

CLARIFICATION:

I carefully noted in all the four days that I attended the ENPA kept quoting: *"conserving and enhancing the natural beauty, wildlife and cultural heritage"*. Not once, not one single time did they mention: *"promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public"* and only *"Duty to foster the economic and social well-being of communities living within the National Park"* to deny it's importance when questioned, despite the Taylor Report etc....

As I feel it got misinterpreted at the Dulverton meeting I also wish reiterate that the Sandford Principle was a concept, it was not legal statement and is often misquoted as *"conservation has priority over recreation"*, however, importantly, it is better summarised as, "where those two purposes cannot be reconciled by skilful management, conservation should come first" , and hence, since 1995, consideration of the Sandford Principle has only been possible through the Environment Act itself, and that the Sandford Principle does not relate to the *Duty to foster the economic and social well-being of communities living within the National Park*.

FURTHER STATEMENT RE: EX11 & EX12 AND EX14-18**EX11 Housing Completions Data - Breakdown of Development Typology - SHLAA Analysis**

The term Affordable Housing is used when ENPA policy is Local Needs Housing. Using the former gives the wrong impression of 'cheap', the ENPA should clearly state their policy will not provide 'cheap' housing, that their policy is to restrict who can live in a property.

Why hasn't the number of Local Needs Housing:-

1. planning applications that have been refused by the ENPA been included?
2. pre-application discussions that have not progressed to a planning application been included?
3. created from conversions of B&B's been included?
4. created from the relaxation of holiday let residency conditions been included? e.g. <http://www.rightmove.co.uk/property-for-sale/property-60082367.html>
5. where the social landlords/housing associations have moved existing tenants into these new properties from their existing properties been included, i.e the practice of moving existing HA tenants to fill these new properties, because they could not find tenants without a home that met Local Needs criteria and wanted to move in.

Ian Rigby, former ENPA member, advised this was done to save embarrassment and allowed HA's to release other properties, that haven't a Local Needs condition, to people from away.

6. Why hasn't the number of empty properties brought back into the housing stock by way of EDMO's Empty Dwelling Management Orders been included?

That the ENPA have actually refused planning permission on 9 Local Needs planning applications, that the ENPA really bought Blackpitts Bungalow with the

intention of demolishing it because it spoilt the 'view', representing some 10%+ of completions, this would indicate the need for Local Needs Housing is not as pressing as the ENPA would have you believe.

Couple this to the fact that:-

- in 2008 the ENPA actually blocked an NDC, North Devon Council, proposal to put 8 units above the ENPA's Lynmouth Pavilion;
- the NDC refused to release grant funding for a LLTC, Lynton & Lynmouth Council, proposal to put 3 Local Needs houses on LLTC land at Grattons Drive, because the NDC believed there was not a need for 'Local Need Housing' on Exmoor;
- the ENPA thwarted Dean Steep's conversion of 12 holiday cottages at Barbrook in pre-application, due to poor public transport links to Lynton even though it has 5 times the number of buses as Lynmouth has to Lynton;
- and that last year the ENPA made North Devon Homes HA build 2 shop units and 3 flats, Costain Villa, away from Lynton's retail centre instead of 4 flats; both shop units remain empty.

I personally gave the ENP Housing Enabler a the whereabouts of a number of empty properties, including 2 neighbouring properties in Watersmeet Road: Woodbine Cottage and Lincliffe Cottage that have been empty, verging towards derelict for 10+ years, that the ENPA singularly failed to do anything about, failed to pursue NDC to instigate EDMO's. This is all well documented.

EX12 Extract from Exmoor National Park Authority Annual House Price Survey 2012

Why haven't comparisons been shown with areas of both North Devon and West Somerset not in Exmoor National Park; will it show existing ENPA housing policy since 2005 has in fact exacerbated price inflation, that the existing draconian housing policy is the problem?

EX14 SHLAA potential supply delivered through conversions

Why hasn't the number of Local Needs Housing, the breakdown between those built by social landlords/housing associations and private developers been included?

EX15 Affordable Housing Completions by Tenure

Why aren't the definitions shown, what is the difference between Social Rented and Affordable Rented, are they 'cheap'?

Why isn't the breakdown between Privately Owned and Privately Rented shown?

How many of the Shared Ownership, Privately Owned, Self Builds are mortgaged?

On the mortgaged Owned how many mortgage offers on average did each receive, what percentages, conditions and premiums above normal Open Market Owned properties did they incur.

EX16 Principal Residence Dwellings Permitted

On those documented how many mortgage offers on average did each receive, what percentages, conditions and premiums above normal Open Market Owned properties did they incur.

How many proposals is the ENPA currently in pre-application/application discussions for Principal Residence Dwelling planning permission and for dual permissions whereby the same property has both Principal Residence Dwellings and Self-Catering permission?

EX17 DCLG Building More Homes on Brownfield Land. Consultation Proposals

Brownfield land is only a solution if available, ENPA policies do not incentive brownfield land owners to build more homes.

What brownfield sites does the ENPA own?

What ENPA owned land near settlements have they sold to facilitate Local Needs Housing?

EX18 Superseded by Case Law – West Berks DC & Reading BC v SSCLG[2015 EWHC 2222 (Admin)]. Changes to Government Policy

Government policy has already been stated and re-stated in the courts; under duress the government made an allowance, which states 'may choose to apply', the allowance does not have to be applied:

- *in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development.*

Government policy to all planning authorities remains:-

- *contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm*

Government policy is not 10-units or less and in designated rural areas 5 units etc., government policy remains 10-units or less, the question is what the figure would be most appropriate between 5 and 10 units in designated rural areas, and what evidence there is beyond blindly quoting "Conserve and enhance the natural beauty, wildlife and cultural heritage" for this.

John Dower, secretary of the Standing Committee on National Parks 1945 report and Arthur Hobhouse's later report was the basis for the National Parks and Access to the Countryside Act 1949.

The essential requirements of a National Park are that it should have great natural beauty, a high value for open-air recreation and substantial continuous extent. Further, the distribution of selected areas should as far as practicable be such that at least one of them is quickly accessible from each of the main centres of population in England and Wales. Lastly there is merit in variety and with the wide diversity of landscape which is available in England and Wales, it

would be wrong to confine the selection of National Parks to the more rugged areas of mountain and moorland, and to exclude other districts which, though of less outstanding grandeur and wildness, have their own distinctive beauty and a high recreational value.

In other words National Parks are not the most outstanding examples of English/Welsh countryside, they happen to be the ones that have a *high value for open-air recreation, substantial continuous extent and quickly accessible from each of the main centres of population.*

This point is graphically illustrated by the fact that Dulverton, where the planning meeting was held and where examiner luxuriated about its beauty, was not included in the original plans for Exmoor National Park as it was not deemed outstanding enough. Only after the Quantock Hills were excluded due to local opposition and the Vale of Taunton that separates them from Exmoor, was Dulverton included as it had a building suitable for the ENPA headquarters, today's Exmoor House. It is safe to say that Dulverton would not be in the National Park if this building had not available at the time of its formation.

A declining economy heavily based on tourism and farming invariability provides just low wage, seasonal, casual employment at best; I believe that the ENPA should concentrate on attracting employment to Exmoor that provide at least average wages.

The fact of the matter is 20 and 30 year olds are not leaving Exmoor due to a shortage of housing, they are leaving Exmoor for better jobs, quality jobs and a better life elsewhere. The ENPA believe that by providing Local Needs Housing at the expense of everything else it will attract 20 and 30 year olds to stay with low wage, seasonal, casual employment.

Rebecca Pow MP in Parliament this May said that Taunton was losing its young people to Bristol, Exeter, Birmingham and London, advocating a University of Somerset be built there. If Taunton struggling what chance Exmoor!

Currently Exmoor's only growth area is in attracting retired people, who contribute little to the local economy, but are high users of local health and social provision etc.. Indeed retired people are the primary reason for Exmoor's housing problem, see attached, none of which even gets a mention in the proposed Exmoor Plan.

Exmoor Nat Park's median age is 56 and getting older

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualsmallareapopulationestimates/mid2014andmid2013-national-park-population-estimates>

International Longevity Centre UK

http://www.ilcuk.org.uk/images/uploads/publication-pdfs/Generation_Stuck.pdf One in three homeowners aged 55+ (32.6%) are considering or expect to consider downsizing. *".....there is substantial demand amongst older households to consider downsizing, which could even have an important impact in addressing continuing challenges in the UK housing market. But it is clear that there remains an inadequate supply of the kinds of properties that would serve older households."*

https://www.planningportal.co.uk/news/article/354/retirement_housing_shortage_quantified

http://www.ilcuk.org.uk/images/uploads/publication-pdfs/The_state_of_the_nations_housing_-_An_ILC-UK_Factpack.pdf

"New report shows an increasing gap in the supply of retirement housing with an estimated shortage of 376,000 housing units by 2050..."

Second/holiday homes are a problem but nowhere near a problem as retired people, their problem is being reclassified as businesses to save council tax <http://www.step.org/second-homes-reclassified-businesses-save-council-tax>

This has been going on since April 2010 when SBRR was increased from 50% to 100%, by switching the property the owner avoids paying Council Tax, the government is effectively giving these property homes an incentive to buy holiday homes which makes anything LPA's do utterly futile and meaningless from a housing standpoint.

Bodies such as the Crown Estate and National Trust who you would think would take a more holistic approach don't care either. The National Trust recently turned a house at Watersmeet near Lynmouth that could have gone to a local family into holiday let after Nat Trt Ranger moved out

<https://twitter.com/RobjouplesNT/status/759055088904245248>

I also wish to draw your attention to a recent Appeal decision: AONB development necessary to meet housing need

<http://www.theplanner.co.uk/decision/appeal-aonb-development-necessary-to-meet-housing-need>

A supply to be two years which he regarded as a "severe" shortfall, Exmoor has no housing supply.

R C Briden

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News

Ageing England

Areas where four in ten residents will be over 65 by 2021

- 1 West Somerset 47.4%
- 2 North Norfolk 46.3%
- 3 Christchurch 45.2%
- 4 Rother 45%
- 5 Tendring 44.5%
- 6 East Devon 44.5%
- 7 East Dorset 44.2%
- 8 New Forest 42.8%
- 9 South Lakeland 42.7%
- 10 West Dorset 42.6%

Areas where the number of households headed by over-75s will rise by 5% by 2021

- 1 Lichfield 5.8%
- 2 South Staffordshire 5.7%
- 3 Wyre Forest 5.6%
- 4 Test Valley 5.1%
- 5 Kensington & Chelsea 5%

Source: NHF

Rural pensioners keep young families off housing ladder

Jill Sherman Whitehall Editor

The shortage of affordable homes in many of England's rural areas is pricing out young families and will lead to dozens of "pensioner pockets" in the countryside, an analysis shows today.

The study, from the National Housing Federation, shows that a sharp rise in pensioners living in rural areas by the end of the decade will stop younger generations from getting a foothold in areas where they grew up. A list of pensioner pockets, where more than 40 per cent of all households will be over 65 by 2021, suggests that the vast majority will be in rural areas.

West Somerset is expected to be the area most affected. Within six years it is expected to house England's oldest residents — with nearly 48 per cent of its households of pensioner age. Next comes North Norfolk (46.3 per cent) and Christchurch, an urban borough next to Bournemouth. Behind them are Rother, Tendring and East Devon.

"Our idealistic view of the English countryside is fast becoming extinct," David Orr, the federation's chief executive, said. "Workers and families aspiring to live, work and grow up in the countryside can't find homes they can afford. If we don't build more homes, these places will become pensioner pockets rather than the thriving, working communities they can be."

The figures, published to coincide with Rural Housing Week, also list the top 20 areas in England where the population aged over 75 is expected to increase most quickly by 2021. Eighteen of these are in rural areas, led by Lichfield, in south Staffordshire, and Wyre Forest in Worcestershire.

The federation said that disproportionately ageing populations was only one of the symptoms of the worsening housing shortage in rural areas. The cost of buying a home in 90 per cent of rural areas is eight times the average salary, while wages in these areas languish way below the national average, making them unaffordable for many young people and families.

This is already putting pressure on small businesses, who cannot find local workers, and schools in places where families have moved away. It is also putting high demands on the health and social care services that are needed for ageing communities.

George Osborne is expected to unveil a package of measures to increase home ownership and to encourage developments in his budget on Wednesday. However, housing organisations have argued that successive governments have not been ambitious enough in trying to provide the 250,000 new homes needed every year.

The federation will call today for more new homes in rural districts, planned at a local level. Several councils in London have started looking at tailored accommodation for pensioners to encourage them to move out of bigger homes, although this is less common in rural authorities. "All it would take to deal with the acute housing crisis in rural areas is a handful of high-quality, affordable homes in our villages or market towns," said Mr Orr.

"The government has committed to ending this housing crisis within a generation. To make this happen it must free up land and provide proper investment in affordable housing."

Libby Purves, page 22