special qualities, health, environment, surrounding land uses, quality of life or amenity. The Aadverse impacts of noise should be minimised to an acceptable level <u>to avoid the gradual erosion of tranquillity where this may have an effect on the character of an area. Noise should not exceed the lowest observed adverse effect level above which adverse effects on health and quality of life can be detected. Further information is set out in the Noise Policy Statement for England^x (or subsequent guidance).</u> Planning obligations and conditions may be used to mitigate the effects of noise (GP5 Securing Planning benefits – Planning Obligations). It is however recognised that existing businesses should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.</p> <p>Footnote ^x <u>Defra (2010) Noise Policy Statement for England</u></p> | For clarification in response to representation number 0047/01 |

Section 6: Achieving a Thriving Community

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| 111 | Page 119, para. 6.1 | The housing policies in this section aim to provide the framework to address the housing needs of the National Park's local communities to ensure that the level of housing development is compatible with the conservation and enhancement of Exmoor. The focus is on addressing the needs of those people who live and work in the area, prioritising the need for affordable housing and ensuring that the National Park's housing stock as a whole meets the needs of all sections of the local community. Providing a range of accommodation types and sizes and thereby a better mix of houses should help create more balanced, living and working communities. <u>This will be achieved through a needs led rural exceptions approach in order to maximise the ability to deliver affordable housing. Together with housing for rural workers and accessible and adaptable homes for older people, this Plan addresses the needs of Exmoor's communities.</u> | Change to the text for clarification to summarise plan approach on how aims will be achieved. |
| 112 | Page 119, para. 6.3 | The National Planning Policy Framework (NPPF) sets out a presumption in favour of "sustainable development" and indicates where development should be restricted. ³⁸ Objectively assessed needs should be met unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or where specific policies in it indicate development should be restricted. Such policies include those within a National Park. ³⁹⁴⁰ The Government has clarified that need alone is not the only factor to be considered. <u>Account should be taken of any constraints, which indicate that development should be restricted and which may</u> | Change to the text to better reflect national policy and guidance. |

³⁸ Ibid. para.. 14 and footnote 9 to para. 14.

³⁹ DCLG (2014) Press Release on the Gov.UK website: Councils must protect our precious green belt land [Online], Available: <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land> [4 Oct 2014].)

⁴⁰ DCLG (2014) Planning Practice Guidance: Do housing and economic needs override constraints on the use of land, such as Green Belt? Paragraph: 044 Reference ID: 3-044-20141006 [Online]

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| | | <p>restrain the ability of an authority to meet its need.⁴¹ Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty and Great weight should be given to conserving them and the conservation of wildlife and cultural heritage which are important considerations in National Parks. landscape and scenic beauty in.⁴² The PPG acknowledges that housing supply and affordability are issues in rural areas, recognising the role of housing in supporting the broader sustainability of rural settlements to ensure the viable use of local services and facilities to maintain thriving communities.⁴³</p> | |
| 113 | Page 120, para. 6.6 | <p>The approach in previous Park-wide Local Plans had been to encourage affordable housing.⁴⁴ <u>The 1997 Local Plan restricted open market new build housing within villages to redevelopment sites. This was a response to the high level of open market in-fill housing built during the previous 5-20 years that had tended to erode the character of Exmoor's villages.</u></p> <p><i>[Split to create new paragraph 6.6A]</i></p> <p>Within the context of restraint necessary in a National Park, the 2005 Plan provided a clear focus that, exceptionally, new affordable housing to meet local need and delivered through a needs led 'exceptions' approach would be considered to ensure that the needs of local communities were prioritised.⁴⁵ An important principle underpinning the approach was that the level of housing development should be compatible with the conservation and enhancement of</p> | Text moved from paragraph 6.101 of the Publication Draft Plan to reduce repetition, and in response to representation number 0058/02 about the length of the plan. |

⁴¹ DCLG (2014) Do local planning authorities have to meet in full housing needs identified in needs assessments? Paragraph: 045 Reference ID: 3-045-20141006 [Online].

⁴² DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115.

⁴³ DCLG (2014) Planning Practice Guidance: How should local authorities support sustainable rural communities? Paragraph 001, Reference ID: 50-001-20140306) [Online], Available: <http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/>

⁴⁴ Exmoor National Park Authority (1997) Exmoor National Park Local Plan 1991-2001, Dulverton: ENPA.

⁴⁵ Exmoor National Park Authority (2005) Exmoor National Park Local Plan 2001-11, Dulverton: ENPA. Chapter 4 pp 64-83.

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| | | Exmoor making maximum use of existing accommodation and buildings to reduce the need for greenfield development | |
| 114 | Page 121, para. 6.8 | <p>Exmoor's population declined by 5.5% from 10,873 in 2001 to 10,273 in 2011.⁴⁶ Comparison with England as a whole, indicates the extent to which Exmoor's population profile is skewed towards older age groups:</p> <ul style="list-style-type: none"> a) a higher than average proportion (around 30%) is aged 65 or above - the same as West Somerset district which has the highest average age in England;⁴⁷ b) almost twice the average proportion (35%) is aged 45 to 64;⁴⁸ c) a lower than average proportion of younger people; 25-44 year olds and under 24 year olds 20%.⁴⁹ d) the proportion of households with one person (<u>especially of over 65s</u>), and particularly two people, is higher than average. Nearly 20% of households are over 65s living alone. By contrast, the proportion of households with children is lower than average;⁵⁰ e) Internal migration (p) People, mainly in older age groups, moving into the area from other parts of the UK, including the South East, London, the Midlands and East Anglia,⁵¹ <u>is are</u> predicted to be the most significant | To clarify that the Exmoor National Park Housing Topic Paper sets out background evidence in relation to housing, To rationalise the plan by reducing figures in it and thereby reduce its length, in response to representation number 0058/02. |

⁴⁶ Office for National Statistics (2013) 2011 Census: Key Statistics for National Parks in England and Wales, [online]: Available: <http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-for-national-parks-in-england-and-wales/index.html>

⁴⁷ Housing Vision (March 2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: Exmoor National Park Authority, para 2.2 and Table 2.1.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Housing Vision (2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: Exmoor National Park Authority, paras 2.2 to 2.4 and Housing Vision (January 2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: Exmoor National Park Authority. Paras 2.3 to 2.4 and Table 2.1.

⁵¹ Housing Vision, Northern Peninsula Strategic Housing Market Area Assessment. (2008) Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton, ENPA, Map 2.11 & p75.

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| | | reason for population change, predominantly of older age groups, resulting in a net increase in Exmoor's population. ^{52 53} | |
| 115 | Page 121, para. 6.9 | Exmoor's housing market therefore continues to be under considerable pressure as the high quality environment of the National Park makes it an attractive place for people to retire to or own a second home. | Moved to paragraph 6.11 below to rationalise the length of the plan. |
| 116 | Page 121, para. 6.10 | Evidence on the occupancy of open market houses permitted in line with planning policies from previous Local Plans showed that 30% of new properties were occupied by retired people (77% the majority of whom came from the south east region and elsewhere in the UK) and 23% as second or holiday homes. Of the fully occupied properties (i.e. excluding the 23% second/holiday homes) only one in five of the smaller one and two bedroom properties and one in 10 of all new homes went to people from National Park communities. ⁵⁴ This is confirmed by recent This appears to still be the case as <u>housing projections for new housing and which are entirely due to result from</u> projected demand from households moving from other parts of the UK rather than locally arising needs. ⁵⁵ | To rationalise references to figures in the plan itself as they are set out in the Housing Topic Paper, and thereby reduce the length of the plan in response to representation number 0058/02 about the length of the plan |
| 117 | Page 121, para 6.11 | Between 2008 and 2011, the 45 to 64 age group moved in greatest numbers to the area <u>Exmoor's housing market therefore continues to be under considerable pressure as the high quality environment of the National Park makes it an attractive place for people, particularly those aged 45 or above, to move to or own a second home,</u> while younger people and a smaller number of older people <u>are moved moving away.</u> Large increases in the proportion of people aged over 65 and even greater increases in those aged 85 and above are predicted to 2035. ⁵⁶ As retired people continue to move into the area and older people | To increase clarity and to rationalise references to figures in the plan itself as they are set out in the Housing Topic Paper and thereby reduce the length of the plan in response to representation number 0058/02. |

⁵² Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton, Exmoor National Park Authority, p78.

⁵³ Exmoor National Park Authority (2016) Local Plan Housing Topic Paper, Dulverton. ENPA

⁵⁴ Exmoor National Park Authority (2000) Residential Occupancy Survey, Dulverton: Exmoor National Park Authority.

⁵⁵ Housing Vision (2015) SHMA Update: Exmoor National Park, Dulverton: ENPA, para 5.11.

⁵⁶ Ibid, p 92.

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| | | become more aged, <u>Large increases in the proportion of people aged over 65 and even greater increases in those aged 85 and above are predicted to 2035⁵⁷ and the age imbalance is likely to become more acute. Continuing to address the local need for affordable housing remains an urgent task to help ensure that younger people of working age can remain in the National Park to achieve balanced and sustainable communities on Exmoor.</u> | |
| 118 | Page 122, para. 6.12 | New build dwellings account for only a small proportion of all housing in the National Park. Nearly 90% of the total stock are houses of which almost half are detached. There are fewer one and two bedroom dwellings and more modest (and more affordable) terraces and flats <u>than average</u> and a well above average proportion of larger bedroom homes. | For clarification. |
| 119 | Page 122, para. 6.13 | Two thirds of Exmoor's housing is owned, nearly half outright. About one third is rented with of which approximately 16% half is in the private rented sector much of it for holiday letting purposes. The proportion of the housing stock which is affordable shared ownership or social rented tenures is 14% below the regional and national average. ⁵⁸ <u>19% Nearly one in five of all housing is homes are</u> second/holiday or empty homes. ⁵⁹ This adds pressure to the limited housing stock and further exacerbates affordability issues and the ability (or otherwise) to satisfy the needs of local communities. | To increase clarity and to rationalise evidence of figures in the plan itself as they are set out in the Housing Topic Paper, and thereby reduce the length of the plan in response to representation number 0058/02. |
| 120 | Page 122, para. 6.14 | The 'Right to Buy' of Council properties, introduced in 1981 had a significant impact on Exmoor's affordable housing stock. ⁶⁰ At the time of drafting, e <u>Concerted efforts on affordable housing were only just beginning to match the</u> | For clarification and to rationalise the plan and thereby reduce its length in response to representation |

⁵⁷ Ibid, p 92.

⁵⁸ Housing Vision (2015) Strategic Housing Market Assessment Update: Exmoor National Park, Dulverton: Exmoor National Park Authority, Table 3.2.

⁵⁹ Office for National Statistics (2013) 2011 Census: Key Statistics for National Parks in England and Wales, Percentage of households with no usual residents. [online]: Available: <http://www.ons.gov.uk/ons/rel/census/2011-census/key-statistics-for-national-parks-in-england-and-wales/index.html>

⁶⁰ Figures supplied by Magna West Somerset and North Devon Homes Housing Associations to whom West Somerset and North Devon local authority housing stock was transferred.

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| | | number of have been made to try and redress the loss of Exmoor's affordable homes lost through Right-to-Buy. | number 0058/02 about the length of the plan. |
| 121 | Page 122, para. 6.15 | As a designated 'rural area', new registered housing provider (RP) properties built after April 1996 were excluded from 'Right-to-Buy'. National changes <u>after 2010</u> , enabled RPs to sell affordable homes on the open market to help fund new schemes which can <u>could</u> be, to date, have all been outside the National Park (sales do not apply to affordable homes subject to a local needs occupancy tie). This reduces the stock of affordable housing for those in housing need. Since suitable housing sites on Exmoor are few and finite and the delivery of new schemes is complex, ENPA, working with partners, will seek the retention of affordable housing for the longer term. | For clarification and to rationalise and reduce the length of the plan in response to representation number 0058/02 about the length of the plan. |
| 122 | Page 122, para. 6.16 | More recent planning policies have sought to provide for a better mix of dwellings types and sizes. between 1992 and 2000 <u>In the 1990s</u> , most dwellings approved and built in the National Park were larger, generally three bedroom houses. ⁶¹ From 2005, local need affordable housing completed since 2005, has tended to be more modest in size - the majority having <u>two</u> bedrooms. | For clarification and to rationalise the plan. |
| 123 | Page 122, para. 6.17 | Table 6.1 shows that a <u>A</u> targeted approach to providing for local needs affordable housing has resulted in occupancy by households with a high proportion of children, young people and working age adults - the reverse of the age profile for those older households who tend to move to market homes in the National Park. ⁶² Provision of local need housing provides an opportunity for those with a local connection who cannot afford to buy open market housing, including younger/working age people and families, to remain living in the National Park helping to achieve a more balanced community. | To reflect the deletion of Table 6.1 |

⁶¹ Exmoor National Park Authority(2000) Residential Occupancy Survey, Dulverton, Exmoor National Park Authority,

⁶² Exmoor National Park Authority (2016) Exmoor National Park Topic Paper, Dulverton, Exmoor National Park Authority. Exmoor National Park, West Somerset and North Devon Rural Housing Project (2012 & 2013) Age Range of Occupiers of Local Need Affordable Housing in Exmoor National Park (based on age provided at time of initial occupation and projected forward), Dulverton, Rural Housing Project.

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| 124 | Page 123, Table 6.1 | <p>Table 6.1 Age Range of Occupants of Local Needs Affordable Homes in Exmoor National Park</p> <table border="1"> <thead> <tr> <th colspan="2">Occupancy at January 2012 and September 2013</th> </tr> <tr> <th>Age Range</th> <th>Number of Occupants</th> </tr> </thead> <tbody> <tr> <td>0-9</td> <td>47</td> </tr> <tr> <td>10-19</td> <td>20</td> </tr> <tr> <td>20-29</td> <td>56</td> </tr> <tr> <td>30-39</td> <td>34</td> </tr> <tr> <td>40-49</td> <td>15</td> </tr> <tr> <td>50-59</td> <td>8</td> </tr> <tr> <td>60-69</td> <td>8</td> </tr> <tr> <td>70-79</td> <td>2</td> </tr> <tr> <td>80+</td> <td>1</td> </tr> <tr> <td>Age not known</td> <td>4</td> </tr> <tr> <td>Total Number Housed</td> <td>195</td> </tr> </tbody> </table> | Occupancy at January 2012 and September 2013 | | Age Range | Number of Occupants | 0-9 | 47 | 10-19 | 20 | 20-29 | 56 | 30-39 | 34 | 40-49 | 15 | 50-59 | 8 | 60-69 | 8 | 70-79 | 2 | 80+ | 1 | Age not known | 4 | Total Number Housed | 195 | To rationalise evidence of figures in the plan itself as they are set out in the Housing Topic Paper, and thereby reduce the length of the plan in response to representation number 0058/02. |
| Occupancy at January 2012 and September 2013 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Age Range | Number of Occupants | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0-9 | 47 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10-19 | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20-29 | 56 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 30-39 | 34 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 40-49 | 15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 50-59 | 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 60-69 | 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 70-79 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 80+ | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Age not known | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Number Housed | 195 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 125 | Page 123, para. 6.18 | <p><u>Income, House Prices, Rental Levels and Affordability</u></p> <p>Housing 'affordability' has to be considered at a local level in the context of local incomes and house prices. Average gross household income within the National Park is between £28,000 and £29,000.⁶³ Many people however, are on lower incomes and in the area of the National Park within West Somerset, 45% of households are dependent on incomes of <u>around £20,000</u> or less (with lower quartile incomes at <u>averaging £16,000</u>).⁶⁴ This is substantially lower than the</p> | For clarification and to reduce the need for separate sub headings for paragraphs 6.18 and 6.19. | | | | | | | | | | | | | | | | | | | | | | | | | | |

⁶³ DEFRA Rural Statistics Unit (2010) - National Parks: Economic Comparison.⁶³

⁶⁴ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: Exmoor National Park Authority, p32.

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| | | national average. As well as many seasonal and part-time jobs, a high proportion - over a quarter - of West Somerset's work-force is self-employed with <u>lower</u> average earnings 14% lower than employee-employment equivalents. ⁶⁵ Comparing rental levels and house prices with income levels and the availability of mortgages within the National Park demonstrates the magnitude of the problem. | |
| 126 | Page 123, para. 6.19 | Between 1998 and 2012 average asking prices rose by over 300% in the National Park due to very high external market demand. ⁶⁶ In 2013 2014, the average Exmoor <u>asking house prices</u> was £325,000 - <u>25% were significantly higher</u> than the South West and 16% higher than England and Wales. ⁶⁷ <u>The disparity between household incomes and house prices means there is an 'affordability gap' with the ratio of average house price to average household income being 1410:1. The price of smaller properties was also high. The average asking price of lower quartile (or the bottom 25%) of houses was £180,000 and the ratio to lower quartile income was 11:1.</u> ⁶⁸ Consequently, the majority of properties is well beyond the means of many local people in housing need, especially first-time buyers and families needing larger accommodation. | For clarification, to update and rationalise evidence including of figures in the plan itself as they are set out in the Housing Topic Paper and thereby to reduce the length of the plan in response to representation number 0058/02. |
| 127 | Page 124, para. 6.20 | If Based on 25% of gross income being spent on rent is taken as a proxy for as <u>affordability</u> , private market rents in Exmoor were beyond the reach of many households on an average income. This was particularly the case for those families requiring a larger (3-4 bed) property. | For clarification. |
| 128 | Page 124, para. 6.21 | Social rental levels (formerly set by the HCA and sometimes known as 'formula' rents) were affordable to households on average income but only one and two | To update the Plan. |

⁶⁵ Ibid para 2.11-2.12

⁶⁶ ENPA (2012) Exmoor National Park Annual House Price Survey, Dulverton: Exmoor National Park Authority, Table 1.

⁶⁷ Ibid (mean average house price)

⁶⁸ Ibid.

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| | | bed housing was affordable for those households on lower quartile incomes. Larger homes were borderline affordable or unaffordable. | |
| 129 | Page 124, para. 6.22 | National changes to offset reductions in public housing grants and the introduction of 'Affordable Rents', pegged at up to 80% of local open market rents, have led, where ' A Affordable R Rents' have been applied, to higher (and less affordable) rents on Exmoor than social (or 'formula') rent levels. On average incomes, 80% rents were <u>only</u> affordable for up to three bedroom housing only . All properties (including one bed dwellings) were at the higher end or above what was considered affordable for those on lower quartile incomes. | For clarification and to update the Plan. |
| 130 | Page 124, para. 6.23 | Severe physical constraints, such as flood risk and topography and the sensitivity of Exmoor's landscape, affect the capacity of Exmoor's settlements to absorb more housing development. The Landscape Sensitivity Study for Exmoor National Park sets out the landscape capacity for new build housing on greenfield sites in each settlement named in the adopted Local Plan. Within the context that land in a National Park is recognised as being nationally important, <u>the Exmoor National Park Landscape Sensitivity Study assessed</u> greenfield land in and around <u>existing named settlements</u> was assessed in terms of its landscape sensitivity to, <u>and capacity for, new build housing.</u> ⁶⁹ It assessed demonstrated that the limited total landscape capacity of all settlements named in the 2005 Local Plan over the longer term (and beyond the period of the Local Plan). was 333 units | To increase clarity, to rationalise evidence of figures in the plan itself, as they are set out in the Housing Topic Paper, and reduce the length of the plan in response to representation number 0058/02. |
| 131 | Page 124, para. 6.24 | The Exmoor National Park Strategic Housing L Land Availability Assessment (SHLAA) examined the potential of land to deliver future housing development to address identified need over the plan period. It was based on realistic assumptions about the availability and suitability of land taking account of constraints. The potential for the re-use of existing buildings was also examined and those considered suitable were included as a means of delivering housing | Grammatical correction and to rationalise evidence of figures in the plan itself, as they are set out in the Housing Topic Paper. |

⁶⁹ Bryan, P. (2013) Exmoor National Park Landscape Sensitivity Study 2013, Dulverton: Exmoor National Park Authority.

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| | | and to reduce the need for greenfield land. The SHLAA supply within the National Park was calculated as 249 units | |
| 132 | Page 124, para. 6.25 | There is a low number of brownfield sites suitable for new housing within the National Park. If the few remaining suitable housing sites and traditional buildings within Exmoor's settlements are not used to provide local needs housing then it will put pressure on other sites outside settlements that have the potential to harm the landscape. The approach of providing housing to meet local needs through the Local Plan has to be based upon the 'exceptions' approach - to grant planning permission where general open market housing would not be permitted. Sites will not be allocated, <u>including because of the need to maintain land at 'rural exceptions site' values to maximise delivery of local needs affordable housing.</u> Instead they sites will be released on an individual basis, based upon the needs evidence. provided by the applicant/developer. | For clarity. |
| 133 | Page 125, subheadings | HOUSING NEED OBJECTIVELY ASSESSED <u>HOUSING</u> NEED (OAHN) | For clarification. |
| 134 | Page 125, para. 6.26 | In line with national policy, the need (both affordable need and market demand) for housing in the Northern Peninsula Housing Market Area (<u>HMA</u>) has been objectively assessed and updated. The 2008 Northern Peninsula Strategic Housing Market Assessment (<u>SHMA</u>) was prepared in partnership with the other local authorities within the same housing market area HMA (North Cornwall, Torridge, North Devon West Somerset and Exmoor National Park) <u>and updates were subsequently completed</u> To take account of the changes in economic and market conditions⁷⁰ since the preparation of the original assessment, separate updates were completed between 2012 and 2014. ⁷¹ In early 2015, a joint | To update and reduce the length and complexity of the text - more detail is set out in the Housing Topic Paper – and in response to representation number 0058/02 about the length of the plan. Updating to refer to review of implications of the 2012 household |

⁷⁰ Housing Vision (2008) Strategic Housing Market Assessment for the Northern Peninsula.

⁷¹ Housing Vision (2012) Strategic Housing Market Assessment: North Devon and Torridge Update, Final Report. Housing Vision (2013) Strategic Housing Market Assessment: West Somerset Update, Final Report. Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report.

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| | | <p>Northern Peninsula Strategic Housing Market Area (SHMA) Update was carried out to provide evidence for Torridge, North Devon, West Somerset and the National Park.⁷² Together with a Cornwall Council assessment of the requirement and future delivery of housing in the former North Cornwall district, it provides evidence on future population led growth. A joint review of the implications of the 2012 household projections was completed in 2015.⁷³ it provides evidence to underpin planning for the delivery of housing in the Housing Market Area over the plan period.</p> | <p>projections in response to representation 0051/04</p> |
| 135 | Page 125, para. 6.27 | <p>The Government has clarified that need alone is not the only factor to be considered. Objectively assessed need should not be met if adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, or where specific policies indicate development should be restricted, such as within a National Park.⁷⁴ Great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty.⁷⁵ The NPPF refers to the National Parks and the Broads Vision and Circular as providing further guidance.⁷⁶ National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.⁷⁷</p> | <p>Deleted to avoid repetition of paragraph 6.3 and in response to representation number 0058/02.</p> |

⁷² Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.

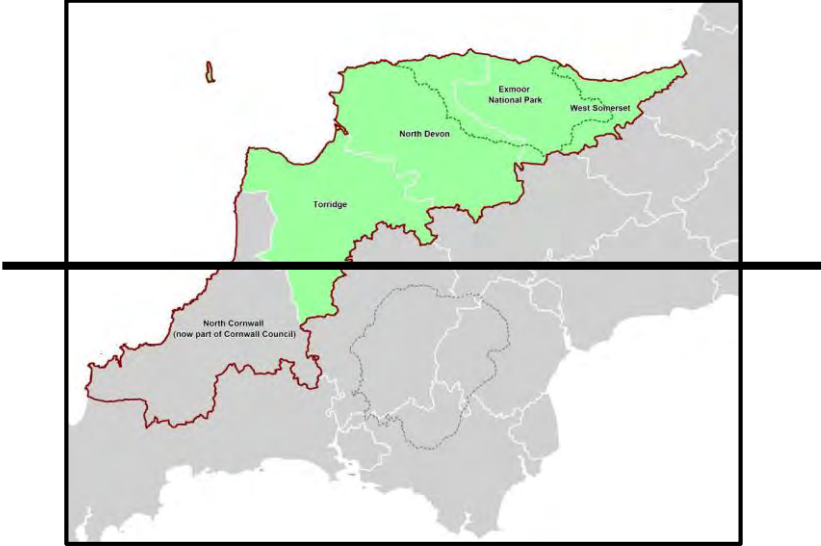
⁷³ Housing Vision (December 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA): The Implications of the 2012-based Household Projections: Final Report.

⁷⁴ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 & 47. DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land> (-) DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, paragraph 54

⁷⁵ Ibid. Paragraph 115.

⁷⁶ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online] <http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/> ; and

⁷⁷ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.

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| 136 | Page 126, Map 6.1 | <p>Map 6.1 Exmoor National Park within the Northern Peninsula Housing Market Area (Map courtesy of Torrridge District Council)</p>  | Delete map as included in Housing Topic Paper. |
| 137 | Page 126, para. 6.28 | <p>The Exmoor National Park Housing Topic Paper sets out how the objectively assessed housing need (OAHN) for Exmoor National Park of 718 units 2011-31 has been calculated.⁷⁸ The unadjusted housing figure identified by the Joint SHMA Update for Exmoor National Park based on the household projections 2011-31 is 537 units.⁷⁹</p> | To clarify that the Housing Topic Paper explains how the OAHN has been calculated and to update the Plan in response to representations 0063/01 and 0051/04. |

⁷⁸ Exmoor National Park Authority (2016) Exmoor National Park Local Plan Housing Topic Paper

⁷⁹ Housing Vision (January-December 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA): The Implications of the 2012 based Household Projections: Final Report.

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| 138 | Page 126, para. 6.29 | The figure for the area of North Devon within the National Park is 205 (when adjusted). This includes both affordable and market housing and does not take into account housing completions since 2011/12.⁸⁰ In considering the evidence for the area, and co-operating with North Devon Council, † There is agreement that the delivery of the 205 units of housing <u>identified for the part of North Devon in Exmoor National Park</u> , a proportion of which will be affordable, identified for that part of North Devon in Exmoor National Park will be <u>included in the North Devon and Torridge Local Plan housing requirement</u> to be met in the North Devon area outside the National Park. North Devon Council has taken the view that the additional housing should be located close to and accessible to the National Park's boundaries, and that community aspirations for growth identified by Ilfracombe, South Molton and local centres complement this objective. | To rationalise housing evidence in the plan itself, as it is set out in the Housing Topic Paper, and in response to representation number 0058/02 about the length of the plan. |
| 139 | Page 126, para. 6.30 Replace wording | Taking into account the backlog of affordable housing, there is projected to be an objectively assessed need (OAN) for 306 affordable units in the area of the National Park in West Somerset over the plan period. <u>The remaining area of the National Park is within the West Somerset housing authority area. In this plan, the focus is on the delivery of affordable housing for which it is projected that there will be a need for 336 units over the plan period.⁸¹</u> | For clarification and to reduce repetition in response to representation number 0058/02 about the length of the plan. |
| 140 | Page 126 Insert new sub-headings and paragraphs | <u>STRATEGIC POLICY HC-S1</u> <u>6.30A National Policy is that if adverse impacts would outweigh the benefits when assessed against the policies in the NPPF or where specific policies indicate development should be restricted, such as within a National Park, that objectively</u> | For clarification. |

⁸⁰ Ibid

⁸¹ Housing Vision (December 2015) Northern Peninsula Housing Market Area, Strategic Housing Market Assessment (SHMA): The Implications of the 2012-Based Household Projections, Final Report

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| | | <p><u>assessed housing need should not be met.⁸²The National Parks and the Broads Vision and Circular⁸² states that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided.^{84 85}</u></p> <p><u>6.30B ENPA has taken account of statutory National Park purposes, the local socio-economic duty to National Park communities and constraints which indicate that development should be restricted and that the ability to meet the full need (demand) for housing over the plan period is constrained.</u></p> | |
| 141 | Page 126, para. 6.31 | <p>The estimate of local affordable housing need in the National Park 2011-2031 is 306 units. This does not take into account affordable housing completions since 2011. The approach to housing delivery in this Plan is therefore to provide positively for housing, working with estimates of housing provision through a rural exceptions approach and without a target, to deliver locally needed affordable homes housing up to the point at which the National Park would be harmed. The estimate of affordable housing units needed in the National Park 2011-2031 for this Local Plan is 336 units.</p> <p><i>[split to create new paragraph 6.31A]</i></p> | For clarification and to update the plan and estimate of affordable need based on updated evidence on the 2012 household projections and consistent with the PPG. |

⁸² DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, footnote 9 of paras. 14 & 47. DCLG (2014) Press Release: Councils must protect our precious green belt land [Online] Available: <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land> (-) DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, paragraph 54

⁸³ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online] <http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/>; and

⁸⁴ DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government, para. 115 footnote 25. DCLG (2014) Planning Policy Guidance: How should local authorities support sustainable rural communities? (paragraph 001, Reference ID: 50-001-20140306) [Online] <http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/>; and

⁸⁵ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 78.

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| | | 6.31A This approach is appropriate in a remote rural area, given the small size of Exmoor’s settlements, landscape sensitivity and capacity, <u>and</u> SHLAA supply and is consistent with National Park purposes, national policy and guidance and the duty to local communities <u>and national policy and guidance.</u> | |
| 142 | Page 127, para. 6.32 | Feedback from the community ‘Your Future Exmoor’ events demonstrated widespread support for housing that is affordable to local people. ⁸⁶ The National Park Authority, through being based on Exmoor, <u>and</u> working at a local level and in partnership with others (including the District Housing Authorities) has a good understanding of the needs of the area and, from 2002, hosted the Rural Housing Project (RHP). | For clarification and to reduce the length of the plan. |
| 143 | Page 127, para. 6.33 | Housing Authority waiting lists have been replaced with a housing register which may not record local connection or may define it differently from planning policies. Households bid for affordable housing as it becomes available. As with the former waiting lists, there remains an issue with rural households registering on the system. <i>[split to create new paragraph 6.33A]</i> 6.33A This was an important reason for the setting up of the RHP. It is therefore important that actual need is assessed. The RHP it carried approach, carrying out rural parish housing need surveys across West Somerset, North Devon, and Exmoor National Park and provided more accurate information on affordable need. and It consistently revealed a local, albeit often small, need, in some cases fewer than three households, for affordable housing in settlements as well as detailed information on size, type and tenure. | To simplify the wording for clarification and correct a grammatical error. |

⁸⁶ Exmoor National Park Authority (2010) Your Future Exmoor’ Feedback Reports (2010). [online: available: <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-development-framework/your-future-exmoor>]

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| 144 | Page 127, para. 6.34 | Surveys carried out between 2002 and 2008, identified 262 households in affordable need in the parishes within and split by the National Park boundary while a Park wide ‘snapshot’ survey to estimate housing need, identified 127 households with a local connection.⁸⁷ A ‘snapshot’ Based on analysis of the needs data and affordable housing completions at September 2013, provided the an estimate of housing need of 90 units for the whole of Exmoor National Park at September 2013 was 90 units.⁸⁸ The reduction in the number of households assessed as being in need indicates, despite newly arising households, that the strategy has, through the delivery of 83 local need affordable homes 2005/06 to 2013/14, helped to address need in the National Park. | To reduce the length of the plan (as this evidence is set out in the Housing Topic Paper) in response to representation 0058/02 on the length of the plan. |
| 145 | Page 127, para. 6.35 | This figure of 90 units should be considered as part of the 306 estimate of 336 affordable households identified needed for West Somerset within the National Park.⁸⁹ This estimate, within the affordable need figure of 306, is considered helpful in framing the Local Plan housing strategy for the National Park to 2031. However, the housing figures set out in this plan should therefore not be used in determining individual planning applications, and parish surveys may ultimately show a different figure for the remaining period of the Local Plan. | For clarification and to reduce the length of the plan. |
| 146 | Page 127, para. 6.36 | The approach is to provide positively for housing, working through a rural exceptions approach (and without a target) to deliver local needed affordable housing. It is intended that the method of assessing local housing need by household developed by the Rural Housing Project RHP will continue to inform a needs led approach providing data on need by parish as housing needs change and additional need arises. Proposals in the National Park will only be permitted on a needs led basis where there is evidence of an identified local affordable need | To reduce repetition ad the length of the plan (as some of this paragraph included in para. 6.31 and elsewhere in the housing section). |

⁸⁷ Rural Housing Project (2008) Exmoor National Park LDF survey of affordable housing need.

⁸⁸ Exmoor National Park, West Somerset and North Devon Rural Housing Project: Households in Affordable Housing Need in Exmoor National Park.

⁸⁹ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Final Report.

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| | | (or where proposals for specialist <u>accessible and adaptable</u> , 'rural worker' or 'Extended Family' dwellings are consistent with the policies in this Local Plan) up to the point at which the National Park would be harmed . As well as new provision, some identified need is likely to be met through re-lets of existing affordable housing. | |
| 147 | Page 128, para. 6.37 | Taking into account the component of the OAN arising in the North Devon part of the National Park that is included in the North Devon and Torridge Local Plan and the estimated of need of 306 affordable homes arising in the West Somerset side of the National Park results in a figure for market housing, arising in the West Somerset side of the National Park, of 174 dwellings 2011-31. | Deleted to reduce repetition and the length of the plan – and relevant figure updated in earlier paragraphs. |
| 148 | Page 128, para. 6.38 | ENPA has taken account of statutory National Park purposes, the local socio-economic duty to National Park communities and constraints which indicate that development should be restricted and that the ability to meet the full need for housing over the plan period is restrained. | Deleted to reduce repetition and the length of the plan. |
| 149 | Page 128, para. 6.39 | The NPPF has changed the definition of exception sites to allow, at the authority's discretion, for small numbers of market homes where essential to enable the delivery of significant additional local needs affordable housing.⁹⁰ Reflecting the change in Government policy in the NPPF⁹¹ and in response to the current reductions in national affordable housing grant, the policies in this plan therefore provide for some flexibility on exception sites /conversions, to consider pPrincipal Residence housing in Local Service Centres and Villages where it is essential to enable delivery of affordable housing consistent with Plan policies. Such housing may include specialist accessible and adaptable housing for Exmoor's communities helping to address the needs of Exmoor's ageing population older | To reduce repetition and for clarification. Change in terminology to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock as referred to in representation 0063/04. |

⁹⁰ DCLG (2012) National Planning Policy Framework, London: DCLG, Para. 54.

⁹¹ DCLG (2012) National Planning Policy Framework, London: DCLG, Para. 54.

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| | | people and/or other vulnerable members of the community who require care and assistance. | |
| 150 | Page 128, para. 6.40 | Any ‘Principal Residence’ housing which may be permitted in accordance with policies in this plan, including to deliver local need affordable housing, the re-use of buildings as dwellings, through subdivision, ‘Extended Family Dwellings’ or for rural worker dwellings for example may also <u>would</u> , indirectly, contribute to the objectively assessed <u>housing need across the HMA</u> . ⁹² It is inappropriate to identify a figure for such housing in a <u>Exmoor National Park</u> and the National Parks Circular is clear that National Parks are not suitable locations for unrestricted housing and general housing targets are not provided for them. | To correct a grammatical error, and for clarification and consistency. |
| 151 | Page 128, para. 6.41 | Allowing for an element of market (‘Principal Residence’) housing as a response to the reduction in levels of public housing grant available to registered housing providers and where essential to deliver the affordable housing on exceptions sites will, if permitted, result in additional units set against the housing supply identified in the SHLAA – This would <u>use</u> up the finite supply of suitable housing land at a faster rate – land with the potential to accommodate future local needs affordable housing both in and beyond the period of this Local Plan. | To simplify the plan. |
| 152 | Page 128, para. 6.42 | The National Park Authority will ensure robust assessments, <u>using ‘an open book’ approach</u> are used to inform viability in such cases to <u>be certain that Principal Residence housing is essential for the viability of the scheme; that there are no alternative sources of funding; and to</u> ensure that development costs and land values are reasonable, commensurate with a rural housing exception site approach. The number of any market (‘Principal Residence’) homes which may be permitted will be the minimum number needed to deliver the affordable housing. <u>The underlying principle is that the Principal Residence housing would replace previously available public housing grant to Registered Providers rather than</u> | For clarification and to reduce repetition and simplify the plan by combining references on the approach to viability and the use of an open book approach to one part of the housing section. |

⁹² Housing Vision (January 2015) Northern Peninsula Housing Market Area Strategic Housing Market Assessment (SHMA) Update: Final Report.

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| | | <p><u>increase site or building value. Higher land or building values impact on scheme viability resulting in a greater number of Principal Residence units of housing to deliver the affordable. This would use up suitable existing sites and buildings more quickly, reducing the ability to deliver affordable housing in the National Park in the longer term.</u></p> | |
| 153 | Page 129, para. 6.43 | <p>Applying the ‘exceptions’ approach - that local need affordable housing may be permitted, where new housing would not normally be allowed - has the effect of reducing the value of land and buildings to a more reasonable level so that local communities and housing providers can acquire sites and buildings for affordable housing. Within the terms of the local needs housing policies, affordability is judged on a household-by-household basis. Those in need of affordable housing will be households who cannot afford to purchase <u>rent or buy</u> a home on the open market.</p> <p><i>[split to create new paragraph 6.43A]</i></p> <p>All types <u>A range of tenures</u> can contribute to the stock of affordable housing - housing for rent, shared equity or low-cost ‘intermediate’ owner occupied properties <u>housing. This reflects the range of incomes of those households in need of affordable housing. Intermediate housing will be affordable to a proportion of households in housing need but is unlikely to be affordable to those households on the lowest incomes. In Exmoor National Park, to be considered as affordable housing, eligibility will be determined with regard to local incomes and local rents/house prices and will include with restrictions, including local occupancy ties, through a planning obligation to ensure they remain affordable for future eligible households in perpetuity. However, because</u> Since the National Park Authority cannot directly control tenure through planning conditions or agreements, different needs will be matched to the appropriate type of property.</p> | For clarification. |
| 154 | Page 129, para. 6.44 | <u>The Need for Rented Affordable Housing</u> | For clarification and to update the plan. |

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| | | Because of low income levels, most local households in housing need will need rented property controlled by a Registered Provider or other landlord. ⁹³ Evidence of income and affordable rent levels indicates that to be truly affordable, rent will need to be based on social (or 'formula') rent levels. | |
| 155 | Page 129, NEW para. 6.44A | 6.44A <u>Anyone building housing to rent out should set the rent at or below the current "Affordable Rent" used by Registered Providers building in the National Park. In all cases, the National Park Authority will work with applicants and seek the advice of the District Housing Authorities on a case by case basis to consider the scheme as a whole, including viability, and to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need.</u> | Formerly part of 6.49 with additional text for clarification. |
| 156 | Page 129, para. 6.45 | Custom/self build is a method of achieving affordable housing which may be possible for those <u>Some households, who are not able to afford a home on the open market but who are on incomes higher than the lowest incomes, but who are not able to afford a home on the open market, to may consider owner occupation. Often called 'intermediate housing' these are homes for sale below market levels subject to the criteria in paragraph 6.43A above. These can include low cost homes for sale and shared equity (shared ownership and equity loans). This is particularly aimed at benefiting young first time buyers to enable them to remain in their communities. In this way, the Government's objectives for starter homes for younger people are applied in the plan appropriately in a National Park context since HC S1 and policies for conversions and new build housing in settlements apply to brownfield as well as greenfield land. Experience of implementing the housing policies in the 2005 Plan has shown that there may be opportunities for Housing Providers to provide serviced self-build plots as part of</u> | For clarification, to reduce repetition (as further detail on custom/self build housing is also set out for Policy HC-D5 and explanatory text) and to update the plan in the light of national changes to housing. |

⁹³ Housing Vision (2014) SHMA: Exmoor National Park in West Somerset Update. ENPA, Dulverton Table 5.2 and key findings. 50.44% of all ENP households need social rent and 10.8 % intermediate housing. (I.e. of those households in need of affordable housing almost five times as many need social rented housing than owner occupied/rented intermediate affordable housing).

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| | | <p>a larger scheme. <u>The policies in this plan provide a flexible approach for affordable housing with local occupancy ties which can apply to owner occupied housing as well as to rented housing where there is an identified local need for it. This includes custom / self build housing and/or housing for first time buyers (see the text box below on Exmoor Starter Homes). In this way, Plan policies apply the Government’s objectives for custom/self build, starter homes and shared ownership appropriately in an Exmoor National Park context.</u></p> <p><i>[split to create new paragraph 6.45A to be inserted after text box below]</i></p> <p>6.45A ENPA will work with partners, including local communities, who may wish to consider ways in which households can be assisted to provide homes, including site preparation and provision of services <u>for self/custom build. ENPA will also consider proposals for low cost shared ownership housing. It will be necessary to ensure it is genuinely affordable. In all cases, the need for the number, type, size, and tenure of proposals will be assessed.</u> There is growing interest in the potential for community land trusts to initiate affordable housing schemes and this approach may be able to achieve mixed schemes with, <u>for example, rented affordable housing, potentially managed by Registered Providers and local need custom/self- build housing and/or housing for first time buyers</u> to address a-the range of needs within a community.</p> | |
| 157 | Page 129, insert Text Box Exmoor Starter Homes Definition | <div style="border: 1px solid black; padding: 5px;"> <p><u>Text Box Exmoor Starter Homes Definition</u></p> <p><u>In Exmoor National Park an Exmoor Starter Home is defined as:</u></p> <p><u>A dwelling where there is a proven local need for that dwelling, and which will, in the first instance, be occupied by a first time buyer under the age of 40 years who has a local connection through meeting one of more of the definitions in clauses 1 a) to 1e) of Policy HC-S3 in this Plan. The Exmoor Starter Home will</u></p> </div> | For clarification to reflect proposed national changes to housing and show how they can be appropriately applied in an Exmoor National Park context. |

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| | | <p><u>thereafter be occupied in perpetuity by a person(s) (and their dependents) with a proven local housing need who cannot afford (to rent or buy) accommodation in the locality with a local connection as above, a maximum gross internal area of 93sqm and which will otherwise be consistent with policies in this Local Plan.</u></p> <p><u>Exmoor ‘Starter Homes’ will be sold at a discount of at least 20% when compared to an equivalent open market home in the National Park. The level of discount will be calculated taking into account average local incomes.</u></p> <p><u>The occupancy requirements, and the discount of at least 20% will be secured in perpetuity through a planning obligation which will ensure that the occupancy cascade will not go wider than the National Park.</u></p> | |
| 158 | Page 129, para. 6.46 | <p>ENPA will consider low cost shared ownership housing only if there is a demonstrated need for it. Evidence indicates that, when both the rent and the mortgage element is taken into account, it may be unaffordable for all but a very few households.</p> | To avoid repetition and simplify the plan. Text is incorporated into para 6.45A. |

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| 159 | Page 129, para. 6.47 | <p><u>Controlling Affordability</u></p> <p>Taking account of the significant gap between open market private rents and open market house prices in the National Park and many local incomes, affordability of owner occupied dwellings will be achieved through both:</p> <p>(i) The local occupancy tie, which will reduce house values and</p> <p>(ii) Keeping the size of properties as small as possible commensurate with the needs of the intended household, and recognising the role of the property to meet future needs of the community for affordable housing. Individual privately or owner occupied dwellings should therefore have a <u>gross internal area net floorspace of 930 square metres (sqm) or less unless it is housing controlled through a Registered Provider where the gross internal area will need to be consistent with the identified need and the appropriate nationally described space standard</u> (Policy HC-S2: A Balanced Local Housing Stock).⁹⁴</p> | <p>Change in terminology to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock.</p> |
| 160 | Page 130, para. 6.49 | <p>At the time of drafting, new housing schemes built by Registered Providers and which receive public housing grant through the HCA must be rented out at ‘Affordable Rents’ which are pegged at up to 80% of open market rental levels. These may not be affordable to many local households in housing need. Even where the HCA agrees to lower rents, extra grant is not currently available. Anyone building housing to rent out should set the rent at or below the current “Affordable Rent” used by Registered Providers building in the National Park. In all cases, the National Park Authority will work with applicants and seek the advice of the District Housing Authorities on a case by case basis to consider the scheme as a whole and to assess whether potential rental levels are likely to be genuinely affordable to households in local housing need. Evidence of income and affordable rent levels indicates that to be truly affordable rent is likely to be lower and based on social rent levels.</p> | <p>To simplify the plan.</p> |

⁹⁴ 93 sqm is consistent with a 3 bedroom, 2 storey, 5 person standard in nationally described space standards.

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| 161 | Page 130, subheading | STRATEGIC POLICY: HOUSING | Title moved to before para. 6.30A for clarity. |
| 162 | Page 130, para. 6.53 | The limited number of opportunities for new housing development emphasises the importance of concentrating on the identified local need for affordable (including intermediate) housing within the National Park. Addressing the local need for affordable housing helps those who cannot compete in the open housing market. It is a justifiable reason for new housing provided there is no harm to the National Park and its special qualities. It can also help people who move away from the National Park (e.g. for further or higher education, early careers and service families) to return within a reasonable period and counteract, to some degree, the overall trend towards an ageing population. <u>Such housing can also be lived in by people with a work connection in the National Park. Live work units are one way in which people can combine living and working and considerations on live work arrangements are set out in paragraph 7.37A of this Plan.</u> As a remote area with all settlements defined as rural, the use of the rural exception sites approach for affordable housing to meet local needs is appropriate for Exmoor National Park. The exceptions approach does not define or allocate sites in a plan. HC-S1 makes it clear that the principal community identified need is for affordable housing with local occupancy ties. | For clarification and in response to representation 0067/18 |
| 163 | Page 141, para. 6.54 | Policy HC-S1 also makes provision for the identified local housing needs of rural land based workers (linking to policies for housing in the open countryside through HC- D7 <u>D6</u> on conversions, HC- D8 <u>D7</u> for new build dwellings, HC- D9 <u>D8</u> for rural workers and HC- D10 <u>D9</u> Succession Farming); older people and/or other vulnerable members of the community in need of specialist housing where adequate care and assistance cannot be provided within the existing housing stock <u>accessible and adaptable housing</u> (Policy HC-D3) and ‘Extended Families’ through the reuse of an existing traditional building (Policy HC-D4). | To update policy numbering to reflect the deletion of policy HC-D6 and change to subsequent policy numbers. To change the terminology to reflect the Technical Housing Standards – nationally described space standards. |

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| 164 | Page 141, para. 6.57 | The National Park Authority will work in partnership to help implement housing policies: delivering housing for the benefit of local communities while conserving and enhancing the National Park. Delivery will be monitored and reported. This will enable the National Park Authority to openly review the effectiveness of policy; taking into account changing circumstances in housing finance and delivery and the capacity to accommodate development in order to secure the necessary amounts of locally needed affordable housing. It will also bring forward Supplementary Planning Documents and legal agreements to provide a comprehensive framework within which local and affordable and housing can be secured in perpetuity. | To simplify the plan and correct a grammatical error. |
| 165 | Page 132, Policy HC-S1 | <p>HC-S1: HOUSING</p> <p>1. The purpose of housing development will be to address the housing needs of local communities. The principal community identified need is for affordable housing with local occupancy ties. Exceptionally, new housing will be acceptable where it addresses an identified local housing need for:</p> <p>a) affordable homes that remain affordable in perpetuity and which will be occupied by local persons in proven housing need in accordance with the local occupancy definition in HC-S3.</p> <p>b) rural workers in agriculture, forestry or other rural land based enterprises with a proven essential, functional need in accordance with HC-D7 or HC-D8 and HC-D89 or to enable succession farming on established farm businesses in accordance with HC-D7 or HC-D8 and HC-D910.</p> <p>c) specialist housing for older people and other vulnerable members of the community, in accordance with HC-D3 which will be occupied by local persons in perpetuity; or</p> | To reflect representation 0043/27 on criterion 1b). Replacement of clause c) with clause 2) for clarification and change in terminology to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock. Clause 4 a) and b) deleted to reflect judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of |

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| | | <p>c) d) an “eExtended fFamily dwelling”, in accordance with HC-D4, which will be occupied by local persons in perpetuity.</p> <p>2. <u>Accessible and adaptable housing for older people and other vulnerable members of the community, will be occupied by local persons in perpetuity, and will only be considered where it will help to deliver an identified need for local affordable housing, in accordance with HC-D3.</u></p> <p>3. 2. Consistent with an exceptions approach to housing, provision will not be made for housing solely to meet open market demand and housing land will not be allocated in the development plan. 3. ‘Principal rResidence’ market housing will only be considered where it is essential to deliver an identified need for local need affordable housing and in accordance with Policy HC-S4.</p> <p>4. ‘Principal residence’ market housing will only be considered as long as government guidance on planning obligations relating to thresholds for affordable housing is extant:</p> <p>a) through the change of use of existing buildings or the redevelopment of a ‘vacant building’ (including provisions for commuted sums towards local needs affordable housing in the National Park); and</p> <p>b) only within Local Service Centres and Villages.</p> <p>If the guidance changes, this provision will no longer apply and 100% affordable housing will be sought.</p> | <p>State for Communities and Local Government [2015] and subsequent change to the PPG.</p> |

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| 166 | Page 133, Text Box | <p>Text Box</p> <p>Government guidance on planning obligations, inserted into the PPG, is in force at the time of the drafting of this Local Plan. It sets out minimum thresholds for the size of housing developments where affordable housing can be sought and introduces a vacant buildings credit. The thresholds for National Parks can be set at 5 dwellings or fewer. The guidance is clear that rural exceptions sites are excluded from this change.</p> <p>While this guidance is in force only, as a variation to HC-D1, applicants will be able to change the use of existing non-residential buildings or redevelop vacant buildings to dwellings in Local Service Centres or Villages (see Policy GP3). In such cases the following thresholds will apply:</p> <ul style="list-style-type: none"> — where the existing building is only able to accommodate up to 5 dwelling units or fewer, and/or have a maximum combined gross floorspace not exceeding 500m²; or — where the existing building is only able to accommodate between 6 and 10 dwelling units, and/or have a maximum combined gross floorspace not exceeding 1000m². From units 6-10, the National Park Authority will expect that a financial contribution will be provided towards the provision of local needs affordable housing in the National Park. — where the existing building is able to accommodate 11 dwelling units (or more), and/or has a maximum combined gross floorspace greater than 1000m²; the National Park Authority will expect any housing to be on-site and for units 11 and above to meet a local affordable need in accordance with Policy HC-D1. <p>The guidance also applies to the change of use or redevelopment of non-residential vacant buildings to housing under the ‘vacant buildings credit’. The</p> | Text box deleted to reflect judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG. |

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| | | <p>guidance specifies that the gross floorspace of housing achieved through the demolition of an existing vacant building and its redevelopment for housing should be no greater than the existing gross floorspace of the existing vacant buildings. Housing which would exceed the gross floorspace will be expected to address an identified local need (clause 1 of HC-D2);</p> <p>In all these cases, new housing whether through the change of use of an existing building or the redevelopment of a vacant building will be expected to be principal residence housing (see HC-S4) and be in line with HC-S2. Changes of use to housing should also accord with CE-S5 and conditions will be attached to planning permissions to remove permitted development rights (see HC-S2 and CE-S5).</p> | |
| 167 | Page 133, para. 6.59 | <p>Based on evidence on <u>The housing stock as a whole should provide a range of accommodation sizes, types and tenures to meet the needs of all sections of the local community. The National Park's existing housing stock has a higher than average proportion of larger and detached dwellings,</u>⁹⁵. ¶<u>To create more balanced communities and address the needs of existing and future households, there is a need for smaller and more affordable dwellings, such as terraces and flats and for tenures of new housing that are aligned to identified needs. Smaller dwellings are also likely to take up less land - an important consideration given the scarcity of suitable housing land in Exmoor's settlements. Following an exceptions site approach, the need for the mix of dwellings and the viability of a proposal, will be</u></p> | To simplify the plan by incorporating text from para. 6.60 and for clarification. |

⁹⁵ Exmoor National Park Authority (2016) Exmoor National Park Housing Topic Paper

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| | | <p>assessed on a case-by-case basis. The Exmoor Housing SPD will provide further guidance.</p> | |
| 168 | Page 133-134, para. 6.60 | <p>The housing stock as a whole should provide a range of accommodation sizes, types and tenures to meet the needs of all sections of the local community. This plan necessarily focuses on new development which is a small part of the National Park's existing housing stock. Policy HC-S2 aims to ensure, in terms of size, type and tenure, that new housing permitted in the National Park will result in a better mix of dwellings and that it contributes to that which is needed locally. It is intended to help achieve more balanced, living and working communities by giving those in housing need, including local young people and those with specialist housing needs, the opportunity to stay in their community and help maintain the <u>contribute to the viability of important services, such as schools.</u></p> <p><i>[split to create new paragraph 6.60A]</i></p> <p>6.60A In delivering affordable homes, housing providers have to consider a variety and range of needs for different sizes, types and tenure of home (such as those for local workers, specialist <u>accessible and adaptable housing, for older people and other vulnerable members of the community and housing for</u> those with care needs, <u>and</u> single people or young families). This is an important part of assessing need and housing providers and developers of two or more affordable homes, will need to show that they have taken into account the housing needs of the community. Single properties will tend to be from private developers or self-builders aiming to satisfy a particular individual (though proven) need. <u>Following a rural exceptions site approach, the need for the mix of dwellings and the viability of a proposal, will be assessed on a case-by-case basis.</u></p> <p><i>[new paragraph 6.60B]</i></p> <p><u>New housing development will be encouraged to be designed to enable it to meet the Building Regulation requirement for accessible and adaptable dwellings to help meet the needs of people over their lifetime. This should improve the</u></p> | <p>To simplify the plan and avoid repetition including with para. 6.59. To change terminology in respect of accessible and adaptable homes to reflect the Technical Housing Standards – nationally described space standards – proposed to be included in policy HC-S2 A Balanced Housing Stock. To provide update the plan following a viability assessment and to provide clarification on the approach to viability of proposed housing.</p> |

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| | | <u>suitability of new housing so that as their needs change, people can remain in their own homes for longer. This is particularly important in Exmoor given the ageing population.⁹⁶ Evidence indicates that it will be viable in housing developments of five or more dwellings to meet this standard for 20% of the dwellings.⁹⁷</u> | |
| 169 | Page 134, para. 6.61 | Any market (pPrincipal rResidence) housing developments to deliver affordable housing will also need to reflect the needs of the area for sizes (to nationally described space standards) and types of homes to help create a more balanced housing stock. Dwellings should be no larger than that needed in the area given the above average proportion of larger and detached dwellings. However, the policy requires that such housing should also meet a good standard of floorspace consistent with the forthcoming Exmoor Housing SPD. This will help to avoid discrepancies between the floorspace standards required by the HCA for affordable housing and that of any principal residence housing, which may be permitted to deliver it. The need for specialist housing for older people and vulnerable members of the community should also be considered and proposals should accord with Policy HC-D3. Specialist housing will always need to either itself meet an identified local need for affordable housing or, where there is a proven need for affordable homes and there is an identified need for specialist housing, part or all of that ‘principal residence’ housing required to cross subsidise the affordable housing will be specialist housing with a local occupancy tie. | To provide clarification and change terminology to reflect the Technical Housing Standards – nationally described space standards – proposed to be included in policy HC-S2 A Balanced Housing Stock and in response to representation 0063/04. To reduce the length of the plan. |
| 170 | Page 134, para. 6.62 | Individual privately or owner occupied <u>Local need affordable dwellings, including individual privately or owner occupied dwellings and self/custom build, should have a net floorspace gross internal area of 903sqm or less unless it is housing</u> | Change in terminology to reflect the Technical Housing Standards – nationally |

⁹⁶ ONS (2011) 2011 Census Exmoor National Park. 20.9 % of the population have their day-to-day activities either limited a lot or a little.

⁹⁷ Three Dragons(2016) Exmoor National Park Viability Assessment, Dulverton, Exmoor National Park Authority.

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| | | <p>controlled through a Registered Provider. The 'net internal floor area' is the area on one or more floors enclosed by the perimeter walls of a dwelling and is measured to the opposing unfinished faces. It includes the area occupied by partitions, the area taken up on each floor by any staircase, the area of any chimney breast or flue, and the area of any external WC. It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p> | <p>described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock. The definition of gross internal area will be a proposed change in the Glossary section.</p> <p>90sqm updated to 93sqm to be consistent with the nationally described space standards.</p> |
| 171 | Page 134, para. 6.63 | <p>The National Park Authority will consider local need dwellings larger than 9093sqm floorspace only where they are controlled through a Registered Provider (including owner occupied dwellings controlled through a Registered Provider), and where the identified need is for a larger dwelling. The size of the dwelling should be based on the HCA Scheme Development nationally described space standards. <u>The only other exception to the 93 sqm floorspace would be where the proposal is for the conversion and change of use of an existing building to a dwelling and the existing building is larger than 93 sqm. Proposals should accord with policy CE-S5. The National Park Authority intends to produce a supplementary planning document to provide advice on addressing the local need for affordable housing, which will include floorspace guidelines.</u> Terraced and modest semi-detached houses and flats will be expected in the majority of cases.</p> | <p>90sqm updated to 93sqm to be consistent with the nationally described space standards.</p> <p>Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock.</p> |
| 172 | Page 134, para. 6.64 | <p>The fundamental objective under these housing policies is to ensure that those new affordable dwellings, which are permitted, remain more affordable to meet the community's needs in perpetuity with new privately/ owner-occupied local need affordable, housing restricted to 90sqm net floorspace. The size of other</p> | <p>To reduce the length of the plan. Change in terminology to reflect the Technical Housing Standards – nationally</p> |

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| | | <p>dwelling including specialist <u>accessible and adaptable</u> housing 'eExtended Family', and sSuccession #Farm #Dwellings is also limited to 903sqm. The size of rural land based worker dwellings should be in accordance with Policy HC-D9D8.</p> | <p>described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock. 90sqm updated to 93sqm to be consistent with the nationally described space standards. Change in policy number to reflect deletion of policy HC-D6 and change to subsequent policy numbers.</p> |
| 173 | Page 134-135, para. 6.65 – 6.66 | <p>Permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015, will be removed <u>to ensure that dwellings do not exceed 93 sqm in size and, where the net internal floorspace limitation will not be exceeded this will</u> <u>to enable the National Park Authority to assess the impact of increasing the size and on the affordability of any extensions on these dwellings on an individual basis and in the case of subdivisions, to assess the cumulative impact of successive extensions.</u> Applications for extensions will be assessed against Policy HC-D15D14. The principal community need identified by Policy HC-S1 is housing affordable to local people in perpetuity. Policy HC-S3 ensures that this will be secured through requiring applicants to enter into a legal agreement (in the form of a planning obligation under Section 106 of the Town and Country Planning Act 1990). The National Park Authority considers that obligations provide greater certainty in securing housing for local needs and ensures that in any change of occupation, the new occupant is aware of the restriction. In respect of the conversion of buildings <u>and subdivisions</u>, the additional reason for withdrawing permitted development rights is to protect the character and appearance of the building.</p> | <p>Merge paragraphs 6.65 and part of para. 6.66 to simplify and reduce the length of the plan. To provide justification for clause 1 d) of the policy in respect of the removal of permitted development rights. Deleted text ('The principal....to ...restriction') moved to para. 6.82A as justification for policy HC-S3.</p> |

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| 174 | Page 135, para. 6.67 | New housing development will be expected to be designed to enable it to be adapted to the needs of people over their lifetime. Improvements to existing homes will also be encouraged. This should improve their suitability so that as their needs change, people can remain in their own homes for longer. A Housing Supplementary Planning Document will provide guidance for applicants. | To simplify the plan. |
| 175 | Page 135, Policy HC-S2 | <p>HC-S2 A BALANCED LOCAL HOUSING STOCK</p> <p><u>1.</u> All new residential development will contribute towards the creation of sustainable, balanced, inclusive communities by providing housing that addresses the local needs of present and future generations, through: a) Hhaving regard to the existing housing stock in the locality, ensuring that new housing provision will, through the mix of new dwellings in terms of size, type and tenure, <u>and</u> meet the needs of Exmoor’s communities. and</p> <p><u>2.</u> <u>New housing will</u> offer a good standard of accommodation by being constructed to be neither too large nor too small and using flexible nationally described space standards that enable dwellings to be adapted to the needs of people over their lifetime.</p> <p><u>3.</u> <u>All new build housing developments will be encouraged to be constructed in accordance with Building Regulations Requirement M4(2) for accessible and adaptable dwellings or successor regulations. In new build developments of 5 or more dwellings, a minimum of 20% will be required to meet this standard.</u></p> <p><u>4.</u> b) For local need affordable dwellings permitted under HC-S1 and HC-D1, or HC-D2, HC-D5, HC-D6, or HC-D67, the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity. For private owner occupied local need <u>affordable dwellings, including custom/self build, specialist accessible and adaptable housing (HC-D3), ‘eExtended fFamily dwellings’ (HC-D4) and ‘sSuccession fFarm dDwellings’ (HC-D910), the net floorspace gross internal area will be 930 square metres or less.</u></p> | Change to reflect the Technical Housing Standards – nationally described space standards in response to representation 0063/04 and following an updated viability assessment. Change to policy numbering including to reflect deletion of HC-D6 and changes to subsequent policy numbering. The definition of gross internal area will be a proposed change in the Glossary section. 90sqm updated to 93sqm to be consistent with the nationally described space standards. Policy restructured to ensure all clauses apply as appropriate in response to representation 0043/28. |

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| | | <p>5. e) Where permission is granted for <u> dwellings created through subdivisions and dwellings of up to 930sqm, including those created through subdivisions</u>, a condition will be attached removing permitted development rights in respect of extensions to ensure that dwellings do not exceed 90sqm in size.</p> <p>6. 2. Where permission is granted for employment uses as part of a proposal, a condition may be attached tying the occupation of the dwelling to the operation of the business <u>space</u>.</p> | |
| 176 | Page 136, para. 6.69 | <p>Before new affordable housing can be considered, the local community need for the new dwelling(s) (including conversions) must be established. The distinction between 'demand' and 'need' has to be recognised. The assessment of community need will be through an up-to-date local housing needs survey based on the process and survey forms established by the Rural Housing Project and prepared by or in consultation with the district council (as local housing authority) and in consultation with the Ttown/Pparish Council(s). Private surveys, without the assistance of the Rural Housing Enabler or <u>'Devon Communities Together'</u>, a Registered Provider or District Council (<u>as housing authority</u>), are not acceptable. Proof of an individual's need within a community will be established through a detailed questionnaire. In assessing proposals for a single local needs dwelling, the extent to which it forms part of a wider community need including any up to date local housing need survey and the likelihood of the type, size and location of the property meeting an ongoing community need for housing if the individual subsequently moves out of the property will be scrutinised. There needs to be evidence that an ongoing need exists before permission is granted. In each case the National Park Authority will carefully examine the survey results to ensure that a genuine need exists for the number, size, type and tenure of dwellings proposed.</p> | To correct grammatical error, update plan and provide clarification. |

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| 177 | Page 136, para. 6.70 | In order to comply with the Local Plan strategy to minimise new build housing on greenfield land, before applying for a new dwelling or housing, an individual or group will be expected to have examined the availability of properties and existing buildings in their own and adjoining Pparishes and the locality. Where existing property of a suitable price, size and type is, or is likely to become, available, and the existing owner has indicated a willingness to sell, or where there are opportunities for extensions and/or subdivision to create smaller more affordable units of accommodation, new build housing is unlikely to be permitted. | To correct grammatical error. |
| 178 | Page 137, para. 6.73 | Where Pparishes do not have an identified settlement (or suitable site within one), the search for a site for a local needs house(s) will be directed towards an adjoining Pparish. Where Pparishes are split by the National Park boundary and the settlement lies outside the National Park, the need for housing should be met in that part of the settlement lying outside the National Park and in accordance with the relevant District Council's planning policies. Where parishes are split by the National Park boundary and there is no identified settlement outside the National Park in that parish, then residents who otherwise meet the requirements of HC-S3, including one or more local connection criteria, may be considered for local needs housing in the National Park. For housing proposals in rural communities in the open countryside, only those with a local connection to that parish will be considered to comply with the policy. Where a rural community in the National Park is in a parish split by the National Park boundary, only those households with a residency in that part of the parish lying within the National Park will be considered to comply with the local connection. | To correct grammatical error. |
| 179 | Page 137, para. 6.74 | Residential conversions in settlements, as well as in the open countryside, will be expected to contribute to the stock of local needs housing. For larger buildings, | For clarification and to update the plan. |

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| | | affordability will be achieved through creating more than one unit. This will need to be done sympathetically to help retain the building's original character. Conversions providing employment space alongside a dwelling(s) are also positively encouraged. Registered Housing Providers can play a valuable role in sub-dividing existing properties within settlements to create smaller units of affordable accommodation. | |
| 180 | Page 137, para. 6.75 | For the purposes of the policies within this Local Plan 'local needs' housing is defined as housing which is intended to meet the needs of the local community. Local community includes those people with strong local connections with a P parish or adjoining P parish(es), defined as a minimum period of 10 years permanent and continuous residency. This includes people who have previously lived within the P parish(es) for 10 years or more and who want to return to their community. 10 in the last 30 years means they can have lived away for up to 20 years. This may apply to service families with a member(s) of the household who has lived away as a result of serving in the armed forces, who wishes to return and who is in affordable housing need. | To correct grammatical errors. |
| 181 | Page 137, para. 6.77 | As well as residency requirements, the definition of local connection includes 'Exmoor Workers' and people who need to live close to their place of work within the P parish(es). Evidence from the applicant on the security of their jobs and the value of their work to the National Park and its communities, will be assessed. The National Park Authority intends to produce a supplementary planning document to provide guidance on application of this clause of the policy including what constitutes an 'Exmoor worker'. | To shorten the plan. |
| 182 | Page 137, insert new | 6.77A <u>Local need includes those people with strong local connections, but who cannot afford to buy or rent existing housing in the locality. 'Locality' includes the</u> | Formerly paragraph 6.79 (page 138) |

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| | paragraph 6.77A | <u>parish, adjoining parishes and an area within a reasonable travelling distance of their place of work and local services.</u> | |
| 183 | Page 138, para 6.79 | Local need includes those people with strong local connections, but who cannot afford to buy or rent existing housing in the locality. 'Locality' includes the Parish, adjoining Parishes and an area within a reasonable travelling distance of their place of work and local services. | For clarification. |
| 184 | Page 138, para 6.80 | ENPA will consult the District Council Housing Officer and work with the Rural Housing Enabler <u>as appropriate</u> , to obtain assessments of whether applicants' are in affordable housing need including their ability to afford existing housing and whether they are currently in unsuitable housing. <u>For housing through Registered Providers, the Devon Homechoice or Somerset Homefinder systems hold information provided by potential tenants on affordable housing need.</u> | For clarification and to update the plan. |
| 185 | Page 138, insert new paragraph 6.82A | <u>6.82A Policy HC-S1 requires that housing is affordable to local people in perpetuity. Policy HC-S3 ensures that this will be secured through requiring applicants to enter into a legal agreement (in the form of a planning obligation under Section 106 of the Town and Country Planning Act 1990). The National Park Authority considers that obligations provide greater certainty in securing housing for local needs and ensures that in any change of occupation, the new occupant is aware of the restriction.</u> | Moved from before Policy HC-S2 as explanatory text relates to clause 2 of HC-S3. |
| 186 | Page 139, Policy HC-S3 | HC-S3 LOCAL OCCUPANCY CRITERIA <u>FOR AFFORDABLE HOUSING</u> | To provide clarity that policy relates to criteria for affordable housing. |
| 187 | Page 140, para. 6.87 | Principal + Residence housing is a form of market housing controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence. The aim of this mechanism is to prevent any new market housing being | For clarification. To reflect deletion of policy HC-D6 |

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| | | <p>used as a second or holiday home given the existing high percentage of homes in the National Park with no usual residents (19%) and its impact on the social well-being of a number of communities where the overall proportion may be significantly higher e.g. Lynton & Lynmouth where 28.5% of household spaces have no usual residents.⁹⁸ <u>All</u> new housing in the National Park should be affordable housing to meet local needs (Principal Residence housing will therefore only be permitted in very specific circumstances where it can be demonstrated to be essential to enable the delivery of affordable housing schemes in accordance with Policies HC-D1 (Conversions to Housing in Settlements) or HC-D2 (New Build Housing in Settlements). ‘Principal Residence’ housing will also apply to any new dwelling units created through the subdivision of existing dwellings (HC-D14D13) and the conversion of hotels/guesthouses to accommodation and in accordance with the tests set out in Policy RT-D3 (Safeguarding Serviced Accommodation) and Policy HC-D6 (The Change of Use of Serviced Accommodation to Housing).</p> | |
| 188 | Page 140, para. 6.88 | <p>The capacity of Exmoor’s settlements to accommodate further housing <u>on greenfield sites without harming the landscape of the National Park</u> has been investigated through a detailed landscape sensitivity study. It shows that, on greenfield land, only 333 new build houses could potentially be provided within the settlements identified in the 2005 Local Plan, without harming the landscape of the National Park. This figure does not include opportunities arising from redevelopments, brownfield land and conversions of existing buildings. However, neither does it include other issues which may mean that remaining sites are not suitable for housing development. This demonstrates the importance of making maximum use of the existing stock of accommodation, buildings and previously</p> | To avoid repetition and simplify and shorten the plan reflecting representation 0058/02. |

⁹⁸ Office for National Statistics (2011) Census 2011. London: The Stationery Office- compared to 4.3% for England.

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| | | <p>developed land/buildings to reduce the level of greenfield housing development within the National Park and ensure that, in the longer term, there will still be some suitable housing sites in settlements to help meet the needs of the National Park's communities. The approach in this This plan seeks to provide for housing to address the needs of Exmoor's communities with the priority being local needs affordable housing by ensuring that most housing development and all new build housing is in settlements (other than that new build for the proven needs for land based workers) helping to sustain them over the long term. The spatial strategy is set out in Section 3 of this plan at Policy GP3.</p> | |
| 189 | Page 141, para. 6.89 | <p>A range of affordable tenures can help address the local need for affordable housing. The Government wants to enable more people to build their own home. The National Park Authority sees eCustom/self-build as a can be a means of local people meeting their own need for affordable housing (policy HC-D5 Custom/Self Build Local Need Housing).⁹⁹ although the majority of households in need of housing will, due to local incomes, need rented housing at social or near social rent levels. The National Park Authority has established a self-build register of people interested in self-build or custom build as part of a joint 'Right to Build' Vanguard Project with Dartmoor National Park Authority.¹⁰⁰ The register will be used to help identify and address the local need for affordable housing of people who work and/or who have longstanding residency in the National Park in line with Policy HC-S1 and other housing policies in this plan. Some sites have been assessed through the SHLAA process, and will be considered for self-build schemes. As part of the Vanguard project, landowners were invited to suggest sites or buildings, which are suitable for new build self-build housing or for</p> | <p>For clarification and to avoid repetition and shorten the plan (representation 0058/02). Further explanation of custom/self build is included before policy HC-D5.</p> |

⁹⁹ DCLG (2014) Planning Policy Guidance: Housing and economic development needs-assessment [Online] Available: <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/> Paragraph: 021 Reference ID: 2a-021-20150326

¹⁰⁰ Exmoor National Park Authority (2014) Self-build: Right to Build Vanguard [Online] Available: <http://www.exmoor-nationalpark.gov.uk/>

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| | | <p>housing through conversions. These will be within or adjoining the settlements in the National Park. These sites might be small pieces of land/buildings for a single dwelling, or larger ones for a number of homes. In this way the Government's starter home initiative will be applied appropriately in the context of a National Park through a rural exceptions site approach where new affordable housing with a local tie may be permitted, including on brownfield sites consistent with other Plan policies. Local need affordable custom/self-build housing may also be allowed outside settlements in accordance with Policy HC-D5.</p> | |
| 190 | Page 141, para. 6.90 | <p>Planning policies continue to prioritise affordable housing, but, in Local Service Centres and Villages, an element of "Principal Residence" market housing may be considered <u>only</u> where this is essential to facilitate the provision of needed affordable housing. Where there is evidence of need for custom/self-build housing and/or specialist <u>accessible and adaptable</u> housing, the National Park Authority, in discussion with the relevant housing authority, will seek proposals to provide for it, either as part of the affordable local needs housing itself (including custom/self-build plots) or where it is proven to be required to deliver the affordable housing, as 'Principal Residence' housing. Land values will need to be kept to affordable housing levels for all plots. The only other circumstances in which Principal Residence housing may be permitted is where it is through the redevelopment of a 'Vacant Building(s)' in accordance with HC-D2 clause 2 b) and HC-S1 clause 4 only or through their change of use. Agricultural buildings and previously developed land without buildings do not come within the definition of 'Vacant Buildings'.</p> | <p>For clarification and to avoid repetition. Change in terminology to reflect the Technical Housing Standards – nationally described space standards. Text from 'The only other circumstances... to Vacant Buildings' deleted to reflect judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG.</p> |
| 191 | Page 142, para. 6.92 | <p>All housing must meet an identified local need for affordable housing and be lived in by people who meet the requirements of the local occupancy criteria in perpetuity. This will be secured through a planning obligation (Policy HC-S3). All</p> | <p>90sqm updated to 93sqm to be consistent with the nationally described space standards.</p> |

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| | | such housing will have a floorspace of 903sqm or less in accordance with Policy HC-S2. | |
| 192 | Page 142, para. 6.93 | A key factor in achieving affordable housing is to obtain buildings at the lowest possible value taking account of existing use value, such that it is possible for housing associations, community land trusts and local households to acquire it for the purposes of affordable housing. The impact of the housing policies within this Local Plan, based on the rural 'exceptions' approach, should be to keep building development values lower than would otherwise be the case. Proposals which include 'Principal Residence' housing to help deliver affordable housing in Local Service Centres or Villages, will be scrutinised through 'an open book' approach to ensure it can be demonstrated that it is essential for the viability of the scheme (because it replaces current reductions in public housing grant to Registered Providers rather than increases building value), and that there are no alternative sources of funding but cross subsidy (through 'Principal Residence' housing). Higher building values would impact on scheme viability and in the longer term would result in a greater number of houses to deliver the affordable using up suitable existing buildings more quickly, so increasing pressure on greenfield sites and reducing the ability to deliver affordable housing for local needs in the National Park in the longer term. | Deleted text amalgamated with earlier text on viability prior to policy HC-S1 to avoid repetition and simplify and shorten plan (representation 0058/02). |
| 193 | Page 142, para. 6.94 | For clause 3 2 of Policy HC-D1, buildings which can only accommodate one dwelling unit will need to be affordable housing. Whether a building is able to accommodate more than one dwelling unit, will be judged on the basis of a maximum floorspace of 903sqm or less. | To reflect changes to the 90sqm updated to 93sqm to be consistent with the nationally described space standards. |
| 194 | Page 142, para. 6.95 | Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, based on robust assessments of housing need | For clarification. |

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| | | as set out in the preamble <u>supporting text</u> to local occupancy criteria, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy GP5. | |
| 195 | Page 142, para. 6.96 | Where there is evidence of need for specialist <u>accessible and adaptable</u> housing, proposals for the change of use of existing buildings to housing should provide for it in accordance with HC-D3, whether through affordable local needs housing or where it is proven to be required to deliver the affordable housing. | Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock. |
| 196 | Page 142, para. 6.97 | Policies provide for ‘Extended Family Dwellings’ in settlements through the change of use of an existing traditional building and where they otherwise accord with Policy HC-D4 including being within the curtilage of, and in close association with, an existing dwelling and where the occupants meet the requirements of that P policy. | To ensure consistency. |
| 197 | Page 142, para. 6.100 | The National Park Authority intends to provide further guidance in a supplementary planning document on the implementation of its housing policies. | To simplify and shorten the plan. |
| 198 | Page 143, Policy HC-D1 | <p>HC-D1 CONVERSIONS TO DWELLINGS IN SETTLEMENTS</p> <p>1. Within the named settlements, the change of use of a non-residential building(s) to a dwelling(s) will be permitted where:</p> <p>a) the building is well related to existing buildings, and the proposal conserves or enhances the character of the settlement and the building in accordance with CE-S5; and where:</p> <p>b) the proposal meets the requirements of CE-S5;</p> <p>a) e) there is a proven local need for the dwelling(s) which will meet an affordable local need, and the intended occupants meet the</p> | To simplify the policy and avoid repetition by reducing the number of clauses and cross references. Change in terminology to reflect the Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A |

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| | | <p>requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3; and</p> <p>b) d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2.</p> <p>2. Proposals for 'extended family dwellings, will accord with criteria 1 (a) and (b) above, be occupied by a person who meets the definition of 'extended family' and be in accordance with HC-D4.</p> <p>2. 3. The intention will remain the provision of 100% <u>local need</u> affordable housing to meet an identified local need and the change of use of a non-residential building to residential will address an identified local affordable need. <u>Where the building is able to accommodate more than one dwelling unit, the following tests will also apply:</u></p> <p>a) it is an element of principal residence market housing in accordance with HC-S4;</p> <p>a) b) it is clearly and robustly demonstrated that it <u>an element of Principal Residence market housing (HC-S4)</u> is required to enable delivery of <u>local need</u> affordable housing (<u>HC-S3</u>) which cannot be made financially viable without it;</p> <p>c) the building is able to accommodate more than one dwelling unit;</p> <p>b) d) it is within a Local Service Centre or a Village <u>named settlement</u> (GP3);</p> <p>c) e) it is the minimum number of pPrincipal rResidence market houses required to support the delivery of the required affordable housing to maximise the proportion of affordable homes within viability constraints;</p> <p>f) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;</p> | <p>Balanced Housing Stock and in response to representation 0063/05.</p> |

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| | | <p>d) g) in terms of size and type, the <u>affordable housing and mix of pPrincipal rResidence market housing</u>, is in accordance with Policy HC-S2;</p> <p>e) h) the affordable housing and pPrincipal rResidence market housing will be indistinguishable and will be fully integrated on the development site; and</p> <p>f) i) the affordable housing will be provided broadly in-step with the pPrincipal rResidence housing as development progresses; or</p> <p>j) it is 'Principal Residence' housing in accordance with HC-S1 clause 4.</p> <p>3. 4. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of one or more dwellings from a single previous planning unit (whether at once or over a period of time), the development should contribute the maximum number of local need affordable homes consistent with this policy. or in accordance with HC-S1, clause 4.</p> <p>4. 5. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling units, its capacity will be re-calculated.</p> <p>5. 6. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with Policy GP5.</p> | |

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| | | <p>6. 7. Proposals for <u>accessible and adaptable specialist</u> housing will be permitted where they accord with HC-D3.</p> <p>8. Where permission is granted condition(s) will be attached removing permitted development rights in accordance with HC-S2 and CE-S5.</p> | |
| 199 | Page 144, para. 6.101 | <p>The 1997 Local Plan restricted open market new build housing within villages to redevelopment sites. This was a response to the high level of open market in-fill housing built during the previous 5-20 years that tended to erode the character of Exmoor's villages. The approach in the 2005 Plan was to prioritise the provision of local needs affordable housing in all settlements through both new build and conversions in order to make the best use of existing buildings, minimise building on greenfield land and help retain vibrant local communities.</p> | To reduce the length and complexity of the plan – part of paragraph relocated to para. 6.6. |
| 200 | Page 144, para. 6.102 | <p>This Plan continues the approach in settlements of seeking all new build housing to be affordable housing to meet local needs. Given the outstanding character of Exmoor's settlements, new build housing will have to be located and designed so that it conserves or enhances the individual character of each settlement. It is considered that t<u>This policy approach has been appropriate in the context of National Park designation and has been successful in delivering new affordable housing through the rural exceptions site approach while minimising new housing especially on greenfield sites to that which is essential so as to maintain a supply of sites for local community needs in the longer term, Between 2005/06 and 2013/14, 83 local need affordable homes were built.</u> ENPA wishes to retain the focus on addressing the community's need for affordable housing. In a designated area with a highly sensitive landscape, with few suitable housing sites, there is a need to minimise new housing especially on greenfield sites to that which is essential. In principle, therefore, it is therefore not considered appropriate to provide for new build cross subsidy housing in Exmoor National Park. so as to maintain a supply of sites for local community needs in the longer term.</p> | To simplify the plan and reduce repetition. |

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| 201 | Page 144, para. 6.103 | <p>However, at the time of drafting, there have been national changes to the way in which affordable housing is funded including Reductions in to housing grant administered by the Homes and Communities Agency (HCA), together with and the setting of higher 'Affordable Rent' levels for affordable homes as a condition of that funding, have resulted in a greater reliance on private lending for affordable housing schemes which means that, at the current time, it is very difficult for Registered Providers to deliver affordable housing on exception sites. ENPA has therefore taken the difficult decision, while seeking all housing to be for affordable local need, to consider cross subsidy <u>through the minimum number of Principal Residence dwellings</u> where it can be clearly demonstrated that there are no other means of funding a scheme including through cross funding from other schemes in a Registered Provider's programme outside the National Park. In the meantime, the case for realistic levels of grant funding to ensure that the National Park can be protected and ensure local needs affordable housing can be provided without the need for additional cross subsidy housing, will continue to be made.</p> | To update the Plan and for clarification. |
| 202 | Page 144, para. 6.104 | <p>A key factor in achieving affordable new build housing is to obtain land at the lowest possible value such that it is possible for housing associations, community land trusts and local households to acquire it for the purposes of affordable housing. The impact of the housing policies within this Local Plan based on the rural exceptions approach should be to keep land development values lower than would otherwise be the case. Proposals which include additional housing to help deliver affordable housing schemes, will need to demonstrate that the affordable housing will be owned or controlled by Registered Providers or Community Land Trusts Registered Providers are those social housing providers on the statutory register compiled by the Homes and Communities Agency (or successor agency) which lists private providers, not for profit providers (of whom most are housing</p> | To simplify the plan and reduce repetition. |

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| | | associations), for profit providers such as private developers and local authority providers. | |
| 203 | Page 143, para. 6.105 | Schemes proposing a mix of affordable housing and ‘Principal Residence’ housing to fund it, will be scrutinised through ‘an open book’ approach to ensure it can be demonstrated that the ‘Principal Residence’ housing is essential for the viability of the scheme and that it replaces current reductions in public housing grant rather than increasing land value. ENPA will need to be convinced that cross subsidy through ‘Principal Residence’ housing is the only alternative and there are no other sources of funding. This is because the number of new dwellings on greenfield land should be minimised to that which is necessary to address local housing needs. Higher land values will impact on scheme viability and in the longer term would result in a greater number of houses to deliver the affordable using up suitable housing sites more quickly and reducing the ability to deliver affordable housing for local needs in the National Park in the longer term. | To simplify the plan and reduce repetition – the approach to assessing viability is set out in para. 6.42. |
| 204 | Page 145, para. 6.106 | In terms of Clause 2 a) (ii) of Policy HC-D2, ENPA will expect that any market (‘Principal Residence’) housing to fund affordable housing proposed in Local Service Centres or Villages will be less than the number of affordable dwellings. This applies the approach set out in the NPPF that planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. The timing and delivery of the affordable and pPrincipal rResidence housing will be secured through the planning approval. | To update the plan in respect of viability considerations. |
| 205 | Page 145, para. 6.107 | The only other circumstances in which Principal Residence housing may be permitted is where it is through the redevelopment of a ‘Vacant Building(s)’ in accordance with HC-D2 clause 2 b) and HC-S1 clause 4 only. Agricultural buildings and previously developed land without buildings do not come within the definition of ‘Vacant Buildings’. | To reflect the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local |

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| | | | Government [2015] and subsequent change to the PPG. |
| 206 | Page 145, para. 6.108 | Where permission is granted, condition(s) will be attached removing permitted development rights in respect of extensions to local need affordable dwellings and dwellings of up to 90 3 sqm in size in accordance with HC-S2 to ensure that the dwellings remain more affordable and contribute to a balanced local housing stock. | 90sqm updated to 93sqm to be consistent with the nationally described space standards. |
| 207 | Page 146, Policy HC-D2 | <p>HC-D2 NEW BUILD DWELLINGS IN SETTLEMENTS</p> <p>1. New build housing development will be permitted in named settlements where:</p> <ul style="list-style-type: none"> a) the site is well related to existing buildings and any development would conserve or enhance the character of the traditional settlement pattern and the character and appearance of the site and its surroundings; and a) b) it will meet an affordable local need, there is a proven local need for the dwelling(s) and that need cannot be met within the existing housing stock, or from-sites/buildings already with planning permission; b) c) the intended occupants meet the local need occupancy criteria requirements of the local need occupancy criteria which will be secured in perpetuity through a planning obligation in accordance with HC-S3; and c) d) the dwelling(s) will be affordable by size and type to local people and will remain so in perpetuity in accordance with HC-S2; <p>2. All new build housing must address an identified local need and be affordable with occupation restricted to local people in perpetuity unless, in the named Local Service Centres and Villages, a) F-for reasons of financial viability, ENPA is satisfied that it can be clearly and robustly demonstrated that:</p> | To simplify the policy. To update the plan in the light of national and changes, to ensure that the approach to delivery is flexible by removing the requirement that, in certain circumstances, the affordable housing will be owned or controlled by a Registered Provider or a community land trust. In respect of (former) clause 2 b) to reflect the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG. Change in terminology in clauses 3 and 4 to reflect the |

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| | | <p>a) i) An element of pPrincipal rResidence market housing (HC-S4) is required to enable delivery of the local need affordable housing which cannot be made financially viable without it. The affordable housing will be owned or controlled by a Registered Provider (including Housing Associations) or a community land trust. The intention will remain the provision of 100% affordable housing to meet an identified local need.</p> <p>b) ii) It is the minimum number of pPrincipal rResidence houses required to support the delivery of the required affordable housing.</p> <p>iii) The affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with the local occupancy definition in HC-S3 and will otherwise accord with this Policy.</p> <p>c) iv) In terms of size and type, the affordable housing and mix of pPrincipal rResidence market housing is in accordance with HC-S2;</p> <p>d) v) rThe affordable housing and pPrincipal rResidence housing are indistinguishable and fully integrated on the development site; and</p> <p>e) vi) The affordable housing will be provided broadly in-step with the pPrincipal rResidence housing as development progresses.</p> <p>or</p> <p>b) It is 'Principal Residence' housing through the redevelopment of a 'Vacant Building(s)' in accordance with HC-S1 clause 4 only. In such cases, for a building to be considered as Vacant, applicants will need to demonstrate that it is not abandoned and that it has been unoccupied and without content for a minimum of 3 years.</p> <p>3. Proposals for <u>specialist accessible and adaptable</u> housing will be permitted where they accord with HC-D3.</p> <p>4. Where permission is granted for local need or 'principal residence' dwellings or <u>specialist adaptable and accessible</u> housing of up to 930sqm floorspace, a</p> | <p>Technical Housing Standards – nationally described space standards - proposed to be included in policy HC-S2 A Balanced Housing Stock and in response to representation 0063/06.</p> |

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| | | condition will be attached removing permitted development rights in accordance with HC-S2. | |
| 208 | Page 147, para. 6.110 | <p>Policy HC-D3 makes provision for specialist <u>accessible and adaptable</u> housing for older people and other vulnerable members of the National Park's communities <u>who have a proven local connection. Such housing should meet the national standard for accessibility and be capable of adaptation to meet the changing needs of those who live in them. Clause 1 a) of the policy recognises that such housing can meet an affordable need in accordance with policies HC-D1 and HC-D2 and it will be subject to a local occupancy tie. Proposals can also meet a local (though not affordable) need to help meet the needs of Exmoor's communities, including its ageing population. Consistent with Policy HC-S1, such housing will also help to deliver an identified need for local need affordable housing. This accords with Policy HC-S2 which aims to ensure that the mix in terms of the size, type and tenure of housing permitted in the National Park contributes to that which is needed by local communities. and Policy HC-S1 which makes provision for specialist housing for older people and other vulnerable members of the community.</u></p> | Change in terminology to reflect and explain of the Technical Housing Standards – nationally described space standards and in response to representation 0063/07. To provide clarification on the local occupancy tie and cross subsidy. |
| 209 | Page 147, para. 6.111 | National Policy confirms that a focus on affordable housing is appropriate and that authorities and agencies should work together to meet the needs of local communities. ¹⁰¹ Planning authorities should be responsive to local circumstances and plan for housing to reflect local needs, and plan for a mix of housing to cater for the needs of older people and people with disabilities (including retirement and specialised housing for those with support or care needs). ¹⁰² To promote sustainable development in rural areas, housing should be located where it will | To simplify the plan. |

¹⁰¹ DEFRA (2010) English National Parks and the Broads UK Government Vision and Circular, London: Department for Environment, Food and Rural Affairs, para. 79.

¹⁰² DCLG (2012) National Planning Policy Framework, London: Department of Communities and Local Government paragraph 50 and Annex 2.

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| | | enhance or maintain the vitality of rural communities. Guidance notes the need for housing for older people. Consideration should be given to the size, location and quality of dwellings needed in the future. | |
| 210 | Page 148, para. 6.112 | West Somerset and Exmoor National Park have the highest average age in England. On Exmoor, has a higher than average proportion of older age groups with over 65s making up nearly one third of the population. West Somerset and Exmoor National Park have the highest average age in England. It is predicted that Exmoor will continue to have a much higher than <u>well above</u> average older population with a high proportion of over 65s households living alone. <u>Within the National Park a significant proportion</u> A quarter of all households with no dependent children include one or more persons with a long term health problem or disability. | To simplify and reduce the length of the plan. |
| 211 | Page 148, para. 6.113 | The Exmoor National Park in West Somerset SHMA Update assessed the requirement for different types of specialised housing based on the projected growth for older households. It estimated the 2011 requirement to be 138 specialised units of accommodation, with an additional 69 homes for older households. required for the West Somerset area of the National Park 2011-2031. This figure was part of the net overall housing requirement and not additional to it.¹⁰³ Although the 2015 Joint SHMA update provides an updated OAN for Exmoor National Park, the figures indicate the potential need/demand for such housing over the plan period.¹⁰⁴ | To simplify and reduce the length of the plan. The Housing Topic Paper sets out evidence on the component of projected households with a specialised housing requirement and in response to representation 0058/02. |
| 212 | Page 148, para. 6.114 | As people grow older their housing needs often change and homes may become unsuitable with many single elderly residents living in large family <u>houses or housing that are is otherwise</u> not appropriate to their needs. It appears that there | For clarification. |

¹⁰³ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, para. 5.32 and Table 5.15.

¹⁰⁴ ~~Housing Vision (2015) Northern Peninsula Strategic Housing Market Assessment Update.~~

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| | | <p>are Exmoor households, particularly of older people, living in unsuitable accommodation. Older people, or those with disabilities, may have specialist accommodation needs that are not met by the general housing stock. <u>The National Park Authority recognises the importance of supporting the housing needs of an ageing population and, within the context of National Park designation and other housing policies in this plan, ENPA considers it is important that opportunities should be taken to address the local need for accessible and adaptable housing for older people and other vulnerable members of the community.</u></p> | |
| 213 | Page 148, insert new paragraph after 6.115 - 6.115A | <p><u>6.115A Policy HC-D13 provides for the creation of smaller units of accommodation through subdivision/adaptation of existing homes. Older people and/or other members of the community who require adapted homes and who have access to appropriate support and finance may, be able to take such measures. The subdivision of homes may provide equity for necessary adaptations or enable a family member to provide support through living next door. An identified need for accessible and adaptable housing may also be addressed through new housing.</u></p> | For clarification (part of paragraph moved from para. 6.116). |
| 214 | Page 148, para. 6.116 | <p>The National Park Authority recognises the importance of supporting the housing needs of an ageing population and, within the context of National Park designation and other housing policies in this plan, ENPA considers it is important that opportunities should be taken to address the local need for specialist housing for older people and other vulnerable members of the community. For those in affordable need, this may be through appropriately designed affordable housing with local occupancy ties in accordance with housing policies. Policy HC-S2 requires that encourages all new build housing should enable adaptation to be constructed to accessible and adaptable Building Regulation Requirement M4(2) and requires 20% of dwellings in housing developments of 5 or more dwellings to</p> | For clarification and to reflect change in terminology to reflect and explain the Technical Housing Standards – nationally described space standards and in response to representation 0063/07. |

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| | | <p>meet the standard. The intention is to build up a stock of housing which should be suitable for people over their lifetime. This also applies to market (Principal Residence) housing, where it is proposed as an element of a scheme to help to fund affordable housing, and justified in the first instance, by a local need for affordable housing (HC-D1 or HC-D2). Policies also provide for the creation of smaller units of accommodation through subdivision/adaptation of existing homes. Older people and/or those in need of care and assistance who have access to appropriate support and finance may, through such measures, be able to continue to live in their own homes for longer.</p> | |
| 215 | Page 148, para. 6.117 | <p>Subdivision of homes may provide equity for necessary adaptations or enable a family member to provide support through living next door. Proposals for subdivision should comply with Policy HC-D14. Where there is no suitable housing within the existing housing stock, including specialised extra care and sheltered housing, or if adaptation/subdivision cannot be achieved then an identified need for specialist housing may be able to be addressed through new housing.</p> | Deleted as part of text moved to para 6.115A and to reflect deletion of clause 1a) of policy HC-D3 in response to representation 0051/06. |
| 216 | Page 148, para. 6.118 | <p>For those in affordable need, this may be through appropriately designed affordable housing with local occupancy ties in accordance with housing policies. Where there is an identified need for specialist housing and a household would not meet the criteria for affordable housing, any market (principal residence) housing, proposed as an element of a scheme to help to fund affordable housing, and justified in the first instance, by a local need for affordable housing (HC-D1 or HC-D2), should also include specialist housing units. In such cases, the affordable housing element of the scheme is or will be owned or controlled by a Registered Provider or Community Land Trust.</p> | To reduce repetition and reduce the length of the plan (part of the paragraph is included in para. 6.110). |
| 217 | Page 148, insert new paragraphs | <p><u>6.118A New accessible and adaptable housing should be reasonable in size and evidence indicates that two bedroom housing is likely to be the most needed</u></p> | For clarification and change in terminology to reflect and explain the Technical Housing |

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| | after para. 6.118 | <p><u>size.¹⁰⁵ The policy, therefore, requires that accessible and adaptable housing should not exceed 93sqm floorspace. Where a specific need for a wheelchair adaptable or accessible dwelling is identified it should be constructed in accordance with Building Regulations Requirement M4(3).</u></p> <p><u>6.118B Proposals should accord with CE-S5 and, where they relate to existing traditional buildings, should ensure that any alterations or conversion work do not harm the fabric or character of the building. Accessible and adaptable housing proposals should accord with Policy AC-D3 (Parking Provision and Standards) to ensure that provision is appropriate for the needs of residents.</u></p> | Standards – nationally described space standards and in response to representation 0063/07. Paragraph 6.118B moved from paras. 6.122 to 6.123. |
| 218 | Page 148-149, para. 6.119 and 6.120 | <p>Local needs affordable housing has occupancy ties to ensure it is lived in by people meeting the local occupancy requirements. However, the high external demand for housing in the National Park from older age groups means that there is a likelihood that new ‘Principal Residence’ specialist <u>accessible and adaptable</u> housing, to fund the affordable housing, although of a size and type needed by Exmoor’s communities, could predominantly be bought by older people moving from other parts of the UK, so exacerbating the trend towards an older population. Given the limited availability of suitable housing sites and the competing demands on them to satisfy the needs of local communities, the question of meeting general needs beyond those of the National Park becomes an important issue. Evidence from consultation indicated high support for local needs affordable housing, and support for the principle of local housing.¹⁰⁶ There was also some support for market and local housing to help deliver affordable housing (and where it could support provision of other housing needed locally, such as for an ageing population).¹⁰⁷ Policy HC-D3, therefore, provides for</p> | Paragraphs 6.119 and 6.120 are merged. Reduce the length of the paragraph. Change in terminology to reflect and explain the Technical Housing Standards – nationally described space standards and in response to representation 0063/07. |

¹⁰⁵ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: ENPA

¹⁰⁶ ENPA (2011) Strategic Options Consultation (2011-12) [Online] Available: <http://www.exmoor-nationalpark.gov.uk/>

¹⁰⁷ Ibid, Question 4.

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| | | accessible and adaptable housing to address a local need for older people's accommodation where adequate care and assistance cannot be provided within the existing housing stock. Local occupancy ties will be attached to permissions for new specialist housing through the use of planning obligations. In this way, such housing will address the locally arising needs of the National Park's older residents and other vulnerable members of the community in the longer term rather than contributing to a potential increase in older households moving to the area. Viability assessments indicate, where land values remain reasonable, that local housing has the potential to help fund local needs affordable housing. ¹⁰⁸ | |
| 219 | Page 149, para. 6.121 | Housing providers and developers of two or more affordable homes need to show that they have taken into account the housing needs of the community. This includes the need for specialist housing. Proposals for residential institutions (HC-S7), including specialist accommodation providing care, such as nursing homes, should also provide evidence on the local need for the development. | To reduce repetition as deleted text reflects para. 6.60A. |
| 220 | Page 149, para. 6.122 | Specialist housing should be specifically designed to meet the needs of older people, generally those of retirement age, and/or other vulnerable members of the community who require care and assistance and whose needs cannot otherwise be met through the existing housing stock. As such it will be subject to additional standards. Proposals should accord with CE-S5 and, where they relate to existing traditional buildings, should ensure that any alterations or conversion work do not harm the fabric or character of the building. | To reduce repetition and the length of the plan. |
| 221 | Page 149, para. 6.123 | New dwellings should be reasonable in size and evidence indicates that two bedroom housing is likely to be the most needed size. ¹⁰⁹ The policy, therefore, requires that owner-occupied, specialist housing should not exceed 90sqm | To reduce repetition and the length of the plan. |

¹⁰⁸ Nathaniel Lichfield & Partners (2011) Exmoor National Park Housing Viability Assessment. Dulverton: ENPA.

¹⁰⁹ Housing Vision (2014) Strategic Housing Market Assessment Update: Exmoor National Park in West Somerset, Dulverton: ENPA

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| | | <p>floorspace. In this way, it will contribute to the stock of housing most needed by Exmoor's communities and help ensure that land take is minimised given the limited and finite number of suitable housing sites in settlements. The Exmoor Housing SPD will set out in more detail, standards and requirements relating to assessing the need for the size type and tenure of housing and arrangements for cascades for future occupiers. Specialist housing proposals should accord with Policy AC-D3 (Parking Provision and Standards) to ensure that provision is appropriate for the needs of residents.</p> | |
| 222 | Page 149, para. 6.124 | <p>Evidence for the National Park, indicates that the level of demand from people moving into the area is such that it is reasonable to assume that were people to 'downsize' that their previous home would in turn be moved into by older people from other parts of the UK. They would be unaffordable to younger people and families on average local incomes.</p> | To reduce the length of the plan. |
| 223 | Page 150, HC-D3 | <p>HC-D3 <u>ACCESSIBLE AND ADAPTABLE SPECIALIST HOUSING FOR EXMOOR'S COMMUNITIES</u></p> <p>1. Proposals which address an identified local need or requirement for <u>specialist housing accessible and adaptable homes</u> for older people and/or other vulnerable members of the community who require <u>care and assistance homes that can be adapted to meet their needs over their lifetime</u>, will be permitted where:</p> <p>a) it cannot be provided within the existing housing stock, including through the appropriate subdivision and adaptation of existing dwellings in accordance with HC-D14 or from sites/buildings already with planning permission;</p> <p>a) b) proposals for more than one dwelling unit of local needs affordable housing and any pPrincipal rResidence market housing provide for an</p> | Change in terminology to accessible and adaptable housing and clause 1a) iii) to reflect and explain the Technical Housing Standards – nationally described space standards and in response to representation 0063/07. Clause 1 a) deleted in response to representation 0051/06. |

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| | | <p>identified need or requirement for specialist <u>accessible and adaptable</u> housing permitted in accordance with HC-D1 or HC-D2; and where:</p> <ul style="list-style-type: none"> i) <u>the dwelling size is in accordance with HC-S2;</u> ii) i) it will be integrated into the local community to enable access to required services and facilities; iii) ii) it is built to standards and to a size in accordance with HC-S2 it <u>should be constructed to at least accord with Building Regulations Requirement M4(2) (accessible and adaptable dwellings) or successor regulations, unless a specific need for a wheelchair adaptable or accessible dwelling is identified; in such cases the dwelling should be constructed in accordance with Building Regulations Requirement M4(3) (wheelchair user dwellings) or successor regulations; and</u> iv) iii) subdivision, adaptation or conversion work accords with CE-S5. <p>2. A planning obligation will be secured to ensure that the occupancy of specialist <u>accessible and adaptable</u> housing is confined in perpetuity to a local person (and their dependents) who has a minimum period of a total of 10 years permanent residence within parishes in the National Park.</p> <p>3. Where permission is granted a condition will be attached removing permitted development rights in accordance with HC-S2.</p> <p>4. The planning obligation will allow, where properties become vacant, and where no person in need of specialist <u>accessible and adaptable</u> housing, can be found to occupy a property, other persons with a local affordable housing need consistent with HC-S3 to occupy the dwelling.</p> <p>5. The provision of specialist accommodation offering care <u>and assistance</u> through a residential institution, should be in accordance with HC-S7.</p> | |
| 224 | Page 150, para. 6.125 | Policy HC-D4 sets out criteria to assess proposals for the re-use of an existing traditional building as a dwelling for 'eExtended fFamily'. The intention of the | To ensure consistency. |

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| | | policy is to provide appropriate opportunities for the re-use of an existing traditional building to enable families to provide support for each other by living close by. This is considered particularly important to support local communities given Exmoor's ageing population. | |
| 225 | Page 150, para. 6.126 | In accordance with Policies including CE-S5, proposals will have to be sensitively designed and lead to an enhancement of the immediate setting to conserve the character of the building and the landscape of the National Park and to enable the family to provide support. Policy HC-D4, therefore, requires that 'eExtended fFamily' dwellings will only be acceptable through the re-use of an existing traditional building within the curtilage of a dwelling in a settlement identified named in GP3 (a Local Service Centre or a Village) or where there is an existing dwelling in a farmstead, and not in isolated locations. | To ensure consistency. |
| 226 | Page 150-151, para. 6.127 | Clause 2 <u>3</u> of the policy requires the occupants to be 'immediate family' as a direct descendent or antecedent i.e. children, parents, grandparents, or great grandparents. Occasionally, relatives who do not meet the definition of immediate family may be considered where they are a dependent relative with an essential need to live close to another person because of age, family or medical reasons. In all cases, the occupier of the associated existing dwelling or the new dwelling should have a local connection of 10 years or more residence in the parish or adjoining parish. This reflects the National Park Authority's statutory duty to <u>Exmoor's local communities</u> , and will provide additional housing choice for <u>them</u> . Exmoor's local communities. | To ensure the text is consistent with the Policy and for clarification. |
| 227 | Page 151, para. 6.128 | Where permission is granted for residential re-use for 'eExtended fFamily' , occupancy will be controlled through a local occupancy tie. | For consistency. |
| 228 | Page 151, HC-D4 | HC-D4 EXTENDED FAMILY DWELLINGS CRITERIA 1. An extended family dwelling will only be permitted through the change of use of an existing traditional building in accordance with CE-S5 and in close association with an existing dwelling: | For consistency. |

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| | | <p>a) in settlements within the curtilage of an existing dwelling; or b) a farmstead within an existing group of buildings.</p> <p>2. <u>The dwelling size will be in accordance with HC-S2.</u></p> <p>3. 2 Extended family dwellings, will be occupied by a person(s) (and their dependents) who can demonstrate that:</p> <p>a) the occupier of the associated existing dwelling or the new dwelling has a minimum period of 10 years or more in the last 2<u>30</u> years permanent and continuous residence in the parish or an adjoining parish; and b) they are immediate family by virtue of being a direct descendent or antecedent of the permanent occupier of the associated existing dwelling; or c) exceptionally, they are a dependent relative who has an essential need to live close to another person, the need arising from age, family or medical reasons.</p> <p>4. 3 A planning obligation will be secured to ensure that the intended occupants meet the requirements of the extended family occupation in this policy and to tie the dwelling(s) to the main house to ensure that they are not sold off separately.</p> <p>5. 4 The variation of a planning obligation which restricts the occupancy of an extended family dwelling as set out in this policy will only be permitted where the occupancy of the dwelling is limited by agreement to local persons as defined in HC-S1 and HC-S3, or as a holiday let where the proposal is in accordance with HC-D12<u>3</u>.</p> <p>6. 5 Where permission is granted, a condition will be attached removing permitted development rights in accordance with HC-S2.</p> | |
| 229 | Page 151-152, para. 6.129 | The Government defines custom build housing as either a builder being contracted by a home owner to create a 'custom built' home or where a private individual builds their own home as a 'self-build'. It wants to enable more people | To update the plan and for clarification. |

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| | | <p>to build their own home.¹¹⁰ Surveys of local residents should be considered to assess local housing need for this type of housing, and a local list or register compiled of people who want to build their own homes.¹¹¹ Exmoor and Dartmoor National Park Authorities ies have <u>has</u> established local registers of people, <u>including local people</u>, interested in self-build or custom build as part of a joint 'Right to Build' Vanguard project.¹¹² The register will be used to help identify and address the local need for affordable housing from those who work and have a <u>longstanding residency local connection</u> in the National Park in line with Policy HC-S1 and other housing policies in this plan. <u>Potential sites can be on greenfield or brownfield land, including the conversion/change of use of existing buildings.</u> Some sites have been assessed through the SHLAA process, and will <u>would</u> be considered for self-build schemes. As part of the Vanguard Project, landowners have also been invited to suggest sites or buildings which are suitable for new build self-build housing or for housing through conversions.</p> | |
| 230 | Page 152, para. 6.130 | <p>Custom or self-build housing can be achieved by a household in different ways:</p> <ul style="list-style-type: none"> a) Self-build: being physically involved in part or all of the construction of one's own home; b) Self-finish: taking on a property which is structurally complete, and finishing the building oneself; c) Community self-build: being physically involved in part of all of the construction of one's home, as part of a wider scheme on one site; | To simplify the plan. |

¹¹⁰ DCLG (2012) National Planning Policy Framework Department of Communities and Local Government; para. 50 and DCLG (2012) House Building Policy [Online] Available: www.gov.uk/government/policies/increasing-the-number-of-available-homes/supporting-pages/self-builders

¹¹¹ DCLG (2014) Planning Policy Guidance: Housing and economic development needs-assessment (Paragraph: 021 Reference ID: 2a-021-20140306) [Online] Available: <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/>

¹¹² ENPA (2014) Self-build: Right to Build Vanguard [Online] Available: <http://www.exmoor-nationalpark.gov.uk/>

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| | | d) Custom build - where a house builder offers a serviced building plot and may also provide a design and build service to create the home. | |
| 231 | Page 152, para. 6.131 | Exmoor National Park Authority has a strong track record in helping to deliver affordable housing for local people. A number of individuals have converted an existing building, or had a new home built recognising that self/custom build can be a more affordable way of owning a home <u>so can be of benefit to first time buyers, including starter homes for younger people, and to achieve enabling more control over design and sustainability. Policy CE-S6 sets out sustainable construction and design principles.</u> This form of housing can include single homes on small plots, as well as community self-build projects. The 2005 plan did not prescribe tenure but instead ensured that a All new build housing <u>will</u> remained more affordable in perpetuity through a local need occupancy tie and upper size limit., an approach continued in this plan. | To update the plan in the light of national changes and for clarification. |
| 232 | Page 152, insert new paragraph after 6.131 | <u>6.131A Experience of implementing the housing policies in the 2005 Plan has shown that there may be opportunities for Housing Providers to provide serviced self-build plots, for example as part of a larger scheme. ENPA will work with partners, including local communities, who may wish to consider ways in which households can be assisted to provide homes, including site preparation and provision of services for self/custom build. There is growing interest in the potential for community land trusts to initiate affordable housing schemes and this may be able to achieve mixed schemes including, for example, local need custom/self- build housing to address the range of needs within a community.</u> | To update the plan including in the light of national changes and to reflect the flexible approach to delivery of affordable housing. |
| 233 | Page 152, para. 6.132 | Policy HC-D5 seeks to encourage custom/self-build housing where it will meet an identified local affordable housing need. Custom/self-build housing proposals will be considered in named settlements (GP3) in accordance with either Policy HC-D1 (conversions to dwellings in settlements) or HC-D2 (new build dwellings in settlements). Where the requirements of this and other policies in the plan are | To simplify the plan. |

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| | | <p>met, Policy HC-D5 also extends the principal of custom/self-build to rural communities to provide for opportunities to have for small scale development to address the needs of their a community for affordable housing. Rural communities are very small communities in the open countryside. <u>They are</u> not identified in the settlement <u>hierarchy strategy, and are</u> defined as those which have service provision in the form of a shop, public house or a community meeting place/hall and therefore considered to be appropriate locations for self-build opportunities to meet local affordable housing needs. At the time of drafting these are Allerford, Countisbury, Hawkridge, Heasley Mill, Kentisbury, Luccombe, Martinhoe, Oare/Malmsmead, Selworthy, Twitchen, West Porlock and Withycombe.</p> | |
| 234 | Page 153, HC-D5 | HC-D5 CUSTOM/SELF BUILD LOCAL NEED HOUSING IN RURAL COMMUNITIES | For clarification. Delete part of title as policy also provides for self/custom build housing in settlements. |
| 235 | Page 153, para. 6.135 | <p>THE CHANGE OF USE OF SERVICED ACCOMMODATION TO HOUSING</p> <p>Policy RT-D3 sets out the criteria to be satisfied for proposals for the change of use of existing serviced accommodation. Where proposals relate to a part or complete change of use to housing, Policy HC-D6 below will apply. In the first instance, the requirements of Policy RT-D3 should be satisfied. In considering proposals for the change of use to housing, the intention will remain the provision of 100% affordable housing. For proposals within Local Service Centres and Villages (GP3), Policy HC-D1 will apply. Outside these areas, an element of ‘Principal Residence’ housing may be permitted where it accords with the criteria in the policy. This will be either that it is required for reasons of financial viability to enable delivery of the affordable housing or, where a scheme would provide more affordable homes than are needed in the parish / adjoining parishes, a financial contribution will be required towards affordable housing needed</p> | To reflect the deletion of Policy HC-D6 following the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG. The change of use of serviced accommodation will be considered against policy RT-D3 which was the position in the |

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| | | elsewhere in the National Park. In all cases, the 'Principal Residence' housing will be the minimum number to support the delivery of the affordable housing. | draft plan before the national thresholds for affordable housing were announced. |
| 236 | Page 154, Policy HC-D6 | <p><u>HC-D6 THE CHANGE OF USE OF SERVICED ACCOMMODATION TO HOUSING</u></p> <p>1. Proposals for the change of use of serviced accommodation to dwelling(s) will only be considered where the requirements in RT-D3 are satisfied. The intention, through the change of use will remain the provision of 100% affordable housing to meet an identified local need.</p> <p>2. In the Local Service Centres and Villages, proposals will accord with HC-D1.</p> <p>3. Outside the Local Service Centres and Villages, an element of principal residence market housing in accordance with HC-S4 may only be permitted where:</p> <p>a) the proposal meets the requirements of CE-S5;</p> <p>b) it is clearly and robustly demonstrated that it is required to enable delivery of affordable housing which cannot be made financially viable without it;</p> <p>c) the building is able to accommodate more than one dwelling unit;</p> <p>d) it is the minimum number of principal residence market houses required to support the delivery of the required affordable housing and to maximise the proportion of affordable homes within viability constraints;</p> <p>d) the affordable dwellings will be occupied by a person(s) with a proven housing need in accordance with HC-S3;</p> | To reflect the judgement in R (on the application of West Berkshire District Council and Reading Borough Council) v Secretary of State for Communities and Local Government [2015] and subsequent change to the PPG. The change of use of serviced accommodation will be considered against policy RT-D3 which was the position in the draft plan before the national thresholds for affordable housing were announced. |

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| | | <p>e) in terms of size and type, the affordable dwellings and the mix of principal residence market housing is in accordance with HC-S2;</p> <p>f) the affordable housing and principal residence market housing will be indistinguishable and will be fully integrated on the development site; and</p> <p>g) the affordable housing will be provided broadly in step with the principal residence housing as development progresses.</p> <p>2. The National Park Authority will ensure that, whether through a single permission or incremental permissions, the number of affordable dwellings created is that which would have been required if the scheme had been constructed as a single development having regard to the planning unit and previous permissions since the adoption of the March 2005 Local Plan. In the case of the creation of more than one dwelling from a single previous planning unit (whether at once or over a period of time) the development should contribute the maximum number of local need affordable homes consistent with this policy.</p> <p>3. Where there is reason to believe that the proposal is formulated with a view to circumventing or mitigating affordable housing requirements, including where the National Park Authority considers that a building is able to accommodate more than one dwelling unit, its capacity will be re-calculated.</p> <p>4. Where a scheme would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future, a financial contribution will be required towards affordable housing needed elsewhere in the National Park in accordance with GP5. Any housing which may be permitted to deliver the required affordable housing should</p> | |

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| | | <p>be principal residence housing (HC S4) and will be the minimum number required to support the delivery of the affordable housing.</p> <p>5. Where permission is granted, condition(s) will be attached removing permitted development rights in accordance with HC S2 and CE S5.</p> | |
| 237 | Page 155, para. 6.136 | National guidance states that housing should be located where it will enhance or maintain the vitality of rural communities and that new isolated homes in the countryside should be avoided. Policies in this Plan therefore focus new build housing in the settlements identified <u>named</u> in Policy GP3. | For consistency. |
| 238 | Page 155, para. 6.137 | <i>Change policy reference numbering:</i> Policies HC- D7 <u>D6</u> and HC- D8 <u>D7</u> | Numbering changed due to deletion of policy HC-D6. |
| 239 | Page 155, para. 6.138 | <i>Change policy reference numbering:</i> Policy HC- D11 <u>D10</u> | Numbering changed due to deletion of policy HC-D6. |
| 240 | Page 155, para. 6.139 | Rural worker dwellings are required to be 90 <u>93</u> sqm or less. Exceptionally, a dwelling larger than 90 <u>93</u> sqm may be permitted <u>where it is justified by the needs of the business</u> , for example to accommodate a farm office. This will be considered where the dwelling is the principal or only dwelling on a holding. In such cases, the upper size limit of the dwelling will be 120sqm <u>124sqm.</u> ¹¹³ | For clarification and to reflect the Technical Housing Standards – nationally described space standards and in response to representation 0063/10. |
| 241 | Page 155, para. 6.140 | Policy HC- D9 <u>D8</u> sets out criteria for assessing applications for housing in the open countryside for rural workers in agriculture, forestry or other rural land based enterprises. Proposals for both the conversion of existing buildings to dwellings (HC- D7 <u>D6</u>) or proposals for new build housing (Policy HC- D8 <u>D7</u>) for rural workers will need to accord with Policy HC- D9 <u>D8</u> or for s <u>Succession</u> f <u>Farm workers</u> policy HC- D10 <u>D9</u> . A rural worker in agriculture, forestry or other land based rural enterprise operating in the locality will need to be a worker who is engaged in actual physical work, actively contributing to the management of the land and | To reflect deletion of HC-D6 and changes to subsequent policy numbering and simplify the plan. |

¹¹³ DCLG (2015) Technical Housing Standards – nationally described space standard

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| | | <p>justifying the need for a new home in that location. This is because non-physical work, although it may be associated with the business, can be achieved away from the enterprise and such cases will not meet the exceptional tests needed to justify a new home in the open countryside (see Annex 2 to this Plan). Proposals for housing for workers in the open countryside who are not employed in agriculture, forestry or other rural land based enterprises will be considered through the reuse of existing buildings for local need affordable housing in accordance with Policy HC-D7 <u>D6</u> and the local occupancy criteria in Policy HC-S3 clause 1 e) where they need to live close to their place of work or they meet the criteria of an Exmoor worker. The definition of an Exmoor worker and further guidance will be set out in the Exmoor Housing SPD.</p> | |
| 242 | Page 156, para. 6.141 | <p>The conversion of buildings in the open countryside to provide accommodation helps to reduce demand for further house building elsewhere on greenfield sites. Policy HC-D7 <u>D6</u> provides for the conversion of existing buildings to dwellings for the essential functional need for a rural worker (as above) and as local need dwellings. It also makes provision for ‘eExtended fFamily’ accommodation or for ‘sSuccession fFarming’. Where permission is granted for residential re-use for local needs, Policy HC-D7 <u>D6</u> requires that occupancy will be controlled through planning obligations in the same way as conversions within settlements. For rural (or sSuccession fFarm) workers, occupancy will be controlled through occupancy conditions consistent with the approach for a new build dwelling in the open countryside). The requirements for initial and subsequent occupiers of such dwellings are set out in Annex 2 of this Plan</p> | For consistency. |
| 243 | Page 156, para. 6.142 | <p>Policy HC-D7 <u>D6</u> sets out criteria on the different locational requirements which will apply in each case depending on the proposed occupier. The building will need to be located:</p> <ul style="list-style-type: none"> a) for local need accommodation, in a hamlet or farmstead where there is an existing dwelling; | To reflect deletion of HC-D6 and changes to subsequent policy numbering and for consistency. |

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| | | <p>b) for ‘eExtended fFamily’ accommodation, in a farmstead within an existing group of buildings, and in close association with an existing dwelling;</p> <p>c) for rural worker or sSuccession fFarm dDwellings, well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity</p> | |
| 244 | Page 156, para. 6.143 | <p>Proposals for new build rural worker or sSuccession fFarm dDwellings will need to accord with HC-D8 <u>D7</u> and be well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity. Considerations will include whether there is a joint access. Ensuring that the proposal relates well to existing buildings can also provide other benefits such as increased security through ‘natural surveillance’</p> | To reflect deletion of HC-D6 and changes to subsequent policy numbering and for consistency. |
| 245 | Page 156, para. 6.144 | <i>Capitalization:</i> ‘ e Extended f Family’- d Dwellings’ | For consistency. |
| 246 | Page 156, para. 6.145 | <i>Capitalization:</i> P policy CE-S5 | For consistency. |
| 247 | Page 156, para. 6.146 | <p>In considering proposals for <u>a</u> new build dwelling for a rural worker through Policy HC-D8 <u>D7</u>, the National Park Authority will need to be satisfied that there is no existing accommodation potentially available (or which has recently been sold which could have met the needs), or that the conversion/change of use of existing buildings or a temporary caravan is <u>are</u> not a viable alternative. Where necessary, the National Park Authority will attach a condition to any other existing dwelling(s) on the holding, restricting the occupancy to those engaged in agriculture, forestry or other business. Exceptionally, planning obligations may also be attached tying the dwelling to the holding or business to ensure that dwellings are not disposed of separately from the business as a whole. Such cases may include where there is a history of fragmentation of the farm holding leading to new agricultural workers dwelling(s). It is considered there may be occasions</p> | To correct a grammatical error and to reflect deletion of HC-D6 and changes to subsequent policy numbering. |

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| | | where this is can be justified to conserve the National Park and/or its special qualities. | |
| 248 | Page 157, para. 6.147 | Proposals for r Residential development associated with a low impact sustainable or environmental land based lifestyle (which can also be known as ‘One Planet Development’), and <u>Proposals for such development</u> , which may include temporary structures such as traditional ‘benders’ or yurts constructed of natural materials for which no conventional foundations are required, will be considered in terms of whether they are in accordance with the policies in this plan. These include the Spatial Strategy (Policy GP3), housing, landscape character and design policies. | For clarification. |
| 249 | Page 157, para. 6.148 | <i>Change policy reference numbering: HC-D7 D6 and HC-D8 D7</i> | To reflect deletion of HC-D6 and changes to subsequent policy numbering. |
| 250 | Page 157, para. 6.149 | Applications to remove agriculture or rural worker occupancy ties will be carefully assessed. In the case of s Succession f Farm d Dwellings permitted under Policy HC-D 10 <u>D9</u> , it may be occupied by other rural workers when the dwelling becomes vacant. When the exceptional need for this type of home no longer exists it can contribute to the provision of local need including intermediate or “more affordable” housing or where a need cannot be identified, holiday let accommodation. Policies in this plan set out the criteria to be met in such cases. | For consistency and to reflect deletion of HC-D6 and changes to subsequent policy numbering. |
| 251 | Page 157, policy HC-D7 | HC-D67 CONVERSIONS TO DWELLINGS IN THE OPEN COUNTRYSIDE | Numbering changed due to deletion of policy HC-D6. |
| 252 | Page 158, policy HC-D8 | HC-D78 NEW BUILD DWELLINGS IN THE OPEN COUNTRYSIDE 1. New dwelling(s) in the open countryside will only be permitted where: a) the accommodation is designed to meet a proven need for a rural worker in accordance with HC-D9 or succession farm worker in accordance with HC-D10 that cannot be met: | Numbering changed due to deletion of policy HC-D6 ad to correct drafting error in cross reference in clause 1 c). |

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| | | <ul style="list-style-type: none"> i. within the existing housing stock including through the subdivision of an existing dwelling, from sites/buildings already with planning permission; or ii. through the provision of a temporary residential caravan in accordance with HC-D11; or iii. the conversion/change of use of an existing building in accordance with CE-S5 and HC-D7; <p>b) the dwelling is well related to existing buildings on the holding such that the dwelling and farm buildings operate as a single entity; and</p> <p>c) the design and layout of the development meet the requirements of CE-S6 and the net floorspace will be in accordance with HC-D6 <u>D8</u> or HC-S2 as appropriate.</p> <p>2. Where permission is granted a condition will be attached removing permitted development rights in respect of extensions.</p> <p>3. Where permission is granted for a new dwelling on an agricultural or forestry holding that has an existing dwelling(s) under the control of the applicant which needs to be used in connection with the enterprise, a condition will be attached to ensure that the occupancy of any existing dwelling(s) is also limited to persons able to demonstrate a proven essential need for that accommodation.</p> | |
| 253 | Page 158, policy HC-D9 | <p>HC-D89 RURAL WORKERS</p> <p>1. New housing to meet the needs of rural workers in the open countryside will only be permitted in accordance with HC-D7 or HC-D8 and where:</p> <ul style="list-style-type: none"> a) it is justified by a proven essential functional need for a full time rural worker in agriculture, forestry or other rural land based enterprises to live permanently at or near their place of work; | Numbering changed due to deletion of policy HC-D6. To correct drafting errors and delete unnecessary cross reference within policy in clause 1 c). Clause 1 d) change to 93 sqm to reflect the |

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| | | <p>b) in the case of agriculture or other rural land based enterprises, the business is proven to be financially viable in the long term, it is extensive in nature, the land management activity contributes to the conservation or enhancement of the natural beauty and wildlife of the National Park and is in accordance with the tests set out in Annex 2 of this Plan;</p> <p>c) where the need for a dwelling is proven, a planning condition will be attached to ensure that occupancy of the dwelling(s) is confined to a rural worker in agriculture, forestry or <u>another rural land based rural land</u> enterprise operating in the locality; and in accordance with clause 1. a) above; and</p> <p>d) the net floorspace will be 90-93sqm or less unless the Authority is satisfied that a larger dwelling is required in which case, the size of the dwelling will be commensurate with the needs of the holding, it can be sustained by the farm business and it would be affordable for the essential need in perpetuity.</p> | <p>Technical Housing Standards – nationally described space standards and in response to representation 0063/10.</p> |
| 254 | Page 159, para. 6.150 | <p>Consultation indicated support for the re-use of existing buildings to provide for sSuccession fEarning.¹¹⁴ There is evidence that there is an ageing farming population on Exmoor. To encourage younger people to manage farm businesses, a second dwelling may be considered on established farms that are financially sustainable where the criteria for a full time worker as set out in Policies HC-D8 <u>D7</u> (new build housing in the open countryside) and HC-D9 <u>D8</u> (Rural Workers) cannot be fully satisfied. To satisfy the terms of the policy it will be required that the proposal accords with Annex 2 of this Plan; and:</p> <p>a) there are secure and legally binding arrangements in place to demonstrate that the farm business is jointly held, including by a person younger than the person currently responsible for management, or management of the</p> | <p>For consistency and to reflect deletion of policy HC-D6 and changes to subsequent policy numbering. To clarify the size of the dwelling and delete unnecessary text.</p> |

¹¹⁴ ENPA (2011) Local Plan Options (November 2011) [Online] http://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0004/251536/Local-Plan-Options-Consultation-Document.pdf

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| | | <p>farm business has been transferred to a person younger than the person currently responsible for management, or, that transfer of management is only conditional upon grant of planning permission for the dwelling. The younger person should demonstrate majority control over the farm business and be the decision maker for the farm business; or <u>and</u></p> <p>b) there is an existing functional need for an additional 0.5 or more of a full time worker;</p> <p>c) the enterprise and activity concerned has been established for at least three years and both the enterprise and the business need for the job, are financially sound, being profitable for at least one of them with a clear prospect of remaining so for a reasonable period of time. Evidence of actual or potential economic performance will be required. To assess economic sustainability it will be necessary to show the business has a reasonable prospect of providing a market return for all operators for the amount of management and manual labour inputs, including the job for which the rural enterprise dwelling is being sought, for at least five years from the anticipated completion of the proposed development. This should be assessed on the basis of what is a realistic income for the skills of the operator. <u>Policy HC-S2 requires that dwellings will be 93sqm or less in size.</u> A financial test is also necessary to assess the size of dwelling which the enterprise can afford to build and maintain. The requirements of the enterprise rather than of the owner or occupier will determine the size of dwelling that is appropriate. Dwellings which are unusually large in relation to the needs of the enterprise, or unusually expensive to construct in relation to the income it can sustain in the long term, will not be permitted.</p> <p>d) the functional need could not be fulfilled by another dwelling or by converting an existing suitable building, or any other existing accommodation;</p> | |

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| | | <p>e) It must also be demonstrated that the management successor or part time worker is critical to the continued success of the farm business, and that the need cannot be met in any other reasonable way, e.g. through the re-organisation of labour responsibilities.</p> | |
| 255 | Page 159-160, para. 6.151 | <p>In considering proposals, ENPA will need to be satisfied that there is no existing accommodation including through the extension and/or subdivision of an existing dwelling or through the conversion/change of use of existing buildings (or any of these have recently been sold which could have met the need) or the use of a temporary caravan that can be used to meet the needs of a resident worker. ENPA may investigate the history of the enterprise to establish the recent pattern of use of land and buildings (a sale may constitute evidence of lack of need) and why labour or residential arrangements cannot be re-organised to ensure that the existing accommodation meets the needs of the enterprise without the need for a further dwelling.</p> | To delete unnecessary text. |
| 256 | Page 160, para. 6.152 | <i>Capitalization: s</i> Succession <i>f</i> Farm <i>d</i> Dwellings | For consistency. |
| 257 | Page 160, policy HC-D10 | <p>HC-D910 SUCCESSION FARMING – SECOND DWELLINGS ON ESTABLISHED FARMS</p> <p>1. New housing to meet the needs of succession farmers in the open countryside will be in accordance with HC-D7 or HC-D8. A new second dwelling on a single farm holding within the open countryside will only be permitted where:</p> <p>a) the accommodation is designed to meet an existing proven functional need for an additional 0.5 or more of a full time agricultural worker to live permanently at their place of work on an established enterprise;</p> <p>b) the business is proven to be financially viable in the long term, it is extensive in nature and where the farming activity contributes to the conservation or enhancement of the natural beauty and wildlife of the</p> | Numbering changed due to deletion of policy HC-D6. Change to clause 1 and layout of clause 1 c) for clarification. |

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| | | <p>National Park and is in accordance with the tests set out in Annex 2 of this Plan;</p> <p>c) a planning obligation will require that there are secure and legally binding arrangements in place to demonstrate that:</p> <ul style="list-style-type: none"> i. the farm business is jointly held; or ii. management of the farm business has been transferred to a person younger than the person currently responsible for management; or iii. that transfer of management will take place on planning permission being granted for the dwelling; <p>d) the need cannot be met in any other way including through the re-organisation of labour responsibilities;</p> <p>e) the design and layout of the development meet the requirements of Policy CE-S6 and the net floorspace will be in accordance with HC-S2; and</p> <p>f) a planning condition is attached to ensure that occupancy of the dwelling(s) is confined to rural workers in accordance with Policy HC-D9.</p> <p>2. The policy will apply only to a single additional succession farm dwelling to be attached to an established farm after adoption of this Plan. Permission will not be granted for subsequent succession farm dwellings on the holding.</p> | |
| 258 | Page 161, para. 6.154 | <i>Capitalization:</i> Policy RT-D8 | For consistency. |
| 259 | Page 161, para. 6.155 | The siting of mobile homes or static caravans on a temporary basis should be closely located to existing buildings relating to the land based business. as <u>This will form part of the functional need to demonstrate that as it will need to be demonstrated that workers will need to be readily available to attend to the needs of the business at most times.</u> Specific consideration will be given to the | For clarification. |

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| | | visual impact of the structure and its potential impacts on landscape character and nature conservation interests. Applicants should therefore submit a landscaping scheme as part of any proposal to demonstrate how the structure can be effectively screened and impacts on the surrounding landscape character minimised (CE-D1 Protecting Exmoor's Landscapes and Seascapes). Siting should also take account of access and parking requirements, connection to utility services and avoidance of flood risk. | |
| 260 | Page 161, policy HC-D11 | HC-D101 RESIDENTIAL CARAVANS <i>Change policy reference numbering in clause 2: Policy HC-D9 D8</i> | Numbering changed due to deletion of policy HC-D6. |
| 261 | Page 162, para. 6.161 | <i>Capitalization (twice within the paragraph): Succession Farming</i> | For consistency. |
| 262 | Page 162, para. 6.162 | <i>Change policy reference numbering: HC-D14 D13</i> | Numbering changed due to deletion of policy HC-D6. |
| 263 | Page 163, policy HC-D12, clause 1 | HC-D112 REPLACEMENT OF RURAL WORKERS OCCUPANCY CONDITIONS 1. Proposals for the alteration of a condition, or variation of a planning obligation, which restricts the occupancy of a dwelling to a person employed, or last employed, in agriculture or forestry (permitted prior to the adoption of the Local Plan) to include the occupancy of a dwelling by a rural worker (as defined in Annex 2) employed in the locality will be permitted where the need has become redundant on that holding. | Numbering changed due to deletion of policy HC-D6. Grammatical correction to clause 1 (commas). Deletion of cross reference. |
| 264 | Page 163, para. 6.164 | Given that one of the key objectives of housing provision is to minimise new build housing development on greenfield land, by re-using existing buildings, there is an opportunity to utilise the resource of those buildings converted as holiday lets, to provide accommodation for local people in affordable housing need. This may be of particular value in the open countryside, where most holiday lets have been permitted historically, and because a large proportion of Exmoor's workforce is based on part-time employment (33% of people in employment work part | Numbering changed due to deletion of policy HC-D6. Grammatical corrections (commas). |

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| | | time). ¹¹⁵ This approach, presents an opportunity for a local need affordable dwelling where the tests for new-build housing under p <u>policies HC-D9 D8</u> Rural Workers or HC-D10 D9 <u>Succession Farming</u> cannot be met. | |
| 265 | Page 164, para. 6.165 | For holiday-lets subject to a holiday occupancy condition, a flexible approach to accommodate local housing needs will be taken to accommodate the replacement of holiday occupancy conditions with an agreement which will limit the occupancy to persons: <ul style="list-style-type: none"> a) in affordable housing need who meet the local occupancy criteria in policy HC-S3 and where the location accords with <u>p</u>olicy HC-D1 Conversions to Dwellings in Settlements or HC-D7 D6<u>Conversions to Dwellings in the Open Countryside</u>; or b) who meet the criteria for e<u>Extended f</u>Family' d<u>Dwellings</u> in policy HC-D4 Extended Family Dwellings. | Numbering changed due to deletion of policy HC-D6. For consistency. |
| 266 | Page 164, para. 6.166 | Additionally, for those dwellings permitted as e <u>Extended f</u> Family homes <u>Dwellings</u> in accordance with policy HC-D4, permission may be granted to vary the occupancy to persons in affordable housing need who meet the local occupancy criteria in <u>p</u> olicy HC-S3, or, where the requirements of <u>p</u> olicy RT-D4 (Non-Serviced Accommodation) are met, the occupancy may be limited to short-term holiday occupancy. | For consistency. |
| 267 | Page 164, para. 6.167 | <i>Capitalization:</i> e <u>Extended f</u> Family | For consistency. |
| 268 | Page 164, policy HC-D13 | HC-D123 REPLACEMENT OF HOLIDAY OCCUPANCY CONDITIONS AND EXTENDED FAMILY TIES | Numbering changed due to deletion of policy HC-D6. |

¹¹⁵ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales.

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| 269 | Page 165, para. 6.169 | <i>Change to floorspace from 90sqm to 93sqm.</i> | Change as a result of technical housing standards (nationally described space standards). |
| 270 | Page 165, para. 6.174 | Dwellings with an agricultural, rural worker, or s Succession f Farming occupancy tie are permitted in the open countryside as an exception and therefore will only be permitted to subdivide to create a new unit of accommodation where the occupancy of the new dwelling unit is for a proven need for a rural worker in accordance with HC- D9 <u>D8</u> , for a s Succession f Farming' d Dwelling in accordance with HC- D10 <u>D9</u> or where the additional unit(s) created will have a local affordable occupancy tie (HC-S3 Local Occupancy Criteria). | Numbering changed due to deletion of policy HC-D6. For consistency. |
| 271 | | <p>HC-D134 SUBDIVISION OF EXISTING DWELLINGS</p> <ol style="list-style-type: none"> 1. Proposals for the subdivision of existing residential dwellings will be permitted where: <ol style="list-style-type: none"> a) there would be no adverse impact on the character of the area, amenity of neighbouring occupiers, or highway safety; b) any necessary alterations will not adversely affect buildings of historic and/or architectural merit (CE-S4, CE-D3); and c) any additional units created will be pPrincipal rResidence housing and subject to a condition limiting its occupancy to a person as their only or principal home (HC-S4). 2. Where a property has a local affordable occupancy tie, any subdivision would require that the new unit(s) created would retain the same occupancy restriction. 3. Proposals to subdivide a dwelling with a rural worker or succession farming occupancy tie will only be permitted where: <ol style="list-style-type: none"> a) the additional unit(s) created will be occupied in accordance with HC-S3 Local Occupancy Criteria; or | Policy numbering changed due to deletion of policy HC-D6. For consistency. Additional clause 4: point of clarification |

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| | | <p>b) the additional unit(s) created will be occupied in accordance with the requirements for HC-D89 Rural Workers Dwelling or HC-D910 Succession Farming.</p> <p>4. <u>Where permission is granted a condition will be attached removing permitted development rights in accordance with HC-S2.</u></p> | |
| 272 | Page 166, para. 6.178 | <p>Extensions for dwellings that are subject to an occupancy tie to ensure they meet the local community's need for affordable (or more affordable housing) will <u>be very carefully considered</u> not be permitted where they would exceed 909393sqm net internal floorspace. This is because such homes have been permitted to provide an opportunity for local people, <u>who would otherwise be</u> unable to afford to buy a home on the open market, to build their own owner-occupied homes. Together with the local need occupancy tie, the size of these dwellings ensures that these homes remain more affordable for local people in perpetuity.</p> | To reflect changes to the policy. Change to 93 sqm as a result of technical housing standards (nationally described space standards) and for clarification. |
| 273 | Page 167, para. 6.182 | <p>In terms of <u>Proposals to extending</u> the residential curtilage of a property, <u>will be carefully considered</u> and <u>and its impact on landscape, and/or settlement character.</u> and <u>Proposals should particularly have regard to the settlement form and the use of traditional boundary treatments that reflect the historic character of the area.</u></p> | For clarification |
| 274 | Page 167, policy HC-D15 | <p>HC-D145 RESIDENTIAL EXTENSIONS</p> <p>1. Proposals for residential extensions will be permitted where they:</p> <p>a) accord with the principles set out in CE-S6 Design and Sustainable Construction Principles and CE-D4 Extensions;</p> <p>b) ensure there is sufficient space within the existing curtilage to accommodate the extension without resulting in overdevelopment of</p> | <p>Policy numbering changed due to deletion of policy HC-D6.</p> <p>Change to clause 2 b) in response to representation number 0058/19.</p> |

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| | | <p>the site or adversely impacting on residential amenity space and parking provision;</p> <p>c) are not disproportionate to the original dwelling and in any case do not increase the external floorspace of the original dwelling by more than 35% (taking into account any extensions provided through permitted development rights); and</p> <p>d) ensure the maintenance or replacement of any bat and barn owl roosts that may be present.</p> <p>2. Residential extensions will not be permitted in the following circumstances:</p> <p>a) for dwellings where the size is restricted the proposed extension would exceed the net internal floorspace limitation – including local need affordable dwellings, extended family dwellings, succession farming dwellings, rural land based worker dwellings and specialist housing for older people;</p> <p>a) b) for temporary dwellings, or</p> <p>b) c) for dwellings that are unauthorised or immune from enforcement action – including those dwellings which have had the benefit of a Certificate of Lawful Use or Development <u>where they would not otherwise comply with policies in the Local Plan.</u></p> <p>3. Extensions to residential curtilages will only be permitted where it can be demonstrated that it will not adversely affect visual amenity, the setting of the residential building, and the surrounding landscape, <u>biodiversity</u> and/or settlement character of the area.</p> | Changes to clause 3 for consistency. |
| 275 | Page 168, para. 6.183 | <i>Change policy reference numbering: HC-D16 <u>D15</u></i> | Numbering changed due to deletion of policy HC-D6. |
| 276 | Page 168, para. 6.184 | It is important that the number, scale and design of any buildings within the curtilage of a dwelling should not detract from the character or appearance of the dwelling, the site and the surrounding area, as the siting and design of | To correct a grammatical error. |

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| | | outbuildings can potentially be as significant as any other built development. Care should be taken to ensure that the position and design of ancillary outbuildings safeguards the amenity of neighbouring occupiers. Proposals which would reduce the level of private amenity space, including parking provision, around the dwelling to an unacceptable level should be avoided. <u>This</u> is to prevent issues in the future such as the relocation of private parking to on-street parking in locations where public parking demand is high or where it could interrupt the flow of traffic. | |
| 277 | Page 168, para. 6.187 | <i>Change policy reference numbering: HC-15 <u>D14</u></i> | Numbering changed due to deletion of policy HC-D6. |
| 278 | Page 168, policy HC-D16 | <p>HC-D156 OUTBUILDINGS</p> <p>1. Proposals for ancillary outbuildings within the domestic curtilage of a dwelling will be permitted where:</p> <ul style="list-style-type: none"> a) in terms of scale and massing they are proportionate to the dwelling they are to serve; b) there is no unacceptable adverse impact on the character, appearance or setting of the existing dwelling, the surrounding landscape, or the amenity of neighbouring occupiers by reason of their siting and design in accordance with policy CE-S6; c) in the case of the conversion of an existing building, the character and appearance of the building is conserved in accordance with policy CE-S5; and d) private amenity space around the dwelling will not be reduced to an unacceptable level. <p>2. Any element of the proposal that pertains to primary living accommodation should accord with the requirements of policy HC-D15 <u>D14</u> Residential Extensions.</p> | Numbering changed due to deletion of policy HC-D6. |

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| 279 | Page 169, para. 6.188 | Applications for replacement dwellings often come forward where an existing dwelling is in disrepair. In many cases such dwellings are of timber construction, modest in size and built prior to the introduction of planning control. Listed buildings or dwellings that are considered to be of historic <u>or architectural</u> importance will not be considered for replacement (CE-S4 Cultural Heritage and, CE-D3 Conserving Heritage Assets). The Exmoor National Park Historic Environment Record has an extensive source of information that includes the historic built environment and can provide useful evidence for applicants proposing to replace an existing dwelling. Where the residential use has been abandoned, any proposals will be assessed against policies for new build residential dwellings (HC-D2 and HC- D8 <u>D7</u>). | To better reflect the policy wording. Numbering changed due to deletion of policy HC-D6. |
| 280 | Page 169, para. 6.189 | Applicants should <u>will need to be able to</u> demonstrate that the existing building adversely affects the landscape or built character of the area. Dwellings recently destroyed by accident/fire will be eligible for replacement. | For clarity. |
| 281 | Page 169, para. 6.191 | The replacement dwelling should be of a similar scale, massing and floorspace as the original dwelling to avoid any adverse harm to landscape character and visual amenity; where existing dwellings have a net internal floorspace below 903 <u>93</u> sqm, the proposed replacement should not exceed 903 <u>93</u> sqm. In terms of policy HC- D17 <u>D16</u> the 'original dwelling' is the dwelling as it exists at the point of application to the National Park Authority. This approach will help to ensure that a stock of smaller, more affordable dwellings remains in the National Park. | Change to 93 sqm as a result of technical housing standards (nationally described space standards) and for clarification. Numbering changed due to deletion of policy HC-D6. |
| 282 | Page 169, para. 6.192 | Conditions will be attached to any permission granted to remove permitted development rights in relation to extensions on replacement dwellings less than 9093 <u>93</u> sqm to ensure they are more affordable to local people. For replacement dwellings larger than 9093 <u>93</u> sqm, the 35% extension allowance should not be factored in to the proposals for the replacement dwelling as this would result in a considerably larger dwelling in terms of scale and massing than the existing dwelling on site. A separate application would be required for any subsequent | Change to 93 sqm as a result of technical housing standards (nationally described space standards) and for clarification. Numbering changed due to deletion of policy HC-D6. |

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| | | extension to the replacement dwelling (unless within permitted development rights) to ensure that the design does not adversely impact on the surrounding landscape or settlement character, and the amenity of neighbouring occupiers in accordance with policies CE-D4 Extensions and HC-D15 D14 Residential Extensions. | |
| 283 | Page 170, policy HC-D17 | <p>HC-D167 REPLACEMENT DWELLINGS</p> <ol style="list-style-type: none"> 1. Proposals for the erection of a replacement dwelling will be permitted where the existing dwelling: <ol style="list-style-type: none"> a) is not listed or considered to be of historic or architectural importance worthy of conservation; b) has an adverse impact on the character and visual amenity of the area; and c) the residential use has not been abandoned. 2. The proposed replacement dwelling should: <ol style="list-style-type: none"> a) be sited on or close to the footprint of the existing dwelling, unless alternative siting would provide benefits for landscape, wildlife or cultural heritage ; b) be no larger in size than the original dwelling or 90 <u>93</u> square metres net internal floorspace, whichever is the larger; c) reflect the massing and scale of the original dwelling; and d) accord with the design and sustainable construction requirements of policy CE-S6. 3. Where permission is granted, conditions will be attached to: <ol style="list-style-type: none"> a) remove permitted development rights granted by the Town and Country Planning (General Permitted Development) Order 2015 in respect of extensions on dwellings of less than 90 <u>93</u> square metres to ensure they do not exceed this size; and | Numbering changed due to deletion of policy HC-D6. Change to 93 sqm as a result of technical housing standards (nationally described space standards) and for clarification and in response to representation 0063/11. |

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| | | <p>b) ensure that the existing dwelling is demolished and removed from the site prior to or within 3 months of the replacement dwelling first being occupied.</p> | |
| 284 | Page 171, para. 6.201 | <p>As a result of concerns over the landscape impacts of residential caravans or mobile homes in a National Park, if a future local need for traveller sites is identified, the policy seeks to accommodate that need outside the National Park and the National Park Authority will work closely with local housing authorities to achieve this. Nevertheless, this Local Plan sets out an approach which acknowledges small scale provision may be justified in exceptional circumstances. Consistent with the conservation and enhancement of the National Park duty to local communities, and the overall approach to housing in Exmoor, a rural exception site policy approach will be used to seek to address the proven needs of the local community for small traveller sites where they can be accommodated without harm to the National Park (including sensitive habitats and wildlife) and in accordance with GP3 Spatial Strategy, well related to existing buildings in or adjoining settlements. The forthcoming Exmoor Housing SPD will provide further guidance, including on assessment of local connection. Assessment of landscape impact will be required, including to take into account the variations in tree and hedgerow cover through the seasons, and a landscaping scheme to ensure a development is screened effectively.</p> | To reduce the length of the plan. |
| 285 | Page 175, para. 6.216 | <p>Policies HC-S6, HC-D18 and HC-D18⁹, support the provision and retention of new outdoor recreation areas and publicly accessible amenity spaces (as listed above) and the retention of existing outdoor recreation and amenity areas as identified on the Policies Map and in Annex 3 Important Open Space in Allerford and Luccombe. When submitting an application for additional open amenity space and outdoor sport and recreation facilities, the need for such development within the named settlements should be established through the evidence provided within the Exmoor National Park Open Space Strategy or other sources of</p> | Correction |

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| | | evidence including community related information. Communities can also designate 'local green space' ¹¹⁶ through the preparation or review of a Local Plan or Neighbourhood Plan. This designation can only be used where: | |
| 286 | Page 178, policy HC-D18 | <p>HC-D178 LOCAL COMMERCIAL SERVICE PROVISION</p> <p>1. Proposals for new build, extensions or change of use of buildings for local commercial service provision within the named settlements will be permitted where:</p> <p>a) the proposed location contributes to the overall vitality of the settlement and the local economy;</p> <p>b) they will not adversely affect the locality, National Park, or the amenity of nearby residents as a result of traffic or parking (AC-D1); and</p> <p>c) if required by the National Park Authority, an impact assessment has been submitted, the scope of which has been agreed prior to submission.;and</p> <p>2. Proposals for new local commercial service provision in the open countryside, through the reuse of existing buildings, will only be permitted in accordance with SE-S3 Business Development in the Open Countryside, and where:</p> <p>a) they are small scale ancillary retail development/operations principally offering for sale goods which are produced at the premises; or</p> <p>b) they principally comprise the sale of crafts and goods made on site, or shops and/or cafés which are ancillary to farms, visitor facilities, or camping and caravan sites; and</p> <p>c) they will not have adverse impacts on adjoining land uses; and</p> | <p>Policy numbering changed due to deletion of policy HC-D6.</p> <p>Correction to clause 1 b) and c).</p> |

¹¹⁶ DCLG (2012) National Planning Policy Framework (paragraphs 76-78) – Department of Communities and Local Government

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| | | <p>d) it can be demonstrated that they will not adversely affect service provision in nearby settlements.</p> <p>3. Extensions to existing local commercial services will be permitted in accordance with policy CE-D4.</p> | |
| 287 | Page 182, policy HC-D19 | HC-D189 SAFEGUARDING LOCAL SERVICES AND COMMUNITY FACILITIES | Numbering changed due to deletion of policy HC-D6. |
| 288 | Page 183, para. 6.237 | The Exmoor National Park Landscape Character Assessment identifies landscape character types and areas across the National Park (see policy CE-S1 Landscape and Seascape Character). At a more local scale, there are smaller areas of land that have a landscape value to communities and the settlements they live in ¹¹⁷ . The Local Plan inset maps identifies land of visual amenity value within and adjoining settlements, which recognises the significance these green areas have to the setting of buildings and other features, and their importance to the overall character of a settlement ¹¹⁸ . These are different to areas in settlements which are considered to be recreational, amenity and public green space that are open to everyone to use are defined as important open space for recreation and which are considered in policies HC-S6 and HC-D189. | <p>Amendment to policy title.</p> <p>Numbering changed due to deletion of policy HC-D6.</p> |
| 289 | Page 183, footnote 343 | There are areas of Important Visual Amenity Space located at Allerford and Luccombe –these settlements do not have inset maps as they are not <u>identified as a named settlement</u> within the <u>settlement hierarchy spatial strategy</u> (see Section 14: Annex 3 for relevant maps) | Point of clarification. |
| 290 | Page 184, policy HC-D20 | HC-D1920 IMPORTANT VISUAL AMENITY SPACE | Numbering changed due to deletion of policy HC-D6. |

¹¹⁷ Natural England & Scottish Natural Heritage (2002) Landscape Character Assessment Guidance

¹¹⁸ There are areas of Important Visual Amenity Space located at Allerford and Luccombe –these settlements do not have inset maps as they are not within the settlement hierarchy (see Section 14: Annex 3 for relevant maps)

Section 7: Achieving a Sustainable Economy

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| 291 | Page 187, para. 7.4 | Exmoor’s economic activity illustrates that two thirds of working age people within the National Park are economically active. There are generally low levels of unemployment despite the low levels of economic activity as a result of the large retired population and the fact that much work is seasonal. Of those working age people that are economically inactive two thirds are retired ¹¹⁹ . Compared to national and regional levels there is a high proportion of self-employment (26%) ¹²⁰ and working from/at home (37%) ¹²¹ within the National Park, which is characteristic of or sparse rural areas where people are twice as likely to be home-based or self-employed, as those in less sparse areas ¹²² . Entrepreneurial activity in such sparse rural locations is generally higher than in urban areas; similar to levels observed in inner London ¹²³ . | Points of clarification. |
| 292 | Page 190, para. 7.17 | Some businesses may grow and intensify their activity to a degree where proposals for extended or new premises are likely to have a detrimental and significant impact on the appearance and character of landscape and other special qualities of the National Park (including sensitive habitats and wildlife), and may no longer therefore be compatible with their location. <u>Such proposals are likely to be considered under policy GP2 Major Development.</u> The National Park Authority seeks to enable successful businesses to expand appropriately, however there may be occasions where the scale of the business and the intensity of its activities are such, in terms of numbers of employees and | Point of clarification in response to representation number 0067/16 |

¹¹⁹ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

¹²⁰ Office for National Statistics (2013) - 2011 Census, Key Statistics for National Parks in England and Wales

¹²¹ Office for National Statistics (2015) Table CT0418 Origin Destination Workplace – Method of travel to work (2001 specification) by distance travelled to work – published online at www.ons.gov.uk

¹²² Office for National Statistics (2010) Rural and urban areas: comparing lives using rural/urban classifications – Regional Trends 43 2010/11

¹²³ Commission for Rural Communities (2010) State of the Countryside 2010

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| | | traffic, for example, that it should consider moving to a more appropriate and sustainable location. | |
| 293 | Page 192, policy SE-S2 | <p><u>SE-S2 BUSINESS DEVELOPMENT IN SETTLEMENTS</u></p> <ol style="list-style-type: none"> 1. In the named settlements proposals for business development or extensions to existing businesses should accord with policy SE-S1 and be located within the settlement or where no suitable buildings/sites are available, well-related to existing buildings. 2. Proposals will be permitted where: <ol style="list-style-type: none"> a) they reuse existing traditional buildings wherever possible, in a way that maintains and enhances their character, or where no suitable buildings are available; b) where no suitable traditional buildings are available they reuse non-traditional buildings, or previously developed sites and proposals achieve enhancement, or where this cannot be achieved; c) <u>where this cannot be achieved</u> a replacement of a non-traditional building, or a new site/building may be permitted. 3. In addition to clause 1, any proposals for new build development in Porlock Weir, other than extensions to existing premises, should be: <ol style="list-style-type: none"> a) small-scale to reflect the form and character of the of the settlement; and b) compatible with industries associated with the settlement. | Amendments made in response to representation number 0043/36 |
| 294 | Page 192, para. 7.25 | Policy SE-S3 provides opportunities, and sets out the policy framework, for new business development in the open countryside, through the extension <u>or redevelopment of</u> existing business sites or buildings, and the reuse of existing buildings in farmsteads or hamlets. Ensuring that the best use is made of existing | Text inserted regarding new business development in the open countryside specifically relating to the redevelopment |

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| | | buildings, including those with the benefit of planning permission, will help to ensure that the National Park is conserved and enhanced (GP4 The Efficient Use of Land and Buildings). In recognition of the importance of farming and forestry to the area, policy <u>SE-S4</u> provides for agricultural and forestry development. | of existing employment sites. Partially responds to representations: 0015/01, 0015/02, and 0015/03. Policy reference added for clarification. |
| 295 | Page 192, para. 7.26 | <i>Change policy numbering:</i> HC-D 9 ¹⁰ Succession Farming – Second Dwelling on Established Farms | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |

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| 296 | Page 192, insert new paragraphs after 7.26 | <p><u>The policy aims to provide diversification opportunities for rural land-based businesses which are businesses that manage the land extensively in a way that conserves and enhances the National Park’s special qualities. These can be defined as farming enterprises based on primary food production, rural estates, forestry, mixed enterprises (e.g. with equestrian activities and/or game shooting) and other businesses that manage the land for conservation and/or recreation, which have benefits for health and well-being. These land-based businesses should also need to be located in the open countryside due to the nature of their operations.</u></p> <p><u>In terms of diversification proposals e.g. for conversions to holiday lets (RT-D4), provision of alternative camping accommodation (RT-D9), or the conversion of buildings for business development (which do not benefit from permitted development rights) a rural land-based business should provide at least full time employment for at least one member of staff. A small-holding that is a hobby farm as a lifestyle choice, which does not directly provide employment for one full-time equivalent person is unlikely to be considered for such diversification opportunities.</u></p> <p><u>Where there may be difficulties in determining whether a proposal for diversification of a ‘rural land-based business’ the applicant will need to demonstrate that the land-based business is a viable concern that generates sufficient income to diversify, or provide a business plan to show how the land-based enterprise can continue to be viable through diversification proposals.</u></p> | Insertion of text to provide explanation of rural land-based businesses in the context of diversification proposals. |

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| 297 | Page 193, para. 7.29 | In the open countryside, reuse of traditional buildings (CE-S5 Principles for the Conversion or Structural Alteration of Existing Buildings) is strongly favoured where the existing building is well related to existing (farm) buildings in a farmstead or within a hamlet. <u>Many traditional farm buildings are recorded on the Historic Environment Record as listed buildings or locally important heritage assets on historic farmsteads; proposals should therefore accord with policies relating to the historic environment (CE-S4 and CE-D3).</u> Proposals for the re-use of existing or construction of new isolated buildings for farm diversification will not be permitted unless it accords with Policy RT-D6 (Camping Barns). | References to policies relating to the historic environment, in response to representation number 0120/16 |
| 298 | Page 193, insert a new paragraph after 7.31 | <u>To help safeguard existing employment sites in the open countryside (not including agricultural or forestry land or buildings), sites may be redeveloped for new business uses (B use classes) where there are existing buildings on a site that have been directly utilised by employees as employment premises, and where the new buildings do not significantly increase the floorspace above that of the employment buildings to be replaced. New buildings should be sited on the footprint of existing buildings unless other locations on the site would help provide enhancement to the setting or benefit wildlife. Proposals should be of a high standard of design (policy CE-S6), and provide an enhancement of the site consistent with landscape character. Traffic and road safety interests should also be addressed.</u> | Change to the text ensures that the policy intention is clear in relation to the redevelopment of existing employment sites in the open countryside and responds to representation number 0015/05. |
| 299 | Page 194, policy SE-S3 | SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE 1. Business development will be permitted for the change of use and conversion of an existing traditional building that is well-related to an | Amendment to clause 3.d) provides greater certainty for diversification proposals, in response to representation number 0043/37. |

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| | | <p>existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling, in accordance with policies SE-S1 and CE-S5.</p> <p>2. Proposals for extensions to existing business sites or buildings that are well-related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling will be permitted in accordance with SE-S1 and where the scale and appearance of the development are compatible with local landscape character.</p> <p>3. Additionally, proposals for the diversification of existing agricultural, or other primary businesses responsible for land management, through the re-use/change of use of an existing non-traditional building for business development may be permitted where the following will be achieved:</p> <ul style="list-style-type: none"> a) they are well-related to an existing group of buildings on the farmstead and accord with policy CE-S5; b) it can be demonstrated that the agricultural use of the existing building(s) to be re-used is redundant; c) the proposed business development supports an existing agricultural or other primary business responsible for land management and does not conflict with the existing farming or land management activity; and d) where proposals relate to the change of use of an existing building from an agricultural use to a business use (use classes B1, B2, B8 or sui generis), a condition may <u>will</u> be attached to the permission to enable the building to be used for the purposes of agriculture or the permitted business use. <p>4. The erection of new business premises in the open countryside will not <u>only be permitted for the redevelopment of existing employment sites,</u></p> | <p>Change to clause 4 ensures that the policy is clear in relation to the redevelopment of existing employment sites in the open countryside and responds to representation number 0015/05.</p> |

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| | | <p><u>where existing buildings are replaced with no significant increase in size, and enhancement is achieved.</u></p> <p>5. Business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.</p> | |
| 300 | Page 194-5, para. 7.34 | <i>Change policy numbering: Policy HC-D145 Residential Extensions</i> | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 301 | Page 195, para. 7.37 | <p>LIVE-WORK OPPORTUNITIES</p> <p>Within Local Service Centres and Villages there is the potential for conversions and new build market housing to enable the delivery of affordable housing – this may provide opportunities for live-work arrangements for both affordable and market housing where such needs exist. In the open countryside the conversion of existing buildings enables the provision of extended family dwellings (on farmsteads) and local affordable homes (in hamlets and on farmsteads), whilst the conversion of additional buildings or the same building(s) to business space is also acceptable; such an approach would be conducive to a live-work arrangement. Similar schemes have been already been provided in the National Park. Proposals for ‘live work’ units should be in accordance with housing policies in Section 6.</p> <p><i>[insert new paragraph]</i></p> <p><u>7.37A Primarily, live-work arrangements will only be suitable where the location is considered to be acceptable for housing development (see Section 6 Achieving a Thriving Community). In all cases live-work arrangements should be designed so that the work space can be used independently of the dwelling space – this offers</u></p> | Amendment in response to representation number 0067/18 to provide additional clarification regarding live-work arrangements. |

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| | | <u>some flexibility for future employment opportunities, so it is not necessarily restricted to the occupants of the associated dwelling.</u> | |
| 302 | Page 195, policy SE-D1 | <p>SE-D1 HOME BASED BUSINESSES</p> <p>1. The use of part of a residential property, a small scale extension, the use of ancillary buildings where they are well related to existing buildings or, where no suitable buildings exist new outbuildings within the domestic curtilage, for a small scale home based business will be permitted where:</p> <p>a) there is no unacceptable adverse impact on the landscape or the amenity of the area or on the occupiers of neighbouring properties; and</p> <p>b) where an extension is proposed the development accords with Policy HC-D145 Residential Extensions.</p> <p>2. Where necessary, conditions will be attached to any granting of planning permission including to:</p> <p>a) control the use to avoid or minimise any potential adverse impacts;</p> <p>b) remove permitted development rights to protect the character and appearance of the building;</p> <p>c) ensure any new development may only be occupied in association with the dwelling and cannot be let or disposed of separately from that dwelling; and</p> <p>d) allow, where appropriate, the business use to cease and revert to an ancillary domestic use without the need for further planning permission.</p> <p>3. Proposals for live-work units should be in accordance with the housing policies in this Plan <u>and designed so the employment space can be used independently of the living accommodation.</u></p> | <p>Point of clarification regarding live-work arrangements in clause 3 of the policy – partially to reflect comments made in representation number 0067/18.</p> <p>Proposed change to policy numbering in clause 1.b) as a result of the proposed deletion of Policy HC-D6.</p> |

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| 303 | Page 195, para. 7.38 | Given the finite supply of employment land in the National Park, and the limited supply of greenfield land for development, the presumption is that existing employment sites and premises <u>within named settlements and in the open countryside</u> , will be safeguarded for economic uses. They make an important contribution towards the local economy, sustainability and self-containment of Exmoor's communities. | Point of clarification. |
| 304 | Page 198, para. 7.50 | Applicants are encouraged to approach the Authority at an early stage for advice on: the siting and design of buildings; whether a proposal requires planning permission; and the need for, and scope of, an Environmental Impact Assessment. New farm buildings tend to have a large, wide span with shallow pitched roofs comprising factory frame and panel components to allow for modern farm operational requirements including the need for efficient movement and access of machinery, and ventilation for larger numbers of stock. These buildings can have an industrial appearance and scale, therefore in assessing proposals for agricultural and forestry development and operations, the main considerations must be siting and design to ensure the landscape, wildlife, visual quality and historic character of the surrounding area is conserved, as well as avoiding possible environmental impacts and effects on neighbouring land uses, including residential. It is generally preferable in functional terms, and visually, for a new farm building to form part of an existing group. A landscaping scheme may also be required, which reduces the impact of the proposal on the wider landscape in accordance with CE-S1 Landscape <u>and Seascape</u> Character and CE-D1 Protecting Exmoor's Landscapes and Seascapes. | Amendment to policy title. |

Section 8: Achieving Enjoyment For All

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| 305 | Page 203, para. 8.12 | Tranquillity is one of Exmoor’s special qualities; providing an experience of calm in an area protected for its high quality landscapes. It is important for people’s health, well-being and improving quality of life; and also significant for Exmoor’s economy, as people come here to escape the noise disturbance and visual intrusion experienced in more urban areas. This does not imply no noise generation at all, but there are some recreational pursuits such as motorised sporting activities and clay-pigeon shooting grounds that are considered to be inappropriate in the National Park as they have the potential to have an adverse effect on the quiet enjoyment of others (<u>including neighbouring properties and users of nearby public rights of way and access land</u>) through exposure to <u>unacceptable levels of</u> noise disturbance that may be sustained for significant periods of the day, throughout the year (<u>see paragraph 5.51 and CC-S7 Pollution</u>). Impacts on landscape character and tranquillity, through intensity of activity, noise, and overall scale will be key considerations in determining whether proposals for recreation and tourism developments are acceptable. | Point of clarification regarding the experience of tranquillity and noise pollution in response to representation number 0067/19 |
| 306 | Page 204, policy RT-S1 | <p>RT-S1 RECREATION AND TOURISM</p> <p>1. Opportunities to provide a high quality, inclusive visitor experience on Exmoor through a diverse range of recreation and tourism facilities that actively enhance the understanding and enjoyment of the National Park’s special qualities will be encouraged <u>in accordance with the following principles:-</u></p> <p>2. Development proposals should demonstrate that:</p> | Point of clarification to the list of guiding principles for recreation and tourism development in response to representation number 0043/39 |

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| | | <ul style="list-style-type: none"> a) They underpin the quiet enjoyment of the National Park. There are no unacceptable adverse effects on the natural and historic environment either individually or cumulatively through levels of activity or use. b) They contribute towards a sustainable future for Exmoor’s local economy and communities. c) They support the improved health and wellbeing of people living, working and visiting Exmoor through the benefits of recreation and experience of tranquillity. d) They ensure appropriate and safe access by the road network and where possible by walking, cycling, horse-riding and public transport. e) They safeguard the existing access network, including public rights of way, and access land; and provide enhancements where opportunities arise (RT-D12). f) They respond to opportunities to improve the quality and viability of existing recreation and tourism businesses, through appropriate restoration, extension, expansion or diversification. g) They are of a scale compatible with their location and setting, in accordance with the relevant development management policy considerations for tourism and recreation (policies RT-D1 to RT-D12). | |
| 307 | Page 205, footnote ref 380 | Quality in Tourism (2015) the assessment service provided for <u>Visit England</u> | Correction |
| 308 | Page 206, para. 8.24 | <i>Change policy numbering: HC-D145 {Residential Extensions}</i> | Proposed change to policy numbering as a result of the |

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| | | | proposed deletion of Policy HC-D6. |
| 309 | Page 207, policy RT-D2 | <p>RT-D2 STAFF ACCOMMODATION</p> <ol style="list-style-type: none"> 1. Proposals for staff accommodation will only be permitted where it can be demonstrated that such accommodation is not available in the locality or cannot be provided within the existing hotel, guesthouse or hostel. Where this need cannot be met provision for staff accommodation will be permitted through: <ol style="list-style-type: none"> a) the change of use and conversion of existing buildings that are within the curtilage in accordance with CE-S5, or where this is not possible; or b) <u>where this is not possible</u>, a small-scale extension to the hotel or guesthouse as a self-contained annexe. 2. Staff accommodation will be tied through a condition or planning obligation to the existing premises, to ensure that it cannot be sold separately or occupied as a separate accommodation unit – other than for staff or owners. 3. Where there is evidence that the need for staff/owner accommodation is no longer required, the following uses will be considered: <ol style="list-style-type: none"> a) a local occupancy tie to meet local affordable housing needs (HC-S1); b) non-serviced holiday-let (RT-D4); or c) extension of guest accommodation. 4. No further extension will be permitted for staff accommodation on premises where the previous staff accommodation has been lost to other uses. | Clarification of policy tests in response to representation number 0043/40 |

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| 310 | Page 207-8, para. 8.30 | <i>Change policy numbering: policy HC-D145 Residential Extensions</i> | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 311 | Page 209, para. 8.35 | Where an applicant is seeking a change of use from serviced accommodation to residential, proposals should first demonstrate that they cannot achieve any other use specified in clause 3(a) of the policy. Where the principle of residential use is accepted, proposals should accord with policy HC-D6 The Change of Use of Serviced Accommodation to Housing <u>the tests for the change of use of buildings to residential use in clause 2 of policy HC-D1.</u> | In response to the deletion of policy HC-D6 The Change of Use of Serviced Accommodation to Housing as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance. |
| 312 | Page 209, policy RT-D3 | <p>RT-D3 SAFEGUARDING SERVICED ACCOMMODATION</p> <p>1. Development proposals that would involve the loss of existing serviced accommodation will only be permitted where:</p> <p>a) other employment uses are to be created in the existing building; or</p> <p>b) evidence clearly demonstrates the use can change to a pPrincipal rResidence dwelling (HC-S4) where:</p> <p>i) the use was formerly a single residential dwelling on 1st July 1948 or built as a single residential dwelling subsequently;</p> <p>ii) there has been no excessive alteration or extension; and</p> <p>iii) the existing use does not provide an additional community service or function.</p> <p>2. Where clause 1 does not apply, proposals relating to the change of use of serviced accommodation should be demonstrate that the</p> | In response to the deletion of policy HC-D6 The Change of Use of Serviced Accommodation to Housing as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance. |

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| | | <p>current use of the building as serviced accommodation cannot be continued or made viable in the longer term and the property has been marketed as a going concern at a reasonable value for a minimum period of 12 months. An independent valuation of the building will be required.</p> <p>3. Where it is demonstrated that the serviced accommodation is longer viable (clause 2), proposals for change of use should be compatible with the cultural heritage of the existing building, local character and amenity and in accordance with the following:</p> <p>a) Changes that will be considered acceptable in principle include:</p> <ul style="list-style-type: none"> i) Change of use to self-catering apartments. ii) Change of use to provide community services or facilities. iii) A mixed use development, based on the uses listed above including employment use. <p>b) Proposals for the change of use to residential dwellings will only be considered where the requirements of this policy are met and clause 3(a) cannot be achieved. Proposals should accord with HC-D6 Change of Use of Serviced Accommodation to Housing <u>the tests set out in clause 2 of policy HC-D1.</u></p> <p>c) In relation to 3 (a) and (b), opportunities for the partial change of use of the building or complex that supplements the existing serviced accommodation will be encouraged.</p> | |
| 313 | Page 211, para. 8.41 | <i>Change policy numbering:</i> policy HC-D1 23 Replacement of Holiday Occupancy Conditions and Extended Family Ties | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |

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| 314 | Page 212, Policy RT-D4 Non-serviced Accommodation | <p><i>Change policy numbering in clause 4:</i></p> <p>Where a non-serviced accommodation unit is no longer needed or viable, a proposal to replace the holiday occupancy condition of the unit with an agreement limiting occupancy to meet a local affordable need for housing or housing for extended families will be considered in accordance with policy HC-D123. In respect of changes to business or community use, proposals should accord with the relevant policies in the plan.</p> | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 315 | Page 213-214, para. 8.49 | <p>Camping barns are also often referred to as bunkhouses, backpacker accommodation and hostels. They usually provide very basic accommodation and in more isolated locations very few facilities are provided apart from basic shelter; these are often referred to as ‘stone tents’. There are very few camping barns on Exmoor, especially those which are available to the wider public – some remote hostels for example are owned by organisations or private charitable trusts. Camping barns include those well-established <u>privately-run</u> facilities at Northcombe Farm near Dulverton and Woodadvent Farm near Roadwater, and establishments run <u>managed</u> by the Youth Hostel Association (Pinkery and Minehead) within the National Park. Opportunities exist for a network of this type of accommodation to be created, particularly close to existing long distance trails such as the South West Coast Path, Two Moors Way and the Coleridge Way.</p> | Correction |
| 316 | Page 214, policy RT-D6 | <p>RT-D6 CAMPING BARNES</p> <p>1. Proposals for the change of use and necessary alteration of a traditional building to a camping barn or hostel accommodation will be permitted where it complements the historic character and appearance of the building, biodiversity interests, and its setting within the landscape.</p> <p>2. Where the existing building is located: in a farmstead or hamlet in close association with an existing dwelling, or in a named settlement;</p> | <p>Point of clarification to ensure the meaning of clause 2 is clear – in response to representation number 0043/41.</p> <p>Clause 2c will be removed as this is already a requirement of</p> |

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| | | <p>a) <u>in a farmstead or hamlet in close association with an existing dwelling, parking and access arrangements should be incorporated within the hamlet/farmstead building group</u> without detrimentally impacting on landscape character and visual amenity; or</p> <p>b) <u>in a named settlement, parking and access arrangements in a settlement</u> are consistent with policies AC-D1 and AC-S3; and</p> <p>c) utility and service supplies will be routed underground.</p> <p>3. The change of use and conversion of a traditional barn or building in an isolated location to provide basic shelter in a camping barn (stone tent) with limited facilities for walkers, will be permitted where it can be demonstrated that:</p> <p>a) the building can be managed effectively without new access provision;</p> <p>b) the proposal does not involve alterations to the external fabric and surroundings of the building that would materially affect the character or appearance of the building and its setting;</p> <p>c) the building is well related to the rights of way network or access land; and</p> <p>d) any bat and barn owl roosts that may be present are maintained or replaced.</p> | <p>policy AC-D6 Fixed Line Transmission Infrastructure.</p> |
| 317 | Page 215, para. 8.55 | <p>New commercial touring caravan sites are considered to be inappropriate within the National Park, due to the significant visual impact they can have on landscape character as a consequence of the degree of landscaping required to enable sites to accommodate the modern requirements of touring caravan parks; including access, parking, level pitches with hard-standing and associated utility and drainage provision. The adverse landscape impact is therefore considerable with or without caravans <u>or motorhomes</u> on the site.</p> | <p>Point of clarification relating to representation number 0052/11</p> |

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| | | Consequently extensions to existing touring caravan sites or the provision for outdoor caravan storage facilities are also considered to be inappropriate in the National Park. Additionally Exmoor's road network has a high proportion of narrow, single track lanes that limits opportunities for such development, as they are generally unsuitable and impractical for towed caravans and large motor-homes to navigate safely. | |
| 318 | Page 216, para. 8.58 | It is considered that static caravan sites could be replaced by appropriately designed holiday accommodation, such as single-storey timber chalets, camping pods, yurts, traditional Romany caravans or similar structures which offer alternative forms of holiday accommodation (RT-D9 Alternative Camping Accommodation). The proposals should demonstrate an overall visual and environmental improvement in terms of form, layout, materials, colour and landscaping, in accordance with policies CE-S1 Landscape <u>and Seascape</u> Character and CC-S6 Design and Sustainable Construction Principles. A reduction in the overall number of units/pitches will be expected where there are three or more static caravans on the site and the restoration of pitches should provide a benefit for wildlife. In terms of new chalet/log cabin holiday accommodation; these structures will only be permitted where they replace units on existing static caravan sites or chalet developments. | Amendment to policy title. |
| 319 | Page 227, para. 8.94 | A high standard of maintenance, clear way-marking and the minimisation of any conflicts between path users and landowners are vital to the enjoyment of the access network. The legal responsibility for the maintenance of PRow lies with Devon and Somerset County Councils, which has been delegated to Exmoor National Park Authority for many years. Exmoor National Park Authority liaises <u>will work</u> with farmers, <u>land owners</u> and land managers to address any issues arising from PRow across their land. A large proportion of the network is available to pedestrians, cyclists and equestrian users. Users' | Point of clarification in response to suggested modification (representation number 0045/01) |

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| | | <p>interests encompass the physical use and the understanding, enjoyment and experience of the access network including views and tranquillity. Opportunities to enhance the access network to improve the inclusiveness and enjoyment of the network to users of all abilities will be sought <u>be sought and national guidelines followed wherever possible to safeguard different user groups interests and find the best possible access option.</u></p> | |
| 320 | Page 230, para. 8.107 | <p>The design of all aspects of a proposal should therefore reflect the historic character and appearance of the original railway and ensure that the proposed development is integrated in terms of its landscape setting. Landscaping should be incorporated as part of the proposal to conserve and enhance the National Park. This should have regard to the site and landscape character of the area and also the traditional features of the former railway; this may include trees, hedges, walls, railings, fences and surface treatments (CE-S1 Landscape <u>and Seascape</u> Character, and CE-S6 Design and Sustainable Construction Principles). Detailed evidence should be provided with any application to demonstrate the need for any deviations from the original historic former railway route consistent with policy RT-D13 to ensure that the reinstated route will be safeguarded.</p> | Amendment to policy title. |
| 321 | Page 227, footnote 403 | <p><u>Devon County Council (2012) Rights of Way Improvement Plan 2</u> Devon County Council (2005) Improving Devon's Environment: Rights of Way Improvement Plan (pages 85-121) <u>Somerset County Council (2015) Rights of Way Improvement Plan 2</u> Somerset County Council (2006) Rights of Way Improvement Plan November 2006 (section 10) <u>Exmoor Appendix (written 2005, revised April 2011)</u></p> | Correction to references to the Rights of Way Improvement Plan in response to suggested modification (representation number 0069/13) |

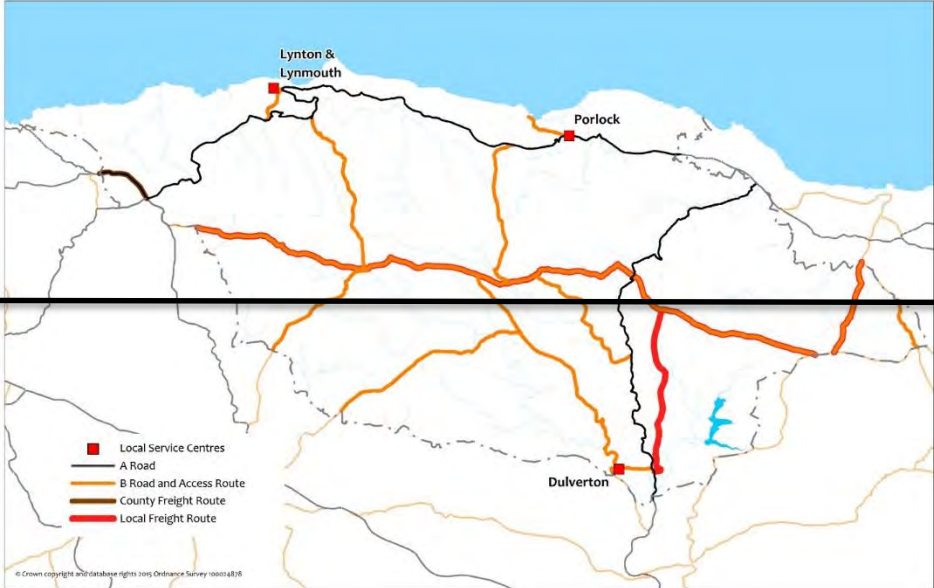
Section 9: Achieving Access For All

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| 322 | Page 235, policy AC-S2 | <p><u>AC-S2 TRANSPORT INFRASTRUCTURE</u></p> <p>1. Exmoor National Park Authority will work with highways authorities and local communities to ensure that works to highways and transport infrastructure including traditional fords and bridges, road maintenance and improvement schemes, parking or new access roads, signage and street furniture reflect local character and:</p> <ul style="list-style-type: none"> a) Are designed and constructed to conserve and enhance the natural beauty of the National Park, using materials and finishes that are appropriate to the character of the local landscape and built environment. b) Maintain and, where possible, enhance the rural character of roads. c) Retain (or if this is not possible, replace like for like) existing traditional street furniture and highways signage such as fingerposts, milestones, cast iron signs or other features important to the character of the area. d) Incorporate wildlife enhancements and landscaping schemes including green infrastructure where appropriate. e) Minimise disturbance and damage during maintenance or construction. f) Minimise lighting (CE-S2), highways signage and reduce clutter. g) Take account of road safety interests particularly for non- motorised modes of transport, and the capacity and function of the road network. h) Increase future resilience of transport infrastructure at risk from climate change and extreme weather events through the use of sustainable drainage systems. | <p>Change to policy numbering to reflect comments made in representation number 0069/17, so the clauses are exclusive from the list of inclusive sub-clauses a) to h).</p> |

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| | | <p><u>2. i)</u> Upgrading of existing routes designed solely to accommodate high traffic speeds will not be supported.</p> <p><u>3. j)</u> New roads and significant road widening are not considered to be appropriate in the National Park context, except where they would result in substantial environmental gain or community benefit.</p> | |
| 323 | Page 238, para 9.20 (move to after current para 9.22) | The Exmoor Route Network (shown on the Policies Map, and Key Diagram (and Map 9.1 below) identifies the main transport routes on Exmoor according to their function in order to ensure that traffic uses roads most suited to the purpose of its journey. provides a hierarchy of routes for different types and modes of travel. The A class roads are the principal transport routes in the National Park, suitable for most types of traffic (with some exceptions relating to HGVs – see below); B class roads are suitable for medium sized vehicles; other smaller roads and lanes are only suitable for cars and other small vehicles. | Clarification in response to representation number 0069/18 |
| 324 | Page 238, para 9.21 | HGV movements on roads within the National Park are at significantly lower levels in relation to total traffic flows but large vehicles can still cause problems on narrow roads and in villages across the National Park. <u>There are weight and length restrictions on a number of A and B roads in the National Park due to constrained junctions or steep gradients, including at Dunster, Porlock Hill, Wheddon Cross and Lynmouth and Lynton.</u> There has been a significant increase in delivery vans, some of which is likely to have resulted from the growth in internet shopping ¹²⁵ . Whilst this is preferable in the National Park to additional HGV movements, such increases in traffic may in future benefit from co-ordination and shared deliveries using an appropriate size of vehicles suited to the small rural roads in the National Park | In response to representation number 0069/18 |
| 325 | Page 238, para 9.22 | There are no long distance strategic national or regional freight routes through the National Park, apart from a short section of A399 that passes through the | In response to representation number 0069/18 |

¹²⁵ Somerset County Council (2011) Freight Strategy

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| | | <p>western edge of the National Park which is identified as a County Freight Route. The A39 from Williton to Dunster and Minehead (outside the National Park boundary) is also designated a County Freight Route. Local Freight Routes, for local access only, are designated for the B3190 (Raleigh's Cross towards Washford Cross), the tertiary route from Machine Cross to Heath Ppoult Cross, and the east/west route across the National Park consisting of the B3224, B3223 and B3358. These are longstanding routes signposted for HGVs for local access only. The B3223 is unsuitable for HGVs at Dulverton. and not as strategic county level routes. The Exmoor Route Network provides the framework to ensure that freight traffic uses roads most suited to the purpose of its journey. The National Park Authority will support continued work by the Highways Authorities with hauliers and SatNav providers to take unnecessary through encourage traffic, particularly lorries and HGVs, away from the National Park. The use of unsuitable routes will be discouraged through appropriate measures, such as positive signing and SatNav route information. to use County Freight Routes to access the settlements on the edge of the National Park including Dunster, Minehead and Lynton/Lynmouth, with Local Freight Routes restricted to local access only. The National Park Authority will also encourage Highways Authorities to ensure that diversionary routes and planned maintenance minimise disruption to local communities. The use of unsuitable routes will be discouraged through appropriate measures, such as positive signing and SatNav route information.</p> | |

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| 326 | Page 239, Map 9.1 |  <p data-bbox="533 874 683 893">Exmoor Route Network</p> <p data-bbox="533 943 1010 975"><i>See Appendix 5 for amended Map 9.1</i></p> | <p data-bbox="1621 284 2029 507">Minor amendments to the presentation of the map to show the Local Freight Route more clearly, add in road numbers and locations outside the National Park.</p> <p data-bbox="1621 555 1823 587">See Appendix 5</p> |
| 327 | Page 240, Policy AC-S3 | <p data-bbox="533 986 1126 1018"><u>AC-S3 TRAFFIC MANAGEMENT AND PARKING</u></p> <ol data-bbox="533 1038 1570 1321" style="list-style-type: none"> <li data-bbox="533 1038 1570 1230">1. The approach to traffic management on Exmoor will take into account the needs of all users including pedestrians, walkers, cyclists, horse-riders, and disabled people, including through the provision of alternative routes to avoid busy roads, safer crossing points, and use of shared surfaces where appropriate. <li data-bbox="533 1251 1570 1321">2. The Exmoor Route Network, as shown on the policies map, will form the framework for traffic and freight management in the National Park. | <p data-bbox="1621 986 2029 1050">In response to representation numbers 0069/19 and 0043/45</p> |

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| | | <p>3. Replacement of existing car parking (lost through development or coastal change), or the creation of small scale new facilities will be permitted where: (a) this enables opportunities to enhance public understanding and enjoyment of the National Park,; or (b) this <u>would</u> relieves traffic and parking pressure elsewhere in the locality,; <u>including adverse impacts arising from parking on the highway.</u> and <u>Such provision should also ensure that:</u></p> <p style="padding-left: 40px;">a) (c) there is good accessibility, and there would be no material harm to the character and appearance of the locality or views from publicly accessible locations; and</p> <p style="padding-left: 40px;">b) (d) it is well designed in accordance with the criteria set out in policy AC-S2(1).</p> <p>4. In the National Park there is a presumption against providing for peak parking demand. The National Park Authority will work with highways authorities, Town and Parish Councils and local communities to identify local solutions to congestion and parking issues in keeping with landscape character, providing for community needs and utilising temporary solutions for peak parking where necessary and appropriate (AC-D4).</p> <p>5. Proposals for new development should make adequate provision for parking in accordance with AC-D3.</p> | |
| 328 | Page 244, para 9.35 | The majority of properties on Exmoor are connected to the mains electricity network – however there remain a number of properties in more remote locations in the National Park that are not connected to mains electricity and are therefore reliant on generators and renewable energy technologies to meet their energy needs. The mains electricity network is delivered to homes and businesses on Exmoor via a local distribution network on wood pole lines (including 11kV and | Clarification in response to representation number 0064/02 |

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| | | <p>33kV lines). Larger high voltage pylon routes and transmission lines would be treated as major development (GP2) and are not considered to be appropriate in the National Park due to the impact on landscape character and other special qualities.</p> | |
| 329 | Page 248, Policy AC-D5 | <p><u>AC-D5 RADIO AND MOBILE TELECOMMUNICATIONS INFRASTRUCTURE</u></p> <ol style="list-style-type: none"> 1. Proposals for radio and mobile telecommunications development will be permitted where they first seek to share existing infrastructure, there is capacity in landscape terms, and no increase in height of existing masts is required. 2. Where it can be demonstrated that (1) is not possible, apparatus will be sited on existing masts or other features such as buildings or other structures, to minimise adverse effects on landscape character. 3. Where it can be demonstrated that (1) and (2) are not possible, the apparatus shall be sited and designed to ensure that it has an acceptable appearance in the landscape including through camouflage as a natural or traditional feature. 4. In determining all proposals: <ol style="list-style-type: none"> a) the highest standards of design will be sought in terms of colour, dimensions, construction and overall shape to minimise any visual impact; b) there will be no unacceptable cumulative or sequential visual impact with other vertical structures in the landscape; c) there will be no <u>unacceptable</u> adverse effects on sensitive habitats and wildlife <u>or historic environment</u>; | In response to representation number 0120/24 |

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| | | <p>d) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</p> <p>e) the amenity of nearby residents and visitors are not adversely affected; and</p> <p>f) opportunities for enhancement of the landscape including consolidation of any existing telecommunications infrastructure will be sought.</p> <p>5. A condition will be attached to any planning consent to ensure that there will be ongoing management in place where trees are essential in providing amelioration to visual impacts including as camouflage to antenna within trees.</p> | |
| 330 | Page 250, para. 9.57 | Where it can be demonstrated that the need for the cabling (electricity and telecommunication cabling/lines) is essential in the National Park and cannot be addressed in another way, and that the cabling cannot be undergrounded because of other adverse impacts which cannot be mitigated (consistent with policies CE-S1 Landscape and Seascape Character, CE-S3 Biodiversity and Green Infrastructure, and CE-S4 Cultural Heritage and Historic Environment) the National Park Authority will negotiate with the distribution network operator to select the least obtrusive route. The route should select a backdrop that makes sympathetic use of existing features such as hedgerows or wooded areas to break views of the line ¹²⁶ and particularly avoid highly sensitive open landscapes, such as moorland, and skyline intrusion. | Amendment to policy title. |
| 331 | Page 251, Policy AC-D6 | <p><u>AC-D6 FIXED LINE TRANSMISSION INFRASTRUCTURE</u></p> <p>1. Proposals for new transmission lines will only be permitted where they <u>first seek to be</u> are routed underground, unless they <u>this</u> will conflict with</p> | In response to representation numbers 0050/02 and 0064/02 and for clarification. |

¹²⁶ National Grid Company (1990) Holford Rules

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|----------------------------|--|---------------|
| | | <p>policies CE-S1 Landscape <u>and Seascape</u> Character, CE-S3 Biodiversity and Green Infrastructure, CE-S4 Cultural Heritage and Historic Environment.</p> <p>2. <u>Where it can be demonstrated that (1) is not possible, other means of providing the service with minimal environmental impact should be considered (CC-S5 Low Carbon and Renewable Energy Development, CE-D7 Satellite Antennae).</u> and the need for the service cannot be met in any other way.</p> <p>3. <u>Where it can be demonstrated that (1) and (2) are not possible</u> In this circumstance, proposals for overhead lines may only be permitted where the visual impact is minimised by selecting the least obtrusive route and where it will not cross any moorland or open landscapes, or break the skyline.</p> <p>4. 2 Proposals relating to low voltage electrical cabling from renewable energy technologies (CC-S5) will only be permitted where:</p> <ul style="list-style-type: none"> a) they will be routed underground; b) they will not adversely affect landscape and seascape character, biodiversity, cultural heritage or recreational use of the coast; and c) there is adequate infrastructure to connect cabling nearby that does not require substantial modification or upgrading, or where any modification /upgrading to existing infrastructure is minimal and will not have any unacceptable impact. <p>5. 3 <u>Development</u> proposals that include <u>require</u> electricity or telecommunication service lines to new development will be expected to provide underground routing subject to policies CE-S1, CE-S3 and CE-S4.</p> | |

Section 10: Exmoor's Settlements

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|---|--|---|
| 332 | Page 254, para. 10.10 | Support and advice may include working with communities to help bring forward development that accords with the policies set out in the Local Plan. Suitable tools could include parish plans, supplementary planning documents (SPDs) or Area Action Plans for larger projects. The Authority also has a duty to support Neighbourhood Planning including the preparation of Neighbourhood Plans to address specific issues within a community including neighbourhood development plans, neighbourhood development orders, and community right to build. The Authority will provide advice to communities, including whether a strategic environment assessment or habitat regulations assessment will be required in the preparation of such plans. <u>Neighbourhood plans should be in general conformity with the strategic policies of the Local Plan.</u> | Point of clarification relating to representation numbers 120/02 and 0063/13. |
| 333 | Section 10 footnotes from page 269 to the end of the section. | <i>Continue numbering references from 451 onwards.</i> | To amend a formatting error which numbers footnotes from 880 onwards. |
| 334 | Pages 255 and 331 – Inset map legend | DISCLAIMER The Proposals <u>Policies</u> Map (including Inset Maps) have been produced with the most current data available at the time of print. Some information on the Proposals <u>Policies</u> Map is shown with the consent of external organisations. Enquiries regarding any external information should be directed to the relevant organisation. | Correction – in response to representation number 0043/47 |
| 335 | Page 269, para. 10.47 | Dulverton has a wide range <u>of</u> services and facilities which serve the local community and surrounding communities including those outside the National Park, such as part of Battleton and Brushford. The centre of the settlement has a | Minor correction |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|----------------------------|--|--|
| | | variety of shops, tearooms and restaurants, in addition to a hotel, pubs and a number of offices. The town is an important visitor destination for those visiting or staying on Exmoor, and there are several shops and facilities to cater for their needs. The number of shops, businesses and community facilities is therefore considered to be relatively high compared to other settlements of this size outside the National Park | |
| 336 | Page 278, para. 10.88 | The Lyn Plan and contains a range of policies relating to development and land use within the parish. It has been prepared to ensure that it is in general conformity with those policies considered to be strategic within the Exmoor National Park Local Plan 2001-2011 and in conjunction with the preparation of this Local Plan. It is considered therefore, that the policies in the Lyn Plan will also be in general conformity with the strategic policies in this Local Plan. <u>Decision-making within the Lynton & Lynmouth neighbourhood area will be made in accordance with the strategic policies of the Local Plan and the policies of The Lyn Plan. The development management policies of the Local Plan will only be used in decision-making where The Lyn Plan is silent, indeterminate, out of date, or as stated in para 10.87, where a proposal relates to RT-D3.</u> | Clarification regarding the strategic policies of the Local Plan in relation to the Lynton & Lynmouth Neighbourhood Plan – representation number 0063/13 |
| 337 | Page 279, policy ES-S2 | <p>ES-S2 LYNTON & LYNMOUTH NEIGHBOURHOOD PLAN</p> <ol style="list-style-type: none"> 1. Development proposals within Lynton & Lynmouth parish shall be determined in accordance with <u>the strategic policies of the Local Plan and the Lynton & Lynmouth Neighbourhood Plan 2013 – 2028</u> and the strategic policies of the Local Plan. 2. Development management policies in the Local Plan will only be given greater weight in the following circumstances: <ol style="list-style-type: none"> a) where the neighbourhood plan is silent, indeterminate or out of date; and | Clarification regarding the strategic policies of the Local Plan in relation to the Lynton & Lynmouth Neighbourhood Plan – representation number 0063/13 |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------|--|---------------|
| | | <p>b) using RT-D3 sSafeguarding sServiced aAccommodation to determine related proposals for the change of use of serviced accommodation within the Neighbourhood Plan area (over-riding the Lyn Plan policy E2 Change of Use of Hotels & Guesthouses).</p> <p>3. Should a conflict arise between development management policies in the Local Plan and the policies in the Neighbourhood Plan, the conflict will be resolved in favour of the Neighbourhood Plan until the end of the Plan period in 2028 or until it is reviewed, whichever is earlier, unless it is considered that the proposal would otherwise have a detrimental impact on the achievement of National Park purposes.</p> | |

Section 11: Monitoring and Implementation Framework

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|---|--|---|
| 338 | Page 304, indicator for CE-S1 | Change in area of <u>Section 3</u> moor and heath as a result of development | Correction to state how this area will be defined. |
| 339 | Page 305 | Delete reference to HC-D6 for the penultimate indicator. | Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance. |
| 340 | Page 307, indicator for CC-S7, CC-D2, CC-D5 | Contextual Indicator Length and % <u>Percentage</u> of monitored rivers achieving 'good' or 'high' ecological status (under the Water Framework Directive) | Amendment to the monitoring indicators to be consistent with Environment Agency monitoring – representation number 0033/04 |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-----------------------------------|--|---|
| 341 | Page 307 | Delete reference to HC-D6 for the penultimate indicator. | Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance. |
| 342 | Page 309 | Delete reference to HC-D6 for the first and sixth indicator. | Proposed change to delete Policy HC-D6 as a consequence of the removal of S106 thresholds for affordable housing from Planning Practice Guidance. |
| 343 | Pages 303, 305, 309 and 310 | Change numbering to the following policy references: HC-D 6 <u>7</u> HC-D 7 <u>8</u> HC-D 8 <u>9</u> HC-D 9 <u>10</u> HC-D 10 <u>11</u> HC-D 11 <u>12</u> HC-D 12 <u>13</u> HC-D 13 <u>14</u> HC- D 14 <u>15</u> HC-D 15 <u>16</u> HC-D 16 <u>17</u> HC-D 17 <u>18</u> HC-D 18 <u>19</u> HC-D 19 <u>20</u> | Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6. |

Section 12: Annex 1: The Conduct of Archaeological Work and Historic Building Recording

No proposed changes.

Section 13: Annex 2: Rural Land Based Worker Dwellings

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|--------------------------|--|--|
| 344 | Page 322, para. 13.2 | This Annex provides additional information and guidance in relation to the following policies: a) HC-D 67 Conversions to Dwellings in the Open Countryside b) HC-D 78 New Build Dwellings in the Open Countryside c) HC-D 89 Rural Workers d) HC-D 1011 Residential Caravans | Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 345 | Page 322, para. 13.3 | <i>Change policy numbering:</i> HC-D 910 'Succession Farming – Second Dwellings on Established | Proposed changes to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 346 | Page 323, para. 13.7 | <i>Change policy numbering:</i> Policy HC-D 89 | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 347 | Page 323, para. 13.8 d) | <i>Change policy numbering:</i> HC-D 134 Subdivision of Existing Dwellings | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 348 | Pages 323-4, para. 13.11 | <i>Change policy numbering:</i> policy HC-D 910 Succession Farming – Second Dwellings on Established Farms. | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------|---|---|
| 349 | Page 324, para. 13.17 | Rural worker dwellings should be of a size commensurate with the established functional requirement. Policy HC-D 89 requires that the net floorspace <u>gross internal area</u> will be 930sqm or less unless the Authority is satisfied that the needs of the holding require a larger dwelling. Larger dwellings should be of a size commensurate with the needs of the holding, and should not be expensive to construct in relation to the income it can sustain in the long-term. It is the requirements of the enterprise, rather than those of the owner or occupier, that are relevant in determining the size of a dwelling larger than 930sqm <u>gross internal area</u> net internal floorspace . | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. Change in terminology to reflect the Technical Housing Standards – nationally described space standards. |
| 350 | Page 325, para. 13.19 | <i>Change policy numbering:</i> policy HC-D 104 Residential Caravans. | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 351 | Page 325, para. 13.23 | <i>Change policy numbering:</i> policy HC-D 112 Replacement of Rural Workers Occupancy Conditions. | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |
| 352 | Page 325-6, para. 13.24 | <i>Change policy numbering:</i> policy HC-D 89 Rural Workers. | Proposed change to policy numbering as a result of the proposed deletion of Policy HC-D6. |

Section 14: Annex 3: Important Open Space in Allerford and Luccombe

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------|---|-------------------------|
| 353 | Page 327, para. 14.1 | The following maps illustrate areas of important open space for recreation and visual amenity within the settlements of Allerford and Luccombe. These settlements are not <u>identified as named settlements</u> within the settlement | Point of clarification. |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|-------------------------|--|---------------|
| | | hierarchy <u>spatial strategy</u> , listed in policy GP3 Spatial Strategy <u>and Table 3.1</u> , and therefore are not represented on the Policies Map and associated Inset Maps. | |

Section 15: Glossary

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification | | | | |
|-----------------------------------|---|--|---------------|------------|-----------------------------------|---|---|
| 354 | Page 328 | Insert the following text in the Glossary Table after 'affordable housing': <table border="1" data-bbox="524 603 1496 727"> <thead> <tr> <th>Term</th> <th>Definition</th> </tr> </thead> <tbody> <tr> <td>All Abilities</td> <td><u>An inclusive approach referring to opportunities for people of all abilities, including those with disabilities.</u></td> </tr> </tbody> </table> | Term | Definition | All Abilities | <u>An inclusive approach referring to opportunities for people of all abilities, including those with disabilities.</u> | To reflect comments made in representation number 0065/01 |
| Term | Definition | | | | | | |
| All Abilities | <u>An inclusive approach referring to opportunities for people of all abilities, including those with disabilities.</u> | | | | | | |
| 355 | Page 330 | Insert the following text in the Glossary Table before 'Cumulative landscape effects': <table border="1" data-bbox="524 820 1496 1136"> <thead> <tr> <th>Term</th> <th>Definition</th> </tr> </thead> <tbody> <tr> <td><u>Community Land Trust (CLT)</u></td> <td>Community Land Trusts are local organisations set up and run by ordinary people to develop and manage homes as well as other assets important to that community, like community enterprises, food growing or workspaces. The CLT's main task is to make sure these homes are genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier.^x</td> </tr> </tbody> </table> <p>^x As defined by the National Community Land Trust Network http://www.communitylandtrusts.org.uk/what-is-a-clt</p> | Term | Definition | <u>Community Land Trust (CLT)</u> | Community Land Trusts are local organisations set up and run by ordinary people to develop and manage homes as well as other assets important to that community, like community enterprises, food growing or workspaces. The CLT's main task is to make sure these homes are genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier. ^x | For clarification. |
| Term | Definition | | | | | | |
| <u>Community Land Trust (CLT)</u> | Community Land Trusts are local organisations set up and run by ordinary people to develop and manage homes as well as other assets important to that community, like community enterprises, food growing or workspaces. The CLT's main task is to make sure these homes are genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier. ^x | | | | | | |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification | | | | |
|-----------------------------------|---|---|---------------|------------|-----------------------------------|---|---|
| 356 | Page 330 | <p>Insert the following text in the Glossary Table before ‘Cumulative landscape effects’:</p> <table border="1" data-bbox="524 352 1496 632"> <thead> <tr> <th data-bbox="524 352 698 395">Term</th> <th data-bbox="698 352 1496 395">Definition</th> </tr> </thead> <tbody> <tr> <td data-bbox="524 395 698 632"><u>Cultural Heritage</u></td> <td data-bbox="698 395 1496 632"><u>Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others. This includes all physical assets of the historic environment which are the surviving remains of past human activity.</u></td> </tr> </tbody> </table> | Term | Definition | <u>Cultural Heritage</u> | <u>Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others. This includes all physical assets of the historic environment which are the surviving remains of past human activity.</u> | To reflect comments made in representation number 0120/02 |
| Term | Definition | | | | | | |
| <u>Cultural Heritage</u> | <u>Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others. This includes all physical assets of the historic environment which are the surviving remains of past human activity.</u> | | | | | | |
| 357 | Page 331 | <p>Insert the following text in the Glossary Table after ‘Green Infrastructure’:</p> <table border="1" data-bbox="524 695 1496 1209"> <thead> <tr> <th data-bbox="524 695 698 738">Term</th> <th data-bbox="698 695 1496 738">Definition</th> </tr> </thead> <tbody> <tr> <td data-bbox="524 738 698 1209"><u>Gross Internal Area</u></td> <td data-bbox="698 738 1496 1209"> <p>The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m2).^x</p> <p>It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p> </td> </tr> </tbody> </table> <p>^x DCLG (March 2015) Technical Housing Standards – nationally described space standards</p> | Term | Definition | <u>Gross Internal Area</u> | <p>The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m2).^x</p> <p>It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p> | Change to reflect the Technical Housing Standards – nationally described space standards. These standards are proposed to be included in policy HC-S2 A Balanced Housing Stock. |
| Term | Definition | | | | | | |
| <u>Gross Internal Area</u> | <p>The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m2).^x</p> <p>It excludes the floor area of any general store, dustbin store, fuel store, garage or balcony; any area in rooms with sloping ceilings to the extent that the height of the ceiling does not exceed 1.5m; and any lobby/porch open to the air.</p> | | | | | | |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification | | | | |
|---------------------------------|--|--|---------------|------------|---------------------------------|--|--|
| 358 | Page 331 | <p>Insert the following text in the Glossary Table after 'Historic environment':</p> <table border="1" data-bbox="524 312 1496 552"> <thead> <tr> <th data-bbox="524 312 703 352">Term</th> <th data-bbox="703 312 1496 352">Definition</th> </tr> </thead> <tbody> <tr> <td data-bbox="524 352 703 552">Historic settlement core</td> <td data-bbox="703 352 1496 552"><u>The historic settlement core includes the historic settlement based on Tithe Maps and the Ordnance Survey 1st Edition maps – the defined area may not necessarily survive above ground but there may be remains below ground.</u></td> </tr> </tbody> </table> | Term | Definition | Historic settlement core | <u>The historic settlement core includes the historic settlement based on Tithe Maps and the Ordnance Survey 1st Edition maps – the defined area may not necessarily survive above ground but there may be remains below ground.</u> | To reflect comments made in representation number 0061/06 |
| Term | Definition | | | | | | |
| Historic settlement core | <u>The historic settlement core includes the historic settlement based on Tithe Maps and the Ordnance Survey 1st Edition maps – the defined area may not necessarily survive above ground but there may be remains below ground.</u> | | | | | | |
| 359 | Page 332 | <p>Insert the following text in the Glossary Table after 'Local Wildlife sites (LWS)':</p> <table border="1" data-bbox="524 612 1527 1249"> <thead> <tr> <th data-bbox="524 612 703 652">Term</th> <th data-bbox="703 612 1527 652">Definition</th> </tr> </thead> <tbody> <tr> <td data-bbox="524 652 703 1249">Major development</td> <td data-bbox="703 652 1527 1249"><u>The Local Plan includes a policy (GP2 Major Development) which provides an interpretation of major development in the context of the NPPF, which is considered to be of a scale that is context-specific and a matter of planning judgement, i.e. it would exceed the local-scale development to address the social and economic needs of Exmoor's communities, and would be considered to also have potential adverse impacts on the National Park's statutory purposes. However the Development Procedure Order also provides a definition of major development in terms of the classification of planning applications – development which falls into this category of planning application will</u></td> </tr> </tbody> </table> | Term | Definition | Major development | <u>The Local Plan includes a policy (GP2 Major Development) which provides an interpretation of major development in the context of the NPPF, which is considered to be of a scale that is context-specific and a matter of planning judgement, i.e. it would exceed the local-scale development to address the social and economic needs of Exmoor's communities, and would be considered to also have potential adverse impacts on the National Park's statutory purposes. However the Development Procedure Order also provides a definition of major development in terms of the classification of planning applications – development which falls into this category of planning application will</u> | To reflect comments made in representation number 0044/01. |
| Term | Definition | | | | | | |
| Major development | <u>The Local Plan includes a policy (GP2 Major Development) which provides an interpretation of major development in the context of the NPPF, which is considered to be of a scale that is context-specific and a matter of planning judgement, i.e. it would exceed the local-scale development to address the social and economic needs of Exmoor's communities, and would be considered to also have potential adverse impacts on the National Park's statutory purposes. However the Development Procedure Order also provides a definition of major development in terms of the classification of planning applications – development which falls into this category of planning application will</u> | | | | | | |

| Ref | Page/ Policy/ Paragraph | Proposed Change | | Justification |
|-----|----------------------------|-----------------|---|---------------|
| | | | <p><u>not always meet the definition set out in policy GP2 and the supporting text.¹²⁷</u></p> | |

¹²⁷ The formal definition of ‘major development’ (for the purposes of consultation on planning applications) is set out in The Town and Country Planning (Development Procedure) (England) Order 2010, and includes – minerals development (i.e. mining, etc.); waste development; housing development of more than 10 units or 0.5 hectares; new building(s) with floorspace 1,000 sqm or more; development of land 1 hectare or more.

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification | | | | |
|-----------------------------------|---|--|---------------|------------|-----------------------------------|---|--|
| 360 | Page 332 | <p>Insert the following text in the Glossary Table after ‘material considerations’:</p> <table border="1"> <thead> <tr> <th>Term</th> <th>Definition</th> </tr> </thead> <tbody> <tr> <td><u>Named settlement(s)</u></td> <td><u>This term represents the settlements identified in policy GP3 Spatial Strategy, and Table 3.1. These settlements have been identified as locations which are most suitable for new development.</u></td> </tr> </tbody> </table> | Term | Definition | <u>Named settlement(s)</u> | <u>This term represents the settlements identified in policy GP3 Spatial Strategy, and Table 3.1. These settlements have been identified as locations which are most suitable for new development.</u> | To reflect comments made in representation number 0043/32. |
| Term | Definition | | | | | | |
| <u>Named settlement(s)</u> | <u>This term represents the settlements identified in policy GP3 Spatial Strategy, and Table 3.1. These settlements have been identified as locations which are most suitable for new development.</u> | | | | | | |
| 361 | Page 333 | <p>Insert the following text in the Glossary Table before ‘Rural exception sites’:</p> <table border="1"> <thead> <tr> <th>Term</th> <th>Definition</th> </tr> </thead> <tbody> <tr> <td><u>Registered Provider</u></td> <td>The term (private) Registered Provider of social housing is the generic name for the providers of social housing (social landlords) not covered by local authorities. This term is commonly used to describe ‘housing associations’ which were also referred to as Registered Social Landlords in previous editions. Registered Providers are defined in section 80 of the Housing and Regeneration Act 2008.</td> </tr> </tbody> </table> | Term | Definition | <u>Registered Provider</u> | The term (private) Registered Provider of social housing is the generic name for the providers of social housing (social landlords) not covered by local authorities. This term is commonly used to describe ‘housing associations’ which were also referred to as Registered Social Landlords in previous editions. Registered Providers are defined in section 80 of the Housing and Regeneration Act 2008. | For clarification. |
| Term | Definition | | | | | | |
| <u>Registered Provider</u> | The term (private) Registered Provider of social housing is the generic name for the providers of social housing (social landlords) not covered by local authorities. This term is commonly used to describe ‘housing associations’ which were also referred to as Registered Social Landlords in previous editions. Registered Providers are defined in section 80 of the Housing and Regeneration Act 2008. | | | | | | |

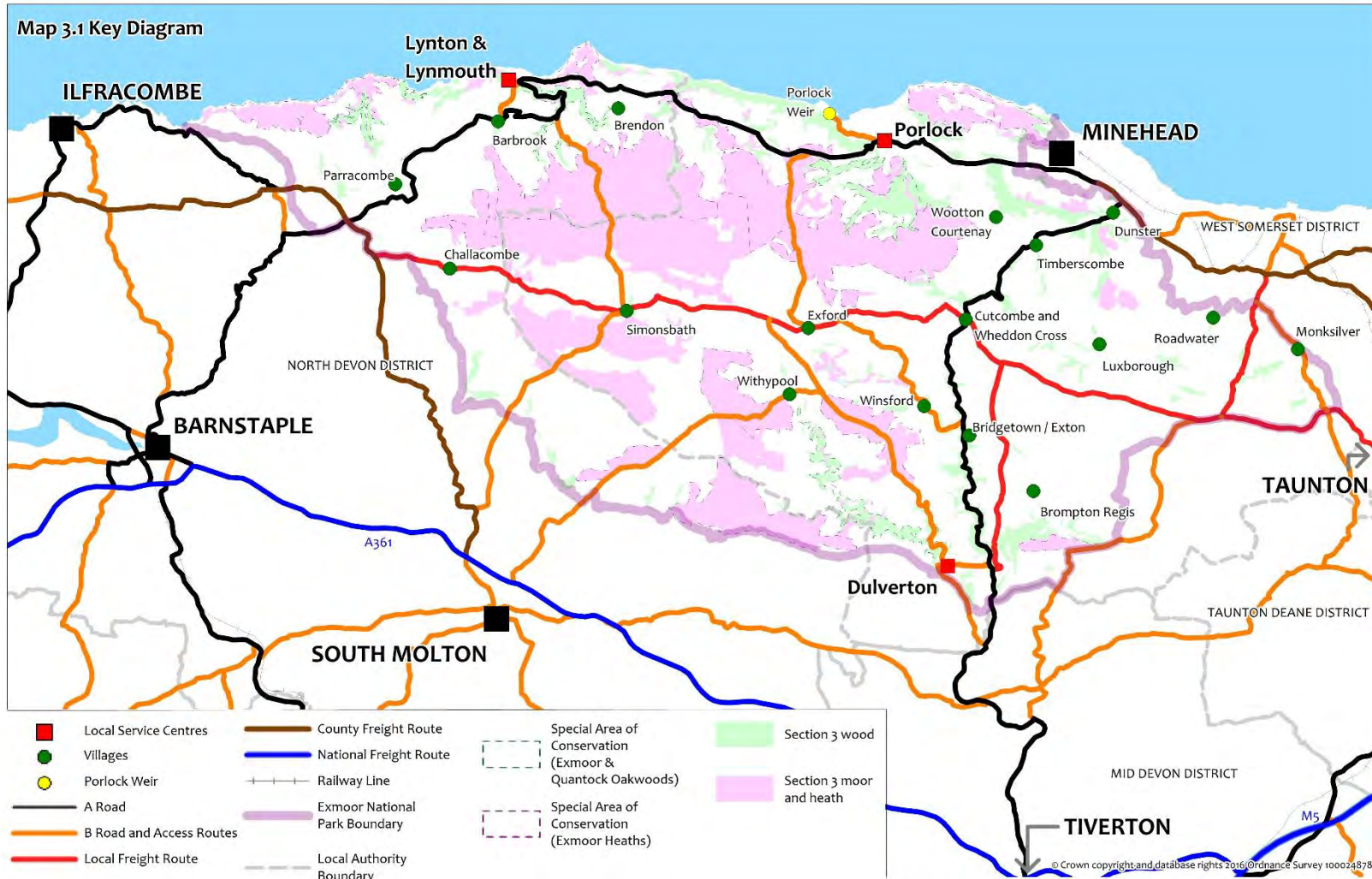
Policies Maps

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|---|--|--|
| 362 | Maps 22 and 23 (east and west of Exmoor National Park), Inset Map 1 | <p><i>Insert the zones relating to the International Dark Sky Reserve on to the main Policies Map and Inset Maps 9, 17 and 21, as follows:</i></p> <p>Dark Sky Reserve – Core Zone</p> | Clarification following 2015 reporting on the IDSR – the reserve area is the core zone |

| Ref | Page/ Policy/ Paragraph | Proposed Change | Justification |
|-----|---|--|---|
| | Barbrook, Inset Map 5 Challacombe, Inset Map 9 Exford, Inset Map 17 Simonsbath, Inset Map 21 Wootton Courtenay. | Dark Sky Reserve – Critical Buffer Zone | rather than the whole of the National Park. |
| 363 | Maps 22 and 23 (east and west of Exmoor National Park), Inset Map 5 Challacombe, Inset Map 6 Cutcombe and Wheddon Cross, Inset Map 9 Exford, Inset Map 17 Simonsbath, Inset Map 21 Wootton Courtenay. | Change the maps relating to ‘local freight routes’ to show they are red only, and ‘county freight routes’ are brown. | Clarification of the Exmoor Route Network. |

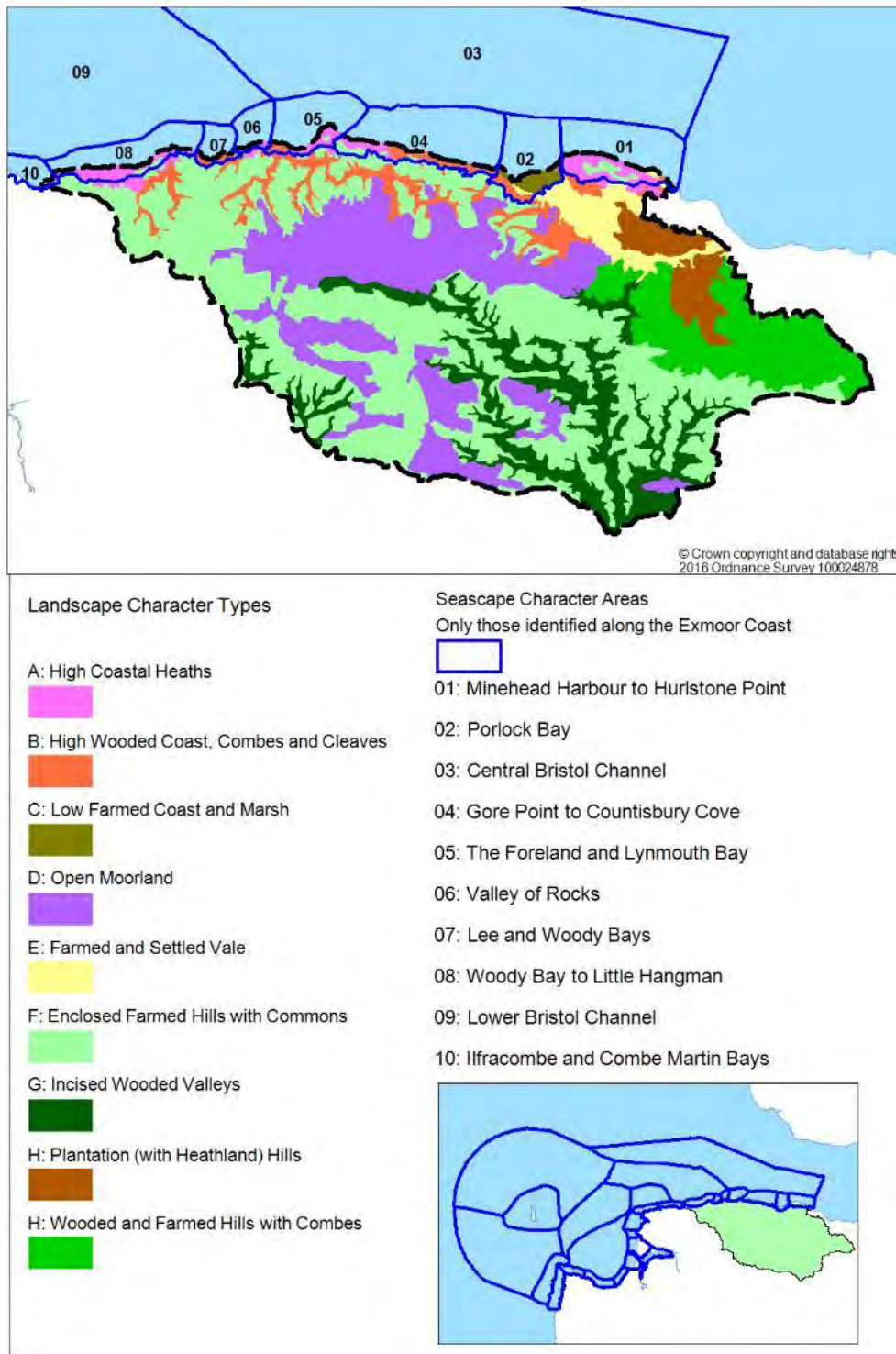
Appendix 1: Key Diagram

2.1 Proposed amendments to Map 3.1 Key Diagram.



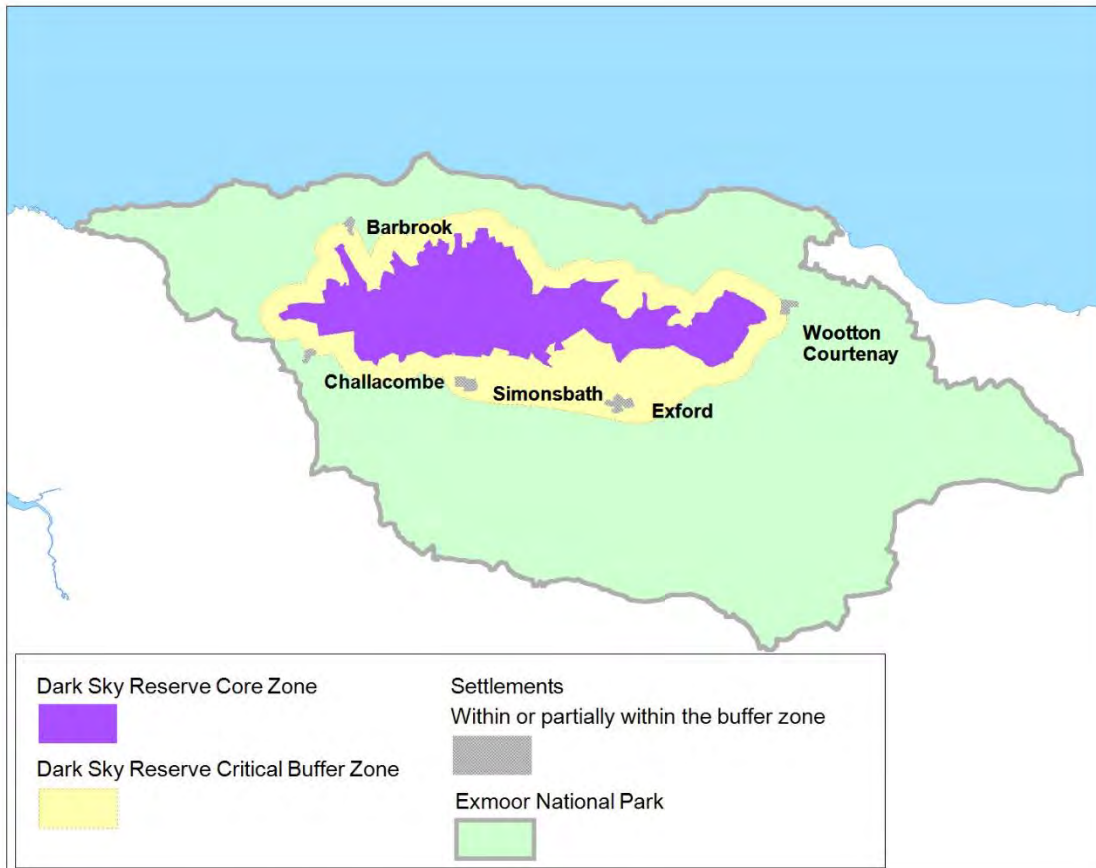
Appendix 2: Exmoor Character Types and Seascape Character Areas Map

2.2 Proposed amendments to Map 4.1 Exmoor Landscape Character Types and Seascape Character Areas.



Appendix 3: Dark Sky Reserve Core Zone and Critical Buffer Zone Map

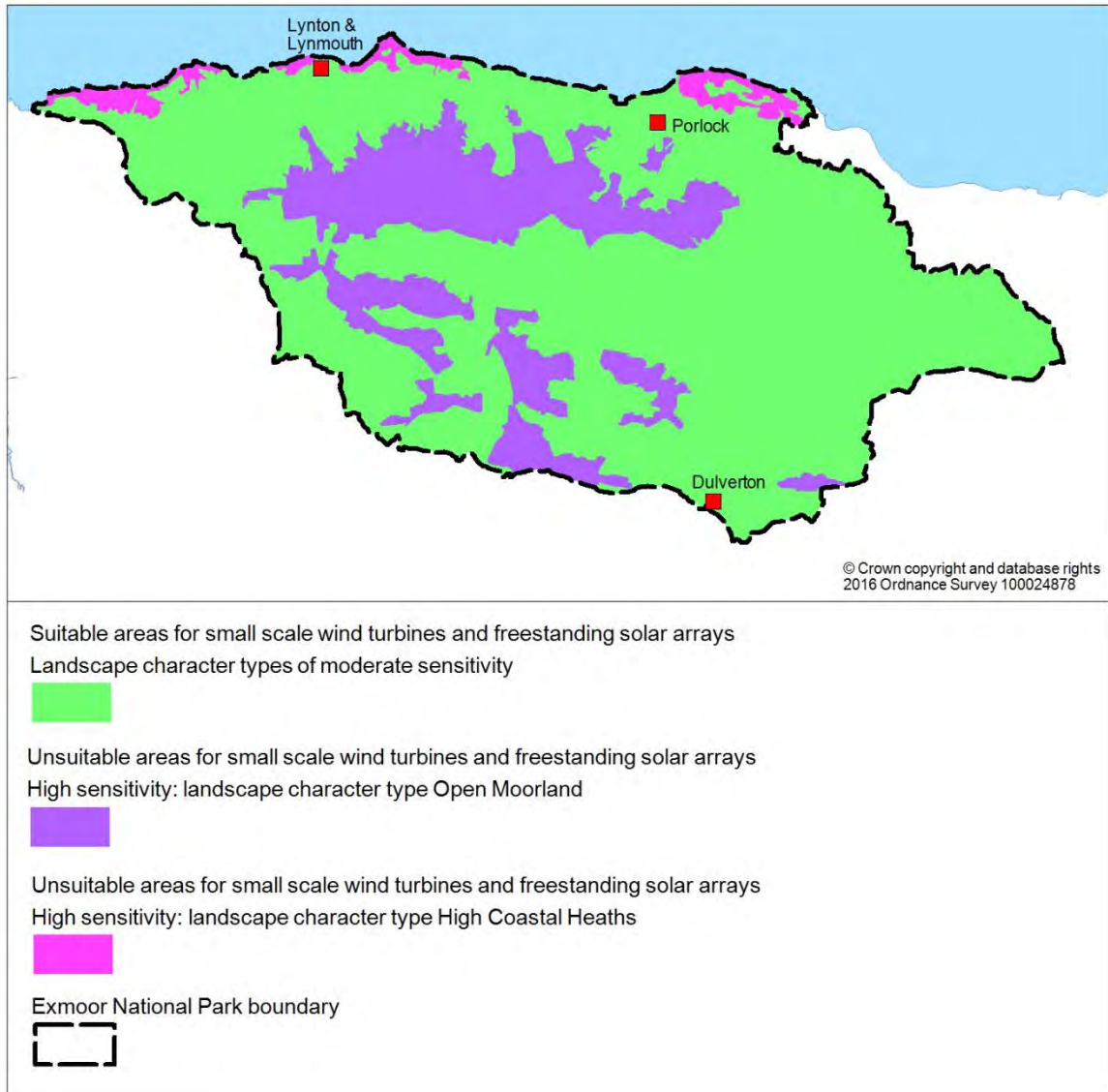
2.3 Proposed amendments to Map 4.2 Dark Sky Reserve Core Zone and Critical Buffer Zone.



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Appendix 4: Suitable Areas for Small Scale Wind Turbines and Freestanding Solar Arrays

2.4 Proposed amendment to include Map 5.2 Suitable Areas for Small Scale Wind Turbines and Freestanding Solar Arrays



Appendix 5: Exmoor Route Network

2.5 Proposed amendments to Map 9.1 Exmoor Route Network

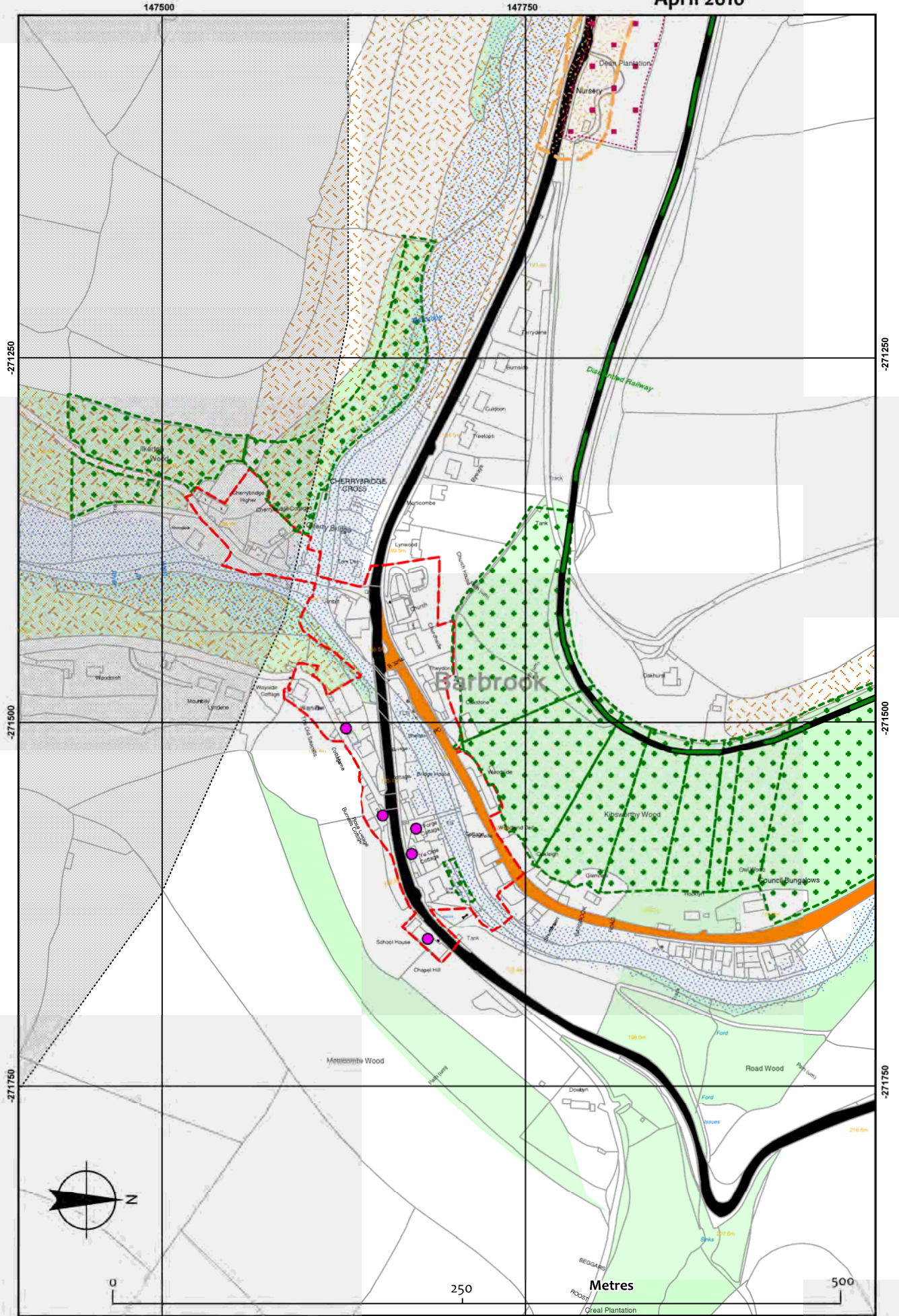


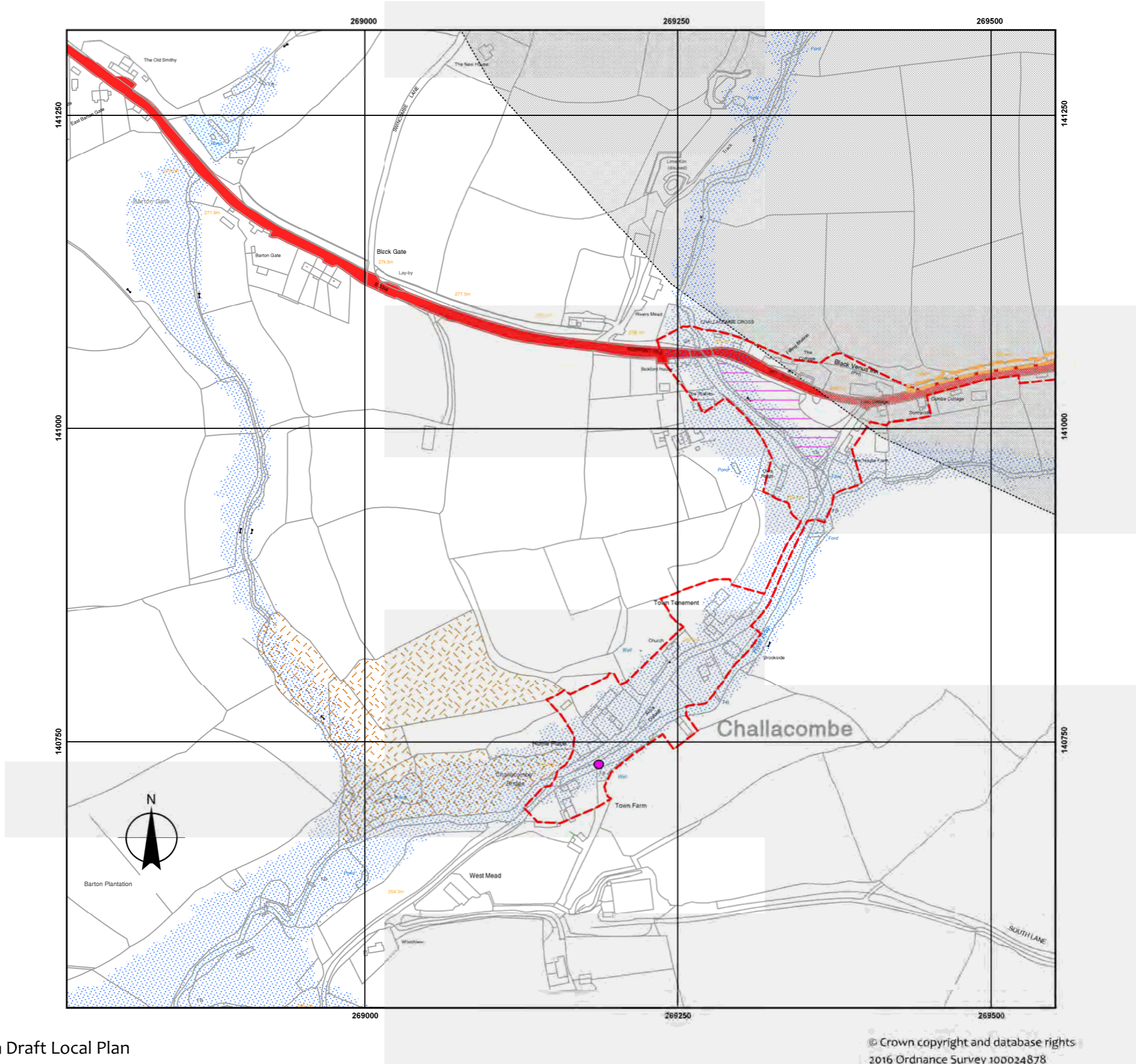
Inset Map Legend

| | | | |
|---|--|---|--|
|  | Site of Special Scientific Interest |  | Historic Settlement Core |
|  | Special Areas of Conservation - Exmoor Heaths |  | Important Open Space - Recreation |
|  | Special Area of Conservation - Exmoor & Quantock Oak Woodlands |  | Important Visual Amenity Space |
|  | Local Wildlife Site |  | Community Safeguarding Areas |
|  | Regionally Important Geological Site |  | Heritage Coast |
|  | Regionally Important Geological Site |  | Coastal Change Management Area |
|  | Section 3 - Cliff and Foreshore |  | Dark Sky Reserve Core Zone |
|  | Section 3 - Woodland |  | Dark Sky Reserve Critical Buffer Zone |
|  | Section 3 - Moor and Heath |  | Flood Zones - 2 and 3 Combined |
|  | Tree Preservation Order - Woodland |  | Water Bodies |
|  | Tree Preservation Order - Tree |  | Route of the Lynton to Barnstaple railway (dismantled) |
|  | Veteran Tree |  | Route of the West Somerset Mineral Line (dismantled) |
|  | Orchard of Landscape Importance | | |
|  | Groundwater Source Protection Zones | Exmoor Route Network | |
|  | Historic Parks and Gardens |  | A Roads |
|  | Listed Buildings |  | B road and Access route |
|  | Scheduled Monuments |  | County Freight route |
|  | Conservation Area |  | Local Freight route |

DISCLAIMER

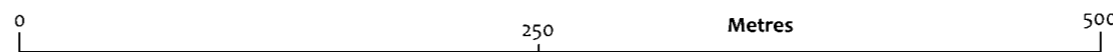
The Policies Map (including Inset Maps) has been produced with the most current data available at the time of print. Some information on the Policies Map is shown with the consent of external organisations. Enquiries regarding any external information should be directed to the relevant organisation.

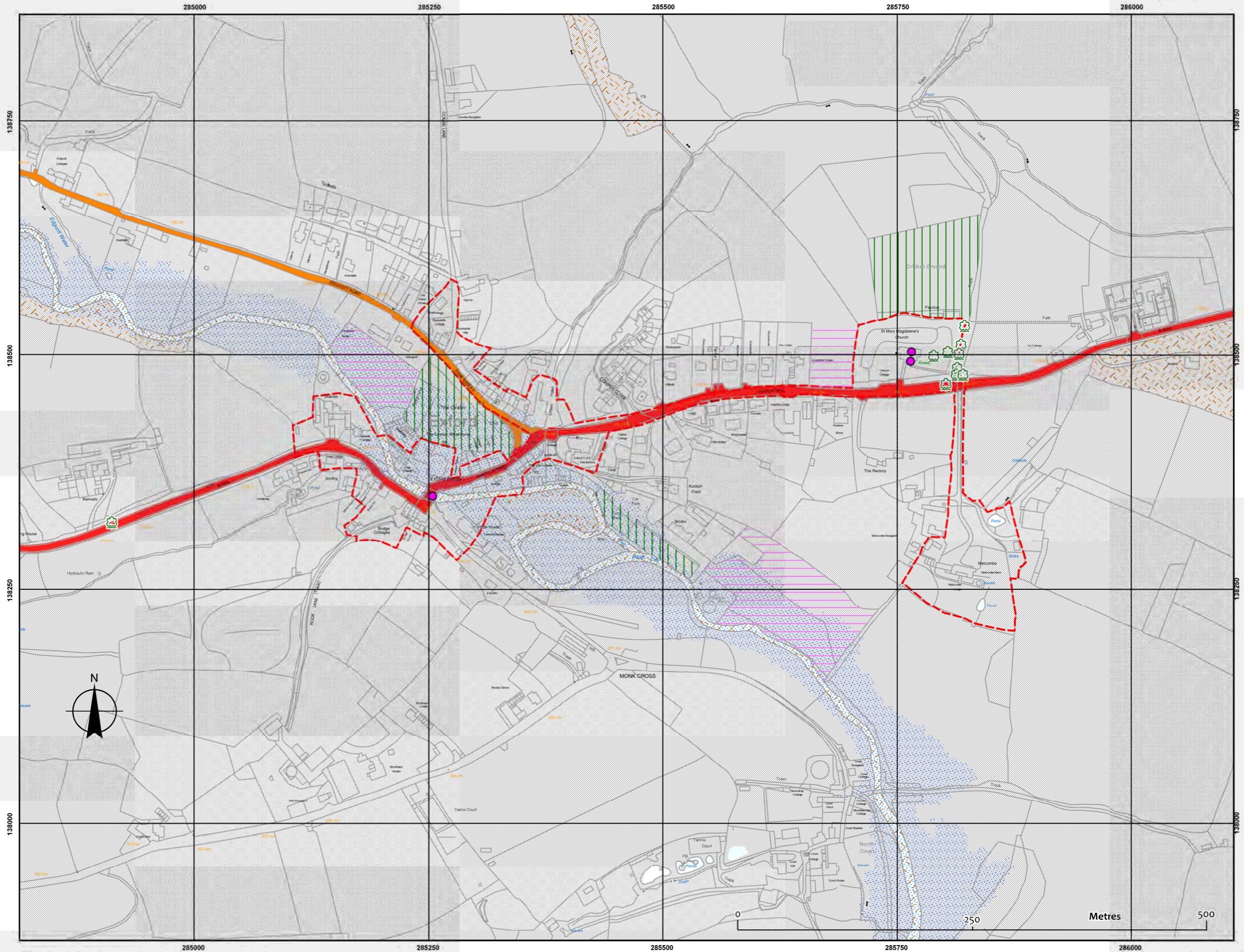


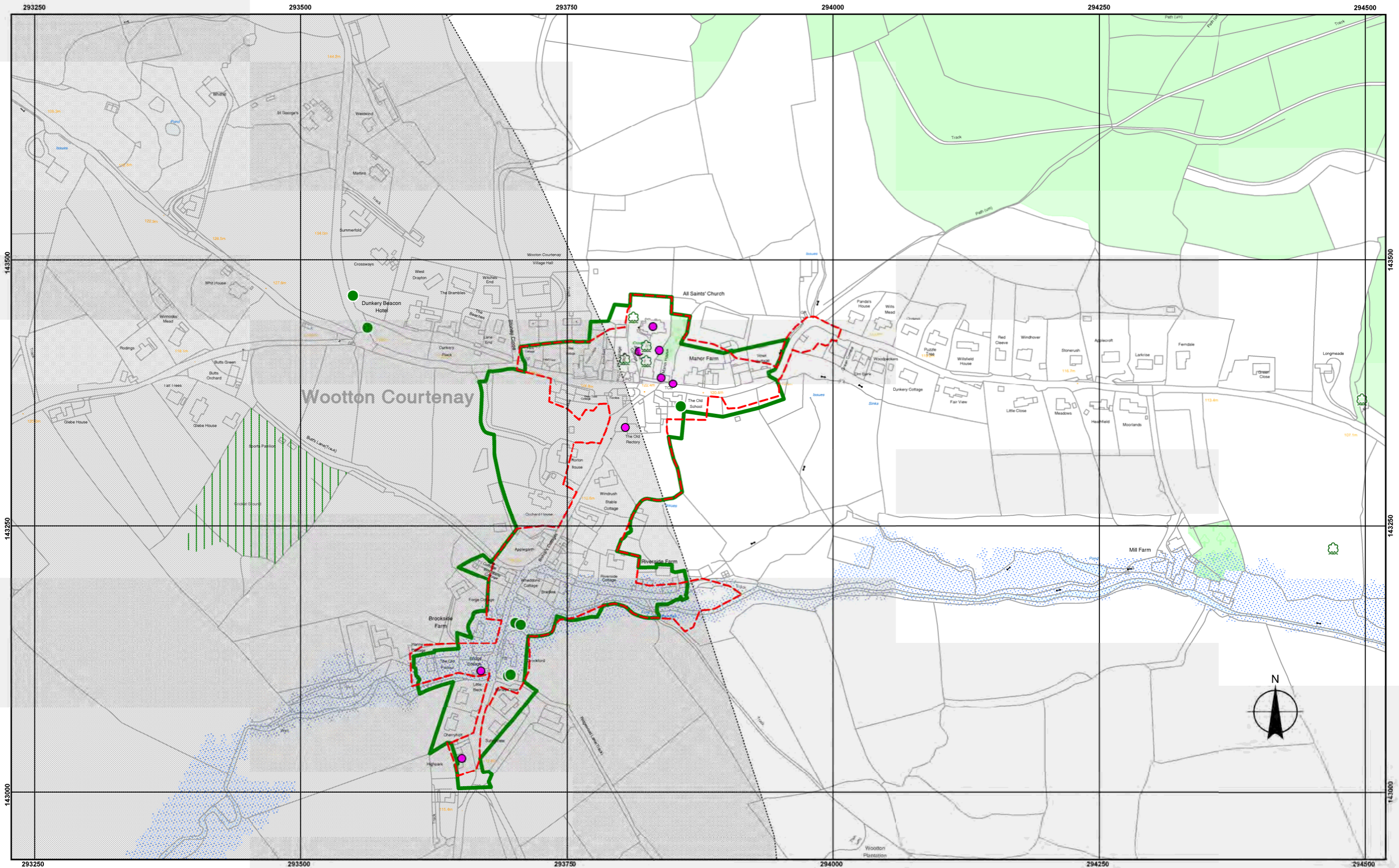


Exmoor National Park Submission Draft Local Plan
(including minerals and waste policies) 2011 - 2031

Settlement is partially within Dark Sky Reserve Critical Buffer Zone



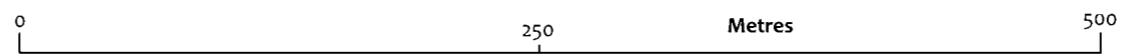


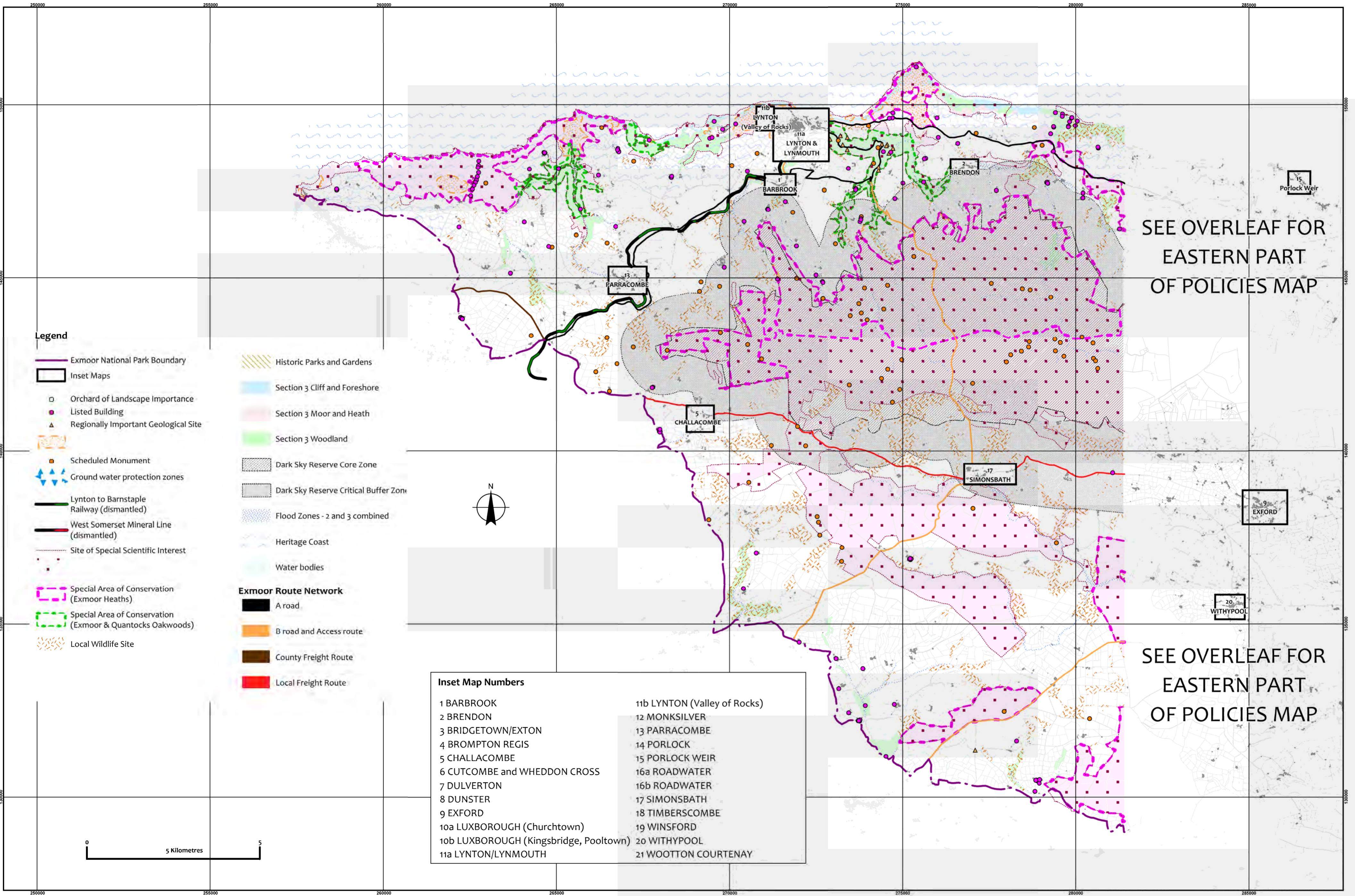


Exmoor National Park Submission Draft Local Plan
(including minerals and waste policies) 2011 - 2031

Settlement is partially within Dark Sky Reserve Critical Buffer Zone

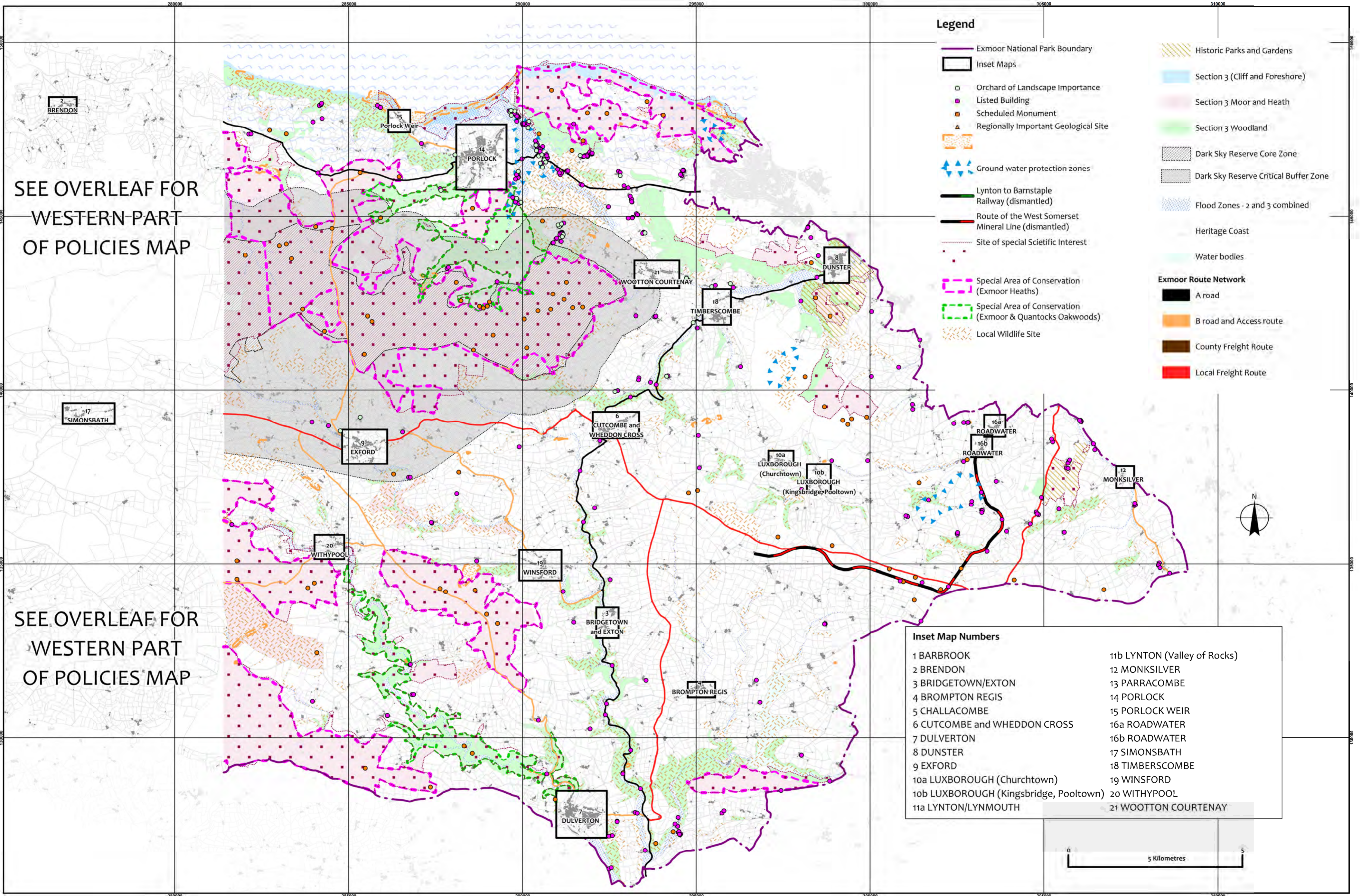
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Inset Map Numbers

| | |
|--|------------------------------|
| 1 BARBROOK | 11b LYNTON (Valley of Rocks) |
| 2 BRENDON | 12 MONKSILVER |
| 3 BRIDGETOWN/EXTON | 13 PARRACOMBE |
| 4 BROMPTON REGIS | 14 PORLOCK |
| 5 CHALLACOMBE | 15 PORLOCK WEIR |
| 6 CUTCOMBE and WHEDDON CROSS | 16a ROADWATER |
| 7 DULVERTON | 16b ROADWATER |
| 8 DUNSTER | 17 SIMONSBATH |
| 9 EXFORD | 18 TIMBERSCOMBE |
| 10a LUXBOROUGH (Churchtown) | 19 WINSFORD |
| 10b LUXBOROUGH (Kingsbridge, Pooltown) | 20 WITHYPOOL |
| 11a LYNTON/LYNMOUTH | 21 WOOTTON COURTENAY |



SEE OVERLEAF FOR
WESTERN PART
OF POLICIES MAP

SEE OVERLEAF FOR
WESTERN PART
OF POLICIES MAP

Legend

- Exmoor National Park Boundary
 - Inset Maps
 - Orchard of Landscape Importance
 - Listed Building
 - Scheduled Monument
 - Regionally Important Geological Site
 - Ground water protection zones
 - Lynton to Barnstaple Railway (dismantled)
 - Route of the West Somerset Mineral Line (dismantled)
 - Site of special Scientific Interest
 - Special Area of Conservation (Exmoor Heaths)
 - Special Area of Conservation (Exmoor & Quantocks Oakwoods)
 - Local Wildlife Site
 - Historic Parks and Gardens
 - Section 3 (Cliff and Foreshore)
 - Section 3 Moor and Heath
 - Section 3 Woodland
 - Dark Sky Reserve Core Zone
 - Dark Sky Reserve Critical Buffer Zone
 - Flood Zones - 2 and 3 combined
 - Heritage Coast
 - Water bodies
- Exmoor Route Network**
- A road
 - B road and Access route
 - County Freight Route
 - Local Freight Route


- Inset Map Numbers**
- | | |
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| 11a LYNTON/LYNMOUTH | 21 WOOTTON COURTENAY |





Representations Statement

Regulation 22 (1)(c)

If you have any queries or questions relating to this document please get in touch with the Policy & Community Team using the contact details below:

 Exmoor National Park Authority
Exmoor House
Dulverton
Somerset
TA22 9HL

 localplan@exmoor-nationalpark.gov.uk

 01398 323665

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1 Introduction

1.1 Exmoor National Park Authority is required to prepare a Representations Statement to accompany the submission of the Exmoor National Park Local Plan 2011-2031 to the Secretary of State, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 [regulation 22(1)(c)].

1.2 This statement complements the following documents:

- LDF Stakeholder Consultation Report (2009) – scoping issues and options
- Overall ‘Your Future Exmoor’ Feedback Report (2010) –Issues & Options
- Local Plan: Vision, Objectives, General Policies & Options Consultation Report (2012)
- Draft Local Plan: Schedule of Representations (2013)
- Consultation Statement – Publication Draft Local Plan (June 2015)

These documents together with this Representations Statement demonstrate that Exmoor National Park Authority is compliant with the requirements set out in the Statement of Community Involvement and local plan regulations.

2 Purpose of the Document

2.1 The purpose of this document is to set out a statement of how the Authority has involved the local community, stakeholders and statutory bodies in the development of the Exmoor National Park Local Plan.

2.2 This statement explains how consultation has been carried out at key stages in the preparation of the Local Plan, which methods of communication were used and how the responses received have influenced the preparation of the Local Plan. The statement will address the following requirements:

- The organisations and individuals who were invited to make representations,
- How they were invited to make representations,
- A summary of the main issues raised as a result of the consultation, and
- How those main issues have been addressed in the Local Plan.

2.3 The Representations Statement will also summarise key issues raised in relation to the stages of engagement and consultation through to the Publication Draft consultation (June-July 2015). This will help to demonstrate how these matters have been considered by the Authority and accounted for; illustrating that the consultation process has positively influenced the Local Plan.

Compliance with the Statement of Community Involvement (SCI)

- 2.4 The Authority's first SCI was adopted in August 2006; setting out the minimum requirements the Authority must carry out when consulting at each stage of the preparation of the Local Plan and on any other planning matters.
- 2.5 A communications strategy was produced to set out how the Publication Draft Local Plan consultation would be managed and publicised; focussing on outcomes, key messages, audiences, communication channels and timescales. The strategy was developed using the draft Statement of Community Involvement (SCI) (March 2015). The preparation of the Local Plan had previously been informed by the SCI adopted in 2006.
- 2.6 The Exmoor National Park Draft Statement of Community Involvement was also made available for consultation in parallel with the Publication Draft Local Plan. Only two consultation comments directly responded to the draft SCI and on balance it was considered that no changes were required in response to these comments. Some minor changes were made to clarify the definition of major development in the context of paragraph 116 of the NPPF and the Development Procedure Order 2010; with additional explanation regarding the Equality Act 2010. The SCI was formally adopted by the Authority on 3rd November 2015 and published on the Authority's website.¹
- 2.7 It is considered that the preparation of the Local Plan and the arrangements put in place to engage the community and other stakeholders during this process, complied with the requirements set out in the adopted 2006 SCI and the draft 2015 SCI – see section 3 for further details.
- 2.8 The Local Plan Consultation Database maintains a record of all consultees and respondents to the Local Plan. This data is maintained having regard to the Data Protection Act 1998, some people request their information to be included on the database, whilst other specific and general consultation bodies are directly contacted as a requirement of the Town and Country Planning (Local Plan) (England) Regulations 2012.
- 2.9 Periodically, and at each stage of consultation, the Local Plan Consultation Database is reviewed and updated to ensure that specific and general consultation bodies, and those who have requested to be informed of key stages of plan preparation, are notified.

¹ <http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/new-local-plan/statement-of-community-involvement>

3 Exmoor National Park Local Plan – Engagement and Consultation

- 3.1 Following the introduction of the Localism Act 2011, changes to the planning system were introduced in March 2012 with the publication of the National Planning Policy Framework (NPPF). The previous system of the Local Development Framework (LDF) was replaced with a Local Plan and the Publication Draft Local Plan reflects this; however references to the LDF and Core Strategy & Development Management Policies DPD will appear in this Representations Statement as these were the correct titles at the time.
- 3.2 Tables 3.1 and 3.2 set out the consultation and engagement strategies employed by the Authority throughout the preparation of the Local Plan; consistent with the adopted and draft SCI's.

TABLE 3.1 LOCAL PLAN ENGAGEMENT AND CONSULTATION

| STAGE | DETAILS |
|--|--|
| SCOPING ISSUES AND OPTIONS December 2008 – January 2009 | <p>Three stakeholder workshops were held to scope key issues and options as an important component of preparing for the Core Strategy & Development Management Policies DPD.</p> <p>A questionnaire was also sent to those stakeholders unable to attend the workshops.</p> |
| ISSUES AND OPTIONS (YOUR FUTURE EXMOOR) July 2009 – December 2010 | <p>Extensive community and stakeholder engagement took place over a period of 18 months, to enable local communities, young people, individuals and representatives of other bodies/organisations to participate in shaping the Local Plan for Exmoor National Park.</p> <p><u>July 2009 – February 2010: youth consultations</u> Working with children at the First, Middle and Primary Schools within the National Park and nearby colleges to gather the views of young people on how they would like to see Exmoor evolve in the future.</p> <p><u>January – March 2010: community events</u> 21 Your Future Exmoor events held in each of the parishes with towns and villages in the National Park. The events were tailored to individual parishes and designed to be interactive and gather views on the matters and issues important to the local community. Two versions of feedback reports were produced for each of the events. A full copy of all the results and comments was sent to the Parish and Town Councils and summary reports were made available to the local community in local services such as shops and pubs.</p> |

| STAGE | DETAILS |
|--|--|
| | <p><u>March 2010: stakeholder event</u> Your Future Exmoor stakeholder event, based on the community events, for representatives of statutory bodies, organisations and businesses.</p> <p><u>October 2009 – June 2010: visitor survey</u> The survey ran from October 2009-January 2010 and was re-launched in May 2010 with a closing date of 11th June 2010.</p> <p><u>November 2009 – January 2010: resident questionnaire</u> This questionnaire formed a part of the community consultation process, (Your Future Exmoor), and took place in the early development stages of the Core Strategy for Exmoor as part of the LDF. The questionnaire was included within the Exmoor National Park Authority November 2009 edition of Parklife community newspaper.</p> <p><u>November – December 2010: Topic Group Meetings</u> Group discussions were held with individuals and members of organisations to discuss specific issues relating to housing, climate change, recreation and tourism in greater detail.</p> |
| <p>VISION, OBJECTIVES AND GENERAL POLICIES – LOCAL PLAN OPTIONS FOR HOUSING AND THE SPATIAL STRATEGY November 2011 – January 2012</p> | <p>A consultation on the emerging Local Plan was held in parallel with the Exmoor National Park Partnership Plan 2012-2017 – both documents having a shared vision and objectives.</p> <p>The following aspects of the Local Plan were consulted on:</p> <ul style="list-style-type: none"> ▪ The Vision & Objectives ▪ General Policies (overarching strategic policies) ▪ Options for the location of new development and the delivery of affordable housing |
| <p>DRAFT LOCAL PLAN November – December 2013</p> | <p>The outcomes of previous consultation and engagement, together with a Sustainability Appraisal, informed the preparation of the Draft Exmoor National Park Local Plan (including minerals and waste policies). Appendix 1 lists those organisations and individuals notified of the consultation.</p> <ul style="list-style-type: none"> ▪ Consultation took place over a 6 week period - this was widely publicised and the Local Plan was available for inspection at a number of locations within and around the National Park (West Somerset and North Devon Council receptions, Exmoor House reception, National Park Centres and local libraries). ▪ Full copies of the Draft Local Plan and CDs were sent to Town and Parish Councils in the National Park. |

| STAGE | DETAILS |
|--|--|
| | <ul style="list-style-type: none"> ▪ Leaflets and posters were sent for display to local businesses within Exmoor communities, and leaflets were also sent to schools within the National Park. ▪ Four events were held with Town & Parish Councillors across the National Park and attendance at the Parish & Consultative Forum. ▪ A press release was issued to local newspapers and a short article sent to parish magazines. ▪ A feature was included in the November edition of Authority's Parklife newspaper - delivered to all households within the National Park and some surrounding areas. ▪ A summary booklet (A5 format) of the Draft Local Plan provided a précis of the policies within the Plan and was well received as a plain English guide to the Local Plan. |
| <p>PUBLICATION DRAFT LOCAL PLAN (Pre-Submission) June – July 2015</p> | <p>The Publication Draft Local Plan and accompanying documents were published under Regulation 19 for a 7 week period from 15 June to 31 July 2015.² Appendix 2 lists those organisations and individuals who were notified of the consultation.</p> <p>Consultation arrangements were set out in a Communications Strategy for the Publication Stage of the Exmoor National Park Local Plan focussing on the wide range of key audiences as set out in the 2006 SCI and draft 2015 SCI. The summary of the communication strategy is set out below in Table 3.2. The communications outcomes regarding what we want people to know/feel/do were:</p> <ul style="list-style-type: none"> ▪ To understand the Local Plan and what it aims to do ▪ To be informed about the consultation and why they should respond ▪ To understand the relevance of the Local Plan to them ▪ To understand how to respond |
| <p>SUBMISSION April 2016</p> | <p>The Local Plan (including minerals and waste policies) will be submitted to the Secretary of State alongside representations received in response to the pre-submission consultation.</p> |
| <p>EXAMINATION Summer/Autumn 2016³</p> | <p>The examination will be held by an independent Planning Inspector who will consider whether the plan is “sound” and legally compliant. Persons who comment on the Publication Draft Local Plan may be invited to appear at the examination.</p> |
| <p>INSPECTOR'S REPORT Winter 2016/17⁴</p> | <p>The Planning Inspector will produce a report for the National Park Authority which will be published as soon as practicable.</p> |

² Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

³ *Indicative dates – timing dependent on Planning Inspectorate availability*

⁴ *Indicative dates – timing dependent on Planning Inspectorate availability*

| STAGE | DETAILS |
|--------------------------------------|---|
| ADOPTION Spring 2017 ⁵ | The Authority will formally adopt the Local Plan as its development plan following receipt of the Inspector's Report. |

TABLE 3.2 PUBLICATION DRAFT LOCAL PLAN – COMMUNICATIONS STRATEGY

| Key communications messages | Key audiences | Key communication channels / activities |
|--|--|--|
| <p>The Local Plan is important as it will guide development in the National Park to 2031.</p> <p>The Local Plan has four main priorities and seeks to address the social and economic needs of Exmoor's communities whilst conserving and enhancing Exmoor's high quality environment and promoting understanding and enjoyment.</p> <p>You can view the consultation documents via the ENPA website and at key locations within and surrounding the National Park.</p> <p>The consultation runs from mid-June to end of July 2015 and you can respond online, via email or by post.</p> | <p>Local authorities (District and County Councils)</p> <p>Parish / Town Councils</p> <p>Statutory agencies and other public bodies</p> <p>Local Enterprise Partnership</p> <p>Local Nature Partnership</p> <p>Residents</p> <p>Businesses</p> <p>Landowners and developers</p> <p>Housing providers</p> <p>Voluntary sector</p> <p>Exmoor-wide Partnerships</p> <p>Visitors, National Park users and national stakeholders.</p> | <p><u>Publicity</u>: articles in Parklife; Parish newsletters; Press releases</p> <p><u>Meetings</u>: Authority meetings; Exmoor Parish & Consultative Forum; Dunster Panel; Exmoor Panel; Lynton & Lynmouth. Duty to Co-operate meetings.</p> <p><u>Website</u>: Copies of consultation documents and supporting documentation; online questionnaire.</p> <p><u>Social media</u>: Twitter and Facebook</p> <p><u>Deposit points</u>: Copies of the consultation documents will be available at statutory deposit points (ENPA offices, District Council offices, NP Visitor Centres) and local libraries. Summary documents at other National Park information points (<i>local shops/pubs etc</i>). Copies will also be sent to Parish / Town Councils.</p> <p><u>On an individual basis</u>: notification of the statutory & general consultation bodies, & consultation register</p> <p><u>Briefings</u>: briefing session for new Authority members and written briefing for all members.</p> |

⁵ Indicative dates – timing dependent on the outcome of consultation and public examination

4 Local Plan Preparation

4.1 This section focuses on the key stages of the Local Plan and how it has been informed by a series of community and stakeholder engagement consultations and workshops.

Scoping Issues & Options 2008/09

4.2 From November 2008 to January 2009, a series of three workshops were held with stakeholders to scope a range of key issues and options to address them. Themed topic papers were produced to help inform the stakeholders, and a questionnaire was included as part of the engagement process.

- Economy and Employment: greater flexibility needed in relation to business development and farm diversification, with options for rural work hubs, shared workspaces and live work units also raised. Accessibility, particularly in relation to the development of communications infrastructure, was considered to be significant for Exmoor's economy.
- Housing: The importance of delivering affordable housing to meet the needs of local communities was generally supported with suggestions for bringing sites forward, having more flexible policies for delivery (including issues of viability for conversion schemes), and flexibility in relation to the local connection cascade. Concern over the level of second/holiday homes was also raised.
- Climate Change, Waste Management and Pollution: General support for the use of more renewable energy (RE) and achievement of a carbon neutral National Park, with some concern over visual impacts of some RE structures. The creation and restoration of carbon sinks and use of sustainable building materials were also supported. Minimising light pollution through sensitive design and energy efficient lighting was also discussed.
- Historic & Built Environment and Minerals: Consensus over the need to protect the historic environment, with the design of new development considered to be one of the key issues to be addressed to ensure that designs could be high quality, innovative and locally distinctive. Action to reduce visual clutter (signs, overhead lines) within conservation areas and to achieve a sympathetic approach to mitigating and adapting historic buildings to the effects of climate change. Generally, small scale working for the extraction of building stone for use within the National Park was supported.
- Landscape, Wildlife and Land Management: General consensus over the need to protect and enhance the natural environment, with tranquillity and landscape character highlighted as important components. Landscape Character Assessments were regarded as a useful tool to conserve and enhance the landscape and the coast. Particular issues were raised in relation to intrusive structures/features in the landscape associated with telecommunications, renewable energy, game-shooting, equestrian activities

and signage. Habitat restoration, creation and linkages were considered to be important to help wildlife adapt to climate change.

- **Settlements and Services**: the key aim was sustainable communities; linking affordable housing to jobs and recognising links to surrounding towns outside the National Park. There was some discussion regarding the spatial strategy and most supported the existing settlement hierarchy but also recognising that settlements were part of a network of communities. The safeguarding of services and facilities was considered to be important to local communities.
- **Transport and Infrastructure**: The key issue was accessibility to services by the elderly and those with no private means of transport. Accessibility to sustainable modes of transport should be improved where feasible but recognise the importance of the need to travel by car in such a sparsely populated area. Improved parking provision in some areas was also important. The need for broadband was essential for people to access services.
- **Recreation and Tourism**: The high quality environment was recognised as an important draw for visitors and the tourism industry, with a need to enhance outdoor recreational facilities; although indoor facilities were also mentioned. There was general agreement that adverse impacts from game-shooting and equestrian activities should be avoided.

4.3 This process was used together with emerging evidence, to help inform the development of issues and options around a series of key themes.

Your Future Exmoor Issues & Options – Community & Stakeholder Events 2009 – 2010

SCHOOL & COLLEGE WORKSHOPS

- 4.4 Workshops were held with schools within and adjoining the National Park and colleges in Minehead, Ilfracombe and Barnstaple. These were tailored according to the age groups of the classes.
- 4.5 The younger children showed an interest in their local communities and highlighted particular issues, places they liked and what they would like to see in the future. Common themes that they were in favour of were the natural environment, local services and facilities including recreational space. Traffic, and buildings/structures in need of repair were issues raised with other factors such as litter and overgrown areas also highlighted.
- 4.6 Older students gave feedback on specific themes and highlighted a number of issues such as:
- Protection of landscape and wildlife
 - Changes in land management
 - Support for renewable energy
 - Minimising energy/resource use, including reuse of existing buildings
 - Encouraging adaptive design and sustainable construction for new buildings

- Flexible policies for new business development such as home working
- Prioritising more affordable homes, and homes/residential care for older people

QUESTIONNAIRES

4.7 Questionnaires for residents and visitors to the National Park were included within the ParkLife and Exmoor Visitor publications produced by the National Park Authority.

KEY FINDINGS FOR VISITORS (197 RESPONSES):

- Majority are short stay visitors (less than 7 nights), with self-catering accommodation the most popular type of accommodation used – the majority staying in the larger centres of Dulverton, Lynton & Lynmouth and Porlock, and travelling by private car.
- Most enjoyed a range of activities including: enjoying the landscape, walking, exploring villages, eating out and wildlife watching.
- Improved public transport and parking were issues raised.
- Generally most thought there were about the right level of visitor facilities and opportunities for recreational activities. However, more public conveniences and petrol stations were needed.
- Local services such as shops, post offices and banks were used by visitors, and were seen as particularly important services to support including emergency services and healthcare centres.
- New business and housing development should be directed to larger and smaller settlements within the National Park.
- Local affordable homes were the most supported type of new housing delivered through a range of options including new build and conversions – including with some market housing cross subsidy.
- All the special qualities of the National Park were supported in terms of contributing to the enjoyment of Exmoor, with the experience of tranquillity a particularly valued aspect.
- Structures and developments such as caravan sites, telecommunication masts, wind turbines and overhead lines were the most significant detractors.

KEY FINDINGS FOR RESIDENTS:

4.8 The residents' survey was only based on a low response rate of 34 questionnaires which gave a range of disparate views. However this has formed a component of the Your Future Exmoor consultation programme during 2009/10; with the responses generally in conformity with the outcomes of the community consultation events (see below).

COMMUNITY CONSULTATION EVENTS

4.9 21 community consultation events were held during the period January – March 2010. A range of issues and options were developed for both strategic and development management policies to enable local communities to engage in the planning process; with almost 1,000 people attending the events.

4.10 The issues and options were developed around seven themes – a summary of the key findings are set out below:

NATURAL ENVIRONMENT

- Conserving and enhancing Exmoor's wildlife and landscape, particularly the coast, were supported. In terms of man-made infrastructure, many people thought there were too many overhead wires and pylons/poles, however were generally happy to see more mobile phone masts. There were conflicting views regarding wind turbines throughout the consultation (see climate change theme).
- General support for minimising light pollution and improving tranquillity.

CULTURAL ENVIRONMENT

- Support for the conservation of historic assets.
- Many supported opportunities to enhance settlements, although there was reservation in relation to increasing protection within conservation areas.
- Allowing a modern interpretation of traditional Exmoor design using natural sustainable materials, and sustainable construction methods was supported.
- Agreement with the opening of new or derelict small scale quarries for the extraction of local building stone for use within the National Park.

CLIMATE CHANGE & NATURAL RESOURCES

- General support for achieving a carbon neutral National Park through encouraging sustainable construction methods, carbon sinks, reducing the need to travel, and renewable energy technologies which do not adversely impact on the National Park.
- Renewable energy technologies at a micro scale were supported for individual buildings, farms and small communities.
- Support for reducing and recycling waste and reusing materials. Storage for waste recycling was important in the design of individual buildings.

SETTLEMENTS

- Most agreed with treating all identified settlements equally, rather than a settlement hierarchy – allowing development where there are a range of services and transport links.
- The safeguarding of community services and facilities was important to local communities and the use of the internet to also access services was also popular.
- Demand for allotments was noted in particular communities, and developer contributions to public green space was supported.

HOUSING

- The priority for new housing was the provision of affordable housing for local people, with a 10 year local connection or need to live close to a place of work in the National Park, or provide care for elderly or disabled relatives.
- Homes should be constructed so they can be adapted to a households needs over their lifetime. The use of existing buildings as annexes to a main dwelling to be occupied by relatives was also supported.
- Support for options to allow more sustainable and self-sufficient lifestyles through low-impact land based communities.

ECONOMY & EMPLOYMENT

- Support for improving employment opportunities and encouraging a greater variety of businesses, particularly skilled/highly paid work. Options to provide opportunities for farm diversification, the self-employed and home based businesses/enterprises were also supported.
- Most agreed with design standards for new farm buildings.
- Increasing tourism's contribution to the economy was particularly important, with flexibility for new self-catering accommodation, and allowing for the conversion of existing buildings to hotels/guesthouses. Specific support was received to provide for staff accommodation and recreation facilities to promote the quiet enjoyment of Exmoor.

TRANSPORT & INFRASTRUCTURE

- Support received for sustainable modes of transport, encouraging linkages between rights of way, and provision of pedestrian/cycle routes in new developments.
- Minimising signage, reducing congestion, speed and parking provision in settlements were supported.
- Undergrounding of new electricity/communication cabling was important to local communities, and ensuring well-designed telecommunication masts.
- Overwhelming support for improved connectivity through access to broadband and mobile phone coverage.
- General support for the reinstatement of the Lynton & Barnstaple Railway.

STAKEHOLDER CONSULTATION EVENT

- 4.11 The stakeholder consultation event was held on 25th March 2010, with representatives from 35 organisations and businesses. The event was based around the same themes as the community events. There were generally similar outcomes to the community events, however there were some variations relating to housing including:
- Favouring a lower local connection for affordable housing (5-9 years) rather than 10 years supported by local communities, and widening the area to anywhere in the National Park rather than a specific parish or grouping of parishes.

- Making use of long term empty homes.

TOPIC MEETINGS

4.12 Topic meetings for the key themes around housing, climate change, and recreation and tourism were held in November 2010 and hosted by an independent facilitator. These events provided an opportunity to enable further in-depth discussion on certain issues in order to develop strategic options for certain issues and preferred approaches for some policy themes. A brief summary of the main findings are set out below.

HOUSING & SETTLEMENTS

- Flexibility needed in the Plan to address the 20 year plan period to be able to respond to the needs of communities – taking account of viability, potential for cross subsidy from market housing, and securing developer contributions for affordable housing.
- Different methods of delivery including live-work units, low-impact sustainable communities, self-build, and community land trusts.
- Should be a policy for a second home on farms.
- Need to ensure economic development is linked to housing provision.
- Widen the number of settlements where new affordable housing can be built – recognise that communities are also built around active social networks not just the services and facilities present.
- Addressing the issue of homes with no usual residents – empty/second/holiday homes. Flexibility to allow holiday lets to change occupancy conditions to local affordable housing and back to holiday lets.
- Making best use of existing buildings and housing stock.
- Housing needs of an ageing population – adaptable homes/lifetime homes.
- Home-based businesses and need for improved broadband infrastructure.
- New Homes Bonus may provide further opportunities.
- Potential solutions for a ‘key worker’ in terms of a local connection for affordable housing.

CLIMATE CHANGE

- Need to consider the impacts of renewable energy technologies on the National Park’s natural beauty, wildlife, cultural heritage and special qualities.
- Wind turbines – issues of scale and visual impact – identify areas where turbines would be more or less acceptable. Landscape Character Assessments are useful tools.
- Micro-hydro schemes work well – well established technology with the potential to restore old infrastructure including watermills.
- Solar PV should be for individual/business/community benefit – not commercial scale.
- Woodfuel should be promoted as virtually carbon neutral.
- The Carbon Neutral Programme was discussed with potential issues regarding renewable energy performance and impacts of sustainable land management.

TOURISM

- Needs to be a diversity of visitor accommodation provision – high quality, affordable and accessible – which can adapt to market trends. Examples such as camping barns and hostels.
- Recognition that the high quality environment of the National Park is the key visitor draw and experience of tranquillity.
- Change of use of hotels: small hotels/guesthouses which were formerly dwellings should be able to revert to a dwelling, viability test for larger hotels and consider alternative uses including partial changes of use. A need to be able to distinguish between smaller hotels and larger more commercial premises.
- Flexible approach for dwellings changing use to guesthouses, so they are able to revert to a dwelling – ensure necessary safeguards are in place).
- Widen opportunities for holiday lets.
- Opportunities for increased tourism are aligned with events and recreation activities. Need for family activities and attractions.

RECREATION

- A need for a flexible approach that provides certainty to ensure that the National Park can be enjoyed whilst safeguarding the special qualities of the National Park, including the experience of tranquillity.
- Opportunities to promote a high quality experience including promoting health and wellbeing for visitors and local communities.
- Promote inclusion and educational facilities.
- Resist large scale over commercialisation.
- Recognise the importance of public rights of way network and the recreational value of water (coast, rivers, lakes).
- Improved communications needed – transport, mobile phones and broadband.
- Some recreational activities such as the owning and keeping of horses need separate policy criteria given the specific impacts around the growth and change in equestrian activities on Exmoor.
- Mixed views regarding game-shooting and how planning can influence this industry as many shoots are long-established and popular forms of farm diversification.
- Diverse responses regarding the issue of zoning areas of the National Park for recreational activities, with concerns that designations could be devalued. The Landscape Character Assessment may be a useful tool in appraising recreational development proposals.

Your Future Exmoor – Vision, Objectives, General Policies, and Local Plan Options 2011/12

4.13 During the period November 2011 to January 2012 a consultation on the emerging Local Plan was held in parallel with the Partnership Plan for Exmoor. Representations were sought on the following:

- **The Vision and Objectives** – a joint set for the Local Plan and National Park Management Plan, which was also being consulted on at the same time.
- **Draft General Policies** for the Local Plan, which will apply to all development requiring planning permission within the National Park.
- **Strategic Options** for where new development should go (spatial strategy) and how affordable housing will be delivered.

4.14 A total of 57 responses were received - 38 online and 19 copies of the consultation response were returned. Brief summaries of the consultation responses for each component of the consultation are set out below:

THE VISION AND OBJECTIVES

- Overall the draft Vision and Objectives were supported by those responding to the consultation.
- Suggested changes to provide clarification or inclusion in the Vision statements relating to: vision outcomes are sought by 2030, carbon-neutral National Park, difficulty in securing long term alternative transport modes, seascape and coast, climate change adaptations to historic buildings, National Parks as an exemplar for sustainable development, local ecological networks, geological conservation interests, community recreation facilities, and transport links to areas outside the National Park.
- A few detailed comments suggested changes to the objectives, but generally they were supported with some general comments relating to cooperation between local planning authorities regarding transport, managing flood risk and waste.

DRAFT GENERAL POLICIES

General Policy 1: Achieving National Park Purposes and Sustainable Development

- General support for the policy.
- Important that all strands of sustainable development are taken into account in planning decision, and a query over the definition of 'sustainable development' used.
- Supporting text to clarify the duty of public bodies to have regard to National Park purposes and other cross-boundary cooperation between neighbouring local planning authorities.
- Include reference to the historic environment and ensure the policy positively supports the achievement of the Vision and Objectives.

General Policy 2: Major Development

- The policy was generally supported. However, a definition of what constitutes 'major development' in the National Park was suggested to provide clarity, and

some concern that the policy may not offer sufficient protection for the natural environment in exceptional cases. It was felt by one respondent that the policy conflicted with paragraph 22 of PPS7 regarding developments that raise issues of national significance.

General Policy 4: Securing Planning Benefits

- Views regarding this policy were mixed, with concerns being raised regarding the impact of a levy on the viability of developments, and the feasibility of developing a CIL given the low level of development likely within the National Park. There was also uncertainty over what a CIL would mean in practice and further information would be required to understand its implications.

OPTIONS FOR LOCATION OF NEW DEVELOPMENT

- Three options were proposed for the spatial strategy – setting out where new development should be focused within the National Park.
 - **Option A:** continue to identify those settlements listed in the adopted Local Plan 2001-2011.
 - **Option B:** only identify those settlements where there is a school, a regular bus service, and a shop.
 - **Option C:** continue to identify those settlements listed in the adopted Local Plan 2001-2011 AND smaller settlements with at least one of the following local services: a shop, pub or community hall.
- The majority of those responding were in favour of Option 3 with some encouraging a more ambitious approach and others a more cautionary approach. Other comments focused on the cross boundary status of settlements split by the National Park boundary and whether there would be a hierarchy amongst the settlements identified. Ensuring that the scale of growth is proportionate to the size of the settlement was highlighted, and the environmental capacity of an area to absorb new development should be a key determinant.

OPTIONS FOR DELIVERY OF AFFORDABLE HOUSING

Alternative options for the delivery of affordable housing were sought given the lower levels of grant funding available.

- The majority of respondents supported the principle of housing for local people and housing for people working in the National Park. A number of comments related to the need for people to be able to downsize, and reduce the number of years from 10 to 5 for people to qualify as having a local connection to Exmoor.
- Options for the delivery of affordable housing included:
 - Option A: require all new housing to be affordable to address local needs.
 - Option B: Require all new housing to be affordable housing but also, where required, allow for local housing to help fund the affordable housing through cross subsidy.

- Option C: Require all new housing to be affordable housing but also, where required, allow for local housing and open market housing to help fund the affordable housing through cross subsidy.
- Option D: Require all new housing to be affordable housing but also, where required, allow for open market housing to help fund the affordable housing through cross subsidy.
- There was support for all the Options, with Option C receiving the most support from the survey, and Option B the lowest, although a lot of respondents did not express an opinion.
- Comments included the need to take a flexible approach to account for financial viability, the need for an open book approach to viability, and whether government funding would be available for some options included. Some concern that the open market elements proposed may become second homes.
- Housing growth should be accommodated with the least impact on the natural environment.
- The majority of respondents agreed with the provision of local housing on single plots in Exmoor's settlements.
- Most respondents did not agree with providing housing for people who need to live close to their place of work in the National Park, if they subsequently moved jobs outside the area.
- In relation to the reuse of existing buildings most supported the reuse of important historic or listed buildings for residential use where it was not viable or achievable to provide affordable housing. There were mixed views relating to conversion proposals that would provide more local affordable homes than needed locally to go to market housing. The possibility of developer contributions to affordable housing off site was also raised.
- Most respondents agreed that other kinds of housing should be considered on brownfield sites to help achieve enhancement of settlements where the provision of affordable housing would not be viable. Comments also related to alternative uses for brownfield sites including community amenity areas.
- The collection of developer contributions from market housing on brownfield land and through the change of use of existing buildings to fund affordable housing was supported.
- The majority of respondents agreed with reuse of buildings on farmsteads to a home for a farmer who is retiring to enable succession farming.

Draft Local Plan Consultation – November 2013

- 4.15 Previous community and stakeholder engagement and consultation, together with other evidence and technical studies, helped to inform the preparation of the Draft Local Plan. Changes made in relation to the Your Future Exmoor Consultation on the Vision, Objectives and General Policies were set out as underlined for new text and struck through for ~~deleted text~~.
- 4.16 The consultation on the Draft Local Plan was held from 4 November to 13 December 2013. Full details of the consultation and the responses received can be found in the Consultation Statement June 2015 (Regulation 18) published at the Publication stage of the Local Plan.
- 4.17 The consultation undertaken on the Draft Local Plan generated 917 separate representations from 144 responses (143 individuals and organisations). The representations are categorised in the following table.

TABLE 4.1

| Type of Representation | Number of Representations | % |
|--------------------------------------|---------------------------|-------|
| Support | 539 | 58.8% |
| Support subject to amendments | 59 | 6.4% |
| Objections | 125 | 13.6% |
| General comments | 194 | 21.2% |

- 4.18 As a result of comments received during the Draft Local Plan consultation, national planning policy changes and other corrections; a summary of key changes made to the Plan to inform the Publication Draft were set out in Appendix 1 to a report to the Authority on 24th March 2015⁶, as set out in Table 4.2 below. An additional column has been added to indicate the reasoning for these particular changes.

⁶ <http://www.exmoor-nationalpark.gov.uk/about-us/meetings-agendas-reports/exmoor-national-park-authority/24-mar-2015/Appendix-1-Summary-of-Key-Changes.pdf>

TABLE 4.2

| SECTION OF THE LOCAL PLAN | KEY CHANGES | JUSTIFICATION |
|---|---|--|
| 1. Introduction | The Spatial Portrait (formerly Section 3) has been incorporated into this section and edited to avoid duplication with other sections of the Plan. | In response to comments on the length of the Plan. |
| | Text added to refer to the ‘Duty to Cooperate’ process. | In response to the need for strategic priorities and any cross-boundary implications to be addressed through the Duty to Cooperate. |
| 2. Vision, objectives and strategic priorities | A set of strategic priorities have been added which are required by the National Planning Policy Framework (NPPF). These have been derived from the Draft Local Plan summary document and explains what each section of the plan intends to achieve. | Required by national planning policy and in response to comments received regarding the need for a clear development plan strategy. |
| 3. Spatial Portrait | This section has been removed and the summarised text moved to Section 1: Introduction. | In response to comments on the length of the Plan. |
| 3. General Policies | GP2 Presumption in Favour of Sustainable Development – (POLICY DELETED) it repeats the presumption stated in the NPPF. | Change in approach – policy no longer required to be included in Local Plans. It remains a material consideration in the NPPF. |
| | GP2 Major Development – policy changed to address how major development in the National Park will be defined. | In response to comments received and to provide clarification on the approach to major development in the National Park. |
| | GP3 Spatial Strategy – the tier of settlements ‘Rural Communities’ has been removed from the settlement hierarchy and will be considered as open countryside due to the Government changes to thresholds for affordable housing. However, policies will still enable self-build local affordable dwellings in small rural communities in the open countryside with a shop, or a pub or community meeting place/ hall (see policy HC-D5 below) – so a similar policy approach remains in place. | In response to changes in Planning Practice Guidance (PPG) which removes thresholds for affordable housing in National Parks for 5 or fewer dwellings. Dunster changed from a Local Service Centre to a Village in response to comments from West Somerset Council and through the Duty to Cooperate process. |

| SECTION OF THE LOCAL PLAN | KEY CHANGES | JUSTIFICATION |
|---|--|---|
| | Further explanation included for development at Porlock Weir. | In response to comments received in relation to Porlock Weir and its status as an identified settlement in the Plan. |
| | GP4 The Efficient Use of Land and Buildings (NEW POLICY) – a sequential approach to use brownfield land and existing buildings before greenfield sites, the approach to density of new housing and avoiding development on the best agricultural land. | New policy created in response to comments relating to the length and complexity of policies. |
| | GP5 Planning Obligations – new clause to incorporate financial contributions for affordable housing (deleting policy HC-S4 Financial Contributions). | For clarification and in response to comments relating to the length of the plan. |
| | GP6 Enhancing the National Park – (POLICY DELETED) text incorporated into the written justification for GP1 National Park Purposes and Sustainable Development. | For clarification and in response to comments relating to the length of the plan. |
| 4. Conserving and Enhancing Exmoor | CE-S1 Landscape Character – policy split between the existing strategic policy and development management policy CE-D1 Protecting Exmoor’s Landscapes and Seascapes (NEW POLICY) . | In response to comments relating to the length and complexity of policies. |
| | CE-S2 Protecting Exmoor’s Dark Night Sky – policy changed from a development management to a strategic policy. | In response to a comment to ensure that the policy approach is safeguarded. |
| | CE-S3 Biodiversity and Green Infrastructure – policy amended to combine former policy CE-S3 Green Infrastructure, incorporate Exmoor’s priority habitats and species, and include Somerset’s (including whole of the National Park) ecological network. | In response to comments relating to the length and complexity of policies. To include reference to new evidence including: ecological networks, reference to ancient woodlands and veteran trees, and the Exmoor |

| SECTION OF THE LOCAL PLAN | KEY CHANGES | JUSTIFICATION |
|--|--|---|
| | | Wildlife Monitoring Framework. |
| | CE-S4 and CE-D3 Cultural Heritage and Historic Environment – Principal Archaeological Landscapes (PALs) given greater prominence in the policy. DM policy specific to Conservation Areas, PALs, climate change and assets that are redundant/at risk. | Change in response to new evidence regarding updating the network of PALs. Policies amended in response to a comment regarding the ‘settings’ of heritage assets. |
| | CE-S5 and CE-S6 relating to the conversion or structural alteration of existing traditional and non-traditional buildings have been combined into one policy (CE-S5). | In response to comments relating to the length and complexity of policies. |
| | CE-S6 Design and Sustainable Construction Principles – policy split to form new development management policy CE-D4 Extensions . | In response to comments relating to the length and complexity of policies. Include reference to reducing carbon emissions in response to the government consolidation technical standards. |
| | Former policy CE-D4 Advertisements, Shopfronts and Private Road Signs split into two policies for clarity CE-D5 Advertisements and Private Road Signs , and CE-D6 Shopfronts . | In response to comments relating to the length and complexity of policies. |
| 5. Responding to Climate Change | CC-S2 Coastal Development – policy changed from a development management to a strategic policy. | In response to a consultation comment stating that a strategic policy is required to establish a presumption against development within the undeveloped coast. |
| | CC-S3 Porlock Weir Coastal Change Management Area (NEW POLICY) – designates the coastal change management area (CCMA) at Porlock Weir as required by the NPPF and sets criteria for development within the CCMA. | NPPF requirement to identify CCMA where areas are likely to be affected by physical changes to the coast. |

| SECTION OF THE LOCAL PLAN | KEY CHANGES | JUSTIFICATION |
|---|--|---|
| | <p>CC-S4 Replacement Development from the CCMA – former policy CC-S2 Responding to Climate Change revised to relate specifically to the Porlock Weir CCMA.</p> | <p>Policy amended in response to the designation of a CCMA at Porlock Weir.</p> |
| <p>6. Achieving a Thriving Community</p> | <p>HC-S1 Housing – new clauses to incorporate the approach for permitting principal residence housing and the approach to new Government thresholds on affordable housing.</p> | <p>Changes in response to consultation comments and the introduction of S106 thresholds for affordable housing in Planning Practice Guidance (PPG).</p> |
| | <p>HC-S2 A Balanced Local Housing Stock (NEW POLICY) – previously part of HC-S1. Incorporates minimum and maximum floorspace requirements, and floor space standards for certain types of housing.</p> | <p>In response to comments relating to the length and complexity of policies.</p> |
| | <p>HC-S2 Housing Conservation and Enhancement (POLICY DELETED) – new Government thresholds on affordable housing superseded the approach.</p> | <p>In response to the introduction of S106 thresholds for affordable housing in Planning Practice Guidance (PPG).</p> |
| | <p>HC-S3 Local Occupancy Criteria – policy simplified and a change in a clause from 10 years in the last 20 years to 10 in the last 30.</p> | <p>In response to people who have a local connection who have moved away and wish to return to Exmoor (including the needs of service families).</p> |
| | <p>HC-D5 Custom/Self Build Local Need Housing in Rural Communities (NEW POLICY) – to allow for new self build dwellings in rural communities in the open countryside where there is at least a shop, pub or community meeting place/hall.</p> | <p>A new policy to provide a similar approach as the Draft Local Plan without including ‘rural communities’ within the spatial strategy (in response to the introduction of S106 thresholds for affordable housing in the PPG).</p> |
| | <p>HC-D6 The Change of Use of Serviced Accommodation to Housing (NEW POLICY) – to clarify the approach to changes of use of serviced accommodation to housing (particularly in the open countryside).</p> | <p>In response to the introduction of S106 thresholds for affordable housing in Planning Practice Guidance (PPG).</p> |

| SECTION OF THE LOCAL PLAN | KEY CHANGES | JUSTIFICATION |
|---|---|---|
| | HC-D17 Replacement Dwellings – change to allow greater flexibility to small replacement dwelling to have maximum internal floorspace of 90 square metres. | Change in response to a consultation comment concerning whether the policy would enable small timber frame dwellings to be replaced. |
| 7. Achieving a Sustainable Economy | Policies generally amended to be clearer and reduce unnecessary cross-referencing and duplication. SE-S4 Agricultural and Forestry Development – policy amended as a result of consultation response in terms of strengthening landscape considerations. Further tests and supporting text relating to isolated buildings in the open countryside. | In response to comments relating to the length and complexity of policies. In response to consultation comment regarding strengthening the policy to afford sufficient protection to the landscape. |
| 8. Achieving Enjoyment for All | RT-D3 Safeguarding Serviced Accommodation – policy amended to refer to new housing policy for the change of use of serviced accommodation to housing. RT-S2 Reinstatement of the Lynton & Barnstaple Railway – policy amended to reduce unnecessary duplication and repetition. Supporting text and policy amended as a result of consultation responses received. | In response to the addition of a new policy (HC-D6 The Change of Use of Serviced Accommodation to Housing) In response to consultation comments which highlighted the need for the supporting text and policy to be more succinctly expressed, and cross reference to other relevant policies in the Plan. A clause seeking a legal agreement was removed as unworkable. |
| 9. Achieving Access for All | AC-S2 Transport Infrastructure amended to include tests for new roads, road widening and upgrading of existing routes. AC-D1 Transport and Accessibility Requirements for Development – policy has been split to create a new policy AC-D2 Traffic and Road Safety Considerations for Development . | In response to the National Parks Circular. ⁷ In response to comments relating to the length and complexity of policies. |

⁷ DEFRA (2010) English National Parks and the Broads: UK Government Vision and Circular 2010

| SECTION OF THE LOCAL PLAN | KEY CHANGES | JUSTIFICATION |
|---|--|---|
| | <p>AC-S3 Traffic Management and Parking – policy amended to include further routes to the Exmoor Route Network (B Roads and Access Routes) as defined on the Policies Map.</p> | <p>In response to consultation comments received regarding freight routes and the need for further clarification regarding the Exmoor Route Network.</p> |
| | <p>AC-D3 Parking Standards – revised to include parking standards for cycles, motorcycles and disabled parking requirements.</p> | <p>In response to consultation comments received regarding the derivation of parking standards, and the need for parking standards for disabled users.</p> |
| | <p>AC-D5 Radio and Mobile Telecommunications Infrastructure – policy amended to incorporate the siting of apparatus on existing masts (which could be raised in height) as part of the sequential approach to new telecommunications development.</p> | <p>In response to consultation comments regarding the restrictive nature of the sequential test for this type of infrastructure.</p> |
| <p>10. Exmoor’s Settlements</p> | <p>Rural Communities removed from this section to reflect that these settlements are no longer part of the spatial strategy due to the Government changes to thresholds for affordable housing. However, policies will still enable self-build local affordable dwellings in small rural communities in the open countryside a shop, or a pub or community meeting place/ hall (see policy HC-D5 above).</p> | <p>A similar approach as the Draft Local Plan has been developed without including ‘rural communities’ within policy GP3 Spatial Strategy (in response to the introduction of S106 thresholds for affordable housing in the PPG).</p> |
| | <p>Tables relating to community services and facilities have been removed and are now included in a separate technical paper.</p> | <p>In response to comments relating to the length of the Plan, and whether the all the information is required given that evidence is also published on the National Park Authority’s website.</p> |
| <p>NEW SECTION 11. Monitoring and Implementation</p> | <p>Sets out how the Local Plan will be monitored and implemented. A monitoring framework includes a number of indicators which have been identified to use for the Annual</p> | <p>In response to comments on the Local Plan. Local Authorities are required to publish</p> |

| SECTION OF THE LOCAL PLAN | KEY CHANGES | JUSTIFICATION |
|--|---|--|
| | Monitoring Report. As a result, policies can be monitored to assess whether the effects of the policies are as intended. | information annually to show how the implementation of policies in the Local Plan is progressing. |
| 12. Annex 1: The conduct of archaeological work and historic building recording within Exmoor National Park | No change | N/A |
| 13. Annex 2: Rural Land-Based Worker Dwellings | Changes to text relating to tying the dwelling to the holding (now only in exceptional circumstances). | In response to appeal decisions. |
| | Further detail in relation to the siting of new rural worker dwellings in relation to existing buildings on the holding. | For clarification. |
| | Explanation regarding subsequent occupiers of rural worker dwellings. | For clarification. |
| NEW SECTION 14. Annex 3: Important Open Space in Allerford and Luccombe | Identifies areas of Important Visual Amenity Space and Important Recreation Space within the two settlements. These settlements do not have separate inset maps. ⁸ | To provide clarification regarding additional areas of important open space outside the named settlements. |
| NEW SECTION Glossary | Provides a definition of various terms used within the Local Plan. | In response to comments on the Plan that terminology within the Plan lacks definition. |

4.19 Further changes were made to the Policies Map (including settlement inset maps) in response to comments made in relation to the Draft Local Plan consultation.

⁸ Allerford and Luccombe are no longer identified as ‘named settlements’ suitable for new development. They would be considered as a ‘rural community’ for self-build opportunities only.

5 Publication Draft Local Plan Consultation

5.1 Alongside the Exmoor National Park Publication Draft Local Plan (June 2015) the following documents were also made available:

- Consultation letter including the notice of consultation
- Guidance Notes for Representations
- Response Form
- Local Plan Summary Guide
- Sustainability Appraisal – Non-technical Summary
- Sustainability Appraisal – Full Report
- Habitats Regulations Assessment
- Consultation Statement (June 2015)
- Duty to Cooperate Statement
- Housing Topic Paper

5.2 A number of new technical documents and evidence studies were also published on the Authority's website at the Publication stage to add to the wider range of evidence documents which have been used to inform the preparation of the Local Plan:

- Equalities Impact Assessment (2014)
- Exmoor National Park Duty to Cooperate Protocol
- Settlement Hierarchy Technical Paper (2015)
- House Price Survey 2013
- Northern Peninsula Housing Market SHMA Update (January 2015)
- SHMA Update: Exmoor National Park (March 2015)
- Exmoor National Park Strategic Housing Land Availability Assessment Report (December 2014)
- Devon Partnership Gypsy and Traveller Accommodation Assessment (2015)
- Infrastructure Delivery Plan (June 2015)
- Open Space Strategy (2015)
- Strategic Flood Risk Assessment Addendum (August 2014)
- Somerset's Ecological Network (2015)

5.3 In total there were 120 responses to the Publication Draft Local Plan consultation generating 394 separate comments; of these 181 comments raised concerns in relation to the Local Plan. The table below shows a breakdown of the comments in relation to the various sections of the Plan.

| Section of the Plan | No. of Consultation Responses | No. of Consultation Responses raising issues of concern |
|---|-------------------------------|---|
| Comments relating to the whole plan | 15 | 4 |
| 1. Introduction | 5 | 3 |
| 2. Vision, Objectives and Strategic Priorities | 6 | 3 |
| 3. General Policies | 22 | 10 |
| 4. Conserving and Enhancing Exmoor | 50 | 31 |
| 5. Responding to Climate Change and Managing Resources | 25 | 18 |
| 6. Achieving a Thriving Community | 78 | 52 |
| 7. Achieving a Sustainable Economy | 24 | 17 |
| 8. Achieving Enjoyment for All | 134 | 21 |
| 9. Achieving Accessibility for All | 23 | 16 |
| 10. Exmoor's Settlements | 9 | 5 |
| 11. Monitoring and Implementation Framework | 3 | 1 |
| 12. Annex 1: The Conduct of Archaeological Work and Historic Building Recording | 0 | 0 |
| 13. Annex 2: Rural Land Based Worker Dwellings | 0 | 0 |
| 14. Annex 3: Important Open Space in Allerford and Luccombe | 0 | 0 |
| 15. Glossary | 0 | 0 |
| Total no. of comments | 394 | 181 |

A SUMMARY OF THE MAIN ISSUES RAISED

- 5.4 The following tables set out the main issues raised by representations received during the consultation on the Publication Draft Local Plan between 15 June and 31 July 2015.
- 5.5 Forming part of the Submission Documents which support the information provided within this section of the Representations Statement are:
- **Summary of Representations and Authority Response** – this document provides a summary of the representations received and how these were considered by the Authority;
 - **Schedule of Proposed Changes** – the changes the Authority recommends to be made to the Publication Draft Local Plan in response to:
 - issues raised by consultation responses,
 - new evidence,

- changes to national policy guidance, and
- points of clarification/corrections.
- **Schedule of Representations.**

Comments relating to the whole plan

| Main Issues Raised |
|--|
| The plan is felt to be unnecessarily prescriptive, very long and difficult to follow and apply and is considered to restrict rather than enable development. |
| The words 'small scale' throughout the plan is contrary to the NPPF and is recommended to be deleted where they relate to a policy context. |
| Concern over whether the Local Plan could override the statutory purposes of the National Park and how this could be reconciled. |

1. Introduction

5.6 No issues of significance to consider.

2. Vision, Objectives and Strategic Priorities

| Policy / Plan Reference | Main Issues Raised |
|-------------------------|---|
| Whole section | Suggestion that additional wording is added to apply a presumption in favour of sustainable development as contained in the NPPF. |

3. General Policies

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| Whole section | Reference to historic environment would be more appropriate than the broad term cultural heritage - to ensure consistency with the NPPF. |
| GP1 NATIONAL PARK PURPOSES AND SUSTAINABLE DEVELOPMENT | Reference to enabling businesses to grow and develop. |
| GP2 MAJOR DEVELOPMENT | Supporting text not NPPF compliant. Further consideration recommended to be given to the local context and potential for development to harm the National Park. |

| Policy / Plan Reference | Main Issues Raised |
|--|---|
| GP3 SPATIAL STRATEGY | <p>Concern that development will be channelled from Villages to Local Service Centres which may be counter to the intentions of establishing National Parks and ultra vires. Modifications seek to delete 'service centres' and describe them as 'attractive small historic towns'.</p> <p>The final criterion of GP3 should not refer to rural land-based businesses but all types of business in rural areas [including new build].</p> <p>Suggestion that Withycombe is worthy of inclusion as a Village within the hierarchy.</p> |
| GP4 THE EFFICIENT USE OF LAND AND BUILDINGS | No comments of concern received. |
| GP5 SECURING PLANNING BENEFITS - PLANNING OBLIGATIONS | <p>By deciding not to have a CIL the implications of pooling restrictions on Section 106 contributions should be considered.</p> <p>Policy is vague and the potential for a cross boundary approach has not been explored. The policy little information on the type of development that would require a CIL payment or level of charge that would be incurred.</p> <p>Contributions towards education provision may need to be sought for Combe Martin primary school.</p> |

4. Conserving and Enhancing Exmoor

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| CE-S1 LANDSCAPE CHARACTER | As the settlements have no development boundaries there are implications for the protection of the undeveloped coast which are solely reliant on policy CE-D1 |
| CE-D1 Protecting Exmoor's Landscapes and Seascapes | Seascape should be included in the plan objectives and the seascape character assessment commissioned by key partners should be referenced through CE-S1. |
| CE-S2 PROTECTING EXMOOR'S DARK NIGHT SKY | No issues of significance. |
| CE-S3 BIODIVERSITY AND GREEN INFRASTRUCTURE | <p>Concern raised in relation to the absence of the biodiversity importance of rivers and streams in the Plan.</p> <p>Given the importance of trees and woodlands a separate policy for trees and woods is suggested.</p> <p>Main concern is the links between protection of priority species and habitats and the planning system which is not conveyed - need further clarity relating to how these species and habitats will be considered in practice.</p> |

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| CE-S4 CULTURAL HERITAGE AND HISTORIC ENVIRONMENT | Criterion 4 of the policy should require a systematic approach to the assessment of the impact of development proposals on the setting of heritage assets. |
| CE-D3 Conserving Heritage Assets | No issues of significance. |
| CE-S5 PRINCIPLES FOR THE CONVERSION OR STRUCTURAL ALTERATION OF EXISTING BUILDINGS Also relevant to HC-D7 Conversions to Dwellings in the Open Countryside | Restrictions are too strict and likely to stifle development that would allow for the preservation and enhancement of traditional buildings. It is important that the long term viability of these buildings is secured through conversion to an alternative use (specific reference to conversions to dwellings and NPPF isolated homes in the open countryside). |
| CE-S6 DESIGN & SUSTAINABLE CONSTRUCTION PRINCIPLES | Criterion 2 of policy CE-S6 should clarify how a developer should demonstrate a reduction in carbon emissions. |
| CE-D4 Extensions | No issues of significance. |
| CE-D5 Advertisements and Private Road Signs | Some concern regarding whether there are sufficient controls in the policy in relation to signage in the open countryside. |
| CE-D6 Shopfronts | No issues of significance. |
| CE-S7 SMALL SCALE WORKING OR RE-WORKING FOR BUILDING AND ROOFING STONE | Criterion 1.f) (can be sourced locally elsewhere) should be deleted as it would be inconsistent with the policy enabling the use of locally sourced materials. |
| CE-S8 MINERALS SAFEGUARDING AREAS | The extent of safeguarded areas needs to be shown more clearly on the Policies Map. |
| CE-S9 MAJOR MINERAL EXTRACTION | It is requested that text is included to ensure fracking of any scale would not be permitted within the National Park. |
| CE-D7 Interim Development Order Permissions | No issues of significance. |

5. Responding to Climate Change and Managing Resources

| Policy / Plan Reference | Main Issues Raised |
|---|---|
| CC-S1 CLIMATE CHANGE MITIGATION AND ADAPTATION | No issues of significance. |
| CC-D1 Flood Risk | No issues of significance. |
| CC-S2 COASTAL DEVELOPMENT | As the settlements have no development boundaries there are implications for the protection of the undeveloped coast which are solely reliant on policy CE-D1 which is not cross- |

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| | referenced in para. 5.31 relating to the undeveloped coast and policy CC-S2. |
| CC-S3 PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA | Request to include Lynmouth within policy CC-S3 and the designation of a coastal change management area (CCMA) following impacts of 2013/14 floods. |
| CC-S4 REPLACEMENT DEVELOPMENT FROM COASTAL CHANGE MANAGEMENT AREAS | No issues of significance. |
| CC-D2 Water Conservation | No issues of significance. |
| CC-S5 - LOW CARBON AND RENEWABLE ENERGY DEVELOPMENT | <p>The test for large scale renewable energy should be deleted and the word small scale removed from the policy.</p> <p>Text in the Plan does not differentiate between hydro schemes on main rivers and those on streams.</p> <p>Support subject to referring to a maximum height for wind turbines in the supporting text - the test in the policy is unnecessary if all other criteria are satisfied.</p> |
| CC-D3 Small-Scale Wind Turbines | No issues of significance. |
| CC-D4 Freestanding Solar Array | No issues of significance. |
| CC-S6 WASTE MANAGEMENT | The restriction of allowable sources of waste for anaerobic digestion from local sources is unworkable and would restrict the viability of such schemes. |
| CC-D5 Sewerage Capacity and Sewage Disposal | No issues raised |
| CC-S7 POLLUTION | Plan makes no reference to the Noise Policy Statement of England 2010, which may benefit any intention to ensure development noise impacts are kept below the lowest observed adverse effect level (LOAE) in regions of valued tranquillity. |

6. Achieving a Thriving Community

| Policy / Plan Reference | Main Issues Raised |
|--|---|
| Housing topic paper (supporting evidence) | <p>The 2011 Housing Viability Assessment is considered to be out of date and contrary to the NPPF (para.158). Up to date assessments of viability in relation to the policy approach in the Plan are important considerations.</p> <p>The selection of a preferred Objectively Assessed Housing Need (OAHN) at the lower end of the range is questionable and its derivation is not clear. Unresolved matter of unmet housing needs should be agreed prior to submission.</p> |

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| | The March 2015 SHMA unfortunately does not reflect release of the 2012-based household projections from February 2015 to be in accordance with planning practice guidance. |
| Housing section | Include a further policy within the Local Plan which would provide greater flexibility for legitimate local needs or local low paid working people with regard to new dwellings where they are located beside or near permanent buildings. |
| Objections to policies relating to 90sqm net internal floorspace thresholds including: HC-S2, HC-D2, HC-D3, HC-D5 HC-D6, HC-D9 HC-D10, HC-D15, and HC-D17. | <p>It is not obvious if the National Park Authority is proposing to adopt the nationally described space standard. If this is the intention then in order to do so the National Park Authority must comply with national policy.</p> <p>The 90sqm floorspace limit is unnecessarily restrictive and will prevent local affordable housing from being delivered or opportunities for live-work provision.</p> <p>Concern regarding the 90sqm threshold for affordable housing due to this not adequately meeting the space needs for larger families needing affordable housing</p> |
| HC-S1 HOUSING | <p>Policy should allow for housing land to be allocated to enable settlements to remain viable and where there is a need for housing to meet employment demands.</p> <p>Concern about the deliverability of the policy – need to allow a proportion of non-affordable housing to be provided to achieve a viable development scheme.</p> |
| HC-S2 A BALANCED LOCAL HOUSING STOCK | No comments of concern received beyond those raised in relation to the 90sqm internal floorspace restriction (see the beginning of the table). |
| HC-S3 LOCAL OCCUPANCY CRITERIA | Local connection criteria are unnecessarily restrictive and the policy should allow for those moving to the area to take up employment or set up a business. |
| HC-S4 PRINCIPAL RESIDENCE HOUSING | <p>Concern that finance will not be obtainable for homes with a principal residence condition.</p> <p>Delete policy HC-S4 which is considered to conflict with the NPPF through use of principal residence conditions.</p> |
| HC-D1 Conversions to Dwellings in Settlements | Delete criteria from 1.c) to the end of the policy as it is considered to conflict with the NPPF in relation to the change of use of buildings to dwellings. |
| HC-D3 Specialist Housing for Exmoor's Communities | Criterion 1.a) (a sequential approach to consider other opportunities) is considered to be unnecessarily restrictive given the large proportion of elderly people within the National Park. |
| HC-D4 Extended Family Dwellings Criteria | Suggest the policy is deleted as it is not considered to be consistent with the NPPF. |

| Policy / Plan Reference | Main Issues Raised |
|--|---|
| HC-D5 Custom/Self Build Local Need Housing in Rural Communities | <p>Concern that the policy encourages homes that would have little or no resale value and therefore seek to modify the policy so self-build homes are exempt from affordable and principal residence housing conditions.</p> |
| | <p>Concern that plots for self-build homes will not be affordable to local people, and other small communities (other than rural communities with a one service) should be considered as locations for self-build as they give and receive services too.</p> |
| | <p>Suggested wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves.</p> |
| | <p>The need for a local occupancy tie is recognised, but the condition that they must be affordable units is too restrictive and would decrease the value of the asset; therefore delivery as a means of meeting an objectively assessed housing need may be compromised.</p> |
| HC-D6 The Change of Use of Serviced Accommodation to Housing | <p>No comments of concern received beyond those raised in relation to the 90sqm internal floorspace restriction (see the beginning of the table).</p> |
| Supporting text to dwellings in the countryside | <p>The purpose of 6.147 is not clear as it introduces the concept of 'low impact' or 'one planet development' (OPD) which appears incongruous in the section dealing with rural workers. It is considered that open countryside one planet development (OCOPD) utilises land and subsistence based livelihood to contribute to sustainable development.</p> |
| HC-D7 Conversions to Dwellings in the Open Countryside | <p>Suggest that the policy is deleted or significantly amended to support the change of use of buildings to [open market] dwellings.</p> |
| | <p>Consider that the costs of conversion would mean the conversion to an affordable home would be unviable. Allowing a proportion to non-affordable [market] dwellings could fund the provision of affordable dwellings elsewhere on site or through contributions towards affordable housing in other areas of the National Park.</p> |

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| <p>HC-D8 New Build Dwellings in the Open Countryside</p> <p>And</p> <p>HC-D9 - Rural Workers</p> | <p>Suggested wooden homes of simple, varied designs that would blend in with remoter hamlet or single home areas; located near to other buildings; include a large wooden enclosed porch; suitable outbuildings to support rural businesses; located on land that is leased perhaps through a ground rent to people with a strong local connection; houses easy to dismantle and move to other sites in two halves – to enable affordable homes to be provided at low cost in locations outside the named settlements helping to sustain family and employment networks.</p> |
| <p>HC-D9 Rural Workers</p> | <p>Modifications sought include the deletion of clause 1.b) regarding financial viability.</p> |
| <p>HC-D10 Succession Farming – Second Dwellings on Established Farms</p> | <p>Concern that the succession farm dwellings are likely to prove unviable without some form of cross subsidy from market housing (delivered through the conversion of buildings on the farmstead).</p> |
| <p>HC-D11 Residential Caravans</p> | <p>No comments of concern received.</p> |
| <p>HC-D12 Replacement of Rural Workers Occupancy Conditions</p> | <p>No issues of significance raised.</p> |
| <p>HC-D13 Replacement of Holiday Occupancy Conditions and Extended Family Ties</p> | <p>No comments of concern received.</p> |
| <p>HC-D14 Subdivisions of Existing Dwellings</p> | <p>No issues of significance raised.</p> |
| <p>HC-D15 Residential Extensions</p> | <p>Deletion of: the 35% increase in criterion 1.c); and criterion 2.c) in relation to dwellings immune from enforcement.</p> |
| <p>HC-D16 Residential Outbuildings</p> | <p>No comments of concern received.</p> |
| <p>HC-D17 Replacement Dwellings</p> | <p>No comments of concern received beyond those raised in relation to the 90sqm internal floorspace restriction (see the beginning of the table).</p> |
| <p>Local Services and Community Facilities</p> | <p>If a significant need arises from housing development in and around Lynton, developer contributions may be sought towards library provision.</p> |
| <p>HC-S6 LOCAL COMMERCIAL SERVICES AND COMMUNITY FACILITIES</p> | <p>No comments of concern received.</p> |
| <p>HC-D18 Local Commercial Service Provision</p> | <p>No comments of concern received.</p> |

| Policy / Plan Reference | Main Issues Raised |
|--|----------------------------------|
| HC-D19 Safeguarding Local Services and Community Facilities | No comments of concern received. |
| HC-D20 Important Visual Amenity Space | No comments of concern received. |
| HC-S7 RESIDENTIAL INSTITUTIONS | No comments of concern received. |

7. Achieving a Sustainable Economy

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| Whole section and policies SE-S1 A SUSTAINABLE EXMOOR ECONOMY and SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE | Plan does not enable the redevelopment of brownfield land in the open countryside. The respondent considers that this does not accord with the NPPF. Such sites are considered to have negative visual amenity impacts if neglected. Amendment suggested to SE-S3 to provide for the redevelopment |
| SE-S1 A SUSTAINABLE EXMOOR ECONOMY | Modifications are sought to change the wording of policy SE-S1 so that employment sites and buildings are not safeguarded in the open countryside. |
| SE-S2 BUSINESS DEVELOPMENT IN SETTLEMENTS | Amendment suggested to policy SE-S2 to specify that previously developed applies to brownfield sites. SE-S2 should not differentiate between traditional and non-traditional buildings and reference to small scale should be deleted. |
| SE-S3 BUSINESS DEVELOPMENT IN THE OPEN COUNTRYSIDE | Policy SE-S3 should not differentiate between traditional and non-traditional buildings, nor should buildings be redundant. Modifications include the deletion of paragraphs 3, 4 and 5. Encourage the amendment of the policy so it is less restrictive by not constraining new build to solely within Local Service Centres and Villages. |
| SE-D1 Home Based Businesses | Deletion of criterion 1.b) in relation to extensions which should be assessed against the needs of the business. The policy is considered unsound and limited in scope. No consideration is given to converting existing buildings to live-work arrangements. |
| SE-D2 Safeguarding Existing Employment Land and Buildings | No comments of concern received. |
| SE-S4 AGRICULTURAL AND FORESTRY DEVELOPMENT | Deletion of criterion 1.c) [site related to the business], clause 2 [condition to require removal of buildings if they cease to be used for agriculture] and clause 3 [isolated buildings only] |

| Policy / Plan Reference | Main Issues Raised |
|-------------------------|--|
| | permitted in exceptional circumstances] of the policy, as they are considered to be contrary to the NPPF and GPDO. |

8. Achieving Enjoyment for All

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| RT-S1 RECREATION AND TOURISM | No issues of significance. |
| RT-D1 Serviced Accommodation | No comments of concern received. |
| RT-D2 Staff Accommodation | No issues of significance. |
| RT-D3 Safeguarding Serviced Accommodation | No issues of significance. |
| Second / holiday homes (para 8.37) | Concern that no opportunity to influence the use of existing open market homes as second/holiday homes has not been implemented when advised that an Article 4 direction could be used to ensure that no planning permissions would be granted for such homes. |
| RT-D4 Non-serviced Accommodation | No comments of concern received. |
| RT-D5 Tented Camp Sites | No comments of concern received. |
| RT-D6 Camping Barns | Plan does not enable the redevelopment of brownfield land in the open countryside. RT-D6 is too restricted and does not provide for lawful buildings in the open countryside (other than agricultural buildings) to be redeveloped to a new use as holiday accommodation. Meaning of 2.b) needs to be clarified as to its association with 2.a) and c). |
| RT-D7 Certificated Caravan and Touring Caravan Sites | No issues of significance. |
| RT-D8 Static Caravan Sites | No comments of concern received. |
| RT-D9 Alternative Camping Accommodation | No comments of concern received. |
| RT-D10 Recreational Development | No issues of significance. |
| RT-D11 Equestrian Development | No comments of concern received. |
| RT-D12 Access Land and Rights of Way | No issues of significance. |
| RT-D13 Safeguarding Land Along Former Railways and | <ul style="list-style-type: none"> Concern raised regarding the misuse of private and public funds better spent on improving accessibility in other ways and on other tourist initiatives. |

| Policy / Plan Reference | Main Issues Raised |
|---|---|
| RT-S2 REINSTATEMENT OF THE LYNTON AND BARNSTAPLE RAILWAY | <ul style="list-style-type: none"> • The impact this proposed attraction would have on the western gateway to the National Park. Would not enhance the access and enjoyment of area risks alienating more people that it could attract. • The trackbed of the former railway should be preserved as an historic asset. • The railway should not be reinstated as no longer required as a suitable transport link and has failed twice previously – there is nothing sustainable about the proposal. • The Lynton and Barnstaple Railway Trust (L&BRT) do not operate a railway or transport network, it is an unjustified, speculative, tourist attraction without the potential to become a viable or sustainable transport network. • A39 follows part of the former track bed and diversion of the track bed would require substantial building ground works and land reinforcement, also risks of cross winds, woodland and flooding exist along the aspirational extension. • Reinstatement would make land (including respondents) unfarmable, other impacts cited include disruptions to the peace and tranquillity of the area from the noise and smell of the trains, as well as the wildlife habitats of protected species, and crowded roads which struggle to support local traffic and make homes and the local community unfavourable. • Does not enhance the enjoyment of Exmoor nor complies with national policy. • The plan has not addressed landowners appropriately and underestimated geological constraints. • A change of use to recreation would fundamentally change the nature of Exmoor – community diluted by railway enthusiasts. • Requirement for owner cooperation or approval for purchase of original/existing buildings or the development of new buildings in association with reinstatement of the railway – distinction needed in relation to historic buildings and temporary buildings. • Concern about new dwellings for railway workers. • The policy would not allow a bridge to be constructed of modern safety standards. |

| Policy / Plan Reference | Main Issues Raised |
|-------------------------|---|
| | <ul style="list-style-type: none"> • Policy should not allow for the line to become a public right of way. • No suitable parking or highway access in Parracombe. • Concern about the impact on Grade I St Petrocks Church |

9. Achieving Accessibility for All

| Policy / Plan Reference | Main Issues Raised |
|---|---|
| AC-S1 SUSTAINABLE TRANSPORT | No comments of concern received. |
| AC-S2 TRANSPORT AND INFRASTRUCTURE | <p>Clause i) [upgrading of existing routes to accommodate high traffic speeds] may be unnecessary and j) [new roads and significant road widening not generally appropriate] may restrict improvements to A39 where schemes could be justified and necessary.</p> <p>Retaining or replacing like for like street furniture may be challenging in their current/future funding and maintenance policy context.</p> |
| AC-D1 Transport and Accessibility Requirements | No comments of concern received. |
| AC-D2 Traffic and Road Safety Considerations | No comments of concern received. |
| AC-S3 TRAFFIC MANAGEMENT AND PARKING | <p>Considered that 'local freight routes' may not be suitable for 'local access only' as A and B roads in the Park are important for local freight movements - suggest this is clarified to ensure local access is encouraged but not fully restricted to just local access.</p> <p>Suggest policy incorporates text in 9.24 relating to the principle of avoiding adverse impacts from parking on the highway.</p> |
| AC-D3 Parking Provision and Standards | Check policy compliance with national policy as the Written Ministerial Statement dated 25th March 2015 that "Local Planning Authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network". |
| AC-D4 Temporary Parking | No comments of concern received. |
| AC-S4 ELECTRICITY AND COMMUNICATIONS NETWORKS | Plan is not consistent with national policy in relation to policy AC-S4 as it contradicts National Policy Statement EN1 and NPPF para. 116 where major infrastructure may be |

| Policy / Plan Reference | Main Issues Raised |
|---|--|
| | granted in protected landscapes in exceptional circumstances. Requirements of AC-S4 must be considered alongside legal obligations to offer economic connections and operate an economic and efficient network. |
| AC-D5 Radio and Mobile Telecommunications Infrastructure | No issues of significance. |
| AC-D6 Fixed Line Transmission Infrastructure | Plan is not consistent with national policy in relation to policy AC-D6 as it contradicts National Policy Statements EN1 and EN5 where there is no general rule about when an overhead line should be considered unacceptable. Requirements must be considered alongside legal obligations to offer economic connections and operate an economic and efficient network. |
| AC-D7 Satellite Antennae | No comments of concern received. |

10. Exmoor's Settlements

| Policy / Plan Reference | Main Issues Raised |
|---|---|
| ES-S1 SUPPORTING LOCAL COMMUNITIES | No comments of concern received. |
| ES-D1 Cutcombe and Wheddon Cross Community Safeguarding Area | No comments of concern received. |
| ES-D2 Dulverton Community Safeguarding Area | No comments of concern received. |
| ES-S2 LYNTON AND LYNMOUTH NEIGHBOURHOOD PLAN | A precedence in favour of the Lynton and Lynmouth Neighbourhood Plan as set out in Policy ES-S2 should not usurp the strategic policies of the Exmoor Local Plan. |

11. Monitoring and Implementation Framework

5.7 Minor comment only, regarding the ecological quality of rivers and how they are measured.

12. Annex 1: The Conduct of Archaeological Work and Historic Building Recording

5.8 No comments of concern received.

13. Annex 2: Rural Land Based Worker Dwellings

5.9 No comments of concern received.

14. Annex 3: Important Open Space in Allerford and Luccombe

5.10 No comments of concern received.

15. Glossary

5.11 No comments directly received, but comments relating to other sections indirectly affect the Glossary terms or absence of certain terms that require definition (see Schedule of Proposed Changes).

6 Appendix 1: Your Future Exmoor early engagement

Examples of posters, leaflets, parish newsletters, press releases, other publicity

Your Future Exmoor (YFE) Leaflet (November 2009) – front page showing the YFE logo.



Centre pages:



Your Future Exmoor

Get Involved And Have Your Say!

We want to know how you would like to see your community evolve in the future and how we can work together to achieve this. A series of events are to be held in villages and towns across Exmoor.



This is a real opportunity for communities to contribute towards the new planning document for Exmoor National Park called 'Your Future Exmoor' and help decide important issues such as where new housing and business development should be provided over the next 15-20 years.

The events are intended to gather views on the matters and issues important to you. They will be tailored to individual parishes. You can also share your views by completing the questionnaire in the November edition of Park Life this can be found at:

www.exmoor-nationalpark.gov.uk/consultations



We have also been working with children at the First Schools and Primary Schools within the National Park. Details of their ideas and work will be displayed at the community events for everyone to see.

The outcome of each of these consultation events will be made available and will include comments and responses from those unable to attend. We will be sending copies of the feedback reports to parish councils and publishing them on the National Park Authority website. There will then be further opportunities for people to participate and comment on the new planning document as it develops through to the final published plan.

Following the community events, a number of group discussions in relation to specific issues will be held; which you can sign up to at the parish events so that we can ensure we have a wide cross-section of views.

If you have any queries regarding the community events or wish to attend one of the discussion groups, please let us know by phoning the Policy & Community Team on 01 398 323665, or email via: ldf@exmoor-nationalpark.gov.uk.

There will be an event for each of the parishes with towns and villages in the National Park. For some Exmoor villages an event will be held either for part of the afternoon and early evening or there may be two 'replica events' held in neighbouring parishes at different times of the day to enable people to attend in one of the parishes at a time convenient for them. Please see the timetable on the back for your nearest event.



Youth Consultation, Lynton

Rear page showing list of community events:

Provisional Community Consultation Dates

| Venue | 2010 | Time |
|------------------------------------|---------------------------|----------------|
| January | | |
| *Cutcombe - Moorland Hall | Monday 18 th | 3.00 - 7.00pm |
| Dulverton Town Hall | Thursday 21 st | 2.00 - 7.00pm |
| *Parracombe Village Hall | Monday 25 th | 3.00 - 7.00pm |
| Lynton - United Reform Church Hall | Thursday 28 th | 2.00 - 7.00pm |
| Brompton Regis Village Hall | Monday 1 st | 3.00 - 7.00pm |
| February | | |
| Porlock Village Hall | Monday 8 th | 2.00 - 7.00pm |
| Bridgetown Village Hall | Thursday 11 th | 12.00 - 4.00pm |
| *Winsford Village Hall | Thursday 11 th | 2.45 - 6.45pm |
| Wootton Courtenay Village Hall | Monday 22 nd | 3.00 - 7.00pm |
| Timberscombe Village Hall | Thursday 25 th | 12.00 - 4.00pm |
| Dunster Tithe Barn | Thursday 25 th | 3.00 - 7.00pm |
| March | | |
| Brendon Village Hall | Monday 1 st | 3.00 - 7.00pm |
| Monksilver - EMN Village Hall | Thursday 4 th | 3.00 - 7.00pm |
| Luccombe Village Hall | Thursday 11 th | 12.00 - 4.00pm |
| Allerford Community Hall | Thursday 11 th | 3.00 - 7.00pm |
| Withypool Village Hall | Thursday 18 th | 12.00 - 4.00pm |
| Exford Memorial Hall | Thursday 18 th | 3.00 - 7.00pm |
| Challacombe Methodist Hall | Thursday 25 th | 12.00 - 4.00pm |
| *Simonsbath - Exmoor Forest Inn | Thursday 25 th | 3.00 - 7.00pm |
| Luxborough Village Hall | Monday 29 th | 12.00 - 4.00pm |
| Roadwater Village Hall | Monday 29 th | 3.00 - 7.00pm |

NB Confirmed dates are marked with a * (as of 3/11/09).

Note that the Luxborough event was subsequently held on Tuesday 30th March at Luxborough Village Hall: 3.00pm to 7.00pm

YFE event poster for Parracombe:



The poster features a grid of images: a solid blue square, a church, a bus, a group of people on a hill, a wind turbine, a house, a house with a sunroom, a group of people in high-visibility vests, a solid blue square, and two views of a metal railing.

Your Future Exmoor

Get involved and have your say!

This is your chance to come to your event, tell us what you think and to influence planning in the National Park. This will help decide important issues such as where new housing and employment should be provided over the next 15-20 years.

Your event will be:

Monday
25 January 2010
3pm-7pm
Parracombe Village Hall
(for the parishes of Parracombe, Martinhoe, Trentishoe, Combe Martin and Kentisbury)

www.exmoor-nationalpark.gov.uk/ldf

Example of an issues and options board displayed at the YFE events:

i Current Access to Local Needs Affordable Housing



To move into a local needs affordable home a person currently needs to:

1. **Have a local connection** which means:
 - a. having lived in the parish or an adjoining parish continuously for 10 years in the last 20 years, or
 - b. needing to live close to another person for age or medical reasons who has lived in the parish (or adjoining parish) for 10 years continuously in the last 20 years, or
 - c. needing to live close to their place of work in the parish (or adjoining parish) - work of value to the National Park and communities.AND
2. **Be in housing need** (decided by the Housing Authority - North Devon or West Somerset Councils - and Housing Associations).AND
3. **Be unable to afford to rent or buy accommodation** in the area.



This approach helps to keep the owner-occupied homes affordable by reducing land values. If these criteria are weakened it is likely that more people will qualify to buy and the land value may increase (i.e. reducing future affordability and availability of sites).

QUESTIONS


(i) How long do you think people should need to have lived locally to occupy new affordable housing?

| | Agree  | Comment  |
|--------------------------|--|--|
| 5-9 years | | |
| As now, 10 or more years | | |
| At least 15 years | | |

(ii) What local area do you think people should have lived in to occupy new affordable housing in your parish?

| | Agree  | Comment  |
|---|---|---|
| Your parish only | | |
| As now, your parish and/or its adjoining parishes | | |
| The area of North Devon OR West Somerset within the National Park | | |
| Anywhere within the National Park | | |

(iii) Please give us your views on the types of workers who should qualify for affordable housing on Exmoor.



Photographs of the YFE events:



Brompton Regis



Dulverton

Letter inviting neighbouring local authorities, local police, and registered providers to attend YFE events.

Fit one full page to window



Exmoor National Park Authority
Exmoor House, Dulverton
Somerset TA22 9HL
Tel: (01398) 323665 Fax: (01398) 323150
www.exmoor-nationalpark.gov.uk
E-mail: ldf@exmoor-nationalpark.gov.uk

23 December 2009

Dear Sir/Madam,

**'YOUR FUTURE EXMOOR' COMMUNITY CONSULTATION EVENTS
EXMOOR NATIONAL PARK LOCAL DEVELOPMENT FRAMEWORK**

You are invited to attend a series of interactive community consultation events to be held throughout Exmoor National Park between January and March 2010.

The events will be a 'drop in' format and are designed to gather the local communities' views to inform the preparation of a Local Development Framework for the National Park. The Local Development Framework will be a collection of planning documents replacing the 2005 Local Plan, covering a wide range of topics including the natural and cultural environment, housing, employment, transport and climate change.

We would very much welcome your attendance as an opportunity for you to engage with Exmoor's communities and also to enable people to get information and ask questions of you directly. The reply slip includes the full list of dates – you are invited to come to all those you feel would be useful. We would be grateful if you can return the enclosed reply form to us by 11 January 2010, or simply email me the event(s) and times you are attending. Alternatively, please feel free to forward this invitation on to an appropriate colleague.

We hope to see you at one of our events. If you have any queries please do not hesitate to contact me on 01398 322 258.

Yours sincerely,

**POIE-YEE LI
ASSISTANT PLANNING POLICY OFFICER**



**Enhancing
Exmoor**
The quality that makes




Dear Resident

A series of events are being held in villages and towns across Exmoor. This is a real opportunity for you to contribute towards the new planning document called "Your Future Exmoor" which will help decide important issues such as where new housing and employment should be provided over the next 15-20 years.


Your nearest event will be on:

Thursday 28th January 2010
2pm-7pm
United Reform Church Hall, Lynton
 (for Lynton & Lynmouth Parish)

www.exmoor-nationalpark.gov.uk/ldf



An example of postcard reminders to local residents



Get Involved and Have Your Say!

We want to know how you would like to see your community evolve in the future and how we can work together to achieve this. This is your chance to have your say and to contribute towards the new planning document for Exmoor National Park called 'Your Future Exmoor' which will help decide important issues such as where new housing and employment should be provided over the next 15 – 20 years.

A series of drop in events are to be held in Lynton, Brendon and Parracombe. Your nearest events will be:

AT: Parracombe Village Hall (for Parracombe, Martinhoe, Trentishoe, Kentisbury and Combe Martin parishes)
WHEN: 3.00pm – 7.00pm
 Monday 25th January

AT: Lynton United Reform Church Hall (for Lynton and Lynmouth parish)
WHEN: 2.00pm – 7.00pm
 Thursday 28th January

AT: Brendon Village Hall (for Brendon & Countisbury and Oare parishes)
WHEN: 3.00pm – 7.00pm
 Monday 1st March

The events will be very informal with a chance to come along and give your views and ideas. Refreshments will be provided and there will be a children's corner with activities!


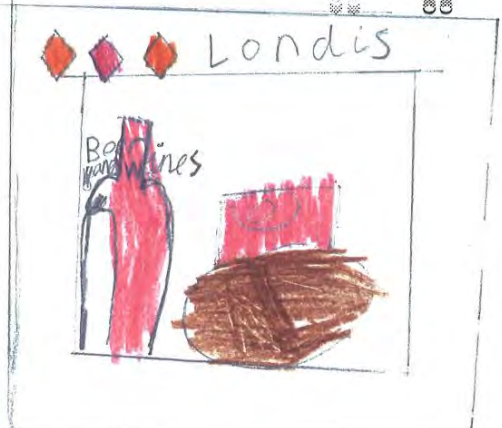

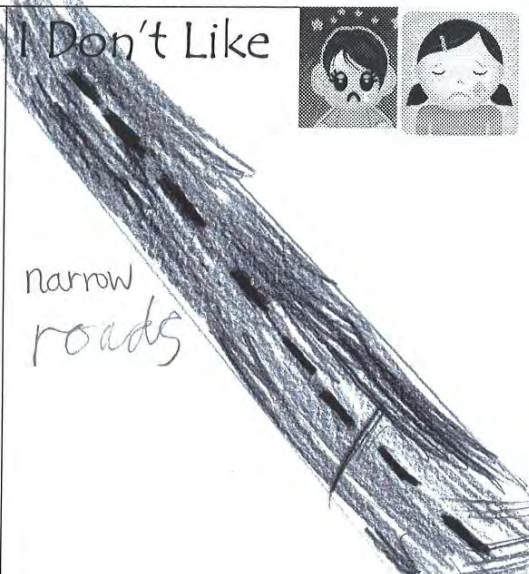



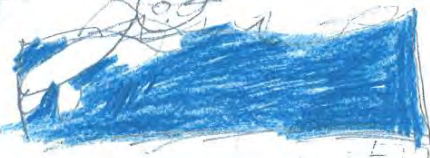
Details regarding further events can be found at:
www.exmoor-nationalpark.gov.uk/ldf

If you require any further information contact Tessa Saunders or Emily Rubin in the Policy & Community Team
 Tel: 01398 323665
 E-mail: ldf@exmoor-nationalpark.gov.uk

Article for the Lyn Valley News parish magazine

Youth Consultations

- Picture template for First Schools and Primary Schools

| | |
|--|---|
| <h2>I ATTEND CUTCOMBE FIRST SCHOOL</h2> | |
| My Name is <i>Chloe</i> | I Live in <i>Cutcombe</i> |
| <h2>IN CUTCOMBE/WHEDDON CROSS</h2> | |
| I Like   | I Don't Like   <i>narrow roads</i> |
| I would like to see <i>a round about</i>  <i>in</i> <i>play ground</i> <i>more water bins.</i>  | <i>No dog bowling</i> <i>in this area.</i>  <i>dog poo bins.</i> <i>more swimming pools</i>  |

Completed drawings – informed a feedback report sent to the school and published on the National Park website. The drawings were also displayed at locally held YFE events

Images of school workshops exploring their community:



Parracombe Primary School



St Dubricius First School - Porlock

7 Appendix 2: Draft Local Plan Publicity

- 7.1 The consultation on the Draft Exmoor National Park Local Plan was held between 4 November and 13 December 2013.
- 7.2 A leaflet was produced to encourage people to respond to the Draft Local Plan consultation. The leaflets were distributed to Local Information Points, libraries, National Park Centres, local schools, shops and businesses together with a poster publicising the consultation.



Exmoor National Park Draft Local Plan Consultation



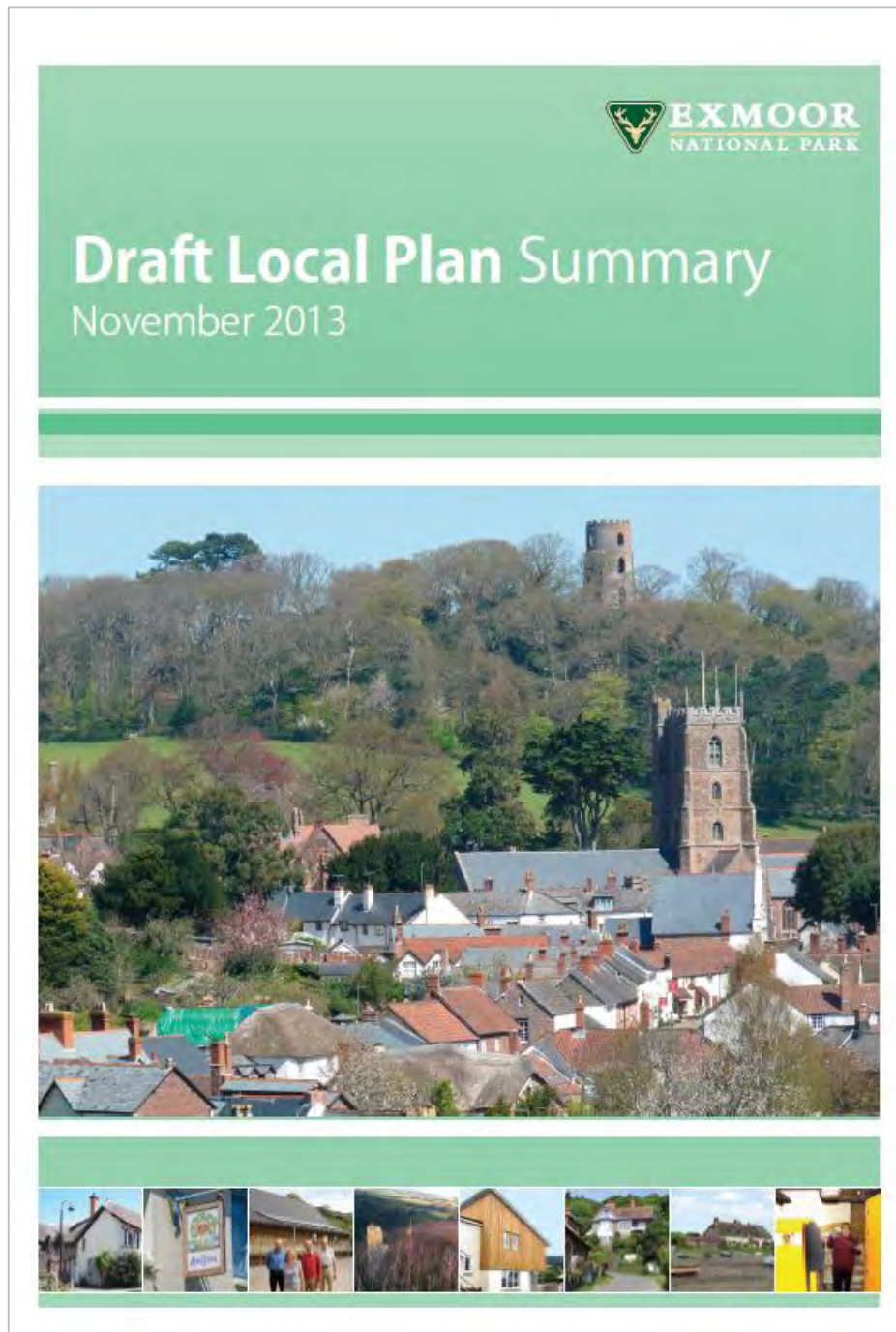
The Draft Local Plan for Exmoor is out for consultation from 4th November 2013 to 13th December 2013.

The Plan seeks to address the social and economic needs of Exmoor's communities whilst conserving and enhancing Exmoor's high quality environment. The Plan provides policies for development and use of the land, and indicates what kind of development will and will not be permitted in planning applications.

Highlighted are some of the issues which may affect you, as a resident, landowner, business or visitor to Exmoor. We welcome your thoughts and comments on the Plan.

Please note that the information contained in this leaflet is a summary and there are detailed criteria in each policy.

- 7.3 A 32 page A5 summary guide to the Local Plan policies was also distributed to Parish Councils together with full copies of the Local Plan and CDs with the full range of consultation documents including Sustainability Appraisal, Habitats Regulations Assessment and response forms.
- 7.4 Summary guides and posters were also:
- sent to Local Information Points, libraries and National Park Centres; and
 - made available at the parish meetings held at Roadwater, Lynton, Porlock, Winsford and the Parish & Consultative Forum at Dulverton.



Email sent to consultees

Tessa Saunders

From: Tessa Saunders
Sent: 04 November 2013 09:07
To: localplan
Subject: Draft Exmoor National Park Local Plan Consultation

Dear Consultee

Exmoor National Park Authority has prepared the Exmoor National Park Draft Local Plan following detailed evidence gathering, including extensive consultation with local communities and organisations. The Local Plan sets out policies that will be used to determine planning applications for future development within the National Park; helping to shape Exmoor over the long term. It includes policies to:

- help support businesses and communities;
- assist in providing local needs affordable housing;
- respond to the challenges of climate change;
- encourage access to the broadband and telecommunications network, and
- conserve and enhance Exmoor's environment.

Views on the Draft Exmoor National Park Local Plan are invited between **4 November and 13 December 2013**. The Plan can be downloaded from the Authority's website at www.exmoor-nationalpark.gov.uk or there are reference copies available at the following locations:

- Exmoor National Park Authority Offices at Exmoor House, Dulverton;
- North Devon District Council Offices, Civic Centre, Barnstaple; and
- West Somerset District Council Offices, West Somerset House, Killick Way, Williton.
- Dulverton, Dunster and Lynmouth National Park Centres
- Libraries at: Taunton, Minehead, Bampton, Dulverton, South Molton, Porlock, Lynton and Combe Martin

A response form is available to download from our website. Please send your comments to us in writing or by email by **Friday 13 December 2013**. If you have any further queries, please do not hesitate to contact us on 01398 323665 or email localplan@exmoor-nationalpark.gov.uk

Kind regards

Tessa Saunders
Planning Policy Officer

Exmoor National Park Authority
Exmoor House, Dulverton, Somerset, TA22 9HL
Tel: 01398 323665
Direct Line: 01398 322246
Fax: 01398 323150

Visit Our Website at <http://www.exmoor-nationalpark.gov.uk>

'Enhancing the qualities that make Exmoor special'

Letter to Parish Councils to invite councillors to a consultation meeting:



Exmoor National Park Authority
Exmoor House, Dulverton
Somerset TA22 9HL
Tel: (01398) 323665 Fax: (01398) 323150
www.exmoor-nationalpark.gov.uk
E-mail: info@exmoor-nationalpark.gov.uk

8 October 2013

Dear Parish Clerk

Draft Exmoor Local Plan Consultation

We warmly welcome you and your Councillors to discuss the Draft Exmoor Local Plan at any one of our forthcoming consultation meetings in November. This is your opportunity, before the Plan is implemented in practice, to have your say on policies which provide for development and use of the land and indicate what kind of development will be permitted in planning applications in Exmoor National Park.

The Draft Local Plan is an important Plan that will help shape Exmoor for the years to come and can affect you as a resident, landowner, business or visitor to Exmoor. The Plan provides policies on a wide range of issues including a continued focus on affordable housing, support for business and communities, responding to the challenges of climate change, encouraging access to broadband and telecommunications, and conserving and enhancing Exmoor.

A large amount of consultation, including the Your Future Exmoor events, has gone into shaping the policies, and policies have been reviewed and changed where considered appropriate. The consultation meetings will provide an opportunity to discuss how the policies will apply across all areas of Exmoor as well as those proposals that may affect individual Parish areas. The meetings will also look at new policies and changes to existing policies that have been made as a result of consultation, evidence or government policy. This will be important to you as a Parish Council when considering planning proposals in your Parish.

The Plan is out for consultation from 4 November to 13 December. Meetings with Parish Councillors will be held throughout November and the table below shows the location, dates and times of these meetings. We have tried to avoid local Parish Meetings as much as possible but appreciate that there may be some clashes, which is why we have arranged a series of meetings.

| Location | Date | Time |
|--|-----------------------|-------------------------|
| Roadwater Village Hall | Monday 11 November | 6.30pm for 7pm – 8.30pm |
| Lynton and Lynmouth Town Hall (Main Hall) | Wednesday 13 November | 6.30pm for 7pm – 8.30pm |
| Porlock Village Hall (Small Hall) | Monday 18 November | 6.30pm for 7pm – 8.30pm |
| Parish and Consultative Forum Exmoor House, Dulverton | Thursday 21 November | 10.30am – 1pm |
| Winsford Village Hall | Tuesday 26 November | 6.30pm for 7pm – 8.30pm |



All Parish Councillors and Clerks are very welcome to attend one or more of the events. To help with an estimate of how many people are coming to each event, it would be helpful if you could indicate numbers for each of the events below, and respond to us by email, phone or post. However, if you still wish to attend an event and have not contacted us, you would still be very welcome.

Copies of the Draft Local Plan will be available from your Parish Council from 4 November, and will also be displayed at Local Information Points, National Park Centres and libraries. Each Parish Councillor will receive a Summary and Leaflet about the Draft Local Plan.

If you have any further queries please do not hesitate to contact us.

Yours sincerely

Richard Edgell

David Wyborn

Chair of Planning Committee

Head of Planning and Sustainable Development

Parish/Town Council

Please indicate numbers wishing to attend each event:

| | | | |
|-----------------------------|--------------------------|---------------------|--------------------------|
| Roadwater Village Hall | <input type="checkbox"/> | Lynton and Lynmouth | <input type="checkbox"/> |
| Porlock | <input type="checkbox"/> | Winsford | <input type="checkbox"/> |
| Parish & Consultative Forum | <input type="checkbox"/> | | |

Please return to Ellie Woodcock by Monday 4 November:

Email: ewoodcock@exmoor-nationalpark.gov.uk

Telephone: 01398 322231

Address: Exmoor National Park Authority, Exmoor House, Dulverton, TA22 9HL



7.5 List of deposit points for the Exmoor National Park Draft Local Plan (November 2013):

- Exmoor National Park Authority reception, Exmoor House, Dulverton
- North Devon Council reception, Civic Centre, Barnstaple
- West Somerset Council reception, West Somerset House, Williton
- National Park Centres:
 - Dulverton
 - Lynmouth
 - Dunster
- Local libraries within and around the National Park at:
 - Williton
 - Bampton
 - South Molton
 - Porlock
 - Dulverton
 - Taunton
 - Minehead
 - Lynton
 - Combe Martin

- A Draft Local Plan was also sent to each Parish Council within/partly within the National Park and one parish adjoining.

7.6 The following list sets out those individuals and organisations notified of the consultation:

CONSULTEES

All Parish Councils, Parish Meetings and Town Councils within the National Park

All First Schools, Primary Schools within and adjoining the National Park and Dulverton Middle School

INDIVIDUALS

Mr C.R. Adams

Mr David Aldrich

Maj. Gen. Edwin Beckett

Mr Chris Binnie

Mr Derek Bishop

Mr Peter Brook

Mr J.N. Brownell

Mr A. Bullen

Mr P. J. Carter

Prof. Chapman

Mrs P. Clarke

Mr & Mrs D. Cook

Mr R. N. B. Clegg

Mr Cresswell

Mr Guy Dewdney

Mr A.J. Dodd

Mrs J. Down

Dr M. R. Eames

Ms J Forshaw

Mr Philip Gannon

Mr Kevin Green

Mr P. Griffin

Mr Nick Harvey MP

Mr M.D. Heggadon
Mrs R. A. Hernandez
Mrs A. Hill
Mr L. Hooper
Mr Jackson
Mr Bryan Jackson
Mrs Jill Jones
Mr Jon Kemp
Mr R. Langrish
Mr D. Latham
Miss R. A. Le Bas
Mr T. J. Loveless
Mr Ray Lupini
Mrs A. McIntosh
Mr Alan Morgan
Ms Christine Moore
Mr Mark Murray
Mr & Mrs A. Piper
Mr Ian Piper
T A Preston
Dr J. Prideaux
Mr P. Reilly
Leslie Riley
Mr J. Roberts
Mr K. Ross
Mr O. Rush
Mr M. Ryall
Ms Snowden
Mr David Sydenham
Mr M D Thackwray
Mr E. Townsend
Mr & Mrs D. Vellacott
Mr Russell Vowles
Mr Peter Warren
Mr & Mrs A. Webb
Mrs C.M. Williams

ORGANISATIONS

Acorn Rural Property Consultants
Age Concern Devon
Age Concern Somerset
All Wheel Drive Club
Arc Addington Fund
Atkins

Badgworthy Land Company
Barton Willmore
Beard Construction
Bovis Homes Ltd
Bristol North Somerset South
Gloucestershire Clinical Commissioning
Group
British Geological Survey
British Horse Society
British Toilet Association
Bruton Knowles
Bath & Wills Diocesan Board
(represented by Cluttons LLP)
British Telecom (represented by
Telereal Trillium)
Calvert Trust
Canoe England
Caractacus Housing
Caravan Club
Centre for Ecology and Hydrology
Chanin & Thomas
Chris Veale Architectural Services
Climate Action West
Colin Buchanan & Partners Ltd
Colson Stone Practice
Community Council for Somerset
Compass Disability Services
Confederation of Forest Industries
Council for National Parks
Country Land and Business Association
CPRE Devon
CPRE Somerset
CSJ Planning Consultants Ltd
Dartmoor National Park Authority
David Kerr Associates
David Wilson Partnership
Design Council CABE
Devon & Cornwall Police
Devon Community Council
Devon & Cornwall Housing Association
Devon County Council (Strategic
Planning, Transport, Minerals & Waste,
Education)
Devon Sustainable Building Initiative

Devon Wildlife Trust
Devonshire Homes Ltd
Doverhay Developments Ltd
DPDS Consulting Group
DPP LLP
Dulverton & District Civic Society
Dulverton & District Young People's
Project
Dulverton Fellowship for Mental
Health
Eco-Exmoor
Ecos
Engage West Somerset
English Heritage
English Rural Housing Association
Environment Agency
Exmoor Hill Farming Project
Exmoor Hill Farmers
Exmoor Livestock Auctions
Exmoor Local Access Forum
Exmoor Natural History Society
Exmoor Rivers and Streams Strategic
Overview Group
Exmoor Tourism Association
Exmoor Trust
Exmoor Uprising
Exmoor Youth Association
Faithnet South West
Falcon Rural Housing Association
Field Studies Council
Farming & Wildlife Advisory Group
Forestry Commission
Forum 21
Fox & Sons
Friends of the Earth
Friends, Families and Travellers
Fulfords Land and Planning
Fusion Online Ltd
Greater Exmoor Shoots Association
Greenslade Taylor Hunt
GVA Grimley LLP
Hastoe Housing Ltd

Heart of the South West Local
Enterprise Partnership
Help the Aged
Henry Adams LLP
Highways Agency
Home Builders Federation Ltd
Homes & Communities Agency
Hosegood Ford Estate Agents
Humberstones
Knightstone Housing Association
Lake District National Park Authority
Landsense Professional Ltd
LDA Design Consulting LLP
Lee Abbey Christian Movement
Leith Planning
LEVVEL
Lyn Community and Development
Trust
Lyn Valley Society
Lynton & Barnstaple Railway Trust
Lynton & Lynmouth Association of
Commerce and Tourism (LACT)
Lynton Tourism Information Centre
Magna Housing Group (MWS)
Marine Management Organisation
Martineau
Mid Devon Council (Economy and
Planning)
Midas Homes
Minehead Chamber of Commerce
Mineral Products Association
Mobile Operators Association
Nancekivell & Co
National Farmers Union (South West)
National Grid (represented by AMEC)
National Parks England
National Planning Casework Unit
(DCLG)
Natural England
Network Rail
New Economics Foundation
New Forest National Park Authority
Nicholas Pearson Associates

North Devon AONB
 North Devon Archaeological Society
 North Devon Council (Chief Executive,
 Economic Regeneration, Recreation
 Team, Planning Policy, and Housing)
 North Devon Homes
 North Devon Plus
 North Devon Voluntary Services
 Exmoor, North Devon and West
 Somerset Rural Housing Project
 North York Moors National Park
 Authority
 Northern Devon Clinical
 Commissioning Group
 Northumberland National Park
 Authority
 Peacock & Smith
 Peak District National Park Authority
 Peninsula Enterprise
 Porlock Allotment Association
 Scottish Executive (Housing Supply &
 Management Team)
 Quantock Hills AONB
 RAC Foundation
 Ramblers Association (North Devon)
 Ramblers Association (Devon)
 Ramblers Association (West Somerset)
 Reed Holland Associates Ltd
 Regen South West
 Renscombe Properties
 River Taw Fisheries Association
 Road Haulage Association Ltd
 Ross Campbell
 Royal Mail Property Ltd
 Royal Society for the Protection of
 Birds (South West Office)
 Savills
 Seddons Estate Agents
 Singer Instruments Ltd
 Somerset Chamber of Commerce
 Somerset County Council (Minerals &
 Waste, Strategic Planning, Transport,
 Economic Development, Schools)
 Somerset Playing Fields Association
 Somerset Racial Equality Commission
 Somerset Rural Youth Project
 Somerset Tourism Association
 Somerset Tourism Partnership
 Somerset Wildlife Trust
 South Downs National Park Authority
 South West Lakes Trust
 South West Protected Landscapes
 Forum
 South West Rivers Association
 South West Tourism Ltd
 South West Water
 South West Wood Fuels
 Sport England South West
 Stags Estate Agents
 Stewart Ross Associates
 Swan Paul Partnership Ltd
 South West Housing Associations and
 Registered Providers (represented by
 Tetlow-King Planning)
 The Broads Authority
 The Church Commissioners
 The Coal Authority
 The Crown Estate (represented by
 Smiths Gore)
 Theed Forestry Estates
 The Exmoor Society
 The National Trust
 Timberscombe and Cutcombe First
 Schools
 Trans-Send Ltd
 Traveller Law Reform Project
 Visit Devon
 West Somerset Archaeological & Local
 History Society
 Wales & West Utilities
 Webbers Fine & Country (Dulverton &
 Minehead offices)
 Wessex Water
 West Somerset & Exmoor Bridleways
 Association
 West Somerset Business Network

West Somerset College
West Somerset Council (Planning
Policy, Economic Development,
Housing, Regeneration and
Development, Environmental
Protection)
West Somerset Disability Association
Western Power Distribution
Western Somerset Local Action Group
White Young Green Planning
Woodland Trust
Woodward Smith Architects
Yorkshire Dales National Park
Authority
Youth Hostel Association

8 Appendix 2: Publication Draft Local Plan Consultation – Publicity

8.1 Excerpt from the Dulverton & Brushford News – June 2015

EXMOOR NATIONAL PARK LOCAL PLAN CONSULTATION


The Draft Local Plan for Exmoor is reaching the final stages of its preparation, and will be out for consultation in mid-June to the end of July 2015. This will be your opportunity to comment before the Plan goes before a Planning Inspector for examination. The Plan indicates what kind of development will and will not be permitted in planning applications. It may affect you through:

- ✦ Policies to support the provision of local needs affordable housing. There is also provision for specialist housing for older people and for those who require care.
- ✦ Encouragement of entrepreneurship and policies to support businesses and home working, continued support for farm diversification.
- ✦ Policies to safeguard community services and improve accessibility.
- ✦ Helping communities to adapt to climate change.
- ✦ Improving access to broadband and telecommunications.
- ✦ Policies to protect the National Park's landscape and heritage, international dark sky reserve status, biodiversity and wildlife.
- ✦ Policies that support recreation and tourism developments which are compatible with the quiet enjoyment of Exmoor's special qualities.
- ✦ Encouraging high quality design, focusing development in existing settlements, and protecting the open countryside.

For more information and to make comments, visit one of the places below:

- ✦ Exmoor National Park Authority offices (Dulverton), West Somerset District Council offices (Williton) or North Devon District Council offices (Barnstaple)
- ✦ National Park Centres, Local Information Points and local libraries
- ✦ Exmoor National Park web site
www.exmoor-nationalpark.gov.uk
- ✦ Telephone 01398 323665
or email: localplan@exmoor-nationalpark.gov.uk

Elaine Woodcock



**"CAKE BREAK"
A BIG THANK YOU**

I hosted an M. S. Fundraising Cake Break Event on the 15th May in the communal lounge in Harover Court. There were a variety of cakes and biscuits on sale that had been home baked, together with teas and coffees supplied by the staff.


There was fun with a Quiz, "Guess my favourite Cake" and a Raffle.

Thank you, also to the Tantivy, Copper Kettle, Co-op, Mark Thompson, Pharmacist, and Emily who all provided Raffle prizes.

This was very well supported and raised £300 which will go to Multiple Sclerosis Headquarters for Research into this dreadful disease and for support at the local M.S. Branch in Tiverton.

Linda Hammond

Easter Experience



News from the Exmoor Youth Project

In a similar style to that of the Christmas Experience, we visited Dulverton, Minehead and Porlock to share the story of Easter with around 500 students over the 3 days. It was a fantastic opportunity to spend time with the schools and share with them the 'Passover meal' and a small communion (which they all really engaged with), we learnt about what happened on Palm Sunday, questioned how Jesus might have felt in the Garden of Gethsemane, and wrote our own thank you prayers after looking at what Jesus did for us on the cross. We also did some craft activities, and had a 'stations of the cross' egg hunt! All in all it was a brilliant event over 3 days!

Youth Camp

The planning for 2015's youth camp is well under way, following a JUNGLE theme, and looking at the 'fruits of the spirit' (Galatians 5:22)

We will again be staying at Northcombe Camping Barns (Near Dulverton) as it is such a fantastic location!

For ages 8-17 with the ages being split this year:

Youth Camp, ages 12-17 will take place from Friday 14th August at 2pm until Monday 17th August at 12pm, followed by a younger Youth Camp, ages 8-12, from 17th August at 12pm until Wednesday 19th August at 3pm.

For more information on any of our work and events please visit our website:
www.exmooryouthproject.com
or contact Jess James on 07772 862329


From the EYC Newsletter - Christmas 2014- Easter 2015

See also advertisements on page 12 (Children's Festival) and Page 13 (Impetus - Youth Worship Evening)

Dulverton Group Exmoor Society

Said to be the finest example of a small medieval manor in England, Cothay Manor dates back to the 14th century. The manor has been lovingly restored with period furniture and fabrics by the current owners. This is an opportunity to have a guided tour of this private house. The tour is on Wednesday 24th June and costs £13.50 p.p. Booking is essential for the tour and for the ploughman's lunch, if required, at £6.75. Please contact Linda Hammond 01398 323954 or email linda_hammond@btconnect.com. A Community Bus is available for up to 16 people.

David Currie




Dulverton Players

Our next planned production (early Sept) is a black comedy "Dinner" by Moira Buffini.

Olga Owen

- 8.2 Poster sent to: deposit points, local libraries, Local Information Points, local businesses and Parish/Town Councils for public display.

**EXMOOR**
NATIONAL PARK

Local Plan for Exmoor

Publication Draft

And

Draft Statement of Community Involvement

Consultation: 15th June - 31st July 2015



Get
Involved
and Have
Your Say!

The Local Plan includes policies for the development and use of land and indicates what kind of development will be permitted.

Copies of the Publication Draft Local Plan are available here:


- Online: www.exmoor-nationalpark.gov.uk
- Exmoor National Park Authority Reception, Exmoor House, Dulverton
- West Somerset Council Reception, West Somerset House, Williton
- North Devon Council Reception, Lynton House, Barnstaple
- National Park Centres at Dulverton, Dunster and Lynmouth
- Local libraries

Copies of a Summary Booklet are available at:

- Local Information Points
- A number of local shops/businesses

For further information please contact the Policy & Community Team:
Call: 01398 323665. Email: localplan@exmoor-nationalpark.gov.uk

- 8.3 Online news article for the Western Morning News was published on 10 June 2015: <http://www.westernmorningnews.co.uk/Local-Plan-Exmoor/story-26673073-detail/story.html>
- 8.4 Article published in the West Somerset Free Press: [http://www.west-somerset-today.co.uk/article.cfm?id=42&headline=Exmoor Plan: Park listened to local opinion§ionIs=news&searchyear=2015](http://www.west-somerset-today.co.uk/article.cfm?id=42&headline=Exmoor+Plan:+Park+listened+to+local+opinion§ionIs=news&searchyear=2015)
- 8.5 Article published in the North Devon Journal: <http://www.northdevonjournal.co.uk/Residents-final-say-Exmoor-Local-Plan/story-26685471-detail/story.html>
- 8.6 Email notification sent to consultees (see Appendix 3):



Fri 12/06/2015 15:46

localplan

Exmoor National Park Publication Draft Local Plan and Statement of Community Involvement - consultation

To localplan

Dear Consultee

Consultation on the Exmoor National Park Publication Draft Local Plan and Statement of Community Involvement

Exmoor National Park Authority would like to invite representations on the Exmoor National Park Publication Draft Local Plan. This includes policies which will guide development and the use of land in Exmoor until 2031 and indicates what kind of development will be permitted in planning applications. The Authority is also consulting on an updated Statement of Community Involvement. This sets out how the Authority intends to consult and engage the public and other stakeholders on future planning policy documents, and planning applications.

The consultation runs from **15 June to 31st July 2015**.

The **Local Plan and Statement of Community Involvement** can be downloaded from the Authority's website at www.exmoor-nationalpark.gov.uk from **Monday 15th June** along with the sustainability appraisal, consultation statement and other supporting documentation. Reference copies are also available to view during normal office hours at the following locations:

- Exmoor National Park Authority Offices at Exmoor House, Dulverton;
- North Devon District Council Offices, reception at Lynton House, Barnstaple; and
- West Somerset District Council Offices, West Somerset House, Killick Way, Williton.
- Copies will also be displayed at National Park Centres in Dulverton, Dunster and Lynmouth.

Information on the consultation is also available at Exmoor National Park Local Information Points and local libraries.

A response form is available to download from our website. Please send your comments to us in writing or by email using the contact details above, **by 4pm on Friday 31st July 2015**.

If you wish to be notified of the submission of the Local Plan for examination; the publication of the recommendations from the examination; and/or the adoption of the Local Plan, please indicate in the appropriate box on the accompanying response form.

If you have any further queries, please do not hesitate to contact us on 01398 323665 or email localplan@exmoor-nationalpark.gov.uk.

Yours sincerely

Ruth McArthur Clare Reid

Ruth McArthur & Clare Reid
Planning & Community Managers

8.7 The following individuals and organisations were notified of the Regulation 19 consultation on the Publication Draft Local Plan:

CONSULTEES

All Parish Councils, Parish Meetings
and Town Councils within the National
Park

INDIVIDUALS

Mr C R Adams
Mr John Airs
Cdr. D Aldrich
William Allen
Jacquie Andrews
Patrick Armstrong
Mr Robin Ashburner
Mr Robert Barnard
Mr Brod Bass
Edwin Beckett
Mr C J A Binnie
Dr D C Bishop
Mr David Bloomfield
Mr Peter Bowes
Mr Robert Bradbury
Mr James Brigden
Mr David Britnell
Mr J N Brownell
Mr A. Bullen
Mr Samuel Burgess
Sir Andrew Burns
David Cameron
Mrs P. Clarke
Mr Richard Collis
Mr Geff Cowan
Mrs Heather Cross
Mr Robert Cross
Richard Croucher
Mr Walter Crowe
Mr Paul Curson
Mr Martyn de Young
Mr Guy Dewdney
Mr A J Dodd
J. Edgington
Mr John Edmonds

Nick Evetts
Peter Ford
Mr Robert Friendship
Mr David Garbett-Edwards
Bill Graham
Mr Kevin Green
Mr Richard Greenwell
Mr P. Griffin
Mr Paul Haresnape
Mr Maurice Hartnell
Mr N Harvey MP
Richard Heacock
Mr Andrew Hearn
Mrs R A Hernandez
Mr John Heys
Mrs A Hill
Mr Anthony Hocking
Mr L Hooper
Mr David Horsfall
Mr B Jackson
Mr Peter Jones
M. & J. Jones
Mrs Jill Jones
Mr Andrew Jones
Mr Jon Kemp
Mr Martin Kerr
Mr D. Latham
Miss R A Le Bas
Mr Neil Legg
Graham Lelliot
Mr Tim Lewis
Mr T J Loveless
Robin Lucas
Mr Ian MacCormac
Mr Barry Marshall
Mr David Martin
Roger Martin
Mr Adrian Maunders
Mr Peter Miles

Christine Moore
Mr A Morgan
Alan Morgan
Mr Mark Murray
Mr Patrick Murrell
Mr Tony Nicholson
Mr Bruce Nottrodt
Mr Robert Palmer
Mr Julian Palmer
Mr Michael Pearce
Mr & Mrs I Piper
Mr Derrick Plyer
Richard Pocock
Dr J Prideaux
Mr Richard Pyatt
Mr Steve Randall
Mrs Margaret Rawle
Mr John Read
Mr P. Reilly
Mr J Roberts
Mr K Ross
Mr Tim Roy
Mr O. Rush
Mr M Ryall
Mr William Selwyn
Diane Simpson
Suzie Sinden
Mr Francis Smith
Mr Peter Snashall
Mr Martin Steel
Mr Charles Summers
Mr Martin Swainson
Mr Anthony Tony
Mr David Tooke
Matt Towell
Mr E. Townsend
Mr Paul Trevena
Mr & Mrs D. Vellacott
Mr Keith Vingoe
Mr Russell Vowles
Mr P Warren
Mr Peter Warren
Mr Alan Watkins

Mr Reginald Weaver
Mr & Mrs A. Webb
Mr John West
Mr Martin White
Mr Roger White
Mr Jon Wilkes
Mike Willes
Mrs C M Williams
Mr James Wilmoth
Revd Timothy Woods
ORGANISATIONS
Acorn Developments
Acorn Rural Property Consultants
Acorn Rural Property Consultants
Age UK Devon
Age UK Somerset
Alasdair Roberston Architecture
All Wheel Drive Club
Arc - Addington Fund
Atkins
Badgworthy Land Company
Barton Willmore
Beard Construction
Bovis Homes Ltd
British Geological Survey
British Horse Society
British Toilet Association
Bruton Knowles
Bath & Wells Diocesan Board
British Telecom c/o Telereal Trillium
Business Exmoor
Calvert Trust
Canoe England
Caractacus Housing
Caravan Club
Catholic Church - Clifton Diocese
Centre for Ecology & Hydrology
Chanin and Thomas
Chris Veale Architectural Services
Climate Action West
Colson Stone Practice
Community Council for Somerset
Community Council of Devon

Compass Disability Services
 Confederation of Forest Industries
 Council for National Parks
 Country Land & Business Association
 Countryside Mobility South West
 CPRE North Devon
 CPRE Somerset
 CSJ Planning Consultants Ltd
 David Kerr Associates
 David Wilson Partnership
 Design Council CABE
 Devon & Cornwall Police
 Devon and Cornwall Housing
 Association
 Devon County Council
 Devon Local Nature Partnership
 Devon Tourism Partnership
 Devon Wildlife Trust
 Devonshire Homes Ltd
 Diocese of Exeter - the Church of
 England Devon
 Doverhay Developments Ltd
 DPDS Consulting Group
 Dulverton & District Civic Society
 Dulverton & District Young People's
 Project
 Dulverton Fellowship for Mental
 Health
 Eco Exmoor
 Engage West Somerset
 English Rural Housing Association
 Environment Agency
 Exmoor Farmer's Livestock Auctions
 Ltd
 Exmoor Hill Farm Project
 Exmoor Hill Farmers
 Exmoor Local Access Forum
 Exmoor Natural History Society
 Exmoor River and Streams Group / Lyn
 Riparian Owners' Association
 Exmoor Tourism
 Exmoor Trust
 Exmoor Uprising Group
 Devon Faith & Belief Forum
 Fair Play South West
 Falcon Rural Housing Ltd
 Farming & Wildlife Advisory Group
 South West
 Field Studies Council
 Forestry Commission
 Forum 21
 Fox and Sons
 Friends of the Earth
 Friends, Families & Travellers
 Fulfords Land & Planning
 Fusion Online Ltd
 Greater Exmoor Shoots Association
 Greenslade Taylor Hunt
 GVA Grimley LLP
 Hastoe Housing Ltd
 Heart of the South West Local
 Enterprise Partnership
 Help The Aged
 Henry Adams LLP
 Henry Adams Planning Ltd
 Highways Agency
 Historic England
 Home Builders Federation Ltd
 Homes & Communities Agency
 Homes and Communities Agency
 (South West Region)
 Hosegood Ford
 Humberstones
 Humberts
 Knightstone Housing Association
 Landsense Professional Ltd
 LDA Design Consulting LLP
 Lee Abbey Christian Community
 Leith Planning
 LEVVEL
 Lyn Community Development Trust
 Lyn Valley Society
 Lynton & Barnstaple Railway Trust
 Lynton & Lynmouth Association of
 Commerce & Tourism
 Magna Housing Group MWS

Marine Management Organisation
 Mid Devon District Council
 Mid Devon District Council
 Minehead Chamber of Commerce
 Mineral Products Association
 Mobile Operators Association
 Nancekivell & Co
 National Farmers Union - South West Region
 National Grid
 National Parks England
 Natural England
 Network Rail
 New Economics Foundation (NEF)
 NHS Commissioning Group
 NHS England: Bristol, North Somerset, Somerset and South Gloucestershire Area Team
 North Devon AONB
 North Devon Council
 North Devon Homes
 North Devon Plus
 North Devon Voluntary Services
 Northern, Eastern and Western Devon Clinical Commissioning Group
 Office of Rail and Road
 PCL Planning Ltd
 Peacock and Smith
 Peninsula Enterprise
 Plymouth & Devon Racial Equality Council
 Porlock Allotment Association
 Porlock Manor Estate
 Private Sector and Affordable Housing
 Quantock Hills AONB
 RAC Foundation
 Ramblers (West Somerset)
 Ramblers Association (Devon)
 Ramblers Association (North Devon Group)
 Reed-Holland Associates Ltd
 Regen South West
 Renscombe Properties Ltd
 River Taw Fisheries Association
 Road Haulage Association
 Ross Campbell
 Royal Mail Group Property
 RSPB
 Sainsbury's Supermarkets Ltd
 Savills
 Seddons Estate Agents
 Shearwell Data Ltd
 Singer Instruments Co Ltd
 Savills incorporating Smiths Gore
 Exmoor Rivers & Streams Strategic Overview Group
 Somerset Chamber of Commerce and Industry Ltd
 Somerset County Council
 Somerset Faith & Belief Forum
 Somerset Local Nature Partnership
 Somerset Playing Fields Association
 Somerset Rural Youth Project
 Somerset Tourism Association
 Somerset Tourism Partnership
 Somerset Wildlife Trust
 South Downs National Park Authority
 South West Lakes Trust
 River Exe & Tributaries Association
 South West Water
 South West Wood Fuels
 Sport England (South West)
 SSA Planning Limited
 Stags
 Stewart Ross Associates
 Summerfields
 SW HARP Planning Consortium
 Swan Paul Partnership Ltd
 South West Aggregates Working Party
 South West Housing Associations and Registered Providers (represented by Tetlow King)
 Taunton Deane Borough Council
 The Church Commissioners
 The Coal Authority
 The Crown Estate

The Exmoor Society
The National Trust
Theed Forestry Estates
Timberscombe & Cutcombe First
Schools
Torrige District Council
Traveller Law Reform Project
W.S. Archaeological & Local History
Society
Wales & West Utilities Ltd
Webbers
Wessex Water
West Somerset & Exmoor Bridleway
Association
West Somerset Business Network
West Somerset College
West Somerset Council
West Somerset Methodist Circuit
Western Power Distribution
Western Somerset Local Action Group
Woodland Trust
Woodward Smith Architects
Youth Hostel Association
West Group Young Farmers Club
West Somerset Clinical Commissioning
Group

**DISTRICT & COUNTY COUNCILLORS
REPRESENTING WARDS IN THE
NATIONAL PARK (NOT MEMBERS OF
THE AUTHORITY)**

Jean Parbrook (Minehead South)
Thomas Hall (Minehead South)
David Archer (Minehead North)
Terry Venner (Minehead North)
(Minehead)
Adrian Behan (Alcombe)
Roger Thomas (Alcombe)
Rollo Clifford (Porlock and District)
Karen Mills (Porlock and District)
Bryan Leaker (Dunster and
Timberscombe)
Richard Lillis (Old Cleeve)

Brenda Maitland-Walker (Carhampton
and Withycombe)
Nicholas Thwaites (Dulverton and
District)
Anthony Trollope-Bellew (Crowcombe
and Stogumber)
Keith Turner (Brendon Hills)
Frederick (Joe) Tucker (Marwood)
Yvette Gubb (Combe Martin)
John Lovering (Combe Martin)
Malcolm Prowse (Bratton Fleming)
Jeremy Yabsley (South Molton Rural)

DUTY TO CO-OPERATE STATEMENT

**EXMOOR NATIONAL PARK LOCAL PLAN 2011 –
2031**

For Submission - April 2016

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Introduction

1. This Statement of Compliance with the Duty to Co-operate covers the Submission of the Exmoor National Park Local Plan 2011-2031 (“the Local Plan”). It sets out how Exmoor National Park Authority (ENPA) is responding to the legal duty to co-operate in preparing the Local Plan. It details how ENPA has worked collaboratively with other councils, public bodies and other organisations to identify the spatial strategy for the Local Plan and develop strategic policies.
2. The Duty to Co-operate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by Section 110 of the Localism Act 2011). It is also included within the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), specifically in terms of planning strategically across local boundaries. The duty:
 - relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
 - requires that councils set out planning policies to address such issues;
 - requires that councils and public bodies ‘engage constructively, actively and on an on-going basis’ to develop strategic policies; and
 - requires councils to consider joint approaches to plan making.
3. The NPPF provides that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their local plan is submitted for examination. The NPPF states that cooperation should be a continuous process of engagement from initial thinking through to implementation. Further guidance is given in national Planning Policy Guidance.

Background

4. Exmoor National Park was designated as a National Park in 1954 and is situated within the counties of Somerset and Devon. Planning within National Parks is unusual, in that the National Park Authorities are responsible for planning policy and development management, but other functions are carried out by the District and County Councils such as housing, economic development, transport and education. Co-operative working is therefore particularly important within the National Park given the responsibilities of these different organisations, and reflecting the national status of the National Park which is given great weight in national planning policy and has *‘the highest status of protection in relation to landscape and scenic beauty’*¹.

¹ National Planning Policy Framework paragraph 115

5. The total area of the National Park is 693 square kilometres (267 square miles) of which approximately two thirds lies within West Somerset District and one third within North Devon District. It has a population of around 10,000 people, with most people living in small dispersed settlements. For the purposes of strategic planning for housing, Exmoor lies within the Northern Peninsula Housing Market Area (see Figure 1).

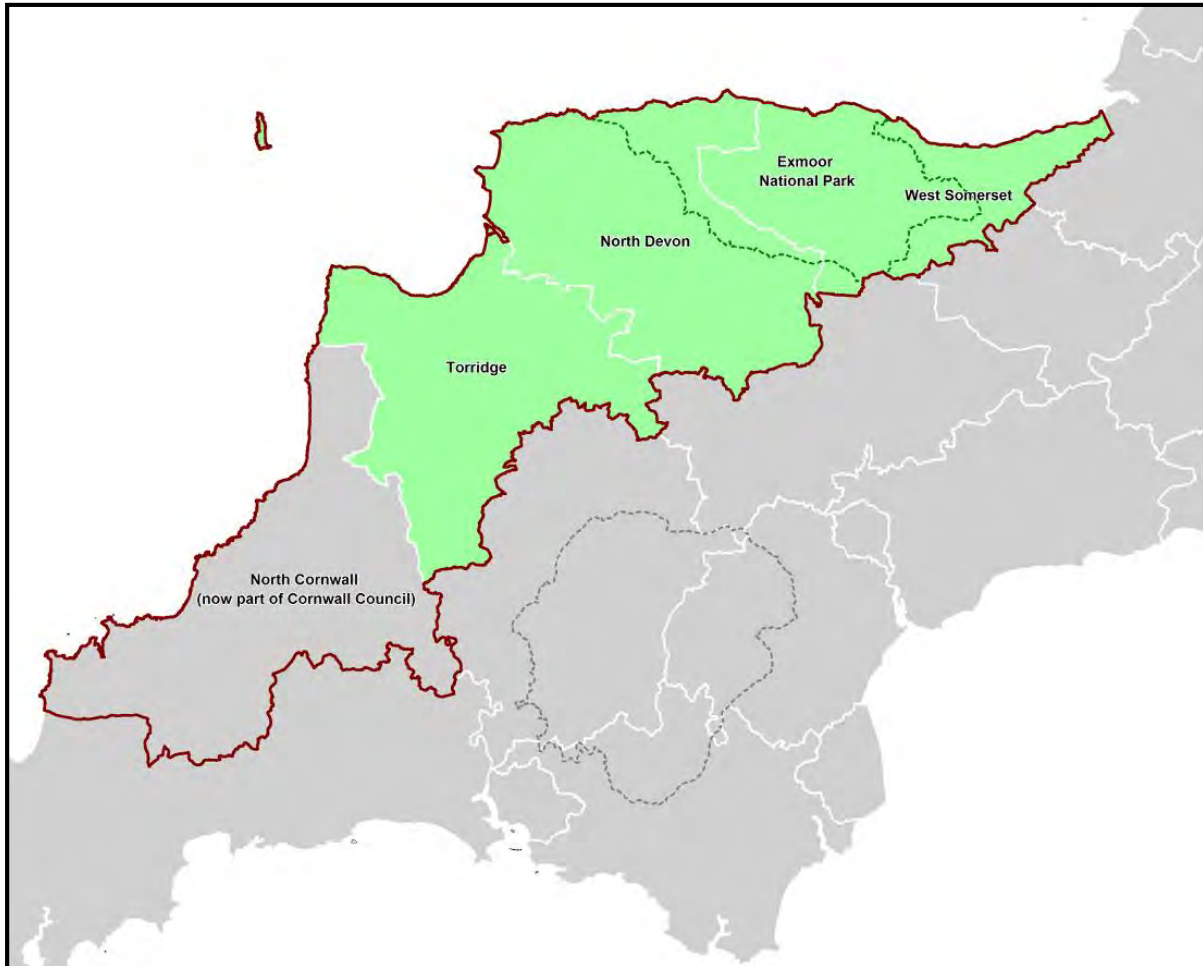


Figure 1 Map of Exmoor National Park within the Northern Peninsula Housing Market Area (Map courtesy of Torridge District Council)

Exmoor-wide Duty to Co-operate Protocol.

6. Exmoor National Park Authority has worked with neighbouring planning authorities and other relevant bodies to develop an Exmoor-wide [Duty to Co-operate Protocol](#) guiding co-operative working on strategic and cross-boundary issues affecting Exmoor. The Protocol signatories include:
- North Devon Council (neighbouring authority and within the Northern Peninsula Housing Market Area)
 - West Somerset Council (neighbouring authority and within the Northern Peninsula Housing Market Area)
 - Torrridge District Council (within the Northern Peninsula Housing Market Area and preparing a joint Local Plan with North Devon Council)
 - Mid Devon District Council (neighbouring authority)
 - Devon County Council (Highways and Education Authority)
 - Somerset County Council (Highways and Education Authority)
 - Natural England (statutory agency)
 - Environment Agency (statutory agency)
 - Devon Local Nature Partnership
 - Somerset Local Nature Partnership, and
 - Heart of the South West Local Enterprise Partnership.²
7. In addition, the following organisations are not signatories to the Protocol, but have agreed to continue to work closely with the National Park Authority in the formulation and implementation of relevant plans and policies:
- Historic England³
 - Marine Management Organisation
 - Cornwall Council (relating to the former North Cornwall Council area which was within the Northern Peninsula Housing Market Area)
8. The two Clinical Commissioning Groups (CCGs) covering the National Park – the Northern Devon CCG and West Somerset CCG were contacted regarding the Protocol but no response was received. The NPA has examined the provision of health facilities within the National Park as part of the Local Plan preparation⁴, and has not identified the need for specific cross-boundary working with the CCGs on these issues. ENPA will seek to engage with the CCGs as the need arises. Additional organisations are listed in the Regulations, but do not have a relevant remit to the National Park and so it was not considered necessary to include them in the Protocol. Further

² The LNPs and LEP are not defined by statute but are identified in the regulations as bodies that those covered by the duty 'should have regard to' when preparing local plans and other related activities

³ Formerly English Heritage

⁴ Exmoor National Park Infrastructure Delivery Plan 2015, Exmoor National Park Authority

information on the signatories and other organisations contacted is given in the Protocol.

9. The Protocol provides a framework for the signatory organisations to ensure effective co-operation throughout the planning process on strategic priorities relating to Exmoor National Park, and cross-boundary issues. It applies to a range of strategic planning policy matters, particularly preparing policy and strategy, implementation, monitoring and other cross-boundary policy issues. It forms the basis for discussing strategic priorities, evaluating options to address cross-boundary issues and agreeing outcomes wherever possible but ultimately respects the individual identities and interests of its signatory organisations.

Mechanisms for Co-operative Working

10. ENPA by virtue of its role as a National Park Authority has long established principles of co-operation with other local authorities and organisations. This enables ENPA to discharge its responsibilities in relation to the Environment Act 1995⁵. Cross boundary working, and engagement with stakeholders, is embedded in the approach both to plan making and decision making and this can be illustrated by the following:
 - The National Park Authority comprises members of each of the key Local Authorities which cover the National Park area, including 2 members appointed by Devon County Council, 4 appointed by Somerset County Council, 2 from North Devon Council and 4 from West Somerset Council. Whilst members are clearly making decisions and contributing to working panels representing the National Park Authority their joint role enables strong connection with other authorities at a member/councillor level.
 - The principal plan for Exmoor, the Exmoor National Park [Partnership Plan](#)⁶, whilst led by ENPA, is a shared plan for a range of partners. The Plan draws together those with an interest in Exmoor with a set of goals to achieve a vision for the National Park. That vision is echoed in the draft Local Plan; this illustrates how the Local Plan for the National Park is furthering the shared vision for Exmoor.
 - Section 62 of the Environment Act 1995 makes it a duty for all relevant authorities to have regard to National Park purposes when coming to decisions or carrying out their duties. This is reflected in the signatories' commitments in the Protocol. The duty means that ENPA has long established relationships with government departments and agencies and

⁵ HM Government (1995) Environment Act

⁶ This forms the Management Plan for the National Park, as required under Section 66(1) of the Environment Act 1995

a range of other local and public bodies in delivering National Park purposes.

- ENPA works with neighbouring district councils regarding their statutory responsibilities for housing, economic development and environmental health and the two county councils in relation to their roles as education and highways authorities and public health and wellbeing to ensure that Exmoor National Park residents can benefit from the decisions made and actions taken across the area.

11. Officers from ENPA, West Somerset, North Devon and Torridge District Councils have worked together on strategic issues relating to the scale and distribution of housing across the Northern Peninsula Housing Market Area for many years prior to the Duty to Co-operate becoming a legal requirement. Since then, the officer meetings have been formalised into Duty to Co-operate meetings and have been used to discuss strategic and cross-boundary issues, commission joint evidence, and develop the Exmoor-wide Duty to Co-operate Protocol. Details of the relevant Duty to Co-operate meetings are given in **Appendix 1**.
12. In addition, ENPA officers attend meetings of the Devon Planning Officers Group involving all Devon local authorities, which provides a forum for duty to co-operate discussions and is responsible for monitoring the Devon Duty to Co-operate Protocol to ensure all strategic cross boundary issues are being addressed. ENPA officers are also involved with the Somerset Strategic Planning Conference Officers Group, which provides a similar forum for the Somerset authorities.

Co-operation with relevant bodies in Plan-making

13. The Protocol sets out how the prescribed bodies and other partner organisations will work together on strategic issues requiring co-operation. Table 1 provides details of the contacts that have been established with each of the prescribed bodies during the preparation of the Exmoor National Park Local Plan and their relevant inputs as the Plan has progressed.

Table 1: Contact with Prescribed Bodies

| | |
|---------------------|---|
| North Devon Council | <p>As a neighbouring planning authority and a signatory to the Duty to Co-operate Protocol, North Devon Council has been closely involved in those elements of the Local Plan that will help to deliver sustainable growth and support the continuing objectives of the National Park.</p> <p>Working with North Devon Council has been of particular significance in relation to the scale and distribution of housing</p> |
|---------------------|---|

| | |
|-----------------------------------|--|
| | <p>across the Northern Peninsula Strategic Housing Market Area, and the role and function of settlements. Joint methodologies and studies have been used for key pieces of evidence, including the Strategic Housing Market Assessments, and Strategic Housing Land Availability Assessment.</p> <p>The National Park Authority has worked with North Devon Council to ensure that a consistent approach is taken to protecting the landscape character, special qualities and setting of the National Park, and its status as a Dark Sky Reserve.</p> <p>As a formal consultee North Devon Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p> |
| <p>West Somerset Council</p> | <p>West Somerset Council are a neighbouring planning authority and a signatory to the Duty to Co-operate Protocol. Working with West Somerset Council has been of particular significance in relation to the scale and distribution of housing across the Northern Peninsula Strategic Housing Market Area including the role and function of settlements and the potential impact of the new Hinkley Point C nuclear power station. Joint methodologies and studies have been used for key pieces of evidence, including the Strategic Housing Market Assessments, Strategic Housing Land Availability Assessment, Quantitative Needs Assessment (Retail Study), and Strategic Flood Risk Assessment.</p> <p>The National Park Authority has worked with West Somerset Council regarding protection of the landscape character, special qualities and setting of the National Park, and its status as a Dark Sky Reserve.</p> <p>As a formal consultee West Somerset Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p> |
| <p>Torridge District Council</p> | <p>Torridge District Council are a signatory to the Duty to Co-operate Protocol, particularly in relation to the scale and distribution of housing across the Northern Peninsula Strategic Housing Market Area. Joint methodologies and studies have been used for key pieces of evidence, including the Strategic Housing Market Assessments, and Strategic Housing Land Availability Assessments. Torridge are producing a Joint Local Plan with North Devon and are indirectly affected by discussions regarding housing provision arising from within the National Park.</p> |
| <p>Mid Devon District Council</p> | <p>A small part of Mid Devon District Council borders the National Park to the south east. Officers have been involved in discussions</p> |

| | |
|--------------------------------|--|
| | <p>regarding the Exmoor National Park and Mid Devon Local Plans. No strategic cross-border issues have been identified.</p> <p>As a formal consultee Mid Devon has been consulted as the Exmoor National Park Local Plan has progressed but have raised no comments.</p> |
| <p>Devon County Council</p> | <p>Devon County Council has a variety of responsibilities covering cross-boundary co-operation and undertake significant work with other Authorities, including the Exmoor National Park Authority, to support local plan preparation with an appropriate evidence base, in particular covering minerals, waste and infrastructure planning issues.</p> <p>Devon County Council led the preparation of a “wider Devon protocol” which forms a basis for fulfilling duty to co-operate requirements. ENPA is a signatory to the protocol.</p> <p>As a formal consultee Devon County Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p> |
| <p>Somerset County Council</p> | <p>Somerset County Council has a variety of responsibilities covering cross-boundary co-operation and undertake significant work with other Authorities, including the Exmoor National Park Authority, to support local plan preparation with an appropriate evidence base, in particular covering minerals, waste and infrastructure planning issues.</p> <p>Somerset County Council has produced a joint Duty to Co-operate Statement with regard to the Somerset Minerals Plan and Sand and Gravel. ENPA is a signatory to the Statement.</p> <p>Somerset County Council has supported work on ecological network mapping across Somerset, including the National Park.</p> <p>As a formal consultee Somerset County Council has been consulted as the Exmoor National Park Local Plan has progressed, and amendments have been made in the light of comments received.</p> |
| <p>Natural England</p> | <p>Natural England has been involved in development of the environmental policies of the Local Plan, particularly in relation to biodiversity, ecological networks and green infrastructure provision. Through its statutory consultee functions, Natural England has advised on the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>ENPA works closely with Natural England on the protection and enhancement of biodiversity within the National Park, and on building coherent ecological networks across boundaries.</p> |

| | |
|---------------------------------------|---|
| | <p>As a formal consultee Natural England has been consulted as the Exmoor National Park Local Plan has progressed. Natural England stated in their consultation response to the pre-submission draft Local Plan that they consider it provides a positive framework for shaping and managing future development sustainably in Exmoor National Park. No specific issues were highlighted requiring changes to the Local Plan.</p> |
| <p>Environment Agency</p> | <p>The Environment Agency have been involved in the development of the Local Plan including through supporting preparation of a key evidence base document - the Strategic Flood Risk Assessment - and via officer comments on draft policies. The Environment Agency also advised on the designation of the Porlock Weir Coastal Change Management Area.</p> <p>As a formal consultee the Environment Agency has been consulted as the Exmoor National Park Local Plan has progressed. The Environment Agency supported many of the policies in the pre-submission draft Local Plan, and minor changes were made to wording in the Plan as a result of Environment Agency comments.</p> <p>Through its statutory consultee functions, the Environment Agency has also advised on the Sustainability Appraisal.</p> |
| <p>Historic England⁷</p> | <p>ENPA has its own archaeological and listed building advisors but works closely with Historic England on planning matters affecting the historic environment. As a formal consultee Historic England has been consulted as the Exmoor National Park Local Plan has progressed. Historic England supported many of the policies in the pre-submission draft Local Plan, and stated that the historic environment appears as a balanced and integrated topic in the Draft Local Plan, the maintenance of which is key to Exmoor's sustainable future. Minor changes were made to wording in the Plan as a result of Historic England's comments.</p> <p>Through its statutory consultee functions, Historic England has also advised on the Sustainability Appraisal.</p> |
| <p>Devon Local Nature Partnership</p> | <p>The Devon LNP is not defined by statute but is identified in the regulations as a body that those covered by the duty 'should have regard to' when preparing local plans and other related activities. The LNP was established in 2012. Their involvement in the Local Plan development to date has been limited, however the Protocol sets out the principles for future co-operative working with the LNP, including on the environmental evidence base and to promote coherent ecological networks across boundaries.</p> |

⁷ Formerly known as English Heritage

| | |
|---|---|
| <p>Somerset Local Nature Partnership</p> | <p>The Somerset LNP is not defined by statute but is identified in the regulations as a body that those covered by the duty ‘should have regard to’ when preparing local plans and other related activities. The LNP was established in 2012. Their involvement in the Local Plan development to date has been limited, however the Protocol sets out the principles for future co-operative working with the LNP, including on the environmental evidence base and to promote coherent ecological networks across boundaries. In particular, Somerset Wildlife Trust, (who provide the Secretariat for the LNP) have worked with Somerset County Council and Exmoor National Park Authority on ecological network mapping across the whole of the National Park, to promote coherent ecological networks across the National Park boundary.</p> |
| <p>Heart of the South West Local Enterprise Partnership</p> | <p>The Heart of the SW LEP is not defined by statute but is identified in the regulations as a body that those covered by the duty ‘should have regard to’ when preparing local plans and other related activities.</p> <p>The LEP has an important role in informing the strategic direction of economic policy in the area and helps to identify emerging opportunities that would support a sustainable economy in the National Park. The LEP’s Strategic Economic Plan (2014-32) highlights the exceptional quality of the environment and recognises the importance role this plays in the economy, particularly the tourism and agricultural sectors.</p> <p>The LEP is a signatory of the Protocol setting out the principles for co-operative working. ENPA prepared a joint Economic Prospectus with Dartmoor National Park Authority, setting out where joint working with the LEP may be promoted in the future. However, there are no strategic economic or development proposals within the National Park to date, requiring joint working with the LEP.</p> |
| <p>Marine Management Organisation</p> | <p>The Marine Management Organisation was contacted regarding the Protocol and any strategic or cross-boundary issues arising. The MMO did not feel that it was necessary to sign the Protocol, and that established ways of working are sufficient to ensure that all parties work together in an effective manner on areas of common interest.</p> |
| <p>Cornwall Council</p> | <p>The previous administrative area of North Cornwall made up part of the former ‘Northern Peninsula Housing Market Area’ – this is now within the Cornwall Council area. Cornwall Council were contacted regarding the Protocol and any strategic matters arising, but felt that it was not necessary to be a signatory. In preparing the Cornwall Local Plan, Cornwall Council has sought to ensure that target housing provision is adequate to meet objectively assessed needs and do not therefore envisage</p> |

| | |
|--|---|
| | circumstances in which there would be a call on adjoining authorities or other planning authorities within the former Northern Peninsula Housing Market Area. Cornwall Council will continue to co-operate with the local authorities in the Northern Peninsula Housing Market Area to share technical studies and liaise on broad strategic planning issues. |
|--|---|

Strategic Priorities for Co-operation

14. The Protocol identifies a number of cross-boundary and strategic issues where co-operative working is required. This includes:
- Strategic Planning
 - Role and Function of Settlements
 - Housing Provision (including Gypsy & Travellers)
 - The Economy and Service Centres
 - Climate Change Mitigation and Adaptation
 - Flood and Coastal Risk Management
 - Biodiversity, Ecological Networks and Green Infrastructure; Natural and Historic Environment (including National Park Statutory Purposes and National Park Landscape and Setting and Biodiversity, Ecological Networks and Green Infrastructure)
 - Minerals and Waste
 - Infrastructure Provision (including Education, Transport and Health)
 - The Impact of the Hinkley Point C New Nuclear Project
 - Marine management.
15. Table 2 provides a summary of the approach taken to address these strategic priorities through co-operation with relevant organisations.

Table 2 – Co-operation on Strategic Priorities

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
|---|--|--|
| Strategic Priority (a) Strategic Planning | | |
| <ul style="list-style-type: none"> • Where relevant, the Authority Partners will co-operate on joint technical studies and other work to provide a consistent evidence base to support their respective plans. This will include: <ul style="list-style-type: none"> • Sharing of evidence/data and joint commissioning where appropriate; • Demographic forecasting and housing projections; and | Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Mid Devon District Council, Devon County Council, Somerset County Council, | Commissioned joint evidence base documents: <ul style="list-style-type: none"> - Northern Peninsula Strategic Housing Market Assessment (NP SHMA) 2008 and Updates Jan 2015 and Dec 2015 (ENPA, NDC, TDC, WSC) - North Devon & Torridge SHMA Update 2012 (includes the part of Exmoor in North Devon) (ENPA, NDC, TDC) |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
|--|--|---|
| <ul style="list-style-type: none"> • Agreed mechanisms for on-going engagement through the plan preparation process and the provision of consultation responses. • Agencies and other partner organisations will provide and share information and data held when requested (including regarding their own plans and strategies) to better inform plan and strategy evidence bases and studies where relevant. | <p>Devon Local Nature Partnership, Somerset Local Nature Partnership, Heart of the South West LEP, Environment Agency, Historic England, Natural England, Marine Management Organisation</p> | <ul style="list-style-type: none"> - Strategic Housing Viability Assessment for the Northern Peninsula Housing Market Area 2008 (ENPA, NDC, TDC, WSC, DCC) - Quantitative Needs Assessment for Retail and Leisure 2011 (ENPA, WSC) - Strategic Flood Risk Assessment Level 1 2009 (ENPA, WSC, with input from EA) - Agreed a joint methodology for undertaking Strategic Housing Land Availability Assessments across the Northern Peninsula Housing Market Area 2009 (ENPA, NDC, TDC, WSC). - Gypsy and Traveller Accommodation Assessment 2015 (led by DCC, covering the whole of Exmoor National Park) - Devon Local Aggregate Assessment (2005-14) (DCC, NDC, TDC, ENPA) - Somerset Local Aggregate Assessment (2004-2013) (SCC, WSC, ENPA) - North Devon and Somerset Shoreline Management Plan 2010 (ENPA, NDC, TDC, WSC, SCC, DCC, EA) - West Somerset Rural Housing Needs Report 2015 (Rural Housing Project, ENPA, WSC, housing partners) - Strategic Stone Study: A Building Stone Atlas of Somerset and Exmoor 2011 (English Heritage) |
| Strategic Priority (b) Role and Function of Settlements | | |
| <ul style="list-style-type: none"> • The Authority Partners will seek to co-ordinate the terminology for the role and function of settlements within two Authority areas, and the policy approach relating to them, to provide clarity and consistency in the adjoining plans. | <p>Exmoor National Park Authority, North Devon District Council, West Somerset Council</p> | <p>Discussed at Duty to Co-operate officer meetings and highlighted in consultation comments.</p> <p>Changes were made to the named settlements in the Exmoor Local Plan in relation to the status of Dunster (as a Village rather than Local Service Centre) to provide consistency with West Somerset’s approach. There were also discussions regarding other</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
|--|--|---|
| | | <p>settlements which cross the ENPA and WSC boundaries such as Carhampton and Monksilver, but no changes were considered to be required.</p> <p>Officer discussions were also held between ENPA and NDC regarding the status of Combe Martin within the Exmoor Local Plan, and it was agreed to continue to identify this area as ‘open countryside’ to ensure that new build development does not take place within the National Park, and NDC considered that there were better sites that could deliver housing in Combe Martin outside the National Park.</p> <p>ENPA’s response to the Publication Draft NDC/TDC Joint Plan (Aug 14) welcomed the incorporation of a wider range of settlements within the Spatial Development Strategy for Northern Devon’s Rural Area (Policy - STO7) that would allow for housing to meet communities’ needs in parishes split by the National Park boundary but where the settlement is located outside the Park (e.g. East Anstey, Molland and Brayford).</p> |
| Strategic Priority (c) Housing Provision | | |
| <ul style="list-style-type: none"> The Authority Partners will continue to work together on ensuring a co-ordinated approach to the distribution of housing across the housing market area and will undertake joint research studies where appropriate. The Authority Partners will seek to co-operate on meeting objectively assessed needs across the Housing Market Areas, including accommodating the needs of | <p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, (North Cornwall prior to Cornwall Council becoming a unitary authority)</p> | <p>A joint evidence base has been commissioned including the Northern Peninsula Strategic Housing Market Assessment and updates. A joint methodology was also agreed for undertaking Strategic Housing Land Availability Assessments to provide a consistent approach.</p> <p>Until April 2015, NDC, WSC and ENPA jointly funded the Rural Housing Project to support delivery of affordable rural housing across the whole of North Devon and West Somerset, including</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
|---|---------------------|---|
| <p>adjoining authorities where appropriate.</p> <ul style="list-style-type: none"> Where needs cannot be met in a sustainable way within adjoining Authority areas, the Authority Partners will explore all other options available to meet these needs. | | <p>Exmoor. In 2015, Joint Working Guidance was agreed to assist with the delivery local needs affordable housing on Exmoor. It focuses on the relationship between Exmoor National Park as the Local Planning Authority and West Somerset Council & Taunton Deane Borough Council Housing Enabling and Development Team on behalf of the Housing Authority. It sets out the expectations and requirements of both organisations to enable them to achieve the common goal of assisting in the delivery of affordable housing in line with Local Plan policy.</p> <p>Duty to Co-operate officer meetings have been ongoing since 2013 to discuss objectively assessed housing needs and distribution across the NP HMA.</p> <p>Discussions have highlighted the difficulties in meeting housing need within the National Park, and the need to consider options to make provision in neighbouring authorities' Local Plans. This has been followed up by formal requests from ENPA to WSC and NDC (see Appendix 2). NDC have indicated that they are able to do so, but WSC responded that they are unable to accommodate this request. A member meeting was held to discuss this further, but no resolution was reached. ENPA also formally requested that NDC consider if they are able to accommodate the housing arising from the West Somerset side of the National Park, but NDC are not able to do so and it is not felt to be sustainable. ENPA subsequently made representations to the WSC Publication Draft Local Plan (Mar</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| | | <p>2015) and Examination in Public (mar 2016).</p> <p>NDC are able to accommodate the market and affordable housing arising from the North Devon part of the National Park and this is included in their Proposed Main Changes to the North Devon and Torridge Local Plan consultation 2015. ENPA’s response to the consultation welcomed this (Apr 2015).</p> <p>Further details on the approach to housing in the Exmoor Publication Draft Local Plan are given in the ENPA Housing Topic Paper. A joint Northern Peninsula HMA Housing Topic Paper is also in preparation to demonstrate how housing need has been distributed across the HMA.</p> <p>A joint evidence base was commissioned for Gypsy and Traveller provision (led by DCC), covering the whole of Exmoor National Park. The GTAA found that there are no pitch requirements within Exmoor National Park.</p> |
| Strategic Priority (d) The Economy and Service Centres | | |
| <ul style="list-style-type: none"> • The Authority Partners will co-operate on strategic issues across functional economic areas including the protection of existing employment land, support for key sectors including tourism and agriculture/forestry, and any proposals for strategic retail, leisure, industrial or other economic development. • The Authority Partners will work with the LEP to ensure that Local Plan policy framework and Strategic | <p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Mid Devon District Council, Devon County Council, Somerset County Council, Heart of the South West LEP</p> | <p>A joint evidence base was commissioned - Quantitative Needs Assessment for Retail and Leisure 2011 (ENPA, WSC). This concluded that the larger centres outside the National Park such as Minehead are important for a wider range of retail and services, but given the dispersed rural nature of the area, local shops and services are also important and need to be retained.</p> <p>Discussion have been held at Duty to Co-operate officer meetings about policy approaches to business and</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| <p>Economic Plan are consistent and mutually supportive.</p> | | <p>employment including retail, leisure, tourism and home working. This included ENPA/WSC officer discussions regarding strategic allocations in Minehead / Alcombe for housing and employment land to ensure that the setting and special qualities of the National Park are protected.</p> <p>The Heart of the SW LEP is included as a signatory to the Duty to Co-operate Protocol. Reference was made to the HoSW LEP’s Strategic Economic Plan in the strategic priorities for the Exmoor Local Plan. Informal officer discussions indicate there are no strategic issues arising for the Exmoor Local Plan.</p> <p>ENPA, NDC and DCC worked together to ensure a consistent cross-boundary approach to the reinstatement of the heritage Lynton & Barnstaple Railway which is an important tourism asset.</p> |

Strategic Priority (e) Climate Change Mitigation and Adaptation

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| <ul style="list-style-type: none"> • The Partner Authorities and Agencies will work together to support climate change mitigation and adaptation measures across boundaries, including ecological networks and green infrastructure. • The Partner Authorities and other relevant partners will work together to avoid impacts of renewable energy schemes on the landscapes, seascapes, visual amenity and setting of the National Park. | <p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Mid Devon District Council, Devon County Council, Somerset County Council, Devon Local Nature Partnership, Somerset Local Nature Partnership, Environment</p> | <p>Following the Written Ministerial Statement on Wind Energy in June 2015, NDC/TDC consulted on options for identifying suitable areas in their Local Plan, and a draft policy. ENPA responded to this supporting the use of landscape sensitivity assessment and the protection of the setting and special qualities of the National Park in the draft policy.</p> <p>The NDC/TDC Publication Draft Local Plan Proposed Main Changes supports renewable energy and heat (Policy ST16) proposals where the special qualities of nationally important landscape, biodiversity and heritage designations and their settings are</p> |
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| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| | Agency, Natural England | <p>conserved and enhanced. It is also recognised that the need for renewable energy does not automatically override environmental protection.</p> <p>NDC/TDC Publication Draft Local Plan Paragraph 13.614 (Kentisbury) supports small scale renewable energy schemes, but includes protection of the landscape, tranquillity, dark skies and setting of the National Park.</p> |
| Strategic Priority (f) Flood and Coastal Risk Management | | |
| <ul style="list-style-type: none"> The Partner Authorities and Agencies will continue to work together to manage flood risk in particular with regard to strategic planning and development. Strategic Flood Risk Assessments will continue to be undertaken jointly where appropriate to inform spatial strategies and cross-border implications. The Authority Partners and Agencies will co-operate over the North Devon and Somerset Shoreline Management Planning (SMP) process, and incorporate the policy approach set out in SMP2 for the planning and management of coastal defences. | <p>Exmoor National Park Authority, North Devon District Council, Torrridge District Council, West Somerset Council, Devon County Council, Somerset County Council, Environment Agency, Natural England Marine Management Organisation</p> | <p>A joint evidence base was commissioned - Strategic Flood Risk Assessment Level 1 2009 (ENPA, WSC, with input from EA).</p> <p>There have been Duty to Co-operate Officer discussions on flood risk and coastal management but no strategic issues have been identified.</p> <p>The Shoreline Management Plan has been used as the basis for policy in Exmoor Local Plan.</p> <p>A Coastal Change Management Area was identified for Porlock Weir based on evidence and policy decisions set out in the Shoreline Management Plan, and discussion with EA officers.</p> |
| Strategic Priority (g) Natural and Historic Environment (including National Park Statutory Purposes, Landscape and Setting; and Biodiversity, Ecological Networks and Green Infrastructure) | | |
| <ul style="list-style-type: none"> The Partner Authorities and Agencies will work in partnership to ensure that Local Plans include policies to protect designated areas, including the setting of the National Park and historic designations. | <p>Exmoor National Park Authority, North Devon District Council, Torrridge District Council, West Somerset Council, Mid Devon District Council,</p> | <p>There have been Duty to Co-operate officer discussions regarding the setting of the National Park.</p> <p>As a result of this, the NDC/TDC Local Plan includes a policy on the conservation and enhancement of the setting of the National Park and its</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| <ul style="list-style-type: none"> • The Partner Authorities will co-operate to ensure that strategic allocations and planning proposals are consistent with National Park statutory purposes through appropriate consultation, master-planning, design, and landscaping. • The Partner Authorities, Local Nature Partnerships and Natural England will co-operate to promote coherent ecological networks across boundaries, through joint work on ecological mapping and green infrastructure provision. | <p>Devon County Council, Somerset County Council, Devon Local Nature Partnership, Somerset Local Nature Partnership, Environment Agency, Historic England, Natural England</p> | <p>special qualities including its dark night skies (ST14: Enhancing Environmental Assets). Reference is also made in a number of specific settlement policies to protecting and enhancing the setting and special qualities of the National Park including its dark night skies.</p> <p>The Proposed Changes to the NDC/TDC Joint Plan (April 2015) reflect Government policy changes in relation to S106 thresholds for housing. As a consequence, NDC/TDC have amended Policy ST19 (Affordable Housing on Exceptions Sites) to ensure that proposals for rural exceptions sites close to, or affecting the National Park, do not detract from its special qualities and setting.</p> <p>As a result of Duty to Co-operate discussions, WSC added reference to the proximity of the National Park to the strategic allocations at Minehead/Alcombe, and reference to Exmoor’s Dark Sky Reserve status in the justification (Publication Draft Local Plan consultation February 2015) which is supported by ENPA in their consultation response.</p> <p>Ecological network mapping (covering the whole of the National Park) was carried out by the Somerset Wildlife Trust supported by SCC and is incorporated within the Exmoor Local Plan.</p> <p>The NDC/TDC Local Plan reflects the importance of cross-boundary linkages for green infrastructure/ habitat networks.</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| Strategic Priority (h) Minerals and Waste | | |
| <ul style="list-style-type: none"> • The Partner Authorities and Agencies will work together to ensure that a co-ordinated strategic approach is adopted to minerals and waste and that strategic planning policies and proposals for minerals and waste are consistent with National Park purposes. • Given the limited scope for minerals exploitation within Exmoor National Park, ENPA, Devon and Somerset County Councils will work together to co-ordinate local assessments of aggregate production. | <p>Exmoor National Park Authority, Devon County Council, Somerset County Council, Environment Agency, Natural England</p> | <p>ENPA worked with DCC and SCC officers to agree proposed changes to the minerals and waste policies.</p> <p>ENPA has worked with Devon and Somerset County Councils respectively on joint evidence base studies for minerals provision through Local Aggregate Assessments (LAAs).</p> <p>ENPA is a signatory to the joint Duty to Co-operate Statement with regard to the Somerset Minerals Plan and Sand and Gravel prepared by Somerset County Council.</p> <p>The Devon-wide Duty to Co-operate Protocol, which ENPA is a signatory to, includes the requirement for co-operation between Minerals and Waste Planning Authorities in Devon in the preparation of an appropriate local, minerals and waste planning policy framework including the preparation of common evidence covering cross-boundary minerals issues which will inform the development of consistent minerals planning policy.</p> <p>The national status of the National Park means that it is not considered to be an appropriate location for major mineral extraction, reflecting national policy. The LAAs for Devon and Somerset demonstrate that there is an adequate availability of crushed rock aggregate mineral resources from outside the National Park, and consequently there is no expectation that major mineral development is required within Exmoor. DCC confirmed this in their response to the consultation draft Local Plan, and SCC did not raise any comments.</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| | | <p>English Heritage (now Historic England) produced an Atlas of Building Stone for Somerset and Exmoor to inform the Exmoor National Park Local Plan policy for small scale working of building or roofing stone to provide building materials to maintain the character of the local built heritage.</p> <p>The national status of the National Park also means that it is not considered to be an appropriate location for large scale waste facilities.</p> <p>ENPA has worked with Devon and Somerset County Councils and the Somerset Waste Partnership to plan for the management of waste arising from within the National Park, and provision has been made for this in the Somerset and Devon Waste Plans.</p> |
| Strategic Priority (i) Infrastructure Provision | | |
| <ul style="list-style-type: none"> The Partner Authorities and other relevant partners will engage as appropriate with relevant bodies to ensure adequate and effective infrastructure provision with regard to for example, transportation, telecommunications, energy, waste water, water quality, water supply, education and health facilities for the communities of the respective authorities. | <p>Exmoor National Park Authority, North Devon District Council, Torridge District Council, West Somerset Council, Devon County Council, Somerset County Council, Heart of the South West LEP, Environment Agency, Natural England</p> | <p>There have been Duty to Co-operate officer discussions with DCC and SCC regarding the Exmoor Route Network.</p> <p>DCC and SCC were consulted regarding the transport and accessibility policies in the consultation draft Local Plan. Minor amendments were made to the Plan including parking standards as a result of comments from SCC.</p> <p>Infrastructure and service providers were contacted to inform the Exmoor Infrastructure Development Plan 2015. This does not identify the need for any strategic infrastructure provision on Exmoor.</p> <p>Partner organisations (DCC, SCC, NDC, WSC, ENPA, Connecting Devon and Somerset, and Defra) have worked together through the Superfast</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| | | <p>Exmoor Steering Group to ensure a consistent cross border approach to the rollout of superfast broadband through the Connecting Devon and Somerset Programme and its bid to the Rural Community Broadband Fund. ENPA is also working with the Department of Culture, Media and Sport’s Mobile Infrastructure Project to improve mobile coverage.</p> <p>Exmoor National Park Authority has worked closely with infrastructure organisations including Highway Authorities and utility companies. Working with Western Power Distribution has achieved the undergrounding of overhead lines for certain areas including Dulverton conservation area (to enhance the quality of the built heritage), Hawkcombe (to enhance the open character of the moorland landscape) and Porlock Marsh (to improve the character of the coastal landscape and seascape).</p> <p>The National Park Authority is working with Somerset and Devon County Councils as the Highways and Transport Authorities and transport providers to encourage sustainable transport for residents and visitors. The Somerset Public Transport Forum (including SCC, ENPA, train operating companies and bus operators) encourages transport authorities and transport providers to support the ongoing provision of public transport services, and to encourage demand-responsive community transport initiatives, particularly in those areas where regular public transport services are not available.</p> |

| Desired outcome from (Exmoor-wide DtC Protocol) | Key partners | Evidence of co-operation |
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| Strategic Priority (j) The Impact of the Hinkley Point C New Nuclear Project. | | |
| <ul style="list-style-type: none"> The Partner Authorities will co-operate through monitoring the impact of the Hinkley Point C project on the housing market area and on the local economy, particularly in relation to tourism, working with the Heart of the South West LEP where appropriate. | <p>Exmoor National Park Authority, West Somerset Council, Somerset County Council, Heart of the South West LEP</p> | <p>Discussion have been held at Duty to Co-operate officer meetings about the potential Hinkley effect on housing and employment. This has been factored into WSC’s housing provision in their Draft Local Plan.</p> |
| Strategic Priority (k) Marine Management | | |
| <ul style="list-style-type: none"> ENPA, Torrington, North Devon, and West Somerset Councils and other relevant partners will liaise to ensure a consistent approach to strategic planning in relation to the coast. The coastal Partner Authorities will liaise with the Marine Management Organisation including having strategic input into the respective Marine Management Plan to ensure the policy framework is consistent and takes account of marine planning priorities. | <p>Exmoor National Park Authority, North Devon District Council, Torrington District Council, West Somerset Council, Environment Agency, Natural England, Marine Management Organisation</p> | <p>The Marine Management Organisation was contacted regarding the Duty to Co-operate Protocol but did not consider it to be necessary for them to be a signatory as no strategic issues have been identified relating to the Exmoor Local Plan. Work on the South West Marine Spatial Plan has not yet begun, but ENPA will work with the MMO as this is developed, to ensure appropriate linkages are made between the spatial plans and policies for the marine and terrestrial areas.</p> |

Monitoring

- The preparation of the Exmoor National Park Publication Draft Local Plan has been informed by joint working on key evidence base documents, and has been the subject of detailed consultation with stakeholders throughout the various stages of plan preparation. This has helped to build a good understanding of key issues and develop good working relationships, which will be central to the successful delivery of the Local Plan. ENPA will continue to work co-operatively with local authorities and other partners, including a joint housing topic paper for the Northern Peninsula Housing Market Area and on affordable housing delivery.
- The effective operation of the Exmoor-wide Duty to Cooperate Protocol and the outcome of co-operative working in relation to the identified strategic priorities will be monitored through officer meetings and reported in the Exmoor National Park Annual Monitoring Report.

Appendix 1- Duty to Co-operate meetings and correspondence

| DUTY TO CO-OPERATE MEETINGS | | |
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| | MEETING DATE | DISCUSSION POINTS |
| Duty to Co-operate officer meeting – ENPA with Somerset County Council | 14 April 2011 | Meeting held to discuss cross-boundary issues between the Waste Planning Authorities of Somerset County Council, Devon County Council and Exmoor National Park Authority. The meeting covered progress to date on strategy development, the respective roles and responsibilities of both authorities and areas of joint interest. After this meeting Somerset County Council drafted text that summarised the tripartite approach being taken, which informed the preparation of the Somerset Waste Core Strategy and the Exmoor National Park Local Plan. |
| Duty to Co-operate officer meeting - ENPA with North Devon Council | 11 July 2012 | Meeting held to discuss cross boundary issues and progress with local plans. The meeting was primarily in relation to policy approaches to the intended reinstatement of the Lynton-Barnstaple Railway that crosses both planning authority areas. |
| Duty to Co-operate officer meeting - ENPA with North Devon Council | 26 November 2012 | Meeting to discuss cross-boundary issues including spatial strategy, settlement hierarchy and housing provision. Also considered respective Local Plan policy development relating to economy, environment, transport and infrastructure. |
| Duty to Co-operate officer meeting - ENPA with West Somerset Council | 17 January 2013 | Meeting held to discuss cross boundary issues and progress with local plans. Discussion included settlement strategy and hierarchy, housing and employment, also environment and transport strategies. |
| Duty to Co-operate officer meeting - ENPA with West Somerset Council, North Devon and Torridge Councils | 11 June 2013 | Discussion of plan progress and evidence base preparation. Particular focus on cross-boundary issues relating to named settlements and whether there was a consistent policy approach between the Plans. |
| Duty to Co-operate officer meeting - | 11 February 2014 | Meeting held to discuss WSC response to the consultation draft Exmoor National Park Local Plan. Also discussions on the Duty to Co- |

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| ENPA with West Somerset Council | | operate Protocol, strategic priorities and progress with evidence base studies including SHMA updates. |
| Duty to Co-operate officer meeting - ENPA with West Somerset Council, North Devon and Torridge Councils | 1 July 2014 | Updates on Local Plan progress and evidence base documents. Particular focus on the Duty to Co-operate Protocol and the strategic priorities for co-operative working. Agreement on the cross-boundary approach to settlements and discussion on housing provision across the Housing Market Area. |
| Duty to Co-operate officer meeting - ENPA with West Somerset Council | 10 November 2014 | Informal meeting between officers to introduce new officers and site visit to demonstrate ENPA approach to housing and employment delivery. |
| Duty to Co-operate officer meeting - ENPA with West Somerset Council, North Devon and Torridge Councils | 15 December 2014 | Officer discussions arising from the Strategic Housing Market Assessment updates focusing on housing provision across the HMA, particularly in relation to how to accommodate housing arising from within the National Park. |
| Duty to Co-operate correspondence between ENPA, West Somerset Council, North Devon and Torridge Councils | August – Dec 2015 | <p>Updated Northern Peninsula Strategic Housing Market Assessment by Housing Vision to take account of the 2012 household projections issued by ONS in February 2015.</p> <p>WSC took advice from their Inspector Brian Cook who advised that it would not be material in relation to their compliance with the Duty to Co-operate for their submitted plan, but suggested that it would be beneficial for WSC to participate in this update in order to comply with Planning Policy Guidance in using the 2012 projections as ‘the most up to date estimate of future household growth’.</p> |
| Duty to Co-operate officer meeting – ENPA with West Somerset Council, North Devon and Torridge Councils | 1 Oct 2015 | Officer meeting to discuss the joint Housing Topic paper for the Northern Peninsula Housing Market Area |

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| Duty to Co-operate officer meeting – ENPA with North Devon and Torridge Councils (West Somerset Council unable to attend) | 30 Nov 2015 | Officer meeting to discuss the joint Housing Topic paper for the Northern Peninsula Housing Market Area |
| Duty to Co-operate correspondence between ENPA, West Somerset Council, North Devon and Torridge Councils | January-February 2016 | Correspondence regarding the drafting and sign-off for the joint Housing Topic paper for the Northern Peninsula Housing Market Area |
| West Somerset Local Plan Examination | March 2016 | ENPA and NDC made joint written representations and appeared at the hearings relating to Duty to Co-operate, objectively assessed housing need, housing provision, and the strategy approach. |

| DUTY TO CO-OPERATE CORRESPONDENCE | |
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| CONSULTATION | MEETING AT WHICH CONSULTATION RESPONSE CONSIDERED AND APPROVED |
| North Devon and Torridge Joint Core Strategy Pre-Publication Consultation | Planning Committee meeting 6 April 2010 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the North Devon and Torridge Joint Core Strategy Pre-Publication Consultation. |
| West Somerset Local Plan 2012-2032 Draft Preferred Strategy | Planning Committee meeting 1 May 2012 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the West Somerset Local Plan 2012-2032 Draft Preferred Strategy |
| Devon Waste Plan | Planning Committee meeting date 7 August 2012 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Devon Waste Plan |
| Somerset Minerals Plan (Preferred Options) | Planning Committee meeting 5 March 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Somerset Minerals Plan (Preferred Options) |

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| Draft North Devon and Torridge Local Plan | Planning Committee meeting 5 March 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Draft North Devon and Torridge Local Plan |
| Somerset Draft Local Aggregate Assessment | Planning Committee meeting 6 August 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Somerset Draft Local Aggregate Assessment |
| Draft West Somerset Local Plan – revised preferred strategy | Planning Committee meeting 3 September 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Draft West Somerset Local Plan – revised preferred strategy |
| Second Devon Draft Local Aggregate Assessment | Planning Committee meeting date 1 October 2013 - Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Second Devon Draft Local Aggregate Assessment |
| Mid Devon Local Plan Review Options Consultation | Planning Committee meeting date 1 April 2014- Authority's Planning Committee considered and approved Exmoor National Park Authority's response to the Mid Devon Local Plan Options Consultation |
| Somerset Minerals Plan (Pre Submission) Consultation | Planning Committee 6 May 2014 - Authority's Planning committee considered and approved Exmoor National Park Authority's response to the Somerset Minerals Plan (Pre Submission) |
| ENPA letter to West Somerset Council, 13th November 2014 | Letter from ENPA requesting that WSC accommodate the market housing arising from the West Somerset side of the National Park within the West Somerset Local Plan |
| West Somerset Council letter to ENPA, 25th November 2014 | Letter from WSC to ENPA in response to the request that WSC accommodate the market housing arising from the West Somerset side of the National Park within the West Somerset Local Plan, stating that they did not think that this would be a beneficial course of action for the Council as Local Planning Authority to take. |
| ENPA letter to North Devon Council, 6th January 2015 | Letter from ENPA requesting that NDC accommodate the market housing arising from the North Devon side of the National Park within the Joint North Devon and Torridge Local Plan. The letter also requested that NDC consider whether it is able to accommodate the housing arising from the West Somerset side of the National Park. |

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| North Devon Council response to ENPA, 9th January 2015 | Informal officer response from NDC indicating that whilst NDC can assist with the objectively assessed figure for market and affordable housing arising from that part of the National Park falling within the North Devon area, this could not be reasonably extended to accommodating some or all of the housing requirement arising from the West Somerset part of the National Park. |
| West Somerset Publication Draft Local Plan | Approved via correspondence with Members and submitted 23 March 2015 |
| Mid Devon Publication Draft Local Plan | Submitted under delegated powers 16 th April 2015 |
| North Devon and Torridge Joint Local Plan Proposed Changes | Submitted under delegated powers 27 th April 2015 |
| Devon County Council Minerals Plan (Pre-Submission) | Submitted under delegated powers 6 November 2015 |
| North Devon and Torridge Joint Local Plan Proposed Changes on Affordable Housing, Starter Homes, and Wind Energy Options consultation | Submitted under delegated powers 3 December 2015 |
| West Somerset Local Plan Submission and Examination | Submission of written statements relating to the Inspector's Matters under delegated powers, February 2016 |