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# Local Plan: Vision, Objectives, General Policies and Options Consultation Report


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REPORT SUMMARISING CONSULTATION RESPONSES

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# Your Future Exmoor Consultation Report

## 1 Introduction

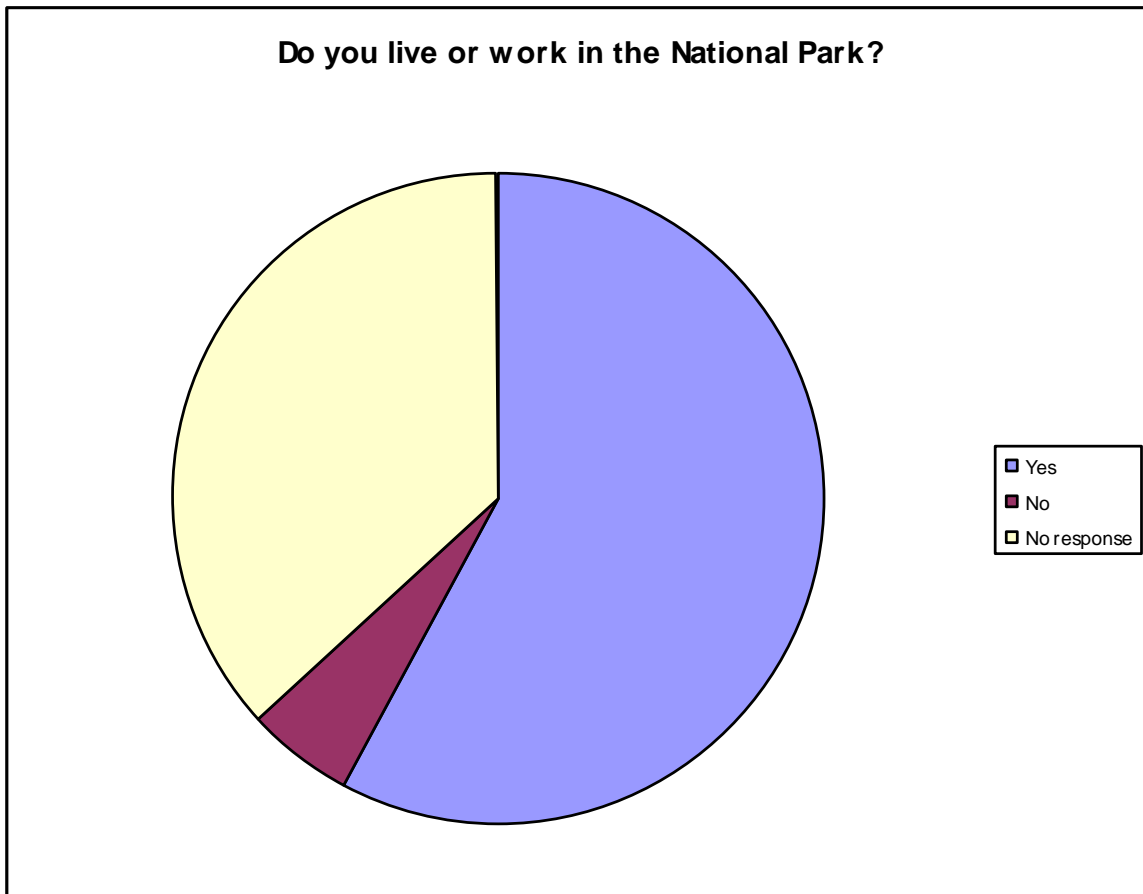
- 1.1 Exmoor National Park Authority is preparing a new Local Plan that will guide future development in the National Park. An initial set of General Policies and options for development were consulted on during November 2011 to January 2012 to inform preparation of the preferred Strategy.
- 1.2 Consultation views were sought on:
  - **Options** for where new development should go and how affordable housing will be delivered.
  - **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.

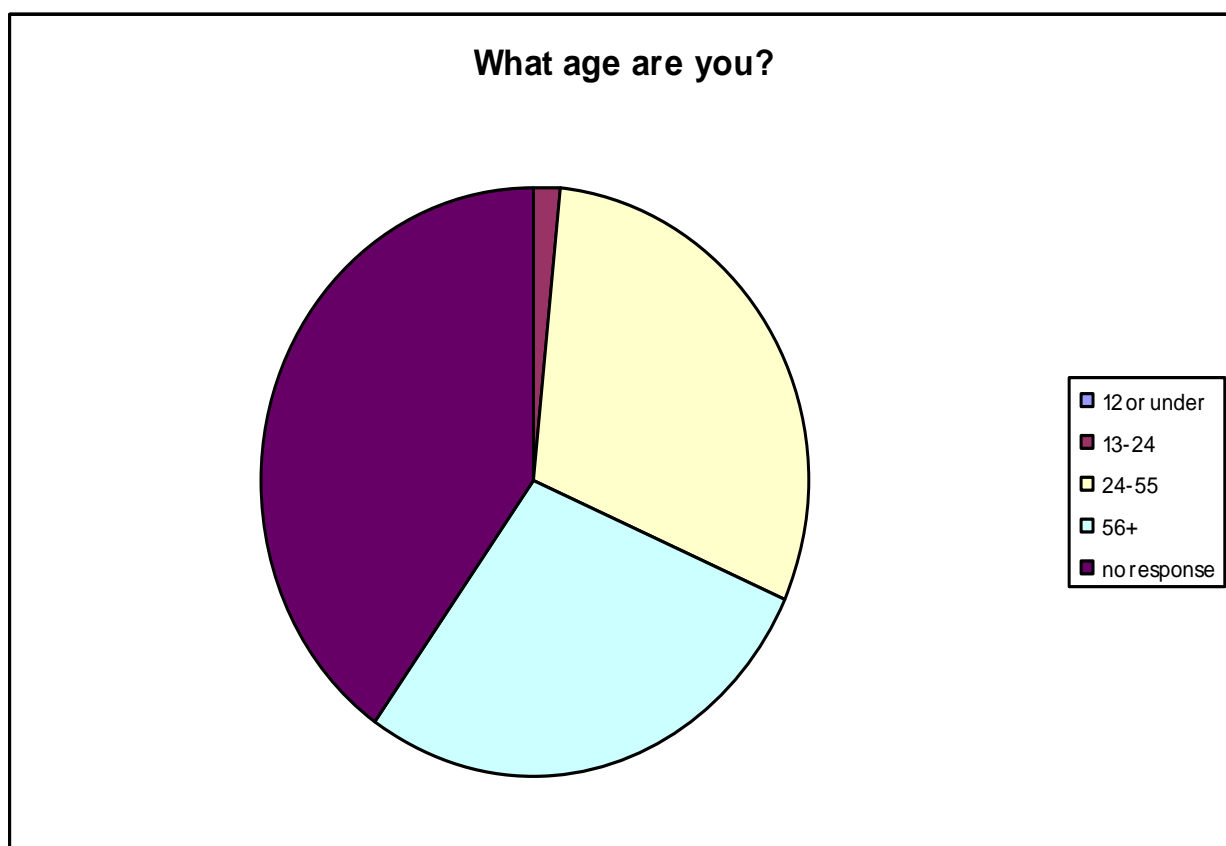
## 2 Consultation Arrangements

- 2.1 Information regarding the consultation was publicised via Parklife magazine, which is distributed to all residents and businesses in the National Park, via the website, and through newspaper articles. An online survey was set up, and sent to contacts including both people living and working in the National Park, and those who visit and enjoy the National Park. Copies of the consultation documents were made available:
  - via the website at [www.exmoor-nationalpark.gov.uk/consultation](http://www.exmoor-nationalpark.gov.uk/consultation)
  - in the National Park Centre in Dulverton
  - at local libraries and a number of information points in key settlements around the National Park
  - Every Parish and Town Council were sent copies, and the consultation was raised at a meeting of the Exmoor Parish and Town Council Consultative Forum.

### 3 Overview of Consultation Responses

- 3.1 A total of 57 responses to the survey were received, 38 from the online survey and a further 19 hard copies were returned. Although this is a low response rate, over 1000 hits were made on the website, indicating that people were aware of the consultation and able to respond if they so wished.
- 3.2 Of those who responded, 58% were from individuals living or working within the National Park, only 5% came from outside the National Park, although the remaining 37% did not specify. About a third of respondents were aged between 24 and 55, a further third were aged over 55, there was one respondent aged between 13 and 24 years old. 40% of respondents did not provide details of their age. There was an even split in gender with a third respondents being male, a third were female, and the remaining third did not provide details.





3.3 The survey responses included Old Cleeve Parish Council, Porlock Parish Council\*, Upton Parish Council, Monksilver Parish Council, Exmoor Parish Council, Devonshire Homes, Falcon Rural Housing Ltd, the National Farmers Union, West Somerset Council\*, the Lynton and Barnstaple Railway, and the Crown Estate\*.  
*(\* denotes respondents who also sent supplementary written comments).*

3.4 Written consultation responses were also received from a number of organisations, including:

- Crown Estate Commissioners
- The South West RP Planning Consortium which includes all the leading Registered Social Landlords (RPs) across the South West
- Campaign to Protect Rural England (West Somerset District Group)
- The Exmoor Society
- The Positive Development Trust
- National Trust
- English Heritage
- West Somerset Council (officer response)
- Porlock Parish Council
- Natural England
- Devon County Council
- Somerset County Council
- Mobile Operators Association (representing the four UK mobile network operators)

- Woodland Trust
- Highways Authority
- Wessex Water
- National Grid

3.5 A summary of the consultation responses from the survey and written responses is given below.



## 4 Summary of Consultation Responses

### DRAFT VISION AND OBJECTIVES

- 4.1 Consultees were asked for their views on the draft Vision and Objectives – these have been developed as a joint set for both the Local Plan and the Exmoor National Park Partnership Plan, which was also consulted on at the same time.

**Q11 Do you agree with the draft Vision and Objectives?**

**Q12 If no, which elements do you disagree with? Please explain why**

**Q13 Is there anything missing from the Vision or Objectives?**

**Q14 If yes, please explain what you think should be added**

Overall, the draft Vision and Objectives were supported.

A number of written comments were made regarding the **Vision**:

- It is important that all of the different elements are pursued in an integrated way (Crown Estate Commissioners)
- Clarity required as to what is ‘special’ about Exmoor that it is so necessary to preserve, conserve and/or enhance. This should not just be about the area as a whole but the variety of different environments, landscapes and, habitats within it (e.g. moorland, heaths, forested valleys, etc.) (West Somerset Council)
- Reference to achieving carbon-neutral status but it is unclear as to what it is being compared (West Somerset Council)
- Vision statement relating to tourism and recreation states *‘As car travel has become more expensive, people are choosing to extend their visits, use alternative forms of transport and rely less on the private car.’* (page 4 – 4<sup>th</sup> para final sentence). This should be deleted as other modes of transport area also likely to become more expensive and the difficulty of securing long term alternative transport modes on Exmoor (West Somerset Council)
- Vision statement regarding Exmoor’s communities (page 5 1<sup>st</sup> para last sentence) *‘This together with the retention of services and facilities and local employment has benefited Exmoor’s communities and visitors as its settlements become increasingly self-contained’* requires evidence that it can be achieved (West Somerset Council)
- Support the Vision to *‘provide local and affordable housing needs for those with a strong connection through living or working in the National Park’* and the focus on *‘local families, young and older people’* (South West RP Planning Consortium)
- Sustainable Energy is to be encouraged but not when it is in conflict with and will have a detrimental impact on either the landscape or environment, either through badly designed schemes or in its placement (CPRE)
- Support the draft Vision and will strive to support it in managing its own landholdings. Add references to the importance of seascape and coast (National Trust)

- Draft vision should take account of the need for climate change adaptation in relation to energy efficiency, supporting alterations to reduce the use of fossil fuels but preserve the historic interest and integrity of buildings (National Trust)
- Support vision and objectives in recognising the contribution of the historic environment to the specialness of Exmoor (English Heritage)
- Biocapacity is a useful concept I suggest including in the Vision & Objectives (Positive Development Trust)
- There is much to commend within the draft Vision. In spite of the current economic and other challenges it is vitally important that the statutory purpose of the Exmoor National Park is maintained into the future and that is clearly the intention. The draft Vision contains the key elements we had hoped to see. Namely - continuing commitment to the conservation and enhancement of landscape, wildlife and cultural heritage and the promotion of opportunities for public understanding and enjoyment. Clarify that every part of the draft Vision relates to the outcomes that are sought for Exmoor by 2030 (Natural England)
- We support those elements of the draft Vision that relate to the delivery of sustainable development and the natural economy. National Parks should act as exemplars in this respect, including demonstrating the value of high quality environments, such as designated sites, in underpinning economic prosperity. Recommend including direct reference to the sustainable development exemplar role and inspiring visitors and local communities to live within environment limits as referred to in the National Parks Circular (2010). The commitment to achieve a carbon-neutral National Park is supported because climate change is a serious long term threat to the natural environment. Our hope is that carbon neutrality and sustainable living as the norm will be achieved by 2030 and preferable well ahead of that time. (Natural England)
- Support the reference to increased extent and condition of wildlife habitats and linkages between them and to thriving populations of valued species which is broadly in keeping with the recent draft National Planning Policy Framework (NPPF). The Local Plan should identify and map components of the local ecological networks, including: international, national and local sites of importance for biodiversity, and areas identified by local partnerships for habitat restoration or creation as stated in draft NPPF. Also to plan for biodiversity at a landscape-scale across local authority boundaries which is implied, but to underline the new emphasis on landscape-scale conservation we recommend specific mention here. (Natural England)
- The draft NPPF also refers to the need for plans to aim to prevent harm to geological conservation interests and we note that these are not specifically mentioned in either the draft Vision or Objectives. The National Park supports a number of important geological sites and we recommend consideration is afforded to adding reference to geological conservation. (Natural England)
- We support the reference to the contribution of ecosystem services. These services i.e. production services (e.g. food, fibre, fuel and water); regulating services (e.g. climate regulation, water; purification and flood protection) and cultural services (e.g. knowledge, recreation and aesthetic value); delivered to society through natural

ecological processes, derived from the natural environment, are fundamental to sustainability and should be valued and protected through land use and land management decisions. The Millennium Ecosystem Assessment (2005) defined ecosystem services as “the benefits people obtain either directly or indirectly from ecological systems”. We question whether it is strictly accurate to state within the draft Vision that ecosystem services are provided by the natural environment and agriculture (fourth bulleted point). Agriculture is an example of a human activity that can only take place because of the ecosystem services derived from our natural capital. We recognise the extremely important role that farming plays in the management and wise stewardship of key components of the natural environment of the National Park but recommend that reference to agriculture as a provider of ecosystem services is deleted (Natural England)

- We support the reference to soil conservation. Soil provides vital ecosystem services that are fundamental to natural, healthy environments. “Safeguarding our Soils: A strategy for England” states that that by “2030, all England’s soils will be managed sustainably and degradation threats tackled successfully”. The reference to pollution is also welcome as this poses a potential threat to the natural environment. But we suggest “minimize” could be open to interpretation. We recommend consideration is afforded to wording along the lines “avoid or reduced below harmful levels”. (Natural England)
- Green infrastructure. We note the recommendation within the SA that the draft Vision and Objectives could be strengthened by reference to “expanding and connecting” habitats and creating networks of multi-functional green infrastructure. The former is referenced but the latter does not appear until Policy GP1 Achieving National Park Purposes and Sustainable Development. The draft NPPF also wishes to see Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. In the Exmoor context there is considerable overlap between habitat networks and green infrastructure but the latter is a wider concept that extends to landscape, open space, public realm design etc. For that reason we recommend consideration is afforded to making specific reference to green infrastructure within the Vision or Objectives. (Natural England)
- We welcome reference to increasing opportunities for alternative modes of transport to be used and available to communities and visitors on Exmoor. We also welcome reference to improved traffic safety in Exmoor’s settlements. The aforementioned documents adopted by Somerset County Council should provide valuable content to you in drafting policies and the evidence base designed to meet and achieve this part of the vision and objectives (Somerset County Council)
- We believe that this consultation offers an opportunity to both improve the protection and restoration of Exmoor’s existing irreplaceable ancient woodland as a biodiversity and landscape asset, whilst also using new native woodland creation as a delivery tool to enhance neighbourhood planning, green infrastructure implementation and the local economy. We support the natural environment being given significant prominence in the emerging Exmoor Local Plan in order to realise all the quality of life benefits that it can deliver, especially in relation to the uniquely wide ranging natural asset of native woodland (Woodland Trust)

Comments from the survey:

- The NP should make sure it makes affordable housing a priority - we can't do it on our own.
- General community amenities are missing from the Vision/objectives - i.e. tennis courts, bowling green, picnic area.
- I feel a great emphasis on tourism needs to be targeted and although this could potentially damage some of the area's beauty through pollution and footpath erosion, I feel tourism is one of the region's main economic industries. If more money and emphasis was placed on this I feel it could benefit the area in the long term.
- What about the vexed question of second home ownership? Are there any plans to discourage it via council tax or other means? Some villages are being slowly drained of locally owned homes. Prices go up beyond local affordability.
- Please encourage small business - give them a chance to succeed or fail - if they succeed will bring jobs and add interest to the area, sometimes Exmoor seems very stuck in old ways and traditions, comfortable but not exciting.
- There is no policy for transport links outside the Park.

A number of written comments were made regarding the **Objectives**:

General:

- The draft objectives are broadly supported. If our recommendations above are accepted they could usefully be amended to reflect any relevant changes to the draft Vision - for example, through referencing green infrastructure as a mechanism for providing a wide range of ecosystem services (Natural England)

Objective 1

- Clarify or provide examples as to what constitutes, 'intrusive development' in a National Park context. This may be very different than that which is regarded in other rural, suburban, urban and, conurbation environments (West Somerset Council)
- Reword as implies that some intrusive developments might be acceptable as long as the landscape remains *predominately* free – *no* intrusive development should be permitted (National Trust)

Objective 2

- Explain why Exmoor's moorland needs to be retained. It is an old man-made landscape and its importance for natural, habitat, landscape and other reasons needs to be emphasised (West Somerset Council)
- The reference to landscape character under Objective 2 relating to moorland is welcome. The need to protect and enhance landscape quality and character is of fundamental importance not just in relation to moor and heath but to other landscapes within the National Park. We recommend consideration is afforded to widening the reference to landscape character to cover all areas of Exmoor. (Natural England)

#### Objective 4

- Reword as implies that *only* native species valued for their conservation status and local distinctiveness should be maintained or increased (National Trust)

#### Objective 9

- We offer particular support for Objective 9 relating to quiet and active outdoor recreation based on Exmoor's special qualities. The Government's White Paper "The Natural Choice: securing the value of nature" (Paragraph 4.35) refers to the benefits of National Parks in providing recreational opportunities, and the importance of visitors to the local economy (Natural England)

#### Objective 11

- The 'meeting the needs' of communities theme sounds rather down-beat to community ears I suggest. They need to hear about going forward not standing still. The ingredients are in the Objectives but verve and ambition are lacking. Well-being implies more than meeting needs? (Positive Development Trust)

#### Objective 12

- proposed amendment to read: '*To address local and affordable housing needs, making the best use of existing developed land and buildings; ensuring a mix of housing and a housing stock which helps sustain local communities and which meets the needs of all groups of the community, including older people and those with a disability.*' (South West RP Planning Consortium)

#### Objective 17

- Somerset County Council is particularly interested in cooperation on highways and transport matters. In the light of the impending abolition of Structure Plans, it is our view that adopted and published transport policy documents form an important material consideration in the planning process. *Further details given on relevant transport documents to inform the transport policies in the Local Plan.* (Somerset County Council)

#### Objective 19

- Requires a reference to sustainable drainage/SuDS and the emerging role of Devon County Council as a SuDS Approval Body. There are major changes regarding sustainable drainage under the Flood and Water Management Act 2010 (FWMA). The FWMA encourages the use of sustainable drainage in new developments and re-developments. It does this by requiring drainage systems to be approved, against a set of National Standards, before construction work can commence. It will be the role of the newly established Sustainable Drainage Systems Approving Body (SAB) within Devon County Council, to approve, inspect, adopt and maintain sustainable drainage systems for new developments exceeding one property. The current proposal is for Schedule 3 (sustainable drainage) of the FWMA and its statutory instruments to be commenced on 1st October 2012. For the first 3 years (October 2012 to September 2015) the plan is for

only major development (10+ dwelling houses) to require SAB approval. After September 2015 all development with drainage implications will require SAB approval. (Devon County Council)

- Under the Flood and Water Management Act 2010, Devon County Council has been established as a Lead Local Flood Authority (LLFA) in order to manage local flood risk from surface water and groundwater. Locally agreed surface water mapping has been developed as part of the Preliminary Flood Risk Assessment for Devon to inform where there is surface water flood risk. This dataset indicates the surface water data that best represents local conditions and was reviewed, discussed and agreed between the LLFA, the Environment Agency and other local partners. It is to be used alongside the existing Environment Agency Flood Zones by Local Planning Authorities in the planning process, assessing flood risk and reducing the potential risk from any new developments (Devon County Council)

#### Objective 20

- We welcome the focus on the lower ends of the waste hierarchy in terms of potential waste management in the Park. The County Council is working with ENP and Somerset County Council to ensure that strategic waste management capacity requirements of the Park are met outside of the Park boundaries. This work is informing the current needs assessment of the emerging Devon Waste Core Strategy. (Devon County Council)
- Somerset County Council has also agreed to continue to work with Devon County Council and ENPA to achieve sustainable waste management given the overlap of waste collection and disposal responsibilities in Exmoor. Refer to Somerset Waste Core Strategy for further details. (Somerset County Council)

## DRAFT POLICIES

4.2 The Local Plan will include a set of General Policies which will apply to all development requiring planning permission within the National Park. Views were sought on the draft General Policies.

**General Policy 1 – Achieving National Park Purposes and Sustainable Development Q15) We would like your views on whether the General Policies will help to ensure that all development will help to achieve the National Park purposes and deliver sustainable development.**

There was general support for GP1.

A number of written comments were made:

- The Crown Estate is generally supportive of Policy GP1 however it will be important to ensure that all aspects of sustainability (economic prosperity, strong, vibrant and healthy communities and the protection and enhancement of the environment) are given equal weight when making planning decisions (Crown Estate Commissioners)

- The written justification (page 8) should highlight linkages with surrounding settlements and the limitations on the settlements within it achieving self-containment and or sustainable development patterns and activity in the future (West Somerset Council)
- The written justification (page 9) refers to the duty on all public bodies to have regard to National Park purposes and states that *'Where their activities outside National Parks might have an impact inside them, the Government says they should cooperate across National Park boundaries.'* West Somerset Council officers suggest replacing this with the following text *"As part of its partnership working with the neighbouring Local Planning Authorities of West Somerset and North Devon, other relevant public bodies, organisations and utility companies, the National Park Authority will liaise and negotiate with them on such development proposals to mitigate their impact on Exmoor National Park."* (West Somerset Council)
- The reference to the five guiding principles for sustainable development (page 9) in the UK Sustainable Development Strategy 2005 including the use of 'sound science' should be deleted as no-one has been able to provide an adequate definition that would withstand legal scrutiny. (West Somerset Council)
- We fully support the statement that development in the National Park *'addresses local affordable housing needs, and enables access to local services and facilities, jobs and technology'*. (South West RP Planning Consortium)
- Sustainable Energy is to be encouraged but not when it is in conflict with and will have a detrimental impact on either the landscape or environment, either through badly designed schemes or in its placement. They also share the concerns over the increase and potential adverse effects of 'horsiculture' which is eating into traditional Exmoor farming practices. Whilst in overall agreement with the aims, observations, and goals of the plan we will be carefully monitoring any applications of a contentious, difficult or unbalanced nature which might compromise or destroy Exmoor's landscape (CPRE)
- Strongly support GP1 (National Trust)
- GP1 does not reflect the importance of the historic environment. Point 7 should be amended to include the natural *and historic* environment (English Heritage)
- GP1 aspects relating to communities / settlements sounds rather down-beat to community ears I suggest. They need to hear about going forward not standing still. (Positive Development Trust)
- The supporting text refers to the fact that some proposals may require an Environmental Impact Assessment. Recommend also reference the fact that any proposals with the potential to affect international conservation sites may also require assessment under the Habitats Regulations. We support the inclusion of the Sandford

Principle within the policy. This principle, which is enshrined in legislation, is the key mechanism in ensuring that the statutory purpose of the National Park remains of paramount importance in case of conflict. The Sustainability Appraisal recommended strengthening GP1 to positively support the achievement of the Vision and Objectives. We accept the policy may already have been changed to reflect that but note that it still requires a proposal to demonstrate that “It does not conflict with the vision and objectives” rather than positively supporting them. We recommend amending the text to reflect the advice of the Sustainability Appraisal on this point. (Natural England)

Comments from the survey:

- I think it needs to be stated that the definition is that of Boserup! (what a great definition) needs expansion on how this is to be met. Stress that this is not just environment.
- Already encouraging sustainable builds - should continue.
- The policies seem adequate.
- Objective ii: Does the word "enable" include financial help or is it aspirational?

## General Policy 2 – Major Development

Q16) We would like your views on how the National Park Authority should respond to any applications for major development within Exmoor

There was general support for GP2.

A number of written comments were made:

- The written justification (page 11) refers to ‘minor applications’ which could be misleading if compared with similarly ‘labelled’ applications in other (rural) LPA’s. A definition of what constitutes major development within the Exmoor National Park would provide clarity. Further information about numbers of applications is needed to provide context (West Somerset Council)
- The draft Policy (2<sup>nd</sup> bullet point) requires clarification over what is being referred to by use of the word ‘cost’. If it is just financial cost then this could act against the National Park’s objective of achieving more sustainable patterns of development, as it could be used by potential providers of non-economic services and facilities (e.g. health-care, social-care, etc.,) as a reason not to develop in the National Park but in larger settlements outside and could lead to National Park residents having to travel further (West Somerset Council)
- GP2 requires clarification and redrafting (who are ‘they’?) (National Trust)
- We are concerned that the policy as worded may not offer sufficient protection for the



natural environment in exception cases. We suggest every effort should be made to mitigate all harm rather than “localised” harm and would like to see the “mitigation sequence” more fully embraced. We recommend revisions along the following lines: “. . . Where exceptionally a proposal for major development is of national significance and needs to be located in the National Park then every effort to avoid adverse effects will be required. Where adverse effects cannot be avoided appropriate steps must be taken to minimise harm through mitigation measures. Appropriate and practicable compensation will be expected for any unavoidable effects that cannot be avoided or mitigated. .” “. . . (iii) any detrimental effect on the environment, the landscape, the National Park’s special qualities and recreational opportunities, and the extent to which that could be moderated through applying the avoidance, mitigation, compensation sequence outlined above . .” Furthermore, the HRA concludes that the policy will need to specifically refer to Natura 2000 sites and proposes a form of words for incorporation into the policy. We recommend following that advice. (Natural England)

- As worded, elements of Policy GP2 are inconsistent with the provisions in paragraph 22 of PPS7 and paragraph 167 of the draft National Planning Policy Framework of July 2011. The policy refers to exceptions where developments “... raise issues of national significance”. This does not adequately reflect the requirements in PPS7 or the draft National Planning Policy Framework. Paragraph 22 of PPS7 implies that major development “includes” proposals that raise issues of national significance but it does not refer exclusively to such proposals, i.e. there could be proposals which may not raise issues of national significance but these could still represent major development. It is important to note that paragraph 167 of the draft National Planning Policy Framework does no longer include reference to “issues of national significance” at all. Given these inconsistencies, Policy GP2 should be re-worded to reflect adequately and fully the provisions in paragraph 22 of PPS7 and paragraph 167 of the draft National Planning Policy Framework. In addition, the policy in its current form lacks clarity. As worded, proposals for major development need to “demonstrate” the list of criteria set out in the policy. Therefore, for example, a developer would need to “demonstrate” the cost of and scope for developing elsewhere outside the National Park. However, we assume that the intention of the policy is instead that “consideration” should be given to the criteria. This would be in line with the wording in PPS7 and the draft National Planning Policy Framework. Furthermore, National Grid questions the need for criteria (iv) and (v) of the Policy GP2. There is already clear policy set out in PPS7 and the draft National Planning Policy Framework, on what proposals for major development in designated areas should consider, and there is no demonstrated need for going beyond this clear and well established national policy framework. As such, the second part of Policy GP2 should be amended to delete points (iv) and (v) (National Grid)

Comments from the survey:

- Consult extensively at local level. National interests should not over ride local decisions.
- Depends on application. Some major development could be achievable in some locations - for economic, sustainable reasons.

- Obviously it would depend upon what it was. You don't make promises without knowing what you are promising.
- I think it is important to study the proposal fully and make a decision on each case on an individual basis, taking into consideration if the development is sustainable.
- Could make the housing empty during the week and only inhabited weekends or holiday time. Also decrease of support to local activities and use of village hall etc.
- No major development should be allowed.
- Must listen and consult with public in the Park.
- Would be against major development.
- Small is beautiful.
- Policy GP2 seems adequate.
- There should be no major housing development. Industrial development should be allowed provided it is sustainable and environmentally friendly.

#### **General Policy 4 - Securing Planning Benefits**

**Q17) We would like your views on whether the National Park Authority should review its position periodically as to whether a Community Infrastructure Levy should be implemented – if the National Park Authority did decide to implement a Community Infrastructure Levy then this would be consulted on at that time.**

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.

A number of written comments were made:

- The impact of the recession on development viability should be a key consideration when setting policies relating to developer contributions (whether planning obligations or CIL). It will be essential to weigh the benefits of these additional costs against the potential effects of that imposition upon the economic viability of new developments. The mechanism for securing these much be appropriate, consistent and transparent. This must be supported by a detailed, up to date evidence base of requirements through the Infrastructure Delivery Plan. The limited scale of development in the National Park may not justify the development of CIL. It will not be appropriate to apply a uniform CIL across the whole of Exmoor or across all types of development, e.g. residential developments are already heavily impacted by affordable housing requirements and it would be inappropriate to apply an additional burden of CIL. It would also be inappropriate to apply a single fixed rate CIL over the lifetime of the Local Plan as economic circumstances and land values will change over time, the intention to review the CIL periodically is therefore welcomed. (Crown Estate Commissioners)

- CIL tariffs only make sense if there is a proven infrastructure deficiency within the LPA area and there is a clear intent on the part of the infrastructure provider(s) to address that need. This would be identified through the Infrastructure Delivery Plan (IDP). The absence of any commitment by infrastructure providers through their responses to the IDP to provide facilities within the life-time of the plan (usually based on the scale of proposed development over that time-scale and/or an outstanding commitment to provide), would mean that any monies raised through such tariffs would ultimately be spent outside of the LPA area and be of little or no benefit to the residents within it (West Somerset Council)
- We support the NPA in seeking contributions towards infrastructure from new development. However, we are unconvinced that it would make economic sense for the NPA to go through the costly CIL process to secure only small amounts of funding for infrastructure. Whatever decision the NPA reaches, they will have to ensure that their top priority is securing affordable housing of a tenure that meet local needs above securing non-site specific planning contributions for a scheme (South West RP Planning Consortium)
- We support the principle of developer contributions to offset the impacts upon land and facilities and to contribute to environmental enhancement. When considering the infrastructure necessary to support development for inclusion within the Infrastructure Delivery Plan we would also encourage the Authority to consider what environmental projects it may be necessary to include. (Natural England)
- We would in principle support development of a Community Infrastructure Levy charging schedule for Exmoor as this could potentially assist in the delivery of infrastructure needed to achieve sustainable development. We would welcome to be part of further discussion with you on this matter. (Somerset County Council)

Comments from the survey:

- A very bad idea
- Any CIL should not make development economically unviable. Planners need to understand. Recent example adjacent to ENP sees how planners can be taken for a ride.
- Quite sure would be roasted by the majority.
- Levy should not be in place.
- Not appropriate in any circumstances.
- A very bad idea.
- Not sure on this - more information required.
- This should be considered should the development be large enough to sustain it.

## OPTIONS FOR LOCATION OF NEW DEVELOPMENT

4.3 Views were sought on Options for *where* new development should go within the National Park. This included buildings for employment, community uses and housing. Currently, new build development, (other than that essential for agriculture or forestry), is only allowed in those settlements named in the Local Plan. Three options were proposed for consideration:

- **Settlement Option A:** Allow for new build development in all towns and villages listed in the Plan namely Allerford, Barbrook, Bridgetown/Exton, Brendon, Brompton Regis, Challacombe, Dulverton, Dunster, Exford, Luccombe, Luxborough, Lynton and Lynmouth, Monksilver, Parracombe, Porlock, Roadwater, Simonsbath, Timberscombe, Winsford, Withypool, Wheddon Cross/ Cutcombe and Wootton Courtenay
- **Settlement Option B:** Allow for new build development only in those towns and villages where there is a school, a regular bus service which runs 5+ times a week and a shop. This would include: Cutcombe/Wheddon Cross, Dulverton, Dunster, Exford, Lynton and Lynmouth, Parracombe, Porlock and Timberscombe
- **Settlement Option C:** Allow for new build development in all towns and villages listed in the Plan AND settlements with a shop and/or pub and/or village hall. This would include the additional settlements of: Hawkridge, Twitchen, Heasley Mill, Martinhoe, Countisbury, Rockford, Oare, Porlock Weir, West Porlock, Selworthy, Withycombe.

### Q1 Where do you think new build development should be located?

Settlement Option A: 14 (24%)

Settlement Option B: 13 (23%)

Settlement Option C: 22 (39%)

No response: 8 (14%)

Of those who supported Option C, the following settlements were identified as ones that should or should not be included in the list:

	<b>Yes</b>	<b>No</b>
Hawkridge	13	3
Twitchen	11	4
Heasley Mill	7	8
Martinhoe	10	5
Countisbury	12	3
Rockford	8	7
Oare	10	5
Porlock Weir / West Porlock	15	3
Selworthy	10	5
Withycombe	10	6

#### Are there other settlements that you think should be included?

Clatworthy, Upton and Brompton Ralph (2 responses)

A number of written comments were made regarding the Settlement Options:

- Although Option C is considered to be the most appropriate option out of the three presented The Crown Estate would encourage the National Park Authority to be even more ambitious if it is to achieve the right amount and type of development in the right places over the coming years to meet the social and economic needs of Exmoor's communities. The main focus for rural development should be at the main towns and villages, but restricting all development to these areas alone will not meet the needs of smaller outlying communities, who represent a significant proportion of Exmoor's total population. In particular the needs of young people, families, and those on low wages are unlikely to be met. The approach to identifying settlements based on current facilities and services does not reflect the complex inter-relationships between settlements, the high amount of home-working and means that these settlements will have no chance to change. An alternative approach using the Toolkit for Sustainable Communities is suggested. The National Park Authority is also encouraged to look favourably upon development outside of settlements where this might be sustainable (e.g. bringing redundant buildings back into use), particularly given the limited supply of housing land within towns and villages. The Crown Estate is pleased to see that settlement options B and C are more ambitious than the current approach. Despite this it is considered that the National Park Authority needs to go further if it is to achieve the right amount and type of development in the right places over the coming years to meet the social and

economic needs of Exmoor’s rural communities. (Crown Estate Commissioners)

- It is unclear as to whether the Settlement Options proposed are intended to create some form of settlement hierarchy (as with the current Local Plan). Will there be a hierarchy amongst the named settlements, and what would be the status of any additional settlements identified through Option C? There is an absence of reference to how the various settlements mentioned in any of the Options relate and function in respect of other settlements (both within and outside the National Park or split e.g. Dunster, Monksilver and, Withycombe). Some settlements in close proximity to others and with reasonable access between them may act as ‘clusters’ in respect of sharing the community and commercial services and facilities they collectively have for the larger local community (West Somerset Council)
- The data provided suggests the National Park has under-achieved in respect of its delivery of housing compared to Joint Structure Plan Review and draft Regional Spatial Strategy targets. (West Somerset Council)
- The wording for the Options seems to suggest that there is a finite amount of land that could be made available for housing development within the National Park. Whilst the designation of the National Park is an acknowledgement of the collective quality of the area, this does not mean to say that it is all of the same standard. The landscape varies considerably and there are pieces of land that are of lesser quality in landscape terms and these can usually be found on the edge of settlements in transition areas, sometimes referred to as ‘urban fringe’. In some locations where commercial forests come to the end of their commercial life, and are located adjoining settlements there may be opportunities to improve the landscape with a combination of traditional tree-planting and development (West Somerset Council)
- The Northern Peninsula Strategic Housing Market Assessment<sup>1</sup> recognised the issue of a resident population collectively ageing over time and the implications this would have on the provision of future housing. Providing specialised open-market housing for the elderly who already live on Exmoor but whose existing accommodation is unsuitable may provide opportunities to provide affordable housing through exchange negotiations or through new-build cross-subsidy (West Somerset Council)
- Option A is supported. The boundary of the Exmoor National Park was drawn up using largely landscape and environmental criteria. The Park covers a limited area and has a small population, living in scattered settlements. It was surely never intended to supply all of the socio-economic needs (services and employment) of the population from within the Park. Has this been the case the boundary would have had to be drawn differently to include at least some of the larger towns close to the Park, which today supply some of those needs. Even then it is unlikely that all services could be provided without calling on towns further away. The Society is concerned that the criteria that may be used to test

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<sup>1</sup> Housing Vision; Strategic Housing Market Assessment for the Northern Peninsula; Northern Peninsula Housing Market Partnership; 2008

the sustainability and suitability for development in some of the small villages and towns are more appropriate to urban areas of the country and are less appropriate for very rural areas, such as the National Park. It is believed that some of the suggested suitability criteria, if applied rigorously would rule out even small developments which might be totally appropriate (Exmoor Society)

- Support Option A. Option B is too stifling of new development. Option C is too permissive and facilities stated are inadequate for any new residential development to be sustainable. The connection between housing and jobs should not be overlooked, an imbalance would lead to additional commuting (National Trust)
- Where growth is proposed it should be proportionate to the size of the existing settlement. In some cases open spaces or tracts of land may be important to the distinctive character of a settlement (English Heritage)
- Agree the focus for development should be the main settlements in order to take advantage of, and support, existing infrastructure and services. However, this should not exclude small scale, appropriate development elsewhere where there is an identified need. The prime focus should be on the provision of affordable housing in order to protect our communities and to counterbalance our skewed demographics, but small scale open market development should be possible where it supports this objective (Porlock Parish Council)
- The approach, overall, is rather reductive, focusing on attributes rather than how settlements as a whole work or function, and also quite narrow - for example job / business density would good alternative attributes. It also concentrates on what a settlement is now (its current state), rather than what is potential might be. The importance of the functional networks settlements form is also missed - this is not a big point on Exmoor where the majority of settlements are free-standing and so need to be more self-sustaining, but relates to some of our settlements. Option B writes out too many settlements and their potential to become more sustainable - so it contains the 'sustainability trap'. Option A or C - would support either is braced / reinterpreted with the points above and other points such as fuel price spikes and the need to support bedrock economic sectors meaning that smaller settlements might become more important for sustainability than they are now. (Positive Development Trust)
- We support the concept of focusing new development upon settlements with a range for services so as to avoid setting up unsustainable patterns of travel. The more focused Settlement Options A and B also appear to perform best against the natural environment elements of the sustainability framework in the SA. However, our principle advice here is to underline that the important of the environmental capacity of an area to absorb new development as a key determinant of where development should be best located. This is a particularly important in a National Park setting in ensuring that the statutory purpose is not compromised. In that regard we offer particular support for the commitment to undertake further studies on landscape capacity if any additional settlements are identified as having the potential to be listed in the Local Plan. We also recommend that whichever development location option is finally adopted, the Local Plan should

incorporate the relevant offsetting measures identified within the HRA. (Natural England)

- Given our experience in considering other local authorities' option papers the assessment undertaken to identify where new development should go within Exmoor National Park appears sound although it should seek to consider any decision taken by the County Council concerning funding of bus services (Option B). It is our view as a service provider that development should be steered to the most sustainable places to generate the critical mass required to maintain and enhance essential services to the local communities. Therefore, we would support a strategy of concentration rather than dispersal, thereby focusing on settlements which already have a good level of service provision. Under a concentration strategy it may not be possible to achieve self-containment at all settlements in Exmoor but it would ensure that important services at key settlements are sustainable, and can be maintained or enhanced to meet the needs of present and future generations. (Somerset County Council)

The following comments were made from the survey but not attributed to specific organisations:

- Housing should be considered in all settlements where there is a proven housing need.
- There are odd sites within such settlements as Porlock Weir next to the old reading room which could for local needs or Hawkridge next to the village hall. There is a site next to the Old Stables/Doverhay Place in Porlock which could be open market.
- Development should be driven by need.
- If a developer feels they can make a go of it where they plan to build they should be given the opportunity to try. We do not want to see all the small villages become totally fossilised.
- Majority view is that affordable housing should be allowed in any village with a defined need.
- Sustainable development. Planning policy should not prohibit development in the countryside. The Taylor Review of Rural Economy and Affordable Housing, commissioned by the Government considered in detail the sustainable development in rural areas: *Planning must not determine the future development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be...* pg 26 Taylor Review)
- We feel that it is very important for the greater outer Exmoor villages to have new properties as there are a lot of people who live in these villages who still work locally.
- Option B is too restricted and will mean the few towns/ villages will become bigger and more commercial, which may make smaller places redundant and lead to loss of industry. Option C will leave new settlers with no means of transport or local network as these areas are too small/ underdeveloped. This is of no use to people needing affordable housing, as they have limited money and resource, and building houses where there is only a hall or shop and a handful of existing houses is unsupportable



A number of comments were made relating to particular places:

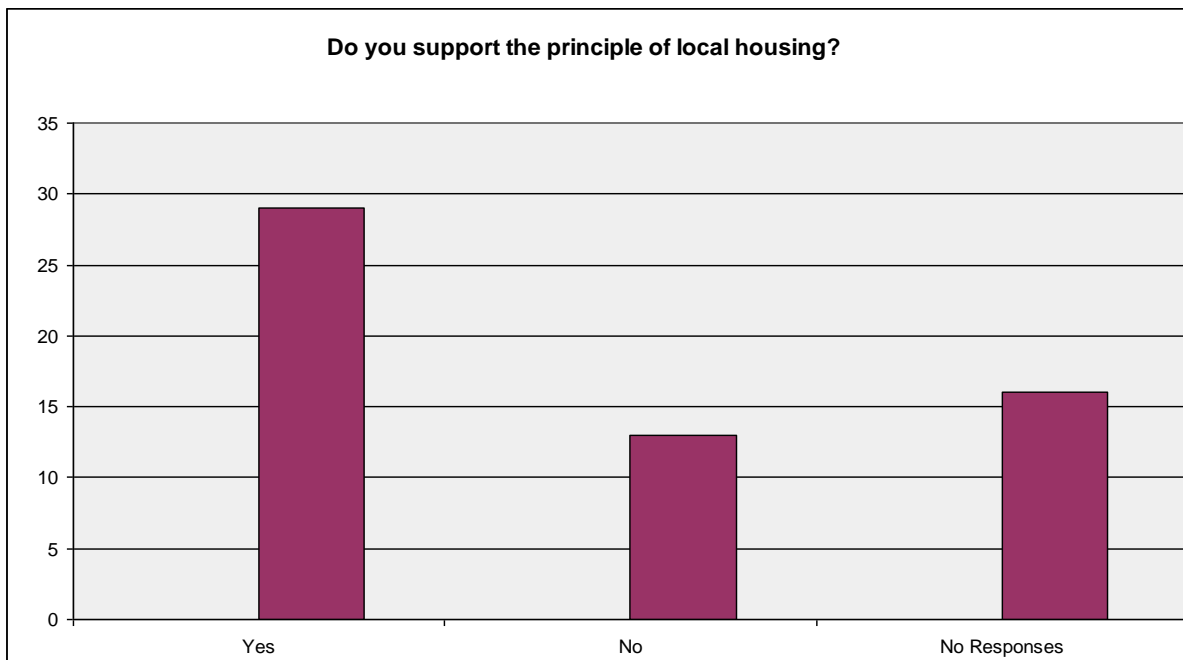
- Battleton: Absence of reference to the fact the West Somerset LPA part of the settlement is not an identified settlement for development purposes as defined in the Local Plan and therefore development proposals are treated as being in the 'open countryside' (Policy SP/5) (West Somerset Council)
- Object to Selworthy, Martinhoe and Countisbury being identified for new development by virtue of their character and landscape setting (National Trust)
- How will the neighbourhood plan at Lynton/Lynmouth feed into the Local Plan? (English Heritage)
- Specific representation regarding The Foundry Workshops, Roadwater. Seeking to overturn the current allocation for industrial use which is no longer suitable and gain a change of use to a brownfield site suitable for housing. (Mr & Mrs Nethercott, Sawmills, Roadwater)
- Porlock Parish Council believes that the current settlements boundary for Porlock is too tightly defined (relating to the main village only, excluding Porlock Weir and West Porlock) and would like to see the potential settlement boundary extended particularly with respect to Porlock Weir. This will open up new opportunities and reflect the potential impact of climate change and possible future need for dwellings on higher ground. (Porlock Parish Council)
- Additional development should be permitted along the route of the proposed extension of the Lynton & Barnstaple Railway at Blackmoor gate to provide engineering facilities.
- New build may be necessary to rehouse in Porlock Weir if it is inundated due to global warming.
- I think that it is essential to consider major development in Porlock Weir and West Porlock as there is to be "managed withdrawal" of flood protection in the area.
- Any settlement should not be excluded from consideration as long as a proven housing need exists.

## OPTIONS FOR DELIVERY OF AFFORDABLE HOUSING

4.4 The priority for housing in the National Park is still on the delivery of affordable housing, given the level of need, and the limited supply of land. However, lower levels of grant funding mean it is more difficult to deliver this in the foreseeable future, and alternative options for delivering affordable housing need to be considered. Four options were proposed, including raising funding for affordable housing through allowing limited local market or open market housing. As this is potentially a major change in policy approach, views were sought on the principle of introducing local housing and local worker housing.

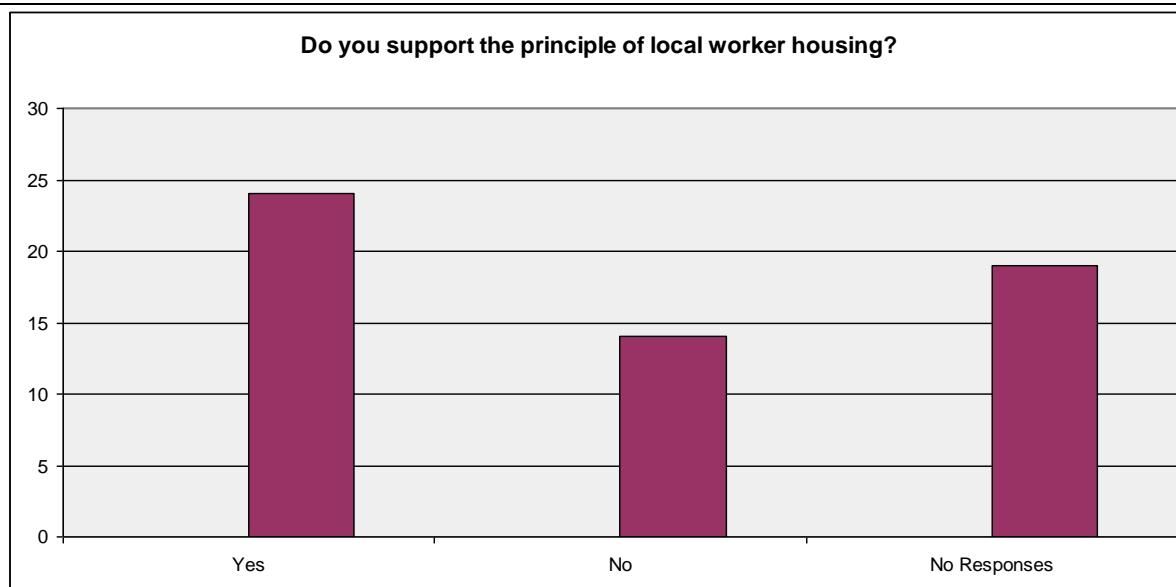
**Q2 Do you support the principle of local housing?** (i.e. housing only for local people who have lived in the National Park for 10 years or more but who may not need affordable housing. A local tie would be likely to reduce the value of the home compared to an open market home).

The majority (69%) of respondents who expressed an opinion (and half of all respondents) agreed with the principle of local housing.



**Q3 Do you support the principle of local worker housing?** (i.e. housing only for people who need to work in the National Park but who may not qualify as being in affordable housing need)

The majority (63%) of respondents who expressed an opinion (and 42% of all respondents) agreed with the principle of local worker housing



Written Comments:

- The definition of ‘affordable housing’ is too restrictive as it does not allow for intermediate and shared-ownership forms of affordable housing which may be the way that affordable housing may need to be funded/provided for in the future (West Somerset Council)
- The justifications relating to local worker housing fail to acknowledge that these are the consequences of the operation of a free-market housing economy. They should be deleted unless more specific benefits and dis-benefits cannot be identified (West Somerset Council)
- The document should reference the definition of affordable housing in the final version of the NPPF (South West RP Planning Consortium)
- Overall, for those settlements with potential for increased sustainability, we need to find ways of ensuring that more people live permanently and work in our settlements, to make them more self-sustaining and robust. Affordable, local and local worker housing all have roles in this. Open market housing does not, with the exception of that with a 'permanent occupation restriction' - '*living housing*'? the number of years qualifying local connection does not appear as a consultation item, however in my view 10 years is too long - five years would still be a significant 'milestone' but also better reflect the more mobile nature of populations and businesses now, and would be less likely to producing housing which is so marginal in terms of the dynamics of the whole housing market that it both cannot function as part of the 'housing ladder' and is potentially difficult to borrow against. (Positive Development Trust)
- The current affordable housing policy is restricting individuals who wish to change use from business to housing (individual representation from McCoys, Porlock)

Comments from the survey:

- Exmoor needs to encourage new families to move into the area. Why is not having the ambition to go anywhere for 10 years seen as a good thing. Exmoor needs less stagnation and more diversity
- If the people's homes, who are down sizing for example, are also used within these plans, i.e. reusing housing plan
- For an older person to down size.
- The control of the supply of housing by this method is going to stifle the viability of villages. What is the demographic of the Park? Is it self-sustaining?
- But the current 10 year local connection is too extensive (should consider 5 years) and too rigidly adhered to. There are other factors which give a local connection in addition to residency.
- Majority view - 6 to 1 - is that affordable housing should be just for local people living within the park and up to 10 miles outside the park.
- In many rural areas there has been a policy to restrict new housing in what are perceived to be unsustainable locations. Development policy should ensure there is a balanced approach to rural housing allowing communities to grow where there is a clear local preference. What is essential is that it must recognise the increasing problem of succession™ planning. This is where a farmer wishes to hand on the management of a family farm to the next generation.
- Although there is a need to increase the supply of affordable housing in Exmoor it is not only affordable homes that are needed to meet local housing needs. The Crown Estate is therefore supportive of the principle of providing local housing. Please see the main written response for further detail.
- As a local person with a young family, I know how difficult it is to find suitable housing in the National Park. However the potential to get suitable rental accommodation has been greatly improved over the last 5 years due to the provisions made in the Local Plan. The next challenge is to help the people in rented accommodation find ways to buy their own properties within the National Park or the same problems will reappear in 10 years when no-one has been able to move on from their current house
- Not on its own. This is too restrictive and does not allow for progression and new people to bring fresh ideas, community help etc. into the area. Plus, if this lowers the value of homes, people will not be able to afford to move out of the area, creating a stalemate.

Comments on local worker housing:

- Concentrate on rental sector for affordable element
- Pointless to maroon people especially those with young children, in villages where there are no infrastructure services.
- I feel this is important to keep non-dependants (aged 16 -65yrs) in the area, by meeting their housing needs by providing affordable housing.
- No point in providing affordable housing in areas not supported by bus, doctor, school,

shops etc.

- The shortage of affordable housing is a national problem - not just confined to Exmoor
- People wanting to move here with jobs not in the NP area may still need affordable housing. New blood needed!
- Sometimes there is a need to bring somebody into the NP because of employment
- As long as the new housing complies with the other policies of the plan and is in agreed locations, why would this need to be limited to housing only for people who need to work in the park.
- I think it is important that local workers such as a schoolteacher can live in the National Park
- Although there is a need to increase the supply of affordable housing in Exmoor it is not only affordable homes that are needed to meet local housing needs. The Crown Estate is therefore supportive of the principle of providing local worker housing. Please see the main written response for further detail.
- I think this needs more thought as to the control of this.
- But not to retain that house if they change jobs and no longer work in the area, otherwise what is the point of this if houses are only available for local workers the first time they are bought?

#### Question 4. Which Option would you choose for delivery of affordable housing?

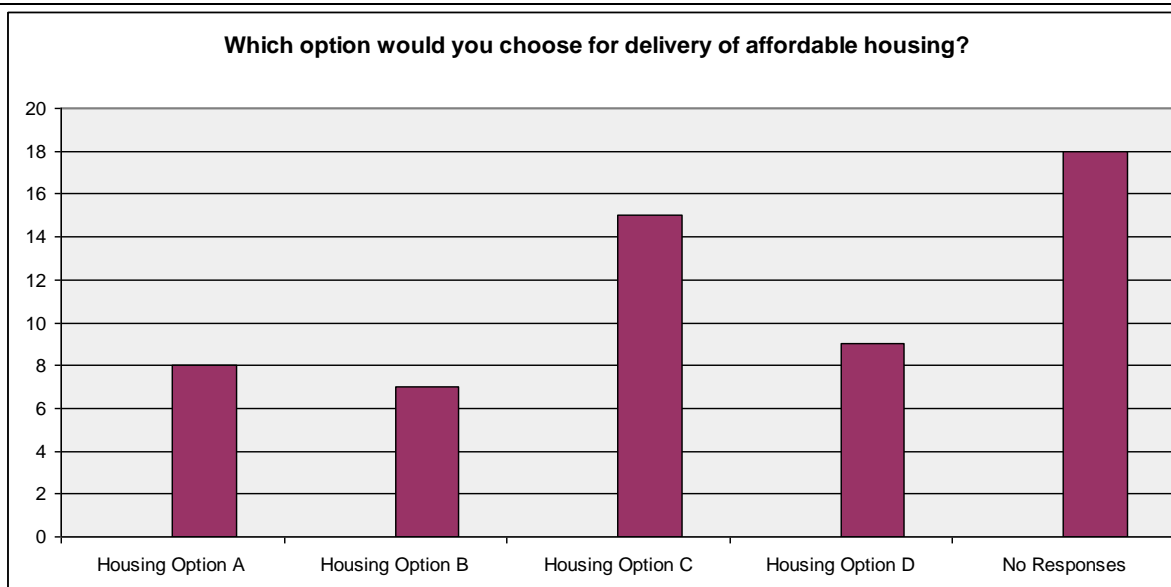
**Housing Option A:** As now, continue to require *all* new build to be for affordable housing to address local needs

**Housing 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

**Housing 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

**Housing 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. From the written comments, there was support for Option C from some respondents (West Somerset Council, Crown Estate, and South West RP Planning Consortium). Other respondents supported Option B (Exmoor Society, CPRE, and National Trust) and did not support Option C.



A number of written comments were made:

- The provision of affordable housing should remain the priority in the Local Plan. However, the current policy does not take account of financial viability, which is likely to be constraining delivery of affordable housing in the current economic climate due to impacts on land values. A flexible approach is needed which takes account of financial viability, including allowing some local or open market housing to facilitate the provision of affordable housing. Option C is supported as the most flexible approach, which could also support provision of other housing types required to meet local housing needs such as for an ageing population. Option A is not supported as it would constrain delivery of affordable housing and lead to more local people being displaced. (Crown Estate Commissioners)
- Object to Option A as it is too restrictive in enabling delivery of affordable housing to meet known need within the National Park. It will be less able to deliver the housing to meet future local needs housing of all types in the context of the emerging Central Government approach to housing delivery as set out in their recently published Housing Strategy. Failure to address the affordable housing need/demand within the National Park can cause increased pressure and demand on the affordable housing stock and future provision in neighbouring LPA areas especially where the Local Housing Authority is common to both (West Somerset Council)
- Unclear as to how Option A and B will be funded in the future with Government support for ensuring that future developments are viable (draft NPPF and Housing Strategy) being a key argument by developers against potential cross-subsidy and/or Section 106/Planning Obligations methods of funding (West Somerset Council)
- Support the principle of Option C allowing all types of housing development within the National Park. However, clarity is required as to how and by what means the provision of housing for local people (all types of tenure) will be linked to the open-market housing and still conform to Central Government aspirations in respect of the viability of delivering future developments. Also support the principle of Option D allowing open-

market housing in order to provide cross-subsidy funding for affordable housing. Again clarity is required as to the means by which this will be achieved (West Somerset Council)

- We welcome the NPA's recognition of *'the need to plan for the housing needs of an ageing population and to consider working age people some of who may not need affordable housing.'* We are pleased to note that the NPA fully understands the implications of the reduction of public subsidy on the delivery of affordable housing. (South West RP Planning Consortium)
- We support Housing Option C subject to text to be amended to state: *'requiring all new housing to be affordable housing but also, where required, allow for local housing ~~and~~ or open market housing to help fund the affordable housing through cross subsidy.'* This option allows the most amount of flexibility to respond to the individual circumstances of the site and the availability of grant at that time. The provision of open market or local housing could be set depending on the amount required to make the scheme viable. The policy should provide detail regarding the use of an open book viability assessment. This option also offers flexibility as we have concerns, which the NPA notes, over the level of cross subsidy that could be obtained from housing that is tied to local needs (South West RP Planning Consortium)
- We support Option B on Affordable Housing but the location of any new development should always be infill, brownfield but not on a greenfield site (CPRE)
- The Exmoor Society supports Housing Option B recognising that with decreased funding there may be little or no affordable housing constructed during the early years of the Plan and the need therefore to move away from existing Housing Option A. There was some support for moving to Option C. but in the end it was concluded that this might be going too far in that direction. It was recognised that in exceptional cases it would be possible to make decisions contrary to policy. The National Park has in the past made decisions contrary to Policy A which the Society had been able to support (Exmoor Society)
- Options C and D are not supported as they could be purchased as second homes. Recognise that a less restrictive way of providing affordable housing should be sought, e.g. that does not require transfer of housing. Accept that restricting new housing for landscape and sustainability reasons can be unduly restrictive for local communities or particular existing buildings (National Trust)
- What mix of these house types would be best would be a combination of response to the state and potential of the settlement and reverse quota open book viability assessment to inform what could be achieved on sites / across settlements as a whole. This needs to be done in the most environmentally efficient and innovative ways to not breach environmental limits and make the best of what we have (including sites which might appear hard to develop with traditional approaches). Overall the consultation document frames a rather prescriptive / top down approach rather than one sensitive to the localism agenda. There should be latitude for a community to define its own trajectory within the reasonable limits set by the broad strategic policies of the Plan. Thus a community might aspire to greater levels of specifically defined growth and should not be

unduly constrained by the analysis of their current state. Others might seek to specialise, and others might see their potential as very limited. The policies need to make space for this bandwidth and these debates (Positive Development Trust)

- It is beyond our remit to offer advice on all aspects of housing delivery within the National Park. Suffice to say that we believe it essential that necessary housing growth should be accommodated with the least impact on the natural environment. We note that Option 1 - 100% affordable housing to meet local need, performs best against the natural environment elements of the sustainability framework in the SA by a considerable margin and would encourage the Authority to attach considerable weight to that finding in its deliberations. (Natural England)

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Survey comments:

- Focusing on affordable housing alone ignores the needs of a large proportion of the local population.
- With open market housing, should a development be 3 or more houses 1 of these could have a local tie the odd open market house built within a village boundaries should be permitted.
- With the likely lack of external funding for the foreseeable future we believe that the only way that any affordable housing will be able to be delivered in the NP will be with cross subsidy from open market homes.
- Cutcombe has worked really well to produce a high quality, mixed and sustainable scheme. Whilst the open market housing didn't cross subsidise the affordable housing there is no reason this could not be replicated elsewhere to meet this objective. Developments should not, however, be driven by open market delivery. Only enough open market to make a scheme viable should be delivered.
- Considering that the plan lasts 15 years it seems best to move to B but if there were special circumstances then there is always the possibility of making an exception and going contrary to policy.
- All affordable housing should be for rental only is our majority view. There is also a minority view that some private development should be allowed for ownership but only for local people with a family connection.
- Option C provides for the most flexible approach to housing delivery, allowing for a proportion of local housing and open market housing to be provided as part of residential schemes where necessary to fund the affordable element. To continue with the status quo (option A) will only serve to constrain the delivery of affordable housing over the coming years. Please see main written report for further detail.
- I think it's very important that open market development is still highly restricted in the park otherwise the land value will start to rocket and young families such as ours will have no hope of ever being able to afford a home of our own.
- Option C, with strict limitations on the amount of open housing approved, to keep the housing market available to locals.



- In reality Open Market housing is essential to provide funding for Affordable Housing.
- Jobs have to be created before Affordable Housing is needed.
- Drop the word "all" for clarity.
- Cannot see the difference between B, C and D. Not sure differentiate between "local" and "affordable" housing.
- It is important to provide a range of housing! However open market housing is essential to maintain the areas' economic viability.
- Only to be built in areas which support families i.e. local facilities. Some open market housing to bring "new" money to this area.
- Affordable housing is okay but the overall policy does not allow for single open market houses to be built for people who bought properties years ago with the express wish to downsize in the garden. Most are pensioners on fixed incomes who have relied on this to fund their later years.
- Must have open market too!
- Oblige the owners of five or more second homes a.k.a holiday cottages, to make at least one available for long term occupation.
- Open market housing should be considered to subsidise affordable housing. No large scale housing development should be considered. Development should be in proportion to the village concerned.
- Whatever options are eventually chosen must be mindful of the needs of all sections of the community - it has to grow or die!

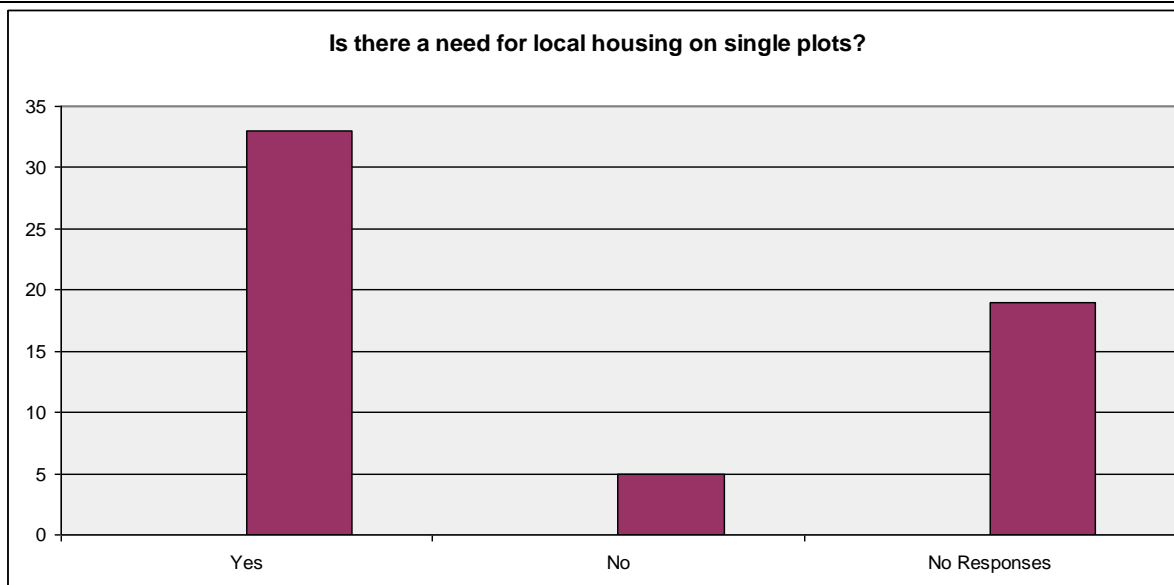
## ADDITIONAL POLICY ISSUES

4.5 Views were also sought on a number of policy issues that will inform the approach to housing in the Local Plan.

### Local Housing on Single Plots

**Q5) Is there a need for local housing on single plots within Exmoor's settlements?** i.e. to provide for the needs of an individual and possibly their family through allowing a single dwelling on a plot of land, which would meet their specific needs

The majority (87%) of respondents who expressed an opinion (and 37% of all respondents) agreed with this statement.



Written comments:

- Q5 - Yes but as part of the more sophisticated approach outlined in response to the Options i.e. with latitude for a community to define its own trajectory within the reasonable limits set by the broad strategic policies of the Plan. Q6 - Yes as economic and social networks do not respect the Park boundary (Positive Development Trust)
- The Exmoor Society wishes to see policies that give increased flexibility. But at the same time they should retain the overarching principle that the priority is for local needs housing. There may be circumstances where local housing on single plots should be permitted, but each case must be judged on its merits. We would not wish to prevent such development in all cases. Likewise we would support housing for people who need to live close to their work in the National Park, but again each must be judged on its merits (Exmoor Society)

Comments from the survey:

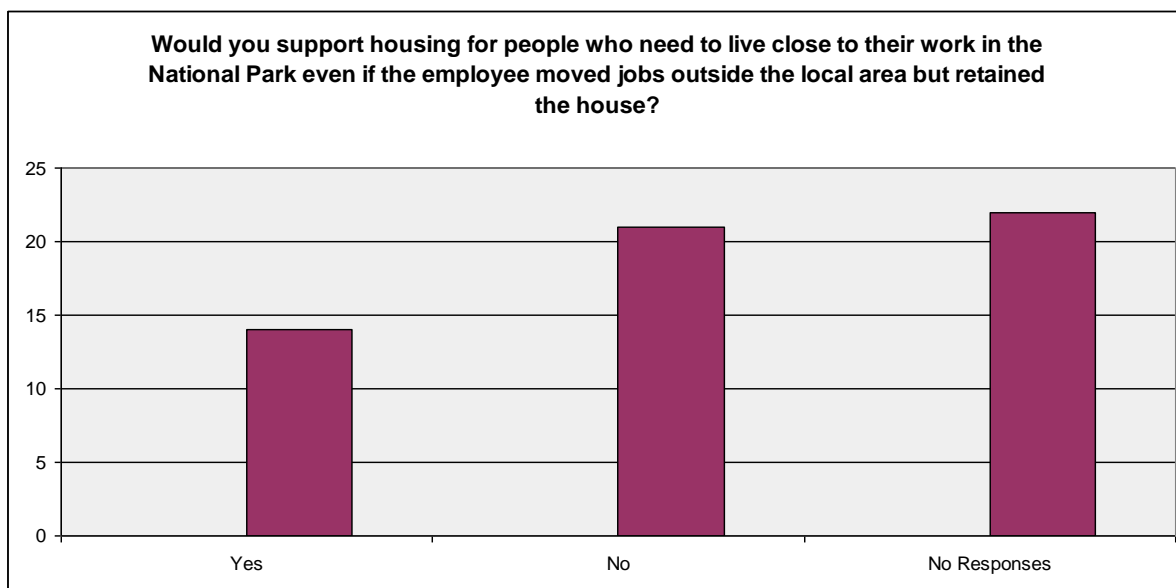
- There would definitely be a need - but I do not like the idea of specifically catering for an individual who may be lucky enough to be identified - when there may be others just as deserving who may not get the opportunity.
- Think if there was other affordable housing being built and made available locally this will not be necessary
- Cutcombe is, again, a good example of this, however, The NPA should satisfy itself that individuals won't be disadvantaged accessing finance for such projects due to planning restrictions imposed.
- In many villages there are small infill plots which would be suitable for 1 or 2 houses.
- This is essential given the nature of farming being in most cases remote from settlements. From time to time farms will need to create new housing in response to issues such as succession. The provision of new housing will allow for the older generation to leave the main farm house and allow the next generation to take over the main farmhouse and take control of the farming enterprise. Without this kind of

development farming will stultify.

- Not sure. This suggests groups who are likely to be older, and single plots will mean they must be able to drive, and to some degree self-sufficient. If this is the main group it does not make sense, you will end up with isolated people who cannot cope with this situation.
- How can you discriminate? What research have you carried out?
- It is important to try to improve the economic structure of Exmoor making it self-sufficient.
- More open market housing but also "affordable" not mansions
- Wider the mix the better
- Tied housing should be relevant to the work. If the owner ceases to work at the relevant location he should sell up.

**Q6) Would you support housing for people who need to live close to their work in the National Park even if the employee moved jobs outside the local area but retained the house?**

The majority (60%) of respondents who expressed an opinion (and 37% of all respondents) disagreed with this statement.



Written comments:

- Q6 Unless the property was linked (through ownership) and tied to a specific employer for whom the occupier was working, this would be impossible to implement and monitor. If the accommodation were to be tied in this way it would be down to the employer to resolve the occupation issue if the occupant no longer worked for them. It would not be a planning issue. (West Somerset Council)
- The Exmoor Society wishes to see policies that give increased flexibility. But at the same time they should retain the overarching principle that the priority is for local needs housing. There may be circumstances where local housing on single plots should be permitted, but each case must be judged on its merits. We would not wish to prevent such development in all cases. Likewise we would support housing for people who need

to live close to their work in the National Park, but again each must be judged on its merits (Exmoor Society)

Comments from the survey

- What kind of leading question is this? The implication is that the employee would be made homeless if his job moved outside the Park - Is this what the Park aspires to? If this is what you want then you had better make sure the Tenancy given allows this! Ridiculous
- It is difficult for the NFU regional office to comment directly on this question without extensively consulting with our members.
- Not to retain that house if they change jobs and no longer work in the area, otherwise what is the point of this if houses are only available for local workers the first time they are bought?

### Reuse of existing buildings

Q7 Do you agree that there are some circumstances where re-use of an existing building for affordable housing may not be appropriate but allowing the change of use could bring other benefits? Tick 'yes' for any statements below that you agree with and tick 'no' for any you disagree with:

	No. of responses	
	Yes	No
i) Affordable housing is not viable but the reuse could achieve the conservation and/or enhancement of important historic or listed buildings	35	3
ii) The building is not suitable for conversion or subdivision for affordable housing for conservation or historic reasons, but the reuse could achieve the conservation and/or enhancement of important historic or listed buildings	33	1
iii) A proposal would provide more affordable homes than are needed within the parish and adjoining parishes (and the National Park as a whole?	17	17
iv) Conversion of a building to local need affordable housing is not viable	17	11

The majority of respondents who expressed an opinion supported statements (i) and (ii). Half of respondents who expressed an opinion supported statement (iii). Two-thirds of respondents who expressed an opinion supported statement (iv).

Written Comments:

- The inherent costs involved in converting a traditional building will usually mean that a conversion to an affordable home is unviable. The Crown Estate is therefore pleased to see that the National Park Authority now recognises that there are some circumstances whereby affordable housing may not be appropriate or achievable, but where allowing the conversion of the building could bring other benefits e.g. for home working. Allowing a proportion of affordable residential conversions to non-affordable dwellings could fund

the provision of affordable dwellings elsewhere on the site through cross-subsidy or through the provision of developer contributions towards affordable housing elsewhere. The (Crown Estate Commissioners)

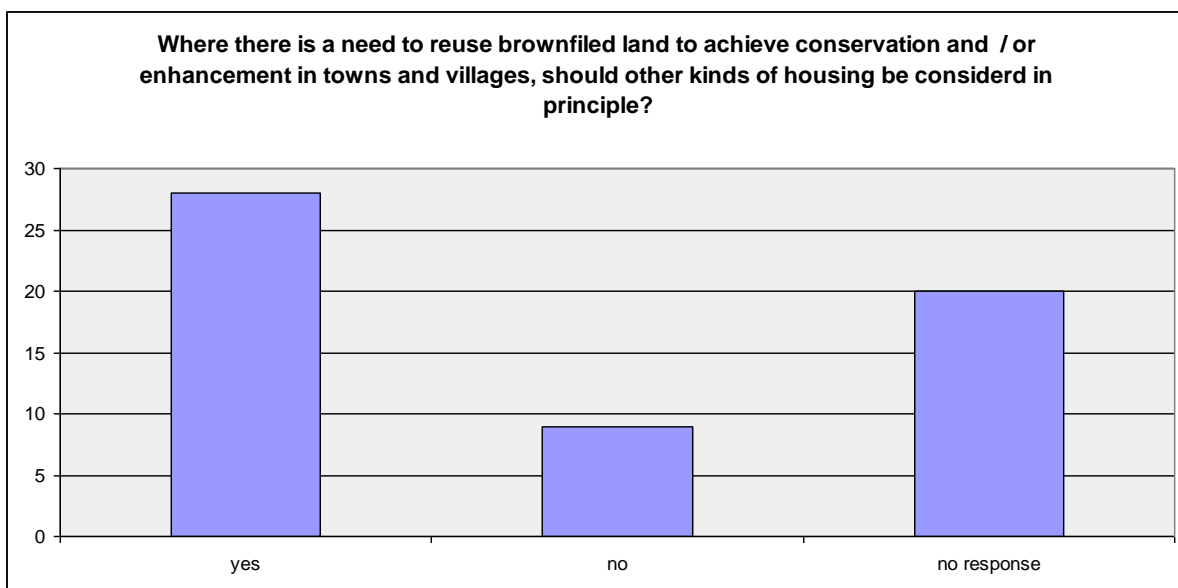
- Text does not allow for consideration of alternative uses including mixed-use, employer-tied accommodation or, work/live units with the emphasis of the building being primarily an employment activity to which the residential accommodation is ancillary. Also a condition or other legal agreement (i.e. Section 106) would be included to prevent the two elements being sold off individually (West Somerset Council)
- The Exmoor Society is generally in favour of increasing flexibility in this area and accepts that there might be circumstances in which any of the four options might be the right solution in a particular case. It is expected that this should, in some cases, require viability assessments (Exmoor Society)
- Current Local Plan policies are too restrictive and have hampered efforts to secure new uses for existing buildings, particularly Listed Buildings. Strongly support criteria-based approach (page 12) (National Trust)
- Only place by place i.e. the money is for development elsewhere in the same settlement. Park wide makes no sense for individual communities or in terms of the overall scarcity of developable land. (Positive Development Trust)

There were no comments from the survey responses.

### Conservation/Enhancement in Settlements

**Q8 Where there is a need to reuse brownfield land to achieve conservation and/or enhancement in towns and villages (and affordable housing would not be viable), should other kinds of housing (i.e. local or open market) be considered in principle?**

The majority (76%) of respondents who expressed an opinion (and 49% of all respondents) agreed with this statement.



Written comments:

- This needs to be placed in context of what may have been on the site before. If it were a

‘bad-neighbour’ use, then a higher value alternative use (e.g. open-market housing) may be the only alternative to securing a viable development on the site. The alternative could be a derelict site that would continue to be an eyesore (West Somerset Council)

- There might be circumstances where the reuse of Brownfield land for other than non-affordable housing might be the best way forward to enhance a specific location. Again all cases must be considered on their merits to justify such a development (Exmoor Society)

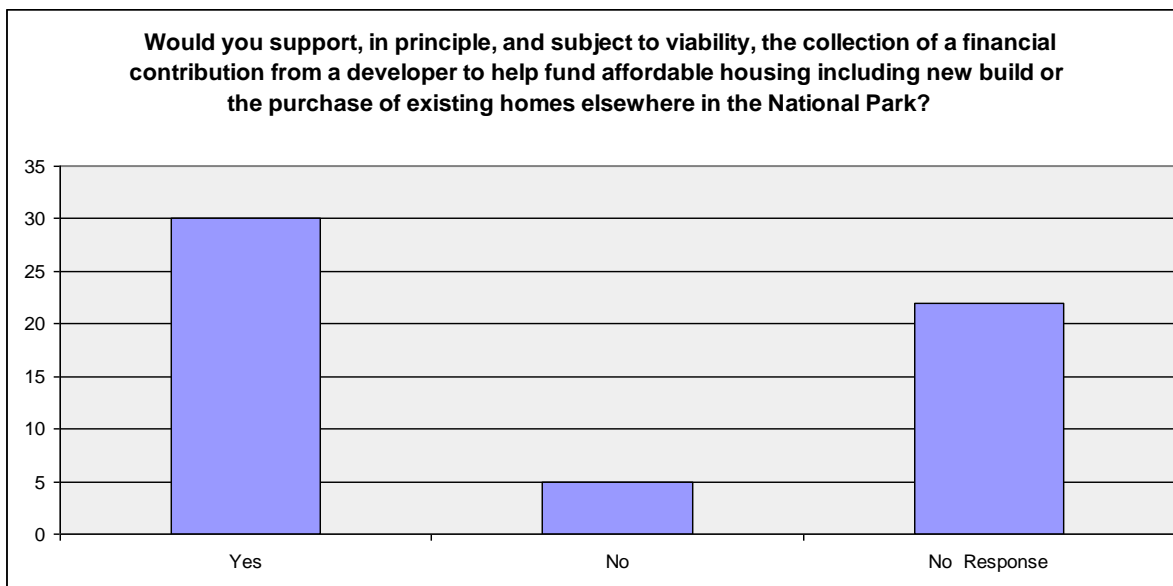
Comments from the survey:

- Brownfield land could be used for a community amenity i.e. tennis courts, bowling green, picnic area.
- Not in principle - as a policy.
- It is important to build on brown field sites. in doing so this will protect large areas of countryside from being built on.
- Brownfield land could be used for a community amenity i.e. tennis courts, bowling green, picnic area.
- The Brownfield land should revert to natural open space / woodland / orchard.
- If the cultural / historical nature of the building is not compromised, conversion to make them useful should be allowed.
- Can't say; I think any case of this sort should be decided on its merits.
- As long as a financial contribution is sought from the developer to enable affordable housing elsewhere - and development should be on a small scale only.
- Yes, possibly. There is a desperate need for something to be done about the change of types of occupancy of many dwellings in Exmoor Villages, though. Something needs to be done to help reverse the trend for dwellings to be sub-divided in to holiday lets, and to address the problems associated with second homes, which rip the heart out of village communities.
- Should be decided on a case by case basis.
- All options should be considered.
- It is important to sustain or enhance the viability of towns and villages and not fossilise them.
- With safeguards to prevent over use of this type of land.

## Financial Contributions

Q9) If you agree with any of the incidences above in Q7/8 would you support, in principle, and subject to viability, the collection of a financial contribution from a developer to help fund affordable housing including new build or the purchase of existing homes elsewhere in the National Park?

The majority (86%) of respondents who expressed an opinion (and 53% of all respondents) agreed with this statement.



### Written Comments:

- Support the levying of Section 106/Planning Obligations from development proposals to contribute towards the provision of affordable housing and/or other relevant community facilities to meet local needs in the surrounding area (west Somerset Council)
- Support in principle the collection of a financial contribution from a developer to help fund affordable housing elsewhere in the National Park (Exmoor Society)

### Comments from the survey:

- Essential now due to reduced grant rates.
- If a developer intends to make money out of a project they should contribute to affordable housing.
- There have been recent examples of change of use of more isolated hotels where this would have been appropriate - providing the spending of the any financial contributions is negotiated with flexible geographic spending areas.
- In a national park it is very reasonable to seek a financial contribution from a developer in return for what is a special privilege - development within a designated protected area.
- The Crown Estate agrees with the principle of collecting a financial contribution to fund affordable housing elsewhere in the National Park. It is however important that contributions are not set so high as to threaten the financial viability of developments. Please see main written report for further detail.
- It could be something worth considering.
- Providing the definition of developer is a commercial business that has the capacity to

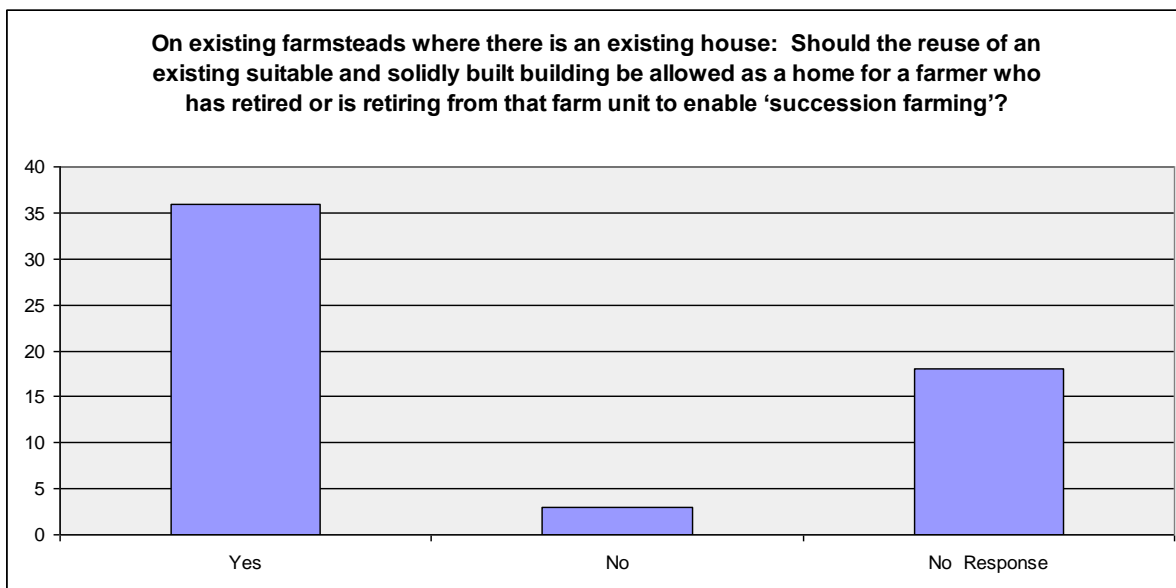
meet this. Not for individuals building their own home, or perhaps the sole trader builder who only works on one house at a time. The developer must have the means to absorb this cost, and still retain healthy profit. This approach also helps locals feel less put out if they are getting something put into their community.

- Planning obligation must be relevant to a development not to a policy.
- A developer needs to be checked and plans analysed. It is essential that new builds will take into consideration social and spatial characteristics to ensure all developments are sustainable in the long term (environmentally/economically/socially).
- On the condition that the developer is not deterred from building. The work must be viable. This should be negotiable.

**Farmsteads:**

**Q10) On existing farmsteads where there is an existing house, should the reuse of an existing suitable and solidly built building be allowed as a home for a farmer who has retired or is retiring from that farm unit to enable ‘succession farming’ e.g. to allow a younger family member to live in the main farmhouse and the retiring farmer to remain living on the farm?**

The majority (92%) of respondents who expressed an opinion (and 63% of all respondents) agreed with this statement.



**Written Comments:**

- Support in principle but would caution that in most cases it is unlikely to be financially viable without some form of cross-subsidy and therefore may also require one or more other buildings on the farmstead to be converted for market housing to fund the dwelling for the retired farm worker. (Crown Estate Commissioners)
- Modification of agricultural condition on the relevant new planning permission to limit the occupancy to agricultural and/or forestry workers who, “...are employed locally or, were last employed locally in...” Application of such a modified condition should address the issuer of ‘succession farming’ (West Somerset Council)
- Subject to a proper analysis to ensure that the case is genuine and would support



‘succession farming’ the Society would support the reuse of suitable existing building to be allowed as a home for a retiring or retired farmer (Exmoor Society)

- Support provided that occupancy and separation from the farm holding can be appropriately restricted and there is no adverse landscape impact (National Trust)

Comments from the survey:

- Family dynamics - although important should not influence the ENP decision on such a matter
- But it could be the other way round i.e. younger family live in new home. Land use is the issue. Tie is essential to the land.

Barn conversions and builds of this kind must be encouraged! They need to look in line with the rest of the farm but again, the use of a barn or farm buildings will promote brown field development.

#### Other comments:

- Although the final draft vision statement and draft objective 14 express a desire to achieve a strong, diverse and resilient economy in the National Park, The Crown Estate is disappointed to see that the National Park Authority has not presented any options with relation to economic development as part of this consultation. This is a notable omission as the success of the local economy will have a direct impact on the social and environmental sustainability of the park. Barriers preventing Exmoor from fulfilling its economic potential and concerns raised by rural businesses include a lack of appropriate premises, extremely limited scope for expanding or modernising existing premises, and inflexibility within the planning system with regards to economic growth. The new Local Plan should seek to overcome these issues in order to encourage strong rural economies which offer those living in rural areas better opportunities to work locally e.g. through encouraging the provision of suitable premises to facilitate opportunities for home-working, which would also reduce the need to travel.
- The Crown Estate is working hard to develop and enhance the tourism industry in Exmoor with the aim of increasing public awareness and the enjoyment of the National Park. It is the aspiration of The Crown Estate to continue to invest in visitor facilities and services in Dunster Forest and where appropriate to attract new forest based tourism activity. The National Park Authority is therefore encouraged to support the work that The Crown Estate, and indeed others are doing to promote Exmoor as a popular destination. (Crown Estate Commissioners)
- Absence of reference to sources and/or evidence to justify or provide context for the approach being taken. These need to be made clear otherwise it will leave the plan, strategy and policies open to challenge (West Somerset Council)
- Dunster – current policy CSF4 is too restrictive and has caused difficulties providing services and facilities. Seek a new approach allowing appropriate commercial development but protecting historic core of the village (National Trust)
- Exmoor National Park should endeavour to monitor the impacts of additional visitor

numbers during the construction of Hinkley Point C and the effects this may have on the National Park. There may also be a need to monitor pressures associated with worker accommodation and the effects on housing available locally for local people and tourists. (Somerset County Council)

- We recommend the inclusion of a generic telecommunications policy within the ‘General Policies’ section of the emerging Local Plan, to ensure the facilitation of a high standard of communications infrastructure within the National Park whilst safeguarding its special landscape and environmental qualities. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. (*Draft policy wording suggested*). We would also support the formation of any Telecommunications SPD within the LDF to provide further guidance and advice. (Mobile Operators Association)
- Maximising the investment into sport and recreation through the land use planning system is one of our priorities. A planned approach to the provision of facilities and opportunities for sport is necessary in order to ensure the sport and recreational needs of local communities are met. The importance of sport should be recognised as a key component of Green Infrastructure (GI), and not considered in isolation. It is clear that outdoor sport already takes place in areas that could be considered part of the existing green infrastructure network, river and green corridors provide space for sports such as canoeing, sailing and horse riding events, and wider open space in the countryside plays host to climbing, all types of cycling events among many others. Green Infrastructure will also include formal sports that have identifiable facilities, like pitch based sport on playing fields. PPG17 makes it clear that open space can perform a variety of functions, so playing fields may serve informal recreation and support wildlife corridors. Sport England has been a statutory consultee on planning applications that affect playing fields since 1996 due to concern over losses. Sport England aims to provide best practice guidance on designing and planning sports provision. We also offer advice and support in strategic planning for sport to assist in plan marking. Key parts of our website offer support in developing policies for sport. (Sport England)
- Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection. Recent Government Strategies and policy (Natural Environment White Paper, England Biodiversity Strategy), state: “*We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites.*” Draft NPPF “*...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland...*” The Trust believes all ancient woodland and ancient/veteran trees must be given *absolute* protection under this Local Plan. We would like to see this incorporated into a Trees & Woodland SPD, as part of the supporting LDF documentation. While Ancient Semi-natural Woodland (ASNW) is an irreplaceable habitat that contributes significantly to existing ecological biodiversity and must be protected, Planted Ancient Woodland sites or PAWS (i.e. ancient woodland where the native trees have been removed and the site replanted with non-native species, chiefly conifers) present a key opportunity for habitat restoration. We would like to see the need for sensitive restoration of Planted Ancient Woodland Sites (PAWS)

incorporated into the Local Plan and a formal Trees, Woods and Forests Supplementary Planning Document (SPD). We would like to see the Local Plan support native woodland creation as a key delivery tool for improving people’s quality of life, particularly via green infrastructure strategies & incorporated into a Trees & Woodland SPD, as part of the supporting LDF documentation. The Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and other social and economic issues that can be addressed by green infrastructure provision in urban design. Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, encapsulated in our *Space for People* publication. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering green infrastructure. We would be pleased for the Woodland Access Standard to be used to underpin this Local Plan and its supporting documentation including a Trees & Woodland SPD. Native woodland on Exmoor can deliver significant economic benefits – employment, regeneration, house prices, rural development, bioenergy, tourism. (Woodland Trust)

- The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK’s energy infrastructure during this period. There will be a requirement for an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites). The main areas of our activities that may have an impact on National Parks are the development, maintenance and refurbishment of the gas and electricity transmission and gas distribution network infrastructure required to fulfil our statutory duties. We are committed to ensuring that all work carried out in, or affecting National Parks, is done in a manner which reflects the duties on National Grid under the National Parks and Access to the Countryside Act 1949 and other relevant legislation, including The National Parks (Scotland) Act 2000, in particular the duty to have regard to National Park purposes. National Grid is a member of the Corporate Forum for National Parks. We are committed to the protection and enhancement of the environment, always seeking new ways to minimise the environmental impacts of our past, present and future activities. We incorporate environmental considerations into all of our business activities and we monitor our environmental performance, audit the effectiveness of our management systems, and report our performance to our employees, shareholders, the public and other stakeholders. (National Grid)