

# ITEM 7

## EXMOOR NATIONAL PARK AUTHORITY

### PLANNING COMMITTEE

3 March 2009

### LOCAL DEVELOPMENT FRAMEWORK CONSULTATION ON ISSUES AND OPTIONS WITH STAKEHOLDERS

#### Report of the Head of Planning and Community

<p><b>Purpose of Report:</b> To inform members of the results of the initial consultation with stakeholders on the issues and options for the Exmoor National Park Local Development Framework.:</p>
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#### **Legal Implications including Human Rights Act 1998:**

Exmoor National Park Authority is required to produce and consult on a Local Development Framework (LDF) in accordance with the Planning and Compulsory Purchase Act 2004. The LDF will form part of the development plan for the National Park, the first consideration in determining planning applications which legally should be determined in accordance with the development plan unless material considerations indicate otherwise.

#### **Financial Implications:**

None

#### **Management Plan Objectives and Targets:**

The Exmoor National Park LDF development plan documents contain policies which guide the use and development of land, framed to ensure they are consistent with and further National Park purposes.

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#### **RECOMMENDATION:**

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It is recommended that the Committee:

1) NOTES the content of this report to inform the development of Issues and Options for the LDF and as the basis for developing further consultation with stakeholders and National Park communities.

#### **1. INTRODUCTION**

1.1 This Paper provides a summary of the consultation with stakeholders to develop issues and options for the LDF.

1.2 To inform, stimulate and focus discussions on issues and options a series of topic papers were produced and sent out to stakeholders and were available on the National Park website. The topic papers set out key issues

and include information, facts and research. It was recognised that the topics and many of the issues are inter-related. Topics were therefore combined to avoid production of a large number of separate papers. The topic papers were as follows:

Topic Paper A: Economy and Employment

Topic Paper B: Housing

Topic Paper C: Climate change, Waste Management and Pollution

Topic Paper D: Historic and Built Environment and Minerals

Topic Paper E: Landscape, Wildlife and Land Management

Topic Paper F: Settlements, Services, Transport and Infrastructure

Topic Paper G: Recreation and Tourism

- 1.3 A copy of each topic paper is available on the National Park website <http://www.exmoor-nationalpark.gov.uk/index/livingin/planning/ldf/living-in-ldf-core-strategy.htm>
- 1.4 At each stakeholder event there were two sessions and stakeholders were invited to discuss one topic at each session. Issues were presented and stakeholders were asked to provide planning policy options to each issue and to add any other issues that may have been omitted.
- 1.5 Stakeholder events were held at Lynton on 4th December at which 16 people attended and Dunster on the 10th December with 30 attendees. Additionally a meeting was held of statutory consultees and local authorities at Exmoor House on 15<sup>th</sup> January attended by West Somerset and North Devon Councils, Somerset and Devon County Councils and the Environment Agency. A separate meeting was held with English Heritage who were unable to attend on 15<sup>th</sup> January.
- 1.6 A questionnaire was also made available and sent out to 83 stakeholders. 33 responses were received.
- 1.7 At this stage, it is considered inappropriate to set out a response by the National Park Authority as the recent events, meetings and questionnaire form the first, early stage of consultation on the LDF. The results will help to develop production of initial issues and options which, it is intended, will form the basis of further consultation with stakeholders and National Park communities during 2009 and beyond.
- 1.8 A summary of the issues and options raised for each topic is set out below. The issues that were set out in each topic paper and the findings for the stakeholder events are listed in detail in appendix A and for the questionnaire in appendix B. A list of stakeholder consultees is set out in appendix C.

## **2. SUMMARY OF KEY ISSUES AND OPTIONS RAISED**

### **Economy and Employment**

- 2.1 There was an appreciation amongst stakeholders that tourism and land management industries work with the environment of Exmoor and therefore one compliments the other, but at the same time commercial objectives may conflict with environmental objectives.
- 2.2 Some stakeholders felt that planning policy was currently too restrictive on conversions, expansions and diversification. Comments from stakeholders involved looking at the individual circumstances of proposed developments and assessing them on their merits. Many stakeholders felt that whether a development is appropriate would depend on its location i.e. whether the development lies in a rural settlement or is rural. Suggestions were put forward on clustering businesses, live work units, converting redundant buildings into 'hubs' consisting of community shared workspaces, business and social use. Emphasis was placed on the need for affordable housing for farm workers and to attract local people generally to stay in the area.
- 2.3 There was general support for agricultural diversification, particularly with a view to sustaining agricultural businesses. However, it was suggested, that each case should be assessed on its merits.
- 2.4 Stakeholders commented that planning policy needs to allow transport access to business development. However, with regard to most tourism development stakeholders felt that accessibility by public transport was an important consideration.
- 2.5 Much emphasis was laid on the importance of communications infrastructure, in particular high speed broadband to allow businesses to function in a rural area such as Exmoor. Some stakeholders felt that planning policy needed to be more encouraging of communications infrastructure.
- 2.6 Many stakeholders were supportive of the policy to resist change of use of existing employment sites and buildings. A suggestion was put forward to provide viability tests for supposed unviable businesses and look at wider employment uses, and not to assume that the change of use should automatically be residential.

### **Housing**

- 2.7 Attendees at the stakeholder events suggested it would be helpful to clarify that the draft Regional Spatial Strategy contains no open market housing figure for Exmoor National Park and requires that all new housing is for local affordable needs only;.
- 2.8 Comments on the approach to take in rural areas included the need to ensure that the scale of new housing in small communities is appropriate to ensure that land is released and not held back for fear of large, out of scale developments. This is given as a reason not to provide for cross-subsidy of affordable housing by open market

- housing because developments would need more land for the open market as well the required amount of affordable housing.
- 2.9 There were issues raised over the difficulty of bringing sites forward for affordable housing and issues over the expectation of 'hope value' for land.
  - 2.10 A suggested approach was to provide for nomination rights for a landowner's family member as this would encourage land to be sold by the landowner for affordable homes provided they were given the guarantee that a family member in local need would be housed.
  - 2.11 A comment was made that Exmoor National Park Authority should consider revisiting some open market development to fund affordable housing in case public sector grants were not available. A response states that the National Park Authority should do more to encourage development by introducing more flexible policies to provide for cross-subsidy of affordable housing. One view that was expressed was that the current planning restrictions have not worked as they have restricted the supply of housing. It was stated that Exmoor's population of 11,000 have planning restrictions imposed for a minority. Instead, a register of neglected/empty buildings should be compiled and Empty Dwelling Management Orders enforced.
  - 2.12 Alternative views were expressed that new housing should be for local people only. It was emphasised that homes are needed for people whose work is important to communities. Open market housing should be restricted as much as possible - the majority of respondents to the questionnaire agreed or strongly agreed with the current approach on providing for affordable housing in the National Park. Such houses need to have permitted development rights for extensions removed to ensure that they remain more affordable.
  - 2.13 Issues were raised over second homes with concern over the impact of the high levels of second homes in communities and the need to differentiate between second homes and holiday lets. Other points made included that planning restrictions should be imposed on second homes and holiday homes that contribute nothing to the local economy.
  - 2.14 The housing needs of the ageing local population were raised. In particular the availability of suitable, smaller housing attractive to people who wish to downsize and stay living in National Park communities. Options considered included facilitating subdivisions of existing larger houses to smaller units to enable (older) people to stay in their homes and redress the imbalance in house sizes in the National Park where there is a shortage of smaller houses. Other suggestions included building new homes to lifetime homes standards.
  - 2.15 Stakeholders proposed that the 10 year local connection and cascade approach should be re-examined. It was suggested that on re-letting if no-one in a parish/adjoining parish met the 10 year connection the cascade could favour someone with a shorter local connection e.g. 8 years from that parish/adjoining parish rather than widening the cascade to a parish further away in the first instance.

- 2.16 Issues over changing the use of hotels to affordable housing or a combination of affordable and open market housing (or other uses) were perceived to be unviable. Stakeholders commented that the value of affordable housing was less than the value of the business as a hotel.
- 2.17 The desirability of using existing buildings for affordable housing was discussed e.g. buying existing open market housing for affordable housing to avoid the need for new building in a National Park. However affordable housing grant rates are not sufficient to enable Registered Social Landlords to do so. Reducing empty properties can be addressed by using them for affordable housing
- 2.18 The importance of good design for new affordable housing in a National Park was raised including housing that uses sustainable construction principles
- 2.19 Land based low impact development proposals including self-build, affordable, sustainable housing in areas outside settlements were raised to reflect a demand for a more sustainable agricultural/horticulture/land-based lifestyle.

### **Climate change, Waste Management and Pollution**

- 2.20 There was general support for the use of more renewable energy and the achievement of a carbon neutral National Park by 2025. In using more renewable energy, stakeholders felt that we should be more flexible in our policy approach towards renewable energy. As such, we should be open to the use of a wide variety of renewables and to granting temporary planning permission for visually intrusive structures such as wind turbines.
- 2.21 There was concern shown from number of responses to the questionnaire on the visual impact of renewable energy structures. However, in order to offset any negative visual impacts of renewable energy structures, it was proposed that a criteria based approach be used to assess planning applications for renewable energy, one which weighed up both the positive and negative impacts and allowed each case to be assessed on its merits .
- 2.22 There was general agreement that where new development was proposed, a renewable energy assessment should be undertaken. However, it was not certain whether an assessment should be undertaken for all development or just development over a certain size limit. In addition, varying thoughts were put forward on whether we should set targets for new development to gain a percentage of their development from renewable sources, or leave it open so as not to limit the potential.
- 2.23 There was a general consensus in support of the restoration of 'carbon sinks'. Likewise, there was general support for the use of sustainable building materials including sourcing local materials for new development. However, there were varying concerns over the

landscape impacts of local quarrying. As such, it was proposed that if quarrying was carried out, the materials should only be used in the National Park.

- 2.24 Support was provided to minimise pollution and preserve the quality of Exmoor's water, air and soil qualities. With regard to light pollution, stakeholders proposed a number of suggestions on minimising light pollution in new development including sensitive design and restricting the hours of use. Other commentators felt that reducing lighting could compromise health and safety and that we should be looking at the use of energy efficient lighting as opposed to light pollution per se.
- 2.25 There were not many comments or contentions with regard to waste. Stakeholders were generally supportive of providing small scale recycling and composting facilities in local areas.

### **Historic and Built Environment and Minerals**

- 2.26 Generally there was consensus over the need to protect the historic environment in the National Park. This was reinforced through the questionnaire responses on this topic. Most respondents agreed that current policies within the Local Plan were successful in maintaining and enhancing the historic and built environment within the National Park.
- 2.27 The design of new development in relation to conservation areas and the historic centres of settlements was considered one of the most important issues. Most of the stakeholders within these groups and through questionnaire responses wanted to secure high quality design which reflected local distinctiveness but should also be innovative – this was aligned with using appropriate/local sustainable materials (which of course could be local stone which is a durable long term material or timber from sustainable sources). Stakeholders responding to the questionnaire were all in favour of updated planning guidance to strengthen the design and quality of new development on Exmoor. Views regarding uPVC windows were mixed with people both for and against their use in the National Park.
- 2.28 The questionnaire results indicated that most stakeholders were in favour of reviewing and identifying new Conservation Areas, although there was some concern over what levels of protection were actually offered by such a designation, and enhancement projects were not a priority except for Dunster. Signs and overhead power lines were generally considered to be cluttering conservation areas, and there should be action to reduce the visual impact of this type of infrastructure. However there were conflicting views, regarding the need to reduce the impact of these man-made features in the open countryside, particularly in areas of open moorland rather than in the settlements (this links to target A2.4 in the NPMP).
- 2.29 Most stakeholders held the view that archaeological monuments and sites should be protected. The main issue was that many people did

not know where they were and the danger was that many could be damaged inadvertently.

- 2.30 There were also views expressed concerning historic buildings and their use. People who aspire to install micro-renewable energy systems such as solar panels are limited if they own a Listed Building (LB). Views were presented with regard to the need to strike a balance between the historic environment and the challenge of climate change. There were positive views regarding the re-use of LBs especially for economic uses. Some concern was also expressed over the use/disuse of traditional farm buildings, and felt that there should be greater emphasis on the protection of historic buildings and farmsteads.
- 2.31 Minerals: There was divided opinion surrounding this issue within the stakeholder groups; most views supported our current policy of allowing small scale mineral workings for local stone, but there were some that thought that any quarrying in the National Park was inappropriate and stone could be obtained from quarries outside the NP such as Brayford and Williton. The questionnaire results indicated that most people were in favour of the continuation of our current policy approach to quarrying, and agreed that the potential for new small scale sites should be explored (for local stone) within and outside the National Park.

### **Landscape, Wildlife and Land Management**

- 2.32 Generally there was consensus over the need to protect and enhance the natural environment and the need to ensure the continuation of traditional land management practices including through farm diversification. This was reinforced by the results of the questionnaire. Most respondents agreed that current policies within the Local Plan were successful in maintaining and enhancing the historic and built environment within the National Park.
- 2.33 A strongly held view was that environmental quality including tranquility and character must not be undermined. Landscape character assessments was felt to be a useful tool in achieving this. There was general agreement that the LDF should play a role in the restoration of the wider landscape. Issues raised included the potential for the LDF to identify areas of search on Proposals Maps for areas where there are opportunities to link, restore and recreate habitats. These may also help species to adapt to climate change. A large majority of those responding to the questionnaire agreed that the LDF had a role to play in mitigation of climate change. Linking of greenspace was also raised as an issue for the LDF.
- 2.34 The coast was identified as an important asset where more focus was needed to ensure protection of the landscape. The LDF should only provide for development in already developed areas and should not be permitted in undeveloped coast. There is a need to plan for potential impacts on the coast from the landfall of infrastructure.

- 2.35 Those attending the stakeholder events highlighted the need to address change in a positive way including the opportunities presented by renewable energy. The scale of such development was cited as a major determinant of whether it was likely to be acceptable. There were a number of issues raised in relation to 'intrusive structures' and questionnaire respondents made a number of suggestions as to the types of development that were intrusive or detracted from the National Park's special qualities. These included telecommunications masts, game shooting and structures associated with it, wind farms, large wind turbines, structures on hill tops, large/prominent development, inappropriate materials such as non natural materials and uPVC windows, large areas of hard landscaping, highway signage, equestrian development and sub-division of fields, brightly lit development and suburbanisation of the area. The importance of high quality development was raised together with the need for practical design guidance.
- 2.36 There was a broad consensus on the need to encourage farm diversification to ensure that people who work the land remain in the National Park. Those responding to the questionnaire gave their views on types of diversification suggested – most felt game shooting was appropriate. Views on business and storage/warehousing were divided. Nearly all respondents agreed that bed and breakfast, self catering and equestrian were suitable. A wide range of suggestions was made on other appropriate types of diversification and these included: renewable energy; wood fuel production; natural environment/ biodiversity/conservation, extensive farming and land management; fisheries, IT/e-commerce, quarrying; centres for cycling and walking; venues for functions; food processing and farm shops. It was pointed out that business and storage/ warehousing are different and that there were travel issues with these.
- 2.37 The effects of equestrian development (and other recreational activity) on the landscape were raised by stakeholders. It was felt that a strategic approach to equestrian/other recreational development would be helpful. It was suggested that areas of the National Park should be identified where landscape type means that development would be more easily accommodated and those areas where landscape would be more sensitive to change and where such development should be precluded.

### **Settlements, Services, Transport and Infrastructure**

- 2.38 This topic was generally felt to reflect the aims of sustainable communities, where the aspiration is to link affordable housing with jobs – but the links to outside influences such as the market and coastal towns outside the National Park should also be recognised in terms of the services and employment they provide, although there was a need to recognise the accessibility of services by the elderly and those who have no access to transport. The issue of the number of



second homes within settlements was raised as this tended to affect the viability of settlements and the services they provided.

- 2.39 During the stakeholder events people were ambivalent on the issue of whether the settlement hierarchy should be changed – however there was some difference in the views which were put forward. One option was to review the settlement hierarchy in the light of changing roles and functions of settlements (i.e. Wheddon Cross) another option to consider was to have no settlement hierarchy within the National Park, because all the settlements were particularly small. The questionnaire results indicated that most people were content with the current settlement hierarchy, and in reviewing the hierarchy the key test for new development should be based on the need to provide for a sustainable and balanced community. There was also general agreement that objectives within community strategies and parish plans should be integrated within the LDF where they were compatible with National Park purposes.
- 2.40 There was a view that settlements should be looked at as part of a network (rather than in isolation) with regard to the provision of services. Some services in larger settlements could offer outreach service provision to neighboring settlements with little or no services – grocery deliveries etc. This way of viewing settlements could also link to the provision of community hubs which could offer a range of integrated services and facilities for use by local communities and small businesses. Stakeholders supported the current policy approach which seeks to prevent loss of employment, retail or community facilities by resisting conversion to other uses. Many of the respondents to the stakeholder questionnaire thought that all the services and facilities listed were important to communities, although not all would be necessary in every settlement. The key facilities identified were: schools, village halls, Post Office/Shop and pubs.

### **Transport and Infrastructure**

- 2.41 The important views here were to provide the best public transport system possible which was flexible enough to meet the requirements of people who did not have access to transport, and encouraged people not to use their car. The general view was to improve accessibility to sustainable modes of transport where it was feasible and possible but also to recognise that in such a dispersed rural area such as Exmoor, there would still be a need to travel by car, as it was the only option in many cases.
- 2.42 Options for sustainable transport were to improve the current demand responsive transport system provided by the SLINKY buses – promote electric car hire systems where electric cars could be hired by members of the local community or by people who are visiting the area (options currently being investigated by Forum 21 as part of the LARC bid). Another option was increasing the use of railways such as the West Somerset Railway linking with Taunton railway station and

providing a public transport service as well as a tourist attraction. In settlements there were options put forward for making certain areas car free, to provide more cycle paths and to improve parking provision (especially short stay parking in the centre of some settlements such as Dunster).

- 2.43 Infrastructure provision should be looked at holistically, and trunk systems for sharing services should be promoted as best practice. Most views concerned the impact of overhead power lines within settlements and in the open countryside. Again there were differing views over which areas should be prioritised for undergrounding.
- 2.44 There was general support for renewable energy schemes, particularly those which provided a community benefit. Examples suggested: combined heat and power systems from biomass, anaerobic digesters, photovoltaic (PV) panels and wind turbines.
- 2.45 The role of the internet was again raised as an important way for people to access services in a deep rural area such as Exmoor – this was particularly useful for people who did not have access to transport, and may also reduce the number of private car journeys made. There was some concern raised over the number of ‘white van’ deliveries which are now very noticeable as more people have internet access and use this to have groceries and other shopping delivered to their homes

### **Recreation and Tourism**

- 2.46 With regard to recreation and tourism there was concern over finding the balance between preserving the environment and tranquillity of Exmoor and promoting recreation and tourism. As has already been mentioned under Economy and Employment, stakeholders appreciate that the environment provides the basis for tourism and as such it was commented that the value rather than the volume of tourism should be enhanced. Stakeholders were also keen to use the environment to provide and enhance outdoor recreational facilities. Although there was a feeling that there was a need to provide more indoor facilities such as coffee shops, bike hire centres, multi purpose halls, stakeholders still felt that outdoor facilities were more important for the National Park both in terms of tourism and recreation.
- 2.47 With regard to equestrian and game shooting activities, stakeholders did not have much comment at the events when discussing recreation and tourism (although more discussion on this topic took place when discussing landscape issues). The results from the questionnaire showed virtually unanimous support for avoiding adverse impacts on the landscape and other special qualities of the National Park with regard to development associated with recreational activities such as equestrian and commercial game shooting.
- 2.48 Overall there was general support for improving public transport and easing traffic congestion generated by tourism. Safeguarding public rights of way and the provision of cycling and equestrian access was

also supported. It was suggested that roads could be prioritised for bicycles as opposed to cars within certain areas of the National Park.

### **3. NEXT STAGES**

- 3.1 The findings of the consultation process will be published on the Exmoor National Park Authority website. Stakeholders will be sent a link to this Paper and feedback on the outcome of the events and questionnaire responses.
- 3.2 The next stage will involve taking these findings forward and developing Issues and Options. It is proposed that Issues and Options will be presented to communities and stakeholders later in 2009 with a view to refining Issues and Options.

**Ruth McArthur/Jo Symons**  
**Policy and Community Managers**  
**15 February 2009**

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

Planning and Compensation Act 2004  
PPS12

## Appendix A: Stakeholder Event Workshop Data

### A. Exmoor's Economy and Employment (farming and forestry)

No.	Issue	Stakeholder Options
1	Understanding the implications of Exmoor's National Park status upon the potential for economic growth.	<ul style="list-style-type: none"> <li>i) Accept the environment is required for tourism and the economy and environment therefore compliment each other in this way.</li> <li>ii) Promote the understanding that environmental objectives are different than commercial objectives.</li> <li>iii) Need to get the right balance between environment / sustainability / employment.</li> <li>iv) Sensible policies need to be developed to facilitate the management of land by farmers whilst achieving the objectives of the national park.</li> <li>v) There are additional pressures/restrictions due to national park designation (this applies across all sectors [tourism/farming etc] and additional costs are incurred which results in more failures and problems selling properties).</li> </ul>
2	The creation of a policy framework that encourages appropriate economic activities which benefit from and help to promote the National Park's special qualities.	<ul style="list-style-type: none"> <li>i) The type of development and whether it is appropriate will often depend on the location.</li> <li>ii) Need to be flexible in policy and look at individual circumstances of each development.</li> <li>iii) Re-use of buildings etc. Need policies to facilitate this (but should also depend on the location- near town or rural).</li> <li>iv) Policy to allow facilities in keeping with the National Park's special qualities.</li> <li>v) Need to allow for private transport access to business developments. There is a need to take account of all sustainability criteria when assessing the appropriateness of business development.</li> <li>vi) Forestry is one of the largest sustainable growth industries. It has recreation and landscape benefits but needs to be commercially viable to succeed (profitability is being eroded at present). There is a conflict between the environment and commercial objectives.</li> </ul>

No.	Issue	Stakeholder Options
		<p>vii) Wood is going up country to be processed and should rather be processed more locally.</p> <p>viii) There should be no reduction in the productive area of forestry. Wood has the potential for economic growth and should be used in a sustainable way – i.e. it should be replanted as it is used.</p> <p>ix) Development should be justifiable and sustainable.</p> <p><i>See also: Topic F, Issue 1 (v)</i></p>
3	The need to establish a clear and deliverable economic vision for Exmoor National Park.	<p>i) Identify areas of the economy with the capacity to grow.</p> <p>ii) There should be co-ordination between regeneration objectives and planning.</p> <p>iii) Provide affordable housing to encourage people to work in the National Park including housing for farmers.</p> <p>iv) The vision of keeping Exmoor special is appropriate for the National Park vision. However, others say the LDF vision needs to go further than just the qualities that make Exmoor special; the vision should incorporate the economic base, the housing stock and should ensure that economic development is compatible with the National Park but that planning policy is flexible towards economic development.</p> <p>v) Cannot just have a one line vision, it needs to be broader.</p> <p><i>See also: Topic F, Issue 1 (iv)</i></p>
4	The need to respond to key challenges– including the current global economic crisis, climate change, social and demographic changes (an ageing population), low income levels, low skill levels, a	<p>i) Should respond dynamically and not descriptively. There is a need for flexibility as there are inflexible trends in some areas (RSS).</p> <p>ii) Allow small scale wind turbines/ wind farms generally on farms. Also allow for tapping into hydropower. Planning policy is restrictive on this currently.</p> <p>iii) Encouragement of small scale renewable energy projects.</p> <p>iv) Improvements to communications infrastructure i.e. broadband and ensure central to planning process. Broadband availability enables high value, high skill jobs to add to local economy</p>

No.	Issue	Stakeholder Options
	high dependency upon traditional economic sectors and the need for technological enhancements.	<p>encouraging younger people to return to the area after education. Policy needs to encourage high speed broadband.</p> <ul style="list-style-type: none"> <li>v) There is a conflict between the development of communications infrastructure with the purposes of the National Park at present.</li> <li>vi) Clustering businesses together.</li> <li>vii) A need to keep farm land commercial.</li> <li>viii) Need active participation in the economy – recreation activities for people.</li> <li>ix) More flexibility to allow for changes such as climate change and the economic downturn.</li> <li>x) Carbon neutral specifications may not be in keeping with the National Parks potential in terms of economic growth.</li> <li>xi) Inaccessibility is the main problem.</li> <li>xii) Access to suppliers, customers and market needs linking to employment and travelling (e.g. commute to work).</li> </ul>
5	The potential to ensure a more stable economic base and a greater diversity of economic activities – targeting potential growth sectors and identifying options for the attraction of higher value activities.	<ul style="list-style-type: none"> <li>i) Need to ensure economic development creates jobs, attractions for visitors and accommodation but needs to take into account the natural environment.</li> <li>ii) There is a need for a more flexible approach to allow for the conversion of buildings for business purposes.</li> <li>iii) Planning system should allow good development in the right location.</li> <li>iv) The LDF should be broader than the management plan to include economy and housing.</li> <li>v) The clustering of businesses.</li> <li>vi) Encourage live/work units through policy.</li> </ul>

No.	Issue	Stakeholder Options
6	The need to provide for sufficient accommodation to meet the needs for employment space.	<ul style="list-style-type: none"> <li>i) Redundant buildings- to become 'new hubs' community shared workspaces, business and social use.</li> <li>ii) Re-using farm buildings as small work spaces e.g. a redundant buildings grant has been successful.</li> <li>iii) Insufficient employment as people moved out due to lack of affordable housing.</li> <li>iv) Agricultural workers dwellings have been taken up by others in the past- maybe this needs to be enforced to a greater extent.</li> <li>v) Need local need houses in the rural settlements but also farms where required.</li> <li>vi) Relax planning legislation at a national level to allow easier development of agricultural workers dwellings etc.</li> <li>vii) Planning policy is a problem as it restricts conversions, expansions and diversification.</li> <li>viii) Test to reuse unviable businesses for wider employment uses e.g. retail, tourism or mixed use rather than automatically assume residential almost a sequential test.</li> <li>ix) Issue of viability test- period where owners cynically run down a business then other options to change to mixed use and smaller e.g. shop. Now thriving (smaller) shop selling local produce and childcare centres.</li> <li>x) Need some flexibility for genuine cases. But clear policy for others.</li> <li>xi) Encourage live/work units through policy.</li> </ul>

No.	Issue	Stakeholder Options
7	The importance of tourism and land based industries to the economy of Exmoor ( <i>Topic Papers 5 and 7 deal with these in more detail</i> ).	<ul style="list-style-type: none"> <li>i) Tourism and forestry are emerging markets. Forestry is one of the largest sustainable growth industries. It has landscape benefits but needs to be commercially viable to succeed (profitability is being eroded at present).</li> <li>ii) Sensible policies need to be developed to facilitate the management of land by farmers whilst achieving the objectives of the National Park.</li> <li>iii) Promote tourism without damaging the environment e.g. a new ferry system will stimulate growth.</li> <li>iv) Don't diversify farms too far away from the traditional area of producing food (tourism needs to operate around the farm etc.)</li> <li>v) General support for agricultural diversification but should depend on circumstances of farm. A common diversification scheme is the re-use of buildings to office use but this may or may not be appropriate.</li> <li>vi) Planning policy should allow farmers to be financially viable and provide affordable housing for those working in it</li> </ul>

<b>Other issues or comments from stakeholders</b>
<ul style="list-style-type: none"> <li>i) The number of farms cannot increase (only set amount of land).</li> <li>ii) There is insufficient employment</li> <li>iii) The prices of housing aren't in sync with the wages- Exmoor is restricted in employment because of housing.</li> <li>iv) There is no demand at present for small scale units.</li> <li>v) Broadband and renewable energy appear as issues in other topics but links with economy (e.g. sustainable construction using local materials and labour). <i>See also: Topics F, Issue 8; Topic G, Issue 2.</i></li> </ul>



### **Other non-spatial issues**

- i) Tourism and forestry are emerging markets.
- ii) Employment in the main towns is as good as elsewhere but in the rural areas there is a lack of technology infrastructure.
- iii) 95% of areas now have broadband but still problems with it availability in certain areas.
- iv) Tourism; possibility bring jetty in (Severn barrage) and Minehead circular route for allowing open top bus route in Exmoor.
- v) 59 is the average age of farmers. A lot of farmers' children do not take up the profession when they retire.
- vi) Bring in new people with high skill levels.
- vii) Need to retrain and update skills to keep economy viable.
- viii) Facilitate businesses to help them expand (get funding). The state of the national economy will mean it will be harder to find funds.
- ix) There is a lack of subsidies to provide help to enterprising people.
- x) The state of the national economy will mean it will be harder to find funds.
- xi) Provide more training for local communities.
- xii) There is a lack of communication between North Devon and West Somerset.
- xiii) There is an over-reliance on tourism. People are likely to go elsewhere to set up a business.
- xiv) Young people are moving away.

## **B. Exmoor's Housing**

<b>No.</b>	<b>Issues</b>	<b>Stakeholder Options</b>
1	To ensure an adequate supply of housing to maintain balanced living and working communities.	<ul style="list-style-type: none"> <li>i) Need to clarify that no open market figures in Exmoor National Park in Regional Spatial Strategy.</li> <li>ii) The main difficulty is bringing sites forward.</li> <li>iii) Often a difficulty in accommodating the level of housing needed in small communities because of land not coming forward since larger developments not wanted. In small communities, therefore, should not build open market housing as the cross subsidy approach means each development site is larger to accommodate affordable housing and the open market housing to fund it.</li> <li>iv) Issue of sites coming forward - need to understand reasons why expectation of hope value can slow down site availability.</li> <li>v) Consider revisiting some open market development for affordable housing in case grants not available.</li> <li>vi) Concern over impact of high levels of second homes in communities e.g. Brendon 26%. Increase in number of 2<sup>nd</sup> homes in a 5 year period in North Devon equal to 25% total increase in new dwellings (new build and not including holiday homes).</li> <li>vii) Need to differentiate second and holiday homes. Former often occupied very little, often seasonal and can impact negatively on the economy. Latter can be advantageous.</li> </ul>

No.	Issue	Stakeholder Options
2	A housing stock providing a better mix of sizes, types and affordability.	<ul style="list-style-type: none"> <li>i) In rural areas affordable need makes up the majority of housing to be considered.</li> <li>ii) Lack of affordable housing compounded by right to buy- North Devon Council has never taken up first refusal - generally re-sales are too expensive e.g. £250,000 in Challacombe.</li> <li>iii) To achieve mixed tenure need to include shared ownership/intermediate housing as well as rented.</li> <li>iv) Imbalance in house sizes – predominance of large houses - need to encourage subdivision into smaller units.</li> <li>v) Size of dwellings needs to meet needs. Can be set out either in policy or in a Supplementary Planning Document. ‘Lifetime homes’ are needed.</li> <li>vi) If no market flexibility got to have housing constructed to meet a particular need. Need to remove permitted development rights. North Devon Council policy that any house under 100m<sup>2</sup> and on small sites had no permitted development rights for extensions.</li> </ul>
3	Meeting the local community need for affordable housing.	<ul style="list-style-type: none"> <li>i) Affordable housing in rural areas should be for local people.</li> <li>ii) LDF local connection criteria- redefine the relationship between the 10 year local connection and cascade approach. On re-letting if there is no-one in a parish/adjointing parish who meets the 10 year connection then there may be a need to consider a cascade which would favour someone with a shorter local connection e.g. 8 years and then 6 years from that parish/adjointing parish rather than widening the cascade geographically to a parish further away.</li> </ul>
4	Ensuring local needs affordable housing remains so in perpetuity while enabling access to finance.	<ul style="list-style-type: none"> <li>i) Issue of whether ‘in perpetuity’ should be replaced by ‘so long as the need exists’.</li> </ul>

No.	Issue	Stakeholder Options
5	Making use of the existing stock of accommodation, buildings and brownfield land to reduce greenfield development.	<ul style="list-style-type: none"> <li>i) Anecdotal evidence that hotels do not want to seek change of use for affordable housing as worth more as a hotel than 50/50 affordable/open market housing.</li> <li>ii) Issue of redistribution of housing- Registered Social Landlords (RSLs) cannot buy existing housing stock because open market houses so expensive - Would need £120,000-£130,000 grant (3 times available grant from government).</li> <li>iii) Reducing empty properties can be addressed by using it for affordable housing.</li> <li>iv) Need to encourage older people to downsize. What are the alternatives if they wish to stay in the locality? Need to link to local occupancy in Exmoor or encourage lodgers (issue of Houses in Multiple Occupation (HMOs)). One option could be appropriately designed housing (not a bungalow) in the grounds of a property.</li> </ul>
6	Ensuring that suitable sites and buildings are available, including land currently in public ownership, to help meet the community's need for affordable housing.	<ul style="list-style-type: none"> <li>i) Consider approach taken by North Devon Council who provide for nomination rights for landowner's family member, son or daughter to a house. Approach encourages land to be sold by landowner for affordable homes as they can guarantee that a family member in local need would be housed.</li> </ul>
7	Ensuring the design of new housing conserves and enhances the special qualities of the National Park and incorporates energy sustainability measures.	<ul style="list-style-type: none"> <li>i) Widen acknowledgement of sustainability e.g. resource reuse and sustainable construction i.e. fabric of building not just energy, water use etc.</li> <li>ii) Some brownfield land is highly biodiverse and is often in the centre of a settlement which is more accessible, potentially useable green space. Might be better to develop greenfield land (such as agriculturally improved land) and enhance brownfield to benefit the settlement. Failure to provide greenspaces within settlements contributes to feeling that 'built development' is bad and all greenspace is good.</li> <li>iii) Key is to build high quality, well designed buildings and developments. Within Exmoor National Park</li> </ul>

No.	Issue	Stakeholder Options
		visitors come to see villages as well as landscape and wildlife.
8	Meeting the needs of agricultural and forestry workers; and other workers whose work is important for the conservation of the National Park and the viability of its communities.	<ul style="list-style-type: none"> <li>i) Need homes for people whose work is important to communities such as ambulance drivers and firemen.</li> <li>ii) Need to provide for live/work units; Landowners release parcels of land within villages, creating balanced development.</li> </ul>
9	Meeting the needs of the elderly and providing for the housing needs of young people.	<ul style="list-style-type: none"> <li>i) Non economically active population considered as a group, to have a high demand for affordable housing. Need to compare this group and elderly local need for affordable housing with that from other areas.</li> <li>ii) Need suitable housing for the elderly population who want to remain in their communities but often leave because no suitable housing to meet their needs. Current Local Plan policies only allow for affordable housing and many already own their own homes. Lifetime homes concept would provide housing which remains suitable for people as their needs change.</li> </ul>

### **Other issues or comments from stakeholders**

- i) In considering the hierarchy of settlements: should not seek to put development in some communities.
- ii) NDC requires local occupancy condition on new homes. A policy in North Devon provides for people with local connection (but not qualifying for affordable housing) to build house in garden. Aimed at existing residents who may wish to move out of (often larger) existing house enabling family member to live in existing house Policy could and has been exploited.
- iii) Examples in North Devon show that change of use from hotels has not resulted in affordable housing for a number of reasons: threshold assessments are difficult, high take up of units for second homes and high cost of servicing.
- iv) If departing from adopted policy need genuine open book negotiation with all the figures available.
- v) Important not to reduce requirements in an economic downturn - will not stimulate development but will lose opportunities e.g. sites for affordable housing when the economy picks up.
- vi) Need to provide flexibility over tenure e.g. shared equity to rent while market depressed which can then become shared equity again after period of time.
- vii) Contaminated land has to be cleaned up to level of use intended for. Often better uses than residential.
- viii) Consider 'land based low impact development proposals' – a positive attitude to self-build, affordable, sustainable housing reflecting a demand for more sustainable agricultural/horticulture/land-based lifestyle. Such developments lie in areas that would not currently be considered because they lie outside settlements. Pembrokeshire Local Plan has a policy on this. Issues: Make sure LDF takes into account low impact policies on sustainable development and consider housing ranging from yurts to more permanent dwellings. Tensions could be created by people moving into the National Park - policy could be framed around local needs. One option is to permit a home for a lifetime and no longer.
- ix) Issue of affordable housing needed to meet very stringent requirements for public funding including sustainability criteria such as availability of services and public transport.
- x) RSS issues over green infrastructure. Natural England and Rural Communities Act requirement to conserve and enhance.

- xi) Perception that good greenspace reduces anti-social behaviour. Places for people to go, young people to play that are not always 'formal' play areas. Needs awareness- if building for primary function then think what else it can be used for to create multifunctional spaces and consider potential.
- xii) North Devon has a lot of reverse commuting. Towns provide small accommodation. Higher paid employees live outside and commute in. Need to provide detached dwellings with gardens in towns like Barnstaple to enable closer living and working.

### **Other non-spatial issues**

- i) Issues in Exmoor National Park overlap with those in rural areas of rest of North Devon though a slightly different balance of issues because there are larger centres in North Devon as compared to the National Park. In North Devon cross subsidy is provided for and they have not been as successful with grant assisted housing.
- ii) Issue of supporting people in their communities. Need an element of supported housing. Consider talking to housing authorities about refurbishment and adaptation of existing houses so more suitable for those who need it.
- iii) Issue with e.g. changes of use proposals that require higher level of development expertise.
- iv) Suggested money flows/plugging the leaks analysis - where does it go - whether people shop locally.
- v) Housing associations are still charged VAT on refurbishments- this is a disincentive to housing associations to refurbish.
- vi) Private landlords and RSLs need to work together to use existing stock more effectively as housing. Need to think about whether the LDF can play a part in raising the issues even if wider than planning policy.
- vii) Role for housing authorities in providing grants to enable new housing and solve problems and blocks to housing.
- viii) Issue of under-occupation of housing e.g. by people whose families have left home –help is required on how to subdivide property and adapt it. Community architects could be available to help solve problems. Could occupiers for newly created units be forthcoming through local need allocations by Registered Social Landlords.
- ix) Need monitoring of affordable housing only to see if policy affects value of all housing.

### **C. Exmoor’s Climate Change, Pollution and Waste Management**

<b>No.</b>	<b>Issue</b>	<b>Stakeholder Options</b>
	<b><u>Climate Change</u></b>	
1	Minimising the net emissions of carbon dioxide and other greenhouse gases into the atmosphere in order to achieve a carbon-neutral National Park by 2025.	i) New development must not add to carbon emissions. See also issues raised in rest of paper.
2	Maximising Exmoor’s potential for renewable energy generation e.g. micro hydro power, small scale wind turbines, solar power, and biomass heating systems.	i) Encourage use of more renewable sources of energy. ii) Set targets for new development to gain a percentage of their energy from renewable sources. iii) Wind turbines need a more sympathetic approach. iv) The visual and landscaping impact of renewable energy should both be looked at. Need to assess each case on its merits. v) Provision of wind farms on a temporary basis- say 10 years. vi) Encourage employment in renewable energy to tackle the carbon footprint. vii) Need to encourage other forms of renewable energy and not just wind turbines – for example, micro, hydro, tidal. There needs to be an integrated approach to renewable energy. <i>See also: Topic D, Issue 1 (iii); Topic F, Issue 14 (iv), Topic F, Other Issues or Comments (ix)</i>
3	Improving the sustainability of Exmoor’s communities.	See above.
4	Maximising the potential for	i) Compensatory planting, to be compulsory and integral to new developments, and ensure that



No.	Issue	Stakeholder Options
	carbon dioxide to be stored in 'carbon sinks' e.g. through restoring peat moorlands, mires/blanket bogs and planting new woodland.	<p>proposals fit in holistically for habitat connectivity and landscape character etc.</p> <p>ii) In favour of mire restoration projects to act as a carbon sink.</p>
5	Encouraging the use of sustainable building methods including careful siting, layout, design and choice of materials (including using more reuse of materials and local materials) to minimise energy loss, reduce environmental pollution and conserve natural resources while conserving and enhancing the National Park.	<p>i) Design Statements for new buildings/materials etc. HLF- have energy efficiency standards for application e.g. green roofs/sustainable drainage, rainwater harvesting.</p> <p>ii) Building materials should be local sustainable materials.</p> <p>iii) Quarrying should not be in Exmoor as it will affect Landscape.</p> <p>iv) If quarrying is carried out in the National Park it should be minimal and materials should be used within the Park.</p>
	<b>Pollution</b>	
6	Maintaining and improving the quality of air, water and soils on Exmoor.	<p>i) Maintain and improve water courses.</p> <p>ii) Need to look at present and future quality of water, soils and air taking into account the impacts of development.</p>

<b>No.</b>	<b>Issue</b>	<b>Stakeholder Options</b>
7	Avoiding further light pollution on Exmoor and addressing existing sources such as street lighting where light pollution could be reduced.	<ul style="list-style-type: none"> <li>i) The location of development should be taken into account i.e. whether the development will expand light or noise pollution, or will it just fit in with current lighting.</li> <li>ii) Light and Noise Pollution are an important consideration in new development. There needs to be criteria in DC policies to address this and ensure new lighting meets best practice standards.</li> </ul>
8	Maintaining a feeling of tranquillity due to an absence of man-made noise.	<ul style="list-style-type: none"> <li>i) A landscape character assessment as a key part of protecting tranquillity should be applied.</li> </ul>
9	Minimising agricultural run off and pollution events into Exmoor's water courses which generally have exceptional water quality.	<ul style="list-style-type: none"> <li>i) Look at the catchment scale of water courses when assessing pollution impacts of development.</li> <li>ii) Use anaerobic digesters, bio gas, digestate fertiliser to reduce the amount of slurry.</li> <li>iii) Extend Nitrate Vulnerable Zones (NVZs).</li> <li>iv) A need to avoid agricultural run off.</li> <li>v) A need to look at agricultural development and its impact on pollution and therefore what development should and should not be permitted.</li> <li>vi) Look at digestive systems for turning slurry into a resource. Small scale systems would be appropriate for the National Park. However, such development would need to take account of water quality.</li> </ul>

No.	Issue	Stakeholder Options
	<b>Waste</b>	
10	Seeking ways to turn 'waste' into a resource, including agricultural waste.	i) Using hedge cuttings as products for fuel.
11	Providing for increasing demand for recycling and composting.	i) Encourage recycling and composting. Plan and integrate recycling and composting into new developments. ii) Have local community collection points.

#### Other issues or comments from stakeholders

- i) There is an area of conflict with developing tourism e.g. Re-developing camping sites can cause noise.
- ii) Research should be undertaken on rivers and whole catchment area to view landuse and how soils are managed which may effect soil and water quality in the area.

#### Other non-spatial issues

- i) We should bring target the 2025 target to become a carbon neutral National Park forward quicker.
- ii) Carbon neutral target should not be set earlier when there are already major issues to consider in the National Park.
- iii) We should measure how far away from 2025 target on becoming a carbon neutral National Park so we can use this as our baseline for benchmarking.
- iv) Quality controls on wood chip production to ensure quality product and to ensure maximum efficiency. Certify that chips are well seasoned and meet standards.
- v) Flight Paths – detract from tranquillity.
- vi) With climate change peat landscape can lose peat.
- vii) With small scale renewable energy projects there is a problem with getting on the grid.

## **D. Exmoor's Historic and Built Environment and Minerals**

<b>No.</b>	<b>Issues</b>	<b>Stakeholder Options</b>
<b>1</b>	Conserve and retain the historic character of Exmoor's settlements and buildings.	<ul style="list-style-type: none"> <li>i) Undergrounding overhead wires, especially within Conservation Areas. Others liked overhead wires as it gave them a chance to admire birds.</li> <li>ii) Approach relevant utility companies to ascertain what funding is available for undergrounding.</li> <li>iii) Micro-renewable systems are the right approach. The opportunity across Exmoor for hydro-power should also be explored further.</li> <li>iv) Conserving the historic character of Exmoor's settlements includes the sustainability of local communities.</li> <li>v) Make Conservation Area Appraisals available to the public.</li> <li>vi) There should be a policy for supporting enhancement of conservation areas. We should work with partners to achieve funding for conservation areas.</li> <li>vii) Planning policy needs a set of indicators to protect the historic character of Exmoor's settlements.</li> <li>viii) Need to be careful of the use of plastic windows especially in conservation areas.</li> <li>ix) Need to record, take account of and preserve any maritime archaeology.</li> </ul>
<b>2</b>	Exmoor has a wealth of historic buildings. Their quality and character can easily be destroyed by unsympathetic or inappropriate renovation, repair, extension, and redevelopment or simply by neglect.	<ul style="list-style-type: none"> <li>i) Reduce signage in settlements as it produces clutter.</li> <li>ii) There should be greater awareness of which buildings are listed within the National Park.</li> <li>iii) Appropriateness of uPVC windows – contentious issue.</li> </ul>

<b>No.</b>	<b>Issues</b>	<b>Stakeholder Options</b>
<b>3</b>	Archaeological sites and monuments, as well as historic landscapes, are often fragile and easily damaged; important sites remain vulnerable to damage or destruction, often inadvertently.	<ul style="list-style-type: none"> <li>i) Balance the priority of archaeology with other factors.</li> <li>ii) Priority of monuments should be in terms of the need for repairs.</li> <li>iii) Archaeological monuments are more at risk. Therefore should have more protection.</li> </ul>
<b>4</b>	Exmoor's villages are one of its most important features but the historic character of buildings and settlements is easily eroded by small changes over time as well as by new development and insensitive modernization.	<ul style="list-style-type: none"> <li>i) Avoid clutter from signage. Traffic Calming measures could include different colour road surfaces which were stated to be an effective remedy that denoted shared surfaces where pedestrians had right of way.</li> <li>ii) Keeping the current landscape of Exmoor e.g. no conifers should be grown.</li> <li>iii) NDC reviewing conservation appraisals and doing the rest. Producing more plans at the same time. Rolling programme of review important. Bringing high quality development outside into conservation areas and securing high quality design.</li> <li>iv) Contention over the issue of whether uPVC windows are appropriate or not – clear reasoning should be set out.</li> </ul>

No.	Issue	Stakeholder Options
5	New development needs to be of a high standard whilst responding to the needs of the community.	<ul style="list-style-type: none"> <li>i) Ensure a balance between conserving the existing historic environment with providing for economic requirements e.g. reuse of Listed Buildings.</li> <li>ii) Sustainable durable building materials should be used to create a positive visual impact in the Exmoor context.</li> <li>iii) Any sustainable houses should have renewable energy systems incorporated into them e.g. solar panels, heat source pumps.</li> <li>iv) Innovative design should be encouraged and ensure that it is appropriate to its setting; siting is an important aspect when planning for new development.</li> <li>v) Awareness and education of waste tipping in quarries should be enhanced.</li> </ul>
6	To enable the best means of protecting the built character of Exmoor, while still allowing for change.	<ul style="list-style-type: none"> <li>i) Listed buildings should be re-used.</li> <li>ii) There are too many restrictions.</li> <li>iii) Policies should be flexible with parameters, people want to move forward.</li> </ul>
7	Encourage the use of sustainable building methods including careful siting, layout, design and choice of materials to minimize energy loss, reducing environmental pollution and conserving natural resources.	<ul style="list-style-type: none"> <li>i) Sustainable durable building materials should be used to create a positive visual impact in the Exmoor context.</li> <li>ii) Any sustainable houses should have renewable energy systems incorporated into them e.g. solar panels, heat source pumps. And should be produced using local materials and labour.</li> <li>iii) The appearance of buildings, against the utility of renewable energy sources, should be balanced.</li> <li>iv) Use sustainable building methods e.g. straw bale buildings; replacing thatch with slate roofing to prepare for climate change and provide longevity of material.</li> <li>v) Refer to facilities for recycling/cycle parking etc.</li> <li>vi) Local Plans need to refer to protected or important species in relation to <u>buildings</u>. (May also refer to converting or restoring historic buildings such as barns)</li> </ul>

No.	Issue	Stakeholder Options
		vii) Development should be locally distinctive and use sustainable building methods and should be produced using local materials and labour.
8	Protecting the special qualities of the National Park through resisting proposals for mineral extraction. Thus conserving minerals whilst ensuring an adequate supply of minor workings for local building stone.	i) Mineral extraction for stone should be resisted in the National Park. It is possible to obtain stone from quarries outside of the National Park, such as Capton stone from Williton (for properties in the Eastern part of the National Park) and from the Bray Valley quarries (in the Western side of the National Park). ii) Small scale working of stone for buildings should be kept comparatively local. ENPA gives assistance through its current minerals policy. iii) Potential for conflict between the need for local stone and local extraction. iv) Need to get a balance between the use of local materials and damaging the landscape through intensive quarrying. <i>See also: Topic E, Issue 4 (iv)</i>

### **Other issues or comments from stakeholders**

- i) Grants are available for barn conversions but only if you are not in an Environmentally Sensitive Areas scheme. There is a danger that some characteristic barns will slowly deteriorate where grants are not available.
- ii) Part of the problem is that local materials required for historic buildings are unique and expensive.
- iii) Speeding traffic through villages such as Parracombe is a perpetual issue due to local people using the village as a shortcut.
- iv) Planning powers cannot address all historic character e.g. farmsteads.
- v) An example of low impact timber buildings used in Scotland (Crofters Scheme - West Coast of Scotland) for affordable local housing was cited as a good example – these did not have to be long term but could be used as long as they were needed.
- vi) The type of signage favoured was the oak fingerposts produced by the National Park's Exford Depot.
  
- vii) Will the new planning legislation regarding the General Permitted Development Order have potential negative impacts for the built environment?
- viii) Missing archaeology as an issue in the issues and options paper.
- ix) Include historic houses and gardens
- x) Preserving the historic characterisation of the landscape including the historic boundaries of fields.
- xi) [www.heritagecounts.co.uk](http://www.heritagecounts.co.uk) – says how many listed buildings there are.



### **Other non-spatial issues**

- i) West Somerset Community College could provide learning/skills centre links for sustainable building techniques.
- ii) Future generations should be encouraged to come forward and take on sustainable building methods.
- iii) Knowledge and awareness should be enhanced e.g. West Somerset Mineral Line Project engaging young people.
- iv) Awareness of what buildings are listed should be made accessible to the public.
- v) Education and awareness towards local communities and visitors should be promoted to avoid accidental damage. Look at funding for education.
- vi) There should be increased scope for guided walks and interpretation boards near car parks to inform people of the archaeology available to see on nearby walks.
- vii) Education should be enhanced to increase the knowledge of Scheduled Ancient Monuments/Sites and Monuments Records.
- viii) The moor is covered with ancient monuments including lost settlements and iron-age forts; the majority of which are not widely known and invisible to the untrained eye therefore could be inadvertently damaged due to unawareness and activities such as bracken clearing.
- ix) The archaeology that is present on Exmoor is some of the best in the country.
- x) More and more sites are being discovered through ongoing work.
- xi) There are concerns regarding the over-riding priority of archaeology e.g. Horse-riders wanted to divert a bridleway because of safety issues, but the archaeology was considered more important than rider's safety.
- xii) There needs to be an investigation into where minerals and building materials can be appropriately extracted.

## E. Exmoor's Landscape, Wildlife and Land Management

No.	Issues	Stakeholder Options
1	<p>Ensuring that the special qualities that make Exmoor a wild, tranquil, remote and emotionally uplifting are retained and enhanced while providing appropriately for the needs of local communities and visitors.</p>	<ul style="list-style-type: none"> <li>i) Environmental quality including tranquillity and character must not be undermined.</li> <li>ii) Use landscape character assessment approach to assist with planning in terms of tranquillity and landscape character. Landscape assessment guides positive change identifying areas that are more sensitive and is a tool for assessing a baseline.</li> <li>iii) Need to weigh up the different attributes of landscape to assess change including cumulative change.</li> <li>iv) Identify areas in the National Park where landscape type means recreation facilities might be more appropriate; also identify areas that are more sensitive to recreation (i.e. where landscape would be more adversely affected by it).</li> <li>v) Identify buffer zones round settlements. E.g. to allow for the protection and enhancement of moorland.</li> <li>vi) As an important asset there needs to be more of a focus on coastal issues to ensure protection of the landscape. Draft South West Regional Spatial Strategy (RSS) coastal policies identify undeveloped coast. Don't want to lose unspoilt character of coast. Development should therefore be directed to developed areas and should not be permitted in undeveloped coast. There is a need to plan for/ be aware of the potential impacts on the coast from the landfall of barrages or other structures.</li> <li>vii) Need to guide large development away from certain areas.</li> </ul> <p><i>See also: Topic A, Issue 2 (iv); Topic B, Other Issues and Options (ix)</i></p>

No.	Issue	Stakeholder Options
2	Planning for the restoration of wilder landscapes such as linking moorland and woodland areas and maintaining and enhancing moorland fringe and transitional areas.	<ul style="list-style-type: none"> <li>i) Potential for developments to incorporate wildlife corridors to link up habitats. This needs to be achieved in a strategic way at a strategic level/scale. Use the Wildlife Trusts' Nature Map as a starting point. In the RSS it is required that local authorities use it to identify areas of regional and local importance; On LDF Maps identify area of search looking at opportunities to link, restore and recreate habitats.</li> <li>ii) Need to guard against identification of corridors.</li> <li>iii) Planning needs to take into account changes to ecosystems and build in wildlife corridors. Need to assess whether proposed developments would isolate areas of habitat such as moorland, tree groups etc. Need to identify areas on maps using landscape character assessment to show new areas of landscape, biodiversity and corridors. Would feed into available information in assessing proposed applications.</li> <li>iv) Welcome opportunities to link greenspace and habitats. Should seek contributions from developers etc. to 'green infrastructure'.</li> </ul>
3	Ensuring that Exmoor remains relatively free of types of elements which detract from landscape character such as major roads, derelict land and neglected buildings, electricity pylons/overhead wires, active quarries, caravan or large camp sites, holiday camps and theme parks. Identifying key views within and out of the National Park. The	<ul style="list-style-type: none"> <li>i) Need a case by case basis in assessing intrusive structures.</li> <li>ii) Need to 'harness' change e.g. alternative energy, telecommunications etc.</li> <li>iii) Need to balance carbon footprint, renewable energy, conservation of the landscape, wind turbines e.g. masts such as the Countisbury Mast, TV dishes etc.</li> <li>iv) Scale is important: often determined by forces outside local control. The preference should be for small scale and local solutions - shorter masts, damming of reservoirs to harness water power but at a smaller scale as it is more self sustaining. Need to define what is 'micro' and what is not.</li> <li>v) Important not to cover Exmoor with caravans because it will adversely impact it.</li> <li>vi) Design Guides promote types of developments we want to see but they need to be practical and help inform discussions e.g. on materials and scale and should be used alongside free pre-application advice.</li> </ul>

No.	Issue	Stakeholder Options
	removal of intrusive man made structures.	<p>vii) To ensure really high quality development a good design guide is needed.</p> <p>viii) Need design statements before design is drawn up. Far superior design will result e.g as regards topography and landscaping.</p> <p>ix) Wind turbines might be seen as an intrusive structure to be removed.</p> <p><i>See also: Topic C, Issue 5 (iii)</i></p>
4	Ensuring that farming, in particular livestock farming, and associated land management practices which have traditionally created and maintained Exmoor's landscape can continue.	<p>i) Need to encourage farm diversification to support local businesses. E.g. raising and slaughtering livestock locally to make more money per animal. Statistic that 90% of farmshops go under within a year. Potential for change of uses beneficial e.g. B&amp;Bs.</p> <p>ii) Need to ensure that people who can work the land remain in the National Park. Especially difficult for tenant farmers (grasslet); Land management is a key issue to conserve the National Park. Need policies to encourage farm diversification to ensure farms are economically sustainable e.g. farm processing.</p> <p>iii) Look into potential/identify a suitable site for a local abattoir. Difficult to justify one financially - Cutcombe suggested because of location of market.</p> <p>iv) There are currently sustainability issues where farmers are permitted to quarry on the farm for their own use only. They should be able to supply a local market as well to avoid importing stone for local use from further afield. There is a need for some small scale quarries for local need.</p>

No.	Issue	Stakeholder Options
5	Ensuring that changes in farming which are transforming Exmoor's landscape such as the subdivision of farms, the increase in commercial shooting and associated development, equestrian development, and farm diversification are managed to conserve and enhance the natural beauty, wildlife and cultural heritage of Exmoor National Park.	<ul style="list-style-type: none"> <li>i) Paddocks, subdivision, maneges; linking farmland, liveries. We need a strategic look at equestrian and other recreational opportunities; The NPA should require maneges to be made available for the community as a condition of the permission. As often only used once or twice when people come to Exmoor.</li> <li>ii) Issue of people buying up farms as hobby farms to avoid inheritance tax relief e.g. hobby farming/equestrian use. This is changing the appearance of Exmoor. Some keep only the house and let the grass; some employ a manager who lives elsewhere. We need viable agriculture. Many farmhouses are sold as second homes. Second homes should need planning permission. Changes resulting in farms without farmers.</li> </ul>
6	The incidental environmental impacts of road safety, traffic management and highway maintenance by Highway Authorities such as signage and can have a harmful effect on the character of the locality and cumulatively on the National Park as a whole.	<ul style="list-style-type: none"> <li>i) Welcome ENP being free of major roads.</li> <li>ii) Highway signs/ roads are very important. People's views of the National Park are often views from roads. Concern over proliferation/number of signs as they are intrusive. Need an overall speed limit to avoid the need for signs.</li> <li>iii) Example of experiment pioneering a 'shared space' scheme in Ashford where signs were removed and there were no pavements. The objective being for drivers to be more aware of pedestrians and to drive more safely as a result. Could areas for such schemes be identified in the LDF?</li> <li>iv) Careful getting rid of clutter- don't want people doing detours because too few directional signs.</li> </ul>
7	Conserving and enhancing Exmoor's habitats and species. Extending/	<ul style="list-style-type: none"> <li>i) Guard against reduction in the extent of forestry. Need to look for opportunities for compensatory planting to maintain existing resource.</li> </ul>

No.	Issue	Stakeholder Options
	restoring/recreating semi-natural habitats including woodland, heathland, moorland and blanket bog and other habitats such as farmland.	ii) Role in LDF identifying areas for coppicing, tying up with wood fuel/economic opportunities. <i>See also: Topic D, Issue 4 (ii)</i>
8	Ensuring that development makes provision for protected and important species.	i) In National Planning guidance.
9	Planning for climate change – a continued northwards migration of species is predicted. The isolation of semi natural habitats is likely to lead to a loss of species at the southern limit of their range while species at or near the northernmost limit of their range are likely to increase. A key issue will be linking habitats to enable migration including for ‘Atlantic’ species which favour mild, wet conditions.	i) Climate change not just northward. Migration of species will also be to higher elevations and to north slopes. Need to plan for more habitats to enable ‘migration’ to these areas.

### **Other issues or comments from stakeholders**

- i) Need to consider policies to complement the attractiveness to visitors of long distance routes such as the Coleridge Way.
- ii) Issue of landscape and appropriateness of recreation/locations for recreation in particular areas/landscapes.

### **Other non-spatial issues**

- i) Natural England should survey future upland environments including ecosystems, moorlands, and areas suitable for wind turbines to enable a holistic approach to ecosystems to be taken, to improve the area and to look at opportunities for corridors to link habitats. Planning needs to take into account changes to ecosystems and build in wildlife corridors etc. It needs to ask questions such as will the proposed development isolate areas of habitat such as moorland, tree groups, etc. Need to identify areas on maps using landscape character assessment to show new areas of landscape, biodiversity and corridors. Would feed into available information in assessing proposed applications. The link to farming is very important. The Exmoor Society Moorland Trust is relevant and the new entry level stewardship scheme. Declining stocking rates are detrimental to landscape with changes in farming causing a reduction in biodiversity.
- ii) Need to consider carbon footprint.
- iii) Subsidy should not result in an increase in scrub.
- iv) Issue regarding agricultural payments which are only known until 2012 while the LDF is looking ahead until 2026. How might farm payments change and affect landscape in that time? E.g. elephant grass has a negative impact on the landscape.
- v) Wildlife is a healthy way for people to enjoy the area. People come here to view it e.g. through guided visits to the rut and they are part of the local economy.
- vi) To enhance value of wildlife then we need awareness.
- vii) Land Management is a key issue. On Dartmoor and Exmoor there is a lack of grazing because of reduction in livestock grazing - issue of Higher Level Stewardship (HLS).
- viii) National Parks will be targeted by Natural England as priority areas. Environmentally Sensitive Area agreements are being replaced by a higher level scheme. Identify areas to be researched.

- ix) Continue support for up grazing through hill farming allowance. Needs to be easier for farmers to obtain.
- x) Proposal for abattoirs at Bishops Lydeard and Combe Martin.
- xi) Do not want to see loss of productive woodland/reduction in the extent of forestry. Issue of compensatory planting to maintain existing resource. We need to look for opportunities (and for HLS to fund such a transition).
- xii) Look at plant seed e.g. tree seed from further south (in Europe) to strengthen existing stock in readiness for climate change.
- xiii) In managing existing woodlands larger trees are needed to maximise carbon uptake (issue not only woodfuel and new planting).
- xiv) Deer and grey squirrel management needed. Red squirrel habitat creation is needed. In living memory there were still red squirrels at Bampton.
- xv) Self sufficient communities who are empowered are good for sustainability. Need to encourage community spirit which is viable/achievable in an area such as Exmoor. It is an important overall aim as viable communities are needed.
- xvi) Rather than Exmoor learning from urban areas, solutions on Exmoor can be taken back to the suburbs/cities. Use Exmoor as an experimental area to find solutions that might work elsewhere.



## F. Exmoor's Settlements, Services, Transport and Infrastructure

No.	Issue	Stakeholder Options
	<b><u>Settlements and Community Services</u></b>	
1	Identifying what makes settlements sustainable in an Exmoor context and what is the appropriate approach to ensure that small rural communities are viable in the long term whilst conserving and enhancing their character.	<ul style="list-style-type: none"> <li>i) To be sustainable, community assets must meet future generations as well as present generation needs.</li> <li>ii) The provision of housing and jobs should be linked - both of which need to be sustainable. There is a danger in creating jobs with no affordable housing available for people who work there.</li> <li>iii) Provision of shared equity housing.</li> <li>iv) Try to stop people moving away particularly young people through attracting new better paid jobs – this will enable people to move out of social housing to shared equity housing and on up the property ladder.</li> <li>v) We should be localising the economy for farming through an Exmoor brand which emphasises good, local food production and supply Exmoor shops - celebrate local businesses using local produce.</li> <li>vi) There needs to be a fundamental review regarding the state of the management of tourism – at present there is a major crisis coming because of a lack of management.</li> <li>vii) Limit the number of second home owners.</li> <li>viii) Sustainability of settlements -levels of infrastructure and audits -should we put the people where the facilities are or protect villages from loss of services?</li> <li>ix) Shouldn't look at one rural settlement in isolation- they are all part of a network.</li> <li>x) Local Authorities need to sign up to long term facilities agreements co-ordinated to serve the needs of local community.</li> </ul>

No.	Issue	Stakeholder Options
2	Identifying a settlement hierarchy appropriate to Exmoor National Park's circumstances. At present the Local Plan classifies the settlements as Local Rural Centres and Villages with the remaining area as Open Countryside.	<ul style="list-style-type: none"> <li>i) There is need to review the settlement hierarchy e.g. the Cutcombe Market Scheme and possibility of an Exmoor National Park Centre at Wheddon Cross would potentially alter the function of the settlement and how it links with neighbouring settlements.</li> <li>ii) Settlement hierarchy may not be appropriate for a small National Park. We should look at local solutions and look at park as a whole.</li> <li>iii) The Local Plan is too rigid in its policies – i.e. greater flexibility in what can be built in settlements.</li> <li>iv) North Devon Council has 5 tiers in their settlement hierarchy. Should we alter the hierarchy or is the present arrangement appropriate?</li> </ul>
3	What can be done to enhance the character of Exmoor's settlements, by for example, undergrounding overhead electricity and telecommunication wires, repairing traditional fabric such as cobbles, removing the clutter of signs, conserving traditional shop fronts etc?	<ul style="list-style-type: none"> <li>i) Cobbles enhance the character of Exmoor's settlements but there are accessibility issues. Cobbles should have priority over accessibility issues. There is a general conflict between the Accessibility Act and the preservation of the historic environment. Need to consider each case on its merits.</li> <li>ii) Some traditional shop fronts may not be appropriate. Need to take into account national legislation.</li> <li>iii) Good design, should be confident and ambitious about the built environment.</li> <li>iv) Agree with undergrounding overhead lines – the difficulty is the cost, although it is desirable.</li> </ul> <p><i>(Also see related comments on the Topic Paper D Historic and Built Environment &amp; Minerals)</i></p>
4	With the rise in the closure of shops, post offices and petrol stations there is a need to safeguard and sustain essential community services.	<ul style="list-style-type: none"> <li>i) Need to think in a more integrated way about community infrastructure in the widest sense e.g. peripatetic services to outer villages rather than large practices in town centres, multi-functional buildings linked to good public transport. Sometimes around a group of hamlets or villages.</li> <li>ii) Plugging the leaks keeps money in circulation on Exmoor rather than disappearing outside the area. Broaden services to smaller settlements rather than direct all services to rural centres.</li> </ul>

No.	Issue	Stakeholder Options
		<ul style="list-style-type: none"> <li>iii) Key hubs should be provided within identified settlements which benefit from a larger population and increased services. Plugging the leaks keeps money in circulation on Exmoor rather than disappearing outside the area.</li> <li>iv) Look at community hub idea - have key settlements and form a circular access to services. Ensure all new development is within a certain distance of services.</li> <li>v) Only provide affordable housing.</li> <li>vi) Other areas have restrictions on who can buy houses. Could NP do this?</li> <li>vii) Co-operate with local suppliers.</li> <li>viii) Should we analyse facilities available or look at the pattern of development we want and take action to support it?</li> <li>ix) Voluntary/community centres.</li> </ul>
5	The need to safeguard Exmoor's schools and health services.	<ul style="list-style-type: none"> <li>i) Need families to stay in communities. Should provide more affordable housing. (see issue 4 above for other options which are also applicable)</li> </ul>
6	Accessibility to essential community services.	<ul style="list-style-type: none"> <li>i) Needs a clear thinking of design on community facilities. Replacement of halls with genuine multifunctional potential where can use whole building or divide into smaller units. Maybe include business support facilities to fund the hall to be 'manned'.</li> </ul> <p><i>(see also Issue 8 and Issues 9 – 11 for Transport)</i></p>
7	Influence of nearby towns in the provision of employment and services	<ul style="list-style-type: none"> <li>ii) Shouldn't look at one rural settlement in isolation- they are all part of a network.</li> <li>iii) Need to consider settlements outside the National Park as well when drawing up a settlement hierarchy <i>(also relevant to Issue 2 above)</i>.</li> </ul>

No.	Issue	Stakeholder Options
8	Access to fast internet connections for accessing services and working from home – leading to the possible reduction in the need to travel.	<ul style="list-style-type: none"> <li>i) Communications infrastructure should be developed.</li> <li>ii) Improve broadband infrastructure so that internet can be used to access services (particularly useful for elderly and those without access to transport).</li> </ul>
	<b><u>Transport</u></b>	
9	Encouraging travel by sustainable means of transport, whilst recognising the need to travel by private modes of transport in a dispersed rural area such as Exmoor.	<ul style="list-style-type: none"> <li>i) Electric vehicles could be provided locally to hire in the main centres.</li> <li>ii) Cost-effective rural transport is required through combining journeys e.g. school runs, work, shopping runs, hospital appointments.</li> <li>iii) We should integrate rural transport with disability transport services.</li> <li>iv) Follow guidelines in RSS; to look for multi-functional centres and linking transport.</li> <li>v) The point is about not needing a car it is more about choosing an appropriate travel choice e.g. walking or cycling. There is a need to differentiate between short/small scale movements as opposed to longer journeys where a car is needed.</li> <li>vi) Distinguish between availability and attractiveness of options to the car.</li> <li>vii) When high levels of car ownership. Need to build in incentives to use other options.</li> <li>viii) There needs to be the issue of location first - rural travel is often a small part of the overall problem relative to urban areas.</li> <li>ix) There is a need to recognise the negative carbon impacts from an approach to development in rural areas - but policy can be robust on this issue.</li> </ul>

No.	Issue	Stakeholder Options
10	Improving the number and frequency of public transport including bus services and encouraging greater use of these services.	<ul style="list-style-type: none"> <li>i) LARC (Local Action for Rural Communities) Project – there is an indicative project to take forward the West Somerset Railway (WSR) to Taunton rail link to provide a more efficient transport service. Look into the scope for opening old railway lines</li> <li>ii) School buses could be utilised as community transport. Emphasise community transport, cycle hire and cycle paths</li> <li>iii) Making the SLINKY BUS demand responsive transport system more widely available for people who wish to change to buses from cars.</li> <li>iv) Follow guidelines in RSS; to look for multi-functional centres and linking transport.</li> <li>v) Public transport shift- there to enable access not just for climate change reasons.</li> <li>vi) Several smaller scale community buses would be more appropriate and more sustainable.</li> </ul>
11	Ensuring that there are improved opportunities for safe horse-riding, cycling and walking as an alternative to car travel.	<ul style="list-style-type: none"> <li>i) There should be planning policy to ensure the provision of cycle paths. Where certain routes bicycles and horses have right of way. Colour roads to direct this.</li> <li>ii) Keep bridleways and footpaths accessible.</li> <li>iii) Provide roads where bicycles have priority and not cars</li> </ul>
12	The reflection of local circumstances in setting the level of car and cycle parking provision that is appropriate for small-scale developments.	<ul style="list-style-type: none"> <li>i) Car parking provision should aim to serve those who need it. Maximum parking standards are not always enough – there needs to be clear objectives of what this is trying to achieve.</li> <li>ii) Wider point about role of travel planning with regard to all modes of transport. Issues 11 and 12 should be linked and put into a travel planning context and the legibility of routes.</li> <li>iii) The appropriateness of travel plans – they do not always result in different modes of transport. There should be a condensed/tailored version to suit rural/more remote locations.</li> </ul>

No.	Issue	Stakeholder Options
13	Working with partners to assist with problems of traffic speed, congestion and parking within settlements.	<ul style="list-style-type: none"> <li>i) Require a parking strategy for Exmoor National Park, need to balance what the need is and what the visual impact will be. Some areas should have special treatment and should not allow cars e.g. use bicycles, buses, Exmoor Explorer.</li> <li>ii) Cobbles, road signage and other practical techniques can be used to decrease speed and accidents.</li> <li>iii) Improve parking in settlements e.g. Dunster long term parking, short-term spaces.</li> <li>iv) Need for innovative forms of transport and transport networks.</li> </ul>
	<b>Utilities</b>	
14	New supplies or alternative sources of energy provision to rural properties.	<ul style="list-style-type: none"> <li>i) There is a need to bring the Environment Agency and Natural England in to ensure that a common approach to renewable schemes and grid connection happens more smoothly.</li> <li>ii) Renewable energy schemes for communities should be promoted.</li> <li>iii) The National Park should be more flexible on community scale wind farms. We are in a crisis situation (in terms of climate change) and should accept that the view would have to be obscured in certain locations for 30-40 years.</li> <li>iv) The turbines at Wimbleball Lake are a massive opportunity for hydro-electricity and the main infrastructure is already there (more appropriate in the climate change topic).</li> <li>v) Dulverton could re-use the old power station to generate hydro-electricity.</li> <li>vi) Should have co-ordination in terms of sharing trunk systems - water, electricity, communications network.</li> <li>vii) Combined Heat and Power (CHP) systems should be utilised for housing developments and communities.</li> </ul>

No.	Issue	Stakeholder Options
		viii) Possibilities of anaerobic digestion from animal manure to generate heat/electricity on farms.
15	Providing appropriately for the socio-economic need for modern telecommunications without adversely affecting the special qualities of the National Park through the visual impact of telecommunication masts.	<ul style="list-style-type: none"> <li>i) Improving communications infrastructure e.g. use pine tree masts.</li> <li>ii) Undergrounding- difficulty is cost although it is desirable.</li> <li>iii) Should have co-ordination in terms of sharing trunk systems- water, electricity, communications network.</li> </ul>
16	Ensuring adequate provision of water and sewerage infrastructure including providing for the extension of sewage treatment plants.	<ul style="list-style-type: none"> <li>i) Need for individual farms and properties have their own water storage and sewers. People should be encouraged to take responsibility of their own actions.</li> <li>ii) Take a holistic view of infrastructure provision e.g. Cutcombe market development.</li> <li>iii) Use anaerobic digestion at sewage treatment plants.</li> <li>iv) Ensure funding is available for this type of infrastructure. There should be an emphasis on the developer to provide.</li> </ul>

### Other issues or comments from stakeholders

- i) Everything is relative; if housing was cheap younger people would have a greater reason for staying.
- ii) The biggest growth in retail is online and this has seen an increase in the 'white van' culture – it appears to be the most common type of vehicle on Exmoor with the growing number of deliveries through online ordering.
- iii) An example of community energy schemes are air source heat pumps within communities in Yorkshire.
- iv) Internet take up is much higher in rural areas.
- v) Western Power has got funding to underground wires.
- i) Going back to the old ways of shopping – where shopping is delivered to outlying settlements with few or no services available.
- ii) Convenience stores and petrol stations are equally important for rural areas.
- iii) Pharmacies are vital to GPs; they provide a very large part of their income.
- iv) Most people get around by car because there is no choice.
- v) Having a petrol station is important.
- vi) Accessibility planning- SCC transport policy and Highways department have got facility to plot accessibility to different services e.g. access to hospitals and GP services.
- vii) Renewable energy schemes for communities should be promoted; set up an exemplar project such as photovoltaic (PV) panels on Cutcombe church which would enable self-generating electricity, which will pay for system through selling surplus electricity to grid to recover capital costs and fund the upkeep of the church.
- viii) Air source heat pumps were an example of community energy schemes suggested – these have been utilised as renewable energy for communities in Yorkshire.
- ix) Climate change also an incentive to use alternative sources of energy.
- x) The prospect of rapidly rising fuel prices in the future will have a major impact on rural communities and how they travel.
- xi) To ensure transport infrastructure is central to the planning process.



### **Other issues or comments from stakeholders**

xii) Need a list of what makes Exmoor Special

*See also: Topic B, Other Issues or Comments (x)*

### **Other non-spatial issues/options**

- i) Up-skilling (i.e. training and access to higher education) is important to sustain communities.
- ii) Minehead should become a 'gateway' town to Exmoor.
- iii) The Steam/coast project from Dunster to Carhampton is working to promote sustainable transport (walking, cycling etc) along this corridor - strategic support is required for developing this.
- iv) Old railway tracks (North Devon) should be used as perambulatory routes, to enable access for all (including wheelchairs users and pushchairs). These routes could be ideal short walks and/or cycle routes for families - a feasibility study needed to develop this idea.
- v) West Somerset Railway could be developed to link services with Taunton station with better co-ordination with bus services at Minehead.
- vi) At present businesses would not rely on internet due to the overall quality and speed of the service. If this service was improved more people could work from home.
- vii) Transport infrastructure needs to be protected by planning policy.

## **G. Exmoor's Recreation and Tourism**

<b>No.</b>	<b>Issues</b>	<b>Stakeholder Options</b>
1	Providing and enhancing opportunities for quiet enjoyment which do not harm landscape, wildlife and archeological interests and do not affect the enjoyment of Exmoor National Park's special qualities.	<ul style="list-style-type: none"> <li>i) Should find a balance between preserving/enhancing the environment and providing for those things that visitors want.</li> <li>ii) Exmoor is one of the smallest and less visited of the National Parks – there is a need to increase visitor numbers but not to the same levels as other National Parks.</li> </ul>
2	Safeguarding existing sports and recreation sites and resources and providing for new facilities where required.	<ul style="list-style-type: none"> <li>i) Outdoor pursuits/recreation still more important than indoors. Could enhance activity trails. We should make use of the geography and topography of the National Park.</li> <li>ii) There is a lack of indoor activities. Development could include multi-purpose sports hall, bike stores and coffee shops.</li> <li>iii) Indoor recreational facilities should make use of existing buildings where possible.</li> <li>iv) Future planning policy should encourage recreation more- more allocated sites? Or broad areas?</li> <li>v) Several smaller facilities are better than 1 large one.</li> <li>vi) A whole range of outdoor pursuits would be appropriate.</li> <li>vii) Promote activities outside the mainstream tourism season e.g. Shooting.</li> </ul>
3	Enabling equestrian activity and development as a traditional activity on Exmoor including stables/loose boxes, field	<ul style="list-style-type: none"> <li>i) Games and Equestrian can have an adverse effect on the landscape there are a lot of applications at the moment for this; policy is generally right in terms of this at present.</li> <li>ii) Issues 3 and 4 should be combined to describe countryside sports.</li> </ul> <p>See also: Topic E 5i and 5ii.</p>

No.	Issues	Stakeholder Options
	shelters, maneges and horse riding or equestrian centres so as to avoid adverse impacts on the landscape and the amenity of nearby occupiers.	
4	Managing game shooting sustainably so as to avoid adverse impacts on the landscape, wildlife, quiet enjoyment and public safety and enjoyment of access rights.	See above and Topic E 5i and 5ii.
5	Evidence suggests that occupancy rates for self catering accommodation are relatively low. There is therefore a need to manage the number of new self catering units.	<ul style="list-style-type: none"> <li>i) Should look at the market when assessing planning applications.</li> <li>ii) The diversification of farming to tourism has created an oversupply of bedspace.</li> </ul>
6	The siting of caravans and camping needs to be carefully managed in terms of their impact on the landscape and road access.	<ul style="list-style-type: none"> <li>i) The LDF should provide for increases in activity based tourism and caravanning/camping etc. Policy is an issue in terms of permitting caravans for local events (need to apply 18 months in advance).</li> <li>ii) Should relax certain policies e.g. barn conversions, events, caravanning (to help tourism).</li> <li>iii) There should be policies against making temporary camping sites more permanent. However this will depend on the area in question e.g. there should be can be more flexibility in allowing tourism development in already developed areas.</li> </ul>

No.	Issues	Stakeholder Options
7	Improving recreational and tourism facilities and businesses in sustainable locations.	<ul style="list-style-type: none"> <li>i) Should improve value of tourism rather than volume of tourism e.g. improve product and broaden season.</li> <li>ii) Should improve the perception of development from anti to pro.</li> <li>iii) Pre-application discussions will lead to lower refusals at the application stage.</li> <li>iv) Planning needs to allow for diversification of existing businesses into recreation and tourism.</li> <li>v) Be proactive not reactive.</li> <li>vi) Planning policy at present is too restrictive in terms of the tourism development that is actually needed.</li> <li>vii) Find the balance between the environment and tourism.</li> <li>viii) Allocate land for a hub of tourist activity in the LDF.</li> <li>ix) Planning policy needs to focus less on tourism and focus more on keeping highly paid people in the area.</li> <li>x) Should we be providing for self-catering in remote locations for transport/sustainable reasons.</li> <li>xi) Policy to replace holiday let ties with local needs tie as in North Devon.</li> </ul> <p><i>See also: Topic E, Other Issues or Comments (ii)</i></p>
8	To seek and promote opportunities for improved access for the enjoyment of Exmoor's special qualities by the public in a sustainable manner.	<p>See Issues 9 and 10</p> <ul style="list-style-type: none"> <li>i) There is a conflict as visitors use roads to get to National Park to go walking but the extra traffic makes the areas unsafe to walk.</li> <li>ii) Improve accessibility and publicity to the Park to increase numbers of tourists.</li> </ul>
9	To ease traffic congestion in the tourism season and	<ul style="list-style-type: none"> <li>i) Should improve local public transport to make tourism more sustainable e.g. Lynton and Barnstaple Railway.</li> </ul>

No.	Issues	Stakeholder Options
	provide more sustainable ways of accessing the National Park.	<ul style="list-style-type: none"> <li>ii) Parking charges are too high in the NP people have to use car because bus service isn't in place.</li> <li>iii) Travel planning – referred to in regional Policy TO1- tourism developments should at the very least refer to public transport that exists. Any new development should be pushing public transport accessibility to sites of interest. SCC keen to offer advice on this matter.</li> <li>iv) The expansion of tourism should be balanced with climate change through for example, <ul style="list-style-type: none"> <li>- More coaches</li> <li>- Option of not allowing cars and then have shuttle bus</li> <li>- If people come for longer could bring car but not for day visit</li> <li>- Improve public transport</li> </ul> </li> </ul>
10	Safeguarding Public Rights of Way and providing appropriate pedestrian, cycling and equestrian access.	<ul style="list-style-type: none"> <li>i) There should be a rights of way improvement and maintenance plan e.g. South west coast path.</li> <li>ii) There are problems with off-road driving on public footpaths. There is a need to allow for these activities through dedicated sites.</li> <li>iii) Need more discussion between estate owners to see how they can contribute jointly (through provision of public footpaths/housing etc).</li> </ul>

<b>Other issues or comments from stakeholders</b>
<ul style="list-style-type: none"> <li>i) People don't apply for planning permission because they think they will be refused- the authority viewed as being anti-development to a certain extent.</li> <li>ii) Walkers have more flexibility/freedom than horse riders.</li> <li>iii) Flood risk needs to be mentioned as caravans are particularly vulnerable to floods.</li> <li>iv) Need to make sure the attraction of Exmoor isn't eroded but also need to provide for needs of indigenous population and visitors.</li> </ul>

### **Other non-spatial issues**

- i) Most people come to the National Park to visit villages and have small walks.
- ii) ENP only has a small catchment area; this may be increased through more effective marketing.
- iii) There are a lot of day visitors and the main business is short breaks. There should be more advertising to this group of tourists to encourage them to come to the National Park.
- iv) Need to segment the market.
- v) Tourism is vital, should be promoted and needs to be more outward looking.
- vi) The planning system encourages footpaths/ public connections/ riding but there is no funding for it. Bridleways need to be updated as the existing routes are not appropriate for existing needs.
- vii) Bus service needs to be promoted.
- viii) A lot of the activities don't fall inside planning system e.g. shooting.
- ix) Planning policies need to link more to the economic strategy.
- x) Promote activities outside the mainstream tourism season e.g. Shooting.
- xi) A rail link could make more areas accessible.
- xii) More promotion of Exmoor as a tourist destination.
- xiii) Cycling is becoming more prevalent. It could potentially be appropriate to set up mountain biking centre.
- xiv) Promote archaeology as a tourist attraction.
- xv) The need changes on a year by year basis (2 wet summers) but you cannot adapt stock to reflect this.
- xvi) Exmoor should be booming last few years through weekend breaks but it is not because tourism in UK is very expensive- transport and accommodation etc.
- xvii) Shouldn't promote tourism to the detriment of the local people and the quality of life.
- xviii) The National Park needs to publish the permitted rights of way and need to implement the rights of way and improvement plan.

xix) Need to develop events in order to bring people in (land and water based).

xx) The National Park does not seem to attract 'middle market'.

xxi) People do not stay in Exmoor as it is not accessible and not marketed effectively.

xxii) Tourism numbers are in decline due to;

- problems with accessibility (poor public transport in rural areas).
- more competition from other areas.

xxiii) Tourism is low wage/seasonal.

xxiv) There is an over-reliance on tourism. People are likely to go elsewhere to set up a business.

xxv) Shooting and equestrian markets should be promoted.

*See also: Topic F, Issue 1 (vi)*

## Appendix B: LDF Stakeholder Questionnaire Data

### Overall Vision

#### Question 1

1) The Exmoor National Park Management Plan 2007-2012 provides a vision (set out in full below). Should this vision be retained for the Core Strategy vision?					
Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree	Total
8	17	2	2	1	30

#### Question 2

2) If you disagree, what amendments would you suggest? Please set out your reasons	
Answers	Organisation
Sustain the cultural and community heritage of the people of Exmoor	(Nicholas Pearson Associates Limited; No title given)
<p>The Environment, Food &amp; Rural Affairs Parliamentary Select Committee 2008            England's Rural Economy Select Committee Report - The potential of England's rural economy  <a href="http://www.drn.org.uk/potential_of_englands_rural_economy_select_cttee_report_oct_08-2.pdf">http://www.drn.org.uk/potential_of_englands_rural_economy_select_cttee_report_oct_08-2.pdf</a></p> <p>Page 34 paragraph 3 &amp; 4 of the latest government report which states -            "Based on the concerns put to the Committee, we recommend that Defra carry out a review of whether planning decisions by National Park Authorities reflect the correct balance between protecting the natural environment and ensuring that communities located within national parks are sustainable and will survive."</p> <p>Also page 8 paragraph 9 states -            "Under the Environment Act 1995, the statutory purpose of national parks is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, but National Park Authorities also have a statutory duty to foster the economic and social well-being of local communities. Under the Act, this duty is given less weight than the conservation element.</p> <p>Based on the concerns put to the Committee, we recommend that Defra carry out a review of whether planning decisions</p>	(Lynton and Lynmouth Association of Commerce; No title given)



<p>by National Park Authorities reflect the correct balance between protecting the natural environment and ensuring that communities located within national parks are sustainable and will survive."</p> <p>It is of course obvious to anyone connected with Exmoor's economy and by that I refer to TOURISM and the ENPA's continued ignorance and failure to recognise this fact is graphically illustrated in the ENPA's above vision - "profitable and competitive farming, forestry and land management enterprises" and yet mentions only "a sustainable tourism and recreation economy" in the context of delivering "inspiration, tranquillity and active outdoor recreation"</p> <p>This 'imbalance' highlighted in England's Rural Economy Select Committee Report is confirmed and endorsed in the vision put forward in the Exmoor National Park Management Plan 2007-2012, which is all to the detriment of the economy of Exmoor and thus the small businesses which support and make up people and local communities of Exmoor.</p>	
<p>Whilst all of the above aims are valid, and most equate to the primary purpose of the National Park, we would nonetheless like to see the vision relating to communities higher up the list!; *The statement on air, water and soil ('are of high quality and we are closer to achieving a carbon-neutral National Park to help tackle climate change'), is far too generalised and should be amended. If there is a need for a general comment, instead focus should be directed whereby ENP will work with partners to help ensure air, water and soil remain good quality and where negative impacts are identified, ENP will work with partners where possible to improve these areas. In terms of the statement on ENP becoming carbon neutral this needs to be quantified, else it lacks focus.</p>	(West Somerset District Council; Economy and Climate Change Officer)
<p>Although basically agreeing with the statement there could profitably be incorporated some reference to economic viability/employment prospects not related to tourism and also how the area related to the adjacent local Planning Authorities and their plans/policies.</p>	(North Devon District Council; No title given)
<p>Generally agree however the achievement of a carbon neutral National Park may be difficult to attain. As set out later in the questionnaire, there is a need for private transport in the more sparsely populated areas of the park and public transport is often not adequate for people's needs. This will also impact on the sustainability of tourism etc in terms of "greenness" – many areas of the park will be accessible only by transport and feasibility of running regular services may not be an adequate solution. Many tourists will also prefer the flexibility of their own transport, therefore more creative solutions may be needed, e.g. private car services from tourist accommodation – look at car full policy. See the Devon DMO Sustainable Tourism Action Group's Sustainability Action Plan <a href="http://www.drn.org.uk/destination_devon_sustainability_plan.pdf">http://www.drn.org.uk/destination_devon_sustainability_plan.pdf</a></p>	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
<p>Access to community services is patchy and varies from area to area. To retain vibrant rural communities, local services must be retained and improved. Local affordable housing is a problem in some areas. Some older folk are living in houses which have more bedrooms / are bigger than they require and they would happily move to smaller houses if they were available. This would leave larger houses available for bigger families. All ages are vital for communities to thrive and therefore must be catered for.</p>	(Exmoor Trust; Chairman)
<p>Largely support the vision, but suggest the following amendments: The vision is strong on climate change mitigation with the aim of moving towards a carbon-neutral National Park, but there needs to be emphasis as well on climate change</p>	(The National Trust; Land Use Planning Adviser)

<p>'adaptation'. There is a need for increased knowledge of the areas, communities, assets and resources most at risk from climate change and measures in place to mitigate the effects, together with improved resilience (RSS Policy SD2).</p> <p>There should perhaps also be specific reference to the coast as this particularly contributes to Exmoor's distinct landscape.</p>	
<p>Whilst I do not disagree with the statement, I think it is too limited. The vision statement needs to include greater reference to the human element that live, work and visit the Park.</p> <p>I believe that the human aspect is an integral part of any National Park and this is the management challenge - how this is accepted, balanced and managed. This has not really been tackled yet.</p>	(North Devon District Council; No title given)
<p>Although it is generally agreed that the Vision's aspirations are acceptable, it is strongly recommended that an amendment should be made to the third part of the vision to read:- there is an enhanced knowledge of the historic environment of Exmoor, increased awareness of the value of its cultural heritage and archaeological sites, historic settlements, buildings and features are conserved and where appropriate enhanced so that their historic character is retained for future generations (to enjoy).</p>	(No organisation given; No title given)
<p>Paragraph 7:...in harmony with local communities- adding 'linking closely with local surrounding settlements outside the park'</p>	(Chamber of Trade; Chairman)

## Landscape, Wildlife and Land Management

### Question 3-5, 7

Question	Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree	Total	Extra Comments
3) The LDF can play a role in the restoration of wilder landscapes and the conservation and enhancement of wildlife through incorporating appropriate policies and mapping key areas of potential for landscape change and recreation/restoration and expansion of wildlife habitats	10	13	2	3	0	28	<i>Disagree.</i> Blackpits (Chamber of Trade; Chairman)
4) Detailed landscape character assessment of Exmoor's natural and historic character would provide a basis for the management of landscape and the location and design of development	11	12	2	3	0	28	N/A
5) The LDF should help mitigate the effects of climate change on species and habitats within the National Park by identifying key features and corridors on the Proposals Map and linking them with neighbouring areas.	14	9	5	1	0	29	Is this the role of an LDF – should this fall into nature mapping and BAP under habitat management? (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)  We would like to make specific comments in relation to Section B (Landscape, Wildlife and Land Management) Question 3 (on page 5), as it is important that semi-natural habitats that do not necessarily automatically benefit from statutory designation, such as ancient woodland, are protected and enhanced. <b>1.</b> We would like to see

							<p>the LDF support <b>No more loss of Ancient Woodland</b> – ancient woodland is irreplaceable, and is our richest habitat for wildlife being home to more species of conservation concern than any other habitat (supporting some 232 species as outlined in the UK Biodiversity Action Plan, 1994). Exmoor has an extremely rich asset of ancient woodland, for instance along the Barle Valley, and it is important that this is protected absolutely. Our Woods under Threat database coordinates details of ancient woodland under threat - <a href="http://www.woodsunderthreat.info/">http://www.woodsunderthreat.info/</a> - and provides information on protecting it. <b>2.</b> We would also like to see the LDF promote <b>Protection for Ancient &amp; Veteran Trees</b> – many ancient trees are not formally recorded, and the Woodland Trust and Ancient Tree Forum are running a national project to identify and map ancient trees (<a href="http://www.ancientreehunt.org.uk/">http://www.ancientreehunt.org.uk/</a>) so they can be protected and enhanced for the benefit of all - see for instance the veteran pedunculate oak (SS 90283505) on National Trust land near Winsford. <b>3.</b> It is important that the LDF supports gradual and sympathetic <b>Restoration of Plantations on Ancient Woodland sites (PAWS)</b> – in the last century, many ancient woodlands were clear felled and replanted with non-native conifers. Restoration of these to native broadleaves is the only way to increase the stock of Ancient semi-natural woodland (ASNW), thus enhancing both landscape and biodiversity, and is now one of the priority targets under the UKBAP Native Woodland Habitat Action Plan (Woodlands Trust; Regional Policy Officer).</p>
<b>7) Conserve and enhance Exmoor's special qualities by ensuring the viability of</b>	17	9	1	1	0	28	CLA would wish to see flexible policies on what diversifications (& their scale) are allowable on

<p><b>traditional land management (farming and forestry) through encouraging and providing for environmentally sustainable forms of farm diversification e.g. small scale processing of farm products to 'add value'/ build on a high quality Exmoor 'brand' or farm/woodland/biodiversity visits and holidays to increase enjoyment and understanding of the National Park</b></p>							<p>farms. The above examples will no doubt be appropriate in certain situations but in situations where they are not practical, other options will need to be considered. (Country Land and Business; Regional Surveyor)</p>
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## Question 6

<b>6) What types of farm diversification are most appropriate for Exmoor National Park?</b>						
	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>	<b>Total</b>
<b>Game shooting</b>	5	9	7	2	3	26
<b>Business use or storage/warehousing</b>	3	5	8	4	3	23
<b>Bed and breakfast</b>	9	14	1	0	1	25
<b>Self catering</b>	7	15	3	0	1	26
<b>Equestrian</b>	9	16	2	0	0	27
<b>Other (please state)</b>					<b>Organisation</b>	
Small-scale renewable energy development, biodiversity and conservation land management (arguably higher-level agri-environment schemes are a form of diversification).					(Quantocks Area of Outstanding Natural Beauty; Manager)	
Fuel wood production, higher value timber, wild fisheries					(Nicholas Pearson Associates Limited; No title given)	
Visitor Attractions; I.T. & E-commerce based businesses; Niche specialised farming in rare & pedigree breeds and types of animal; Quarrying					(Lynton and Lynmouth Association of Commerce; No title given)	
energy generation – e.g. hydro where appropriate – see Old Walls, Dartmoor: <a href="http://www.t4cd.org/Resources/ICT_Resources/Projects/Pages/ICTProject_256.asp1">http://www.t4cd.org/Resources/ICT_Resources/Projects/Pages/ICTProject_256.asp1</a>					(West Somerset District Council; Economy and Climate Change Officer)	
Educational: Making use of the Natural Environment for all users including deprived sectors of the community.					(Natural England; Planning, Communities and Biodiversity Adviser)	
Cycling and walking centres					(Peninsula Enterprise; No title given)	
Temporary land use where accessible for caravans to support local organised events; i.e. Equestrian,					(Caravan Club South West Region; No title given)	

Cycling, Walking, Water sports etc. Also caravanning centres could use this agreed land for short term holiday breaks.	
Traditional extensive farming where appropriate, continued encouragement of food security	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Renewable energy, recreational uses e.g. clay pigeon shooting, wedding/function venues, food processing, farm shops etc. Diversification options depend on the resources available to the landowner or tenant – these include physical infrastructure like the type and quality of buildings or land available but also depend on skills and abilities and capital within the family concerned – so its not possible to say ‘these are appropriate diversifications but these are not’.	(Country Land and Business Association; Regional Surveyor)
Fishing	(No organisation given; No title given)
Wood Fuel!!! Early 2009 no seasoned wood left and a small bag of wood in garden centre £11! This is your biggest sustainable ecofriendly business asset for the future. Talk to Brendon Hill stoves on sales activity	(Chamber of Trade; Chairman)
<b>Extra Comments</b>	<b>Organisation</b>
<i>Business use or storage/warehousing;</i> These are two different things – low vs. high impact. Use of redundant buildings. Bed and breakfast P/T activity. Self catering. Where appropriate Equestrian Historical use on moor, but may affect character – needs careful management in terms of visual impact if temporary fencing, buildings etc	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
<i>Game Shooting. Disagree;</i> Enough Already	(Chamber of Trade; Chairman)
<i>Business use or storage/warehousing;.</i> Travel Issues	(Chamber of Trade; Chairman)

## Question 8

<b>8) Please list the types of developments or structures that detract, in your view, from Exmoor’s special qualities:</b>	
<b>Answers</b>	<b>Organisation</b>
Anything that looks imposed or un-natural. Development within existing buildings is fine. The role of productive/commercial woodlands must be protected along with the native woodlands environmental benefits. Currently unmanaged woodland areas should be brought back into management.	(Confederation of Forest Industries; No title given)
Intrusive buildings, Development generating excessive heavy traffic	(National Health Service; No title given)
Wire fencing when not screened by hedges or banks, proliferation of signs on minor roads, any development that is brightly lit at night.	(Exmoor Trust; No title given)
Noise, visual or ecological polluting structure.	(Exmoor Trust; Business Trustee)
Telecommunication masts, any built development not connected to existing buildings (including	(Quantocks Area of Outstanding Natural Beauty;

equestrian development and the sub-division of fields into paddocks), unsympathetic design, scale and siting of any development (including wind turbines) in or close to the National Park is damaging.	Manager)
Highway signage; power/telecom cables; UPVC windows; caravans	(Nicholas Pearson Associates Limited; No title given)
Turning farm buildings into business premises, warehouses. I think of West Lyn Farm, Lynton, as a classic example. I am also concerned about the 'modernisation' of traditional farm houses. The National Park should be doing more to protect these farm houses against unsuitable alterations and extensions.	(Lynton and Lynmouth Town Council; Mayor)
Re pheasant shooting: although this brings income into the Park, it is also environmentally unfriendly. The feed uses energy, the birds are mostly not used for food, and they are a hazard on the roads.	(Forum 21; No title given)
Nothing should be ruled out, the benefits and liabilities to the local community of any development or structure should be evaluated on a case by case basis without the prevailing hypocrisy of the 'nimby'.	(Lynton and Lynmouth Association of Commerce; No title given)
Some hilltop structures e.g. Wind turbines spoiling long views not small farm turbines	(No organisation given; No title given)
Large scale developments	(Natural England; Planning, Communities and Biodiversity Adviser)
Very large or prominent buildings. Suburbanisation of rural areas. Large or prominent game-bird hatcheries, and associated fenced areas.	(Lyn and Exmoor Vision; Chairman)
Those which do not complement the natural values of the moor ie spoil the wide uninterrupted vistas, the peace and tranquillity.	(Peninsula Enterprise; No title given)
This will depend greatly on design and presentation? Structures over a certain height might detract in some instances, but again depends on the overall design	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Large wind turbines. Increasing numbers of speed restriction road signs.	(Exmoor Trust; Chairman)
Nearly all developments have the potential to detract, if inappropriately sited, designed etc.	(The National Trust; Land Use Planning Adviser)
General the park is mercifully free from large structure of such nature.	(Devon Conservation Forum; Chairman, Planning and Transport Committee)
Renovation or new BLDG that is not 'in tune' with existing style- 'phone masts, large obtrusive wind farms'.	(The Ramblers' Association; Footpath Officer-North Devon Group)
Use of inappropriate materials - metal sheeting etc rather than wood cladding for industrial uses. Large areas of hard landscaping especially if visible/exposed. Any structures or developments which will significantly effect rain/water run off, drainage etc. Excessive heights and excessive spread in certain areas. Need to ensure structures/developments sit and fit within the immediate landscape area, so depends very much on the site proposed.	(North Devon District Council; No title given)
Hill top barns and plastic lodder bails inappropriately positioned e.g. County Gate!	(Chamber of Trade; Chairman)

## Historic and Built Environment

### Question 9-15

Question	Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree	Total	Extra Comments
9) The character of our historic and built environment is successfully maintained through current Exmoor National Park planning policies	1	13	8	1	1	24	N/A
10) Update planning guidance to strengthen the design and quality of new development and adopt as supplementary planning documents.	7	12	5	0	1	25	N/A
11) The overall quality and design of new development within the National Park is of a sufficiently high standard.	0	9	10	4	0	23	The overall quality and design of new development within the National Park is of a sufficiently high standard. This should be a matter of course under current regulations? (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
12) Continue to provide for the small scale reuse of quarries for local building materials provided that the reopening of a quarry is environmentally acceptable.	12	13	1	0	0	26	Continue to provide for the small scale <b>reuse</b> of quarries for local building materials provided that the reopening of a quarry is environmentally acceptable. Provision of local building material would fit into character of building clause (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
13) Explore the potential for new small scale sites both outside and within the National Park as sources of local building materials	10	13	1	2	0	26	N/A
14) Be more proactive in encouraging the	13	11	2	0	0	26	Encouraging only. No Regulation! (Lynton



sourcing of local building materials such as local building stone, straw for thatch, wood							and Lynmouth Association of Commerce; No title given)
15) Undertake a review of conservation areas looking at existing boundaries and, if appropriate, identifying new areas	5	12	5	1	1	24	N/A

### **Question 11- If you disagree**

<b>11) The overall quality and design of new development within the National Park is of a sufficiently high standard. If you disagree please state how we can improve on standards of design (both of existing buildings and new developments).</b>	
<b>Answers</b>	<b>Organisation</b>
Promote use of local timber	(Nicholas Pearson Associates Limited; No title given)
My real concern is about the inadequate protection afforded to existing buildings. Buildings in conservation areas are being given new windows, doors and other inappropriate alterations and at present the National Park seems powerless or unwilling to prevent it. The level of protection given to traditional farm houses and to listed buildings should also be increased.	(Lynton and Lynmouth Town Council; Mayor)
There is too much emphasis on retaining the status quo. Low impact housing should be permitted: this would not detract visually and would be good environmentally. Low impact dwellings sit lightly on the planet's resources	(Forum 21; No title given)
Design is an art and art is subjective by its very nature; What in design makes for 'good taste'? Form over function?; By high standards of design do you mean that buildings are in keeping with their surroundings or do you mean that they work well and are efficient (carbon-neutral)?	(Lynton and Lynmouth Association of Commerce; No title given)
There is too little innovative design, and I think that is because architects "play safe", and adhere closely to the sort of design they believe ENPA planners will pass. It should be made clear that ENPA design guidance is not incompatible with novel or imaginative development.	(Lyn and Exmoor Vision; Chairman)
Avoid constriction to a degree	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Re open local slate and stone quarries, use traditional building techniques and help with buildings training	(Chamber of Trade; Chairman)

**Question 16- Linked to question 15**

<b>15) Undertake a review of conservation areas looking at existing boundaries and, if appropriate, identifying new areas</b>	
<b>16) If you agree with the statement above, which areas would you identify as potential conservation areas?</b>	
<b>Answers</b>	<b>Organisation</b>
Unspoilt wilderness areas in particular, then traditional-method maintained land, followed by hamlets to keep their character.	(Exmoor Trust; Business Trustee)
Registered and unregistered designed historic landscapes.	(Nicholas Pearson Associates Limited; No title given)
I agree with reviewing conservation areas and identifying new areas but my real concern is that the National Park identifies conservation areas and then carries out detailed appraisal studies but then, with the single exception of Dunster, it does very little to protect or enhance them, or even to raise public awareness of them. The National Park has really failed on this issue. Expectations were raised when the conservation areas were created but they have been cruelly dashed!	(Lynton and Lynmouth Town Council; Mayor)
I can't reply to the specific question; but the Park would need to be careful about imposing even more restrictions on areas.	(Forum 21; No title given)
We have assumed you mean built conservation areas rather than natural areas.	(Natural England; Planning, Communities and Biodiversity Adviser)
This should be a periodic process as a matter of course.	(North Devon District Council; No title given)
This review should include the production of character appraisals and management plans (where they don't exist already) therefore consolidating the management of existing conservation areas BEFORE creating new conservation areas.	(No organisation given; No title given)

## Recreation and Tourism

### Question 17-25

Question	Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree	Total	Extra Comments
<b>17) Continue working with partners to encourage a more sustainable tourism industry based on the special qualities of the National Park, providing better quality jobs and maximising local social and economic benefits.</b>	16	11	0	0	0	27	<p>And just as importantly and attracts visitors and thus creates jobs (Lynton and Lynmouth Association of Commerce; No title given).</p> <p>Continue working with partners to encourage a more sustainable tourism industry based on the special qualities of the National Park, providing better quality jobs and maximising local social and economic benefits. Tie into Visit Devon DMO work and the Sustainable Tourism Action Group (STAG) Action Plan (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).</p>
<b>18) Provide for recreational and tourism development which conserves and enhances the National Park and benefits from and furthers the special qualities and enjoyment and understanding of Exmoor National Park.</b>	12	15	0	0	0	27	<p>And just as importantly and attracts visitors and thus creates jobs (Lynton and Lynmouth Association of Commerce; No title given).</p> <p>Build on Active Exmoor Model (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).</p>
<b>19) Development associated with recreational activities such as equestrian and commercial game shooting should avoid adverse impacts on the landscape and other special qualities of the National Park.</b>	13	12	2	1	0	28	<p>Stag hunting or riding holidays – traditional Exmoor activities although needs careful management to prevent an adverse impact on the character of the landscape (Devon Rural Network and Devon County Council; Devon Rural Network</p>

							<p>Coordinator).</p> <p>There should be flexibility and tolerance employed here – where impacts are insignificant we risk stifling rural development (Country Land and Business Association; Regional Surveyor).</p> <p>All forms of countryside activities should be included especially legal forms of hunting and fishing (No organisation given; No title given).</p> <p><i>Underlined adverse impacts.</i> Put silences on the 12 bores (Chamber of Trade; Chairman).</p>
<b>20) Ensure that new recreation and tourism developments make provision for local communities e.g. in having use of development such as new sports and recreation facilities to reduce the proliferation and replication of new facilities in the National Park.</b>	15	9	1	2	0	27	<p>Recreation facilities on Exmoor are inadequate so there is little chance of proliferation and replication (Lynton and Lynmouth Association of Commerce; No title given).</p> <p>This should be ‘encouraged where appropriate’ rather than ‘ensured’. Should be treated on a case by case basis – certain ventures will wish to target specific markets &amp; business models/plans will be tailored accordingly (Country Land and Business Association; Regional Surveyor).</p>
<b>21) Incorporate and integrate visitor and tourism developments and local community facilities and services wherever appropriate</b>	14	12	1	0	0	27	N/A
<b>22) Safeguard existing sports and recreation sites and resources</b>	8	16	4	0	0	28	Sustainable competition is good. Don't just prop up what's there (Chamber of Trade; Chairman).
<b>23) Provide for new sports and recreation sites and facilities where required</b>	9	17	3	0	0	29	<p>Provide for new sports and recreation sites and facilities where required. A component of Parish planning? Devon plans recorded on the Communities in Action database</p> <p><a href="http://syd.paribus.co.uk/cia/index.do">http://syd.paribus.co.uk/cia/index.do</a> (Devon Rural Network and Devon County Council; Devon Rural</p>

							Network Coordinator).
<b>24) Seek to ease traffic congestion/parking shortfalls in the tourism season by looking at alternative modes of transport to the private car.</b>	19	7	1	1	1	29	A parking strategy might be developed to assist areas of congestion like Dunster (No organisation given; No title given).  Parking shortfalls should be a priority (Chamber of Trade; Chairman).
<b>25) Safeguard public rights of way and provide for appropriate pedestrian, cycling and equestrian access</b>	15	12	1	0	0	28	Existing roads and lanes could be affected as cycle lanes for priority over other modes of traffic? (No organisation given; No title given).

## Economy and Employment

### Question 26

<b>26) What issues should the LDF address in relation to the economy and employment? Please tick all those that apply.</b>				
<b>Safeguarding existing employment sites and buildings by resisting change of use</b>	<b>Providing for development which benefits from and supports Exmoor's special qualities</b>	<b>A diverse and stable economy</b>	<b>Other: please state in the row below.</b>	<b>Total</b>
9	19	21	6	55
<b>Extra Comments</b>			<b>Organisation</b>	
<i>Safeguarding existing employment sites and buildings by resisting change of use; Allow for innovation</i>			(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)	
<i>Safeguarding existing employment sites and buildings by resisting change of use; or provide alternative nearby</i>			(North Devon District Council; No title given)	
<i>Providing for development which benefits from and supports Exmoor's special qualities; although caveat is a bit limiting</i>			(North Devon District Council; No title given)	
<i>Safeguarding existing employment sites and buildings by resisting change of use; This is rather a leading question or at least needs qualifying – CLA is all for safeguarding employment but resisting change of use is unnecessarily restrictive. In certain circumstances, business development &amp; employment can equally be safeguarded by allowing change of use.</i>			(Country Land and Business Association; Regional Surveyor)	
<i>Safeguarding existing employment sites and buildings by resisting change of use; Allow Change.</i>			(Chamber of Trade; Chairman)	
<b>26) What issues should the LDF address in relation to the economy and employment? Please tick all those that apply. Other: please state in the row below.</b>				
<b>Answers</b>			<b>Organisation</b>	
Re-use of existing farm buildings <b>provided</b> environmental impact of this and any new/replacement farm buildings are acceptable.			(Nicholas Pearson Associates Limited; No title given)	
Development of environmental and energy friendly industries e.g. wood fuel supply and boiler maintenance.			(Forum 21; No title given)	

Paramount is that the LDF address the seasonality, low wages, small labour pool that beset and thus act as a barrier to any growth of the economy and consequent benefits to the local community.	(Lynton and Lynmouth Association of Commerce; No title given)
Ensure the continuance of traditional trades	(Peninsula Enterprise; No title given)
ICT connectivity and hub space	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Ensure there is sufficient employment and business space for local businesses – allow change of use <u>to</u> employment sites in case of redundant buildings and provide space that enables businesses to expand	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Development should be supported that meets general sustainability objectives, encourages community resilience and self-sufficiency, and conserves and enhances Exmoor’s special qualities.	(The National Trust; Land Use Planning Adviser)
Providing employment space by reusing redundant agricultural buildings	(National Farmers’ Union; Food and Farming Adviser)
Providing for development where impacts are minimal, even if qualities of Exmoor are not enhanced - i.e. remain static	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Wood fuel management	(Chamber of Trade; Chairman).

## Question 27

<b>27) Where should policies provide for new employment uses? Please put an order of preference in the boxes (1 being the preferred option). Note: Lowest number indicates highest preference</b>				
<b>Within Porlock, Dulverton, Lynton &amp; Lynmouth only</b>	<b>Within and adjacent to Porlock, Dulverton, Lynton &amp; Lynmouth only</b>	<b>Within Porlock, Dulverton, Lynton &amp; Lynmouth and other settlements</b>	<b>Within and adjacent to Porlock, Dulverton, Lynton &amp; Lynmouth and other settlements</b>	<b>Within, adjacent to and outside settlements on existing farms and in hamlets</b>
56	39	35	15	22
<b>Extra Comments</b>			<b>Organisation</b>	
Avoid development “doughnuts” and allow for greater farm diversity etc in redundant buildings and home working. Refer to the Devon Employment Space Strategy <a href="http://www.devoneconomy.co.uk/index.php?option=com_content&amp;view=article&amp;id=46&amp;Itemid=55">http://www.devoneconomy.co.uk/index.php?option=com_content&amp;view=article&amp;id=46&amp;Itemid=55</a>			(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)	
Within, adjacent to and outside settlements on existing farms and in hamlets; Depends on size, scale, use class etc.			(North Devon District Council; No title given)	

### Question 30

<b>30) Given the difficulty of finding new sites for employment, the existing Exmoor National Park Local Plan policy of requiring that a business is marketed for a minimum of 12 months before allowing a change of use should be continued.</b>					
<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or Disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>	<b>Total</b>
4	6	7	3	2	22
<b>Extra Comments</b>			<b>Organisation</b>		
I disagree because this may be a disincentive which may mean that a business may not start up at all.			(Forum 21; No title given)		
The above statement is untrue and highlights the ENPA's lack of awareness with regard to the economy			(Lynton and Lynmouth Association of Commerce; No title given)		
Need a balance of greater flexibility as 12 months is a long time period for a micro or small enterprise – this will constrict the development of some businesses. Would agree with this if the change of use is from business to residential.			(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)		
This depends on the circumstances and the policy should therefore allow for a degree of flexibility.			(The National Trust; Land Use Planning Adviser)		
Will depend on location			(National Farmers Union; Food and Farming Adviser)		
Not clear as to the current effectiveness of this policy			(Devon Conservation Forum; Chairman, Planning and Transport Committee)		
If the change of use is to another employment use there should be scope to be flexible on this.			(Country Land and Business Association; Regional Surveyor)		

### Question 28

<b>28) How can LDF policy support key economic industries in the National Park? (which include tourism, land based industries, public sector such as health services and retail)</b>	
Ensure planning policies are sufficiently flexible to meet local requirements	(National Health Service; No title given)
By speeding permissions for projects of all sorts that meet required parameters. By encouraging local communities to consider new projects that meet parameters by attending their meetings and advising them as to what are considered good, viable and enhancing projects they can gain by supporting/starting.	(Exmoor Trust; Business Trustee)



Avoid unnecessary or inappropriate policy barriers	(Nicholas Pearson Association; No title given)
By encouraging them but only when this does not threaten landscape quality, historic buildings or the natural habitat	(Lynton and Lynmouth Town Council; Mayor)
Probably most by more flexible planning policies	(Forum 21; No title given)
Relax the current draconian planning restrictions which act as a barrier to the economy; Improve access and awareness from the main arterial routes to the National Park boundaries; Allocate a specific and increasing budget to support the economy, raise awareness and market Exmoor; Eradicate the fragmented marketing by getting WSDC and NDC working as one; Set a target to increase visitor numbers to 6.5 million visitor days per year, this represents the median average of all the UK's National Parks removing the distortions of the most and least visited National Parks. <a href="http://www.nationalparks.gov.uk/learningabout/factsandfigures.htm">http://www.nationalparks.gov.uk/learningabout/factsandfigures.htm</a>	(Lynton and Lynmouth Association of Commerce; No title given)
Encouraging public sector provision to share resources wherever possible, e.g. shared buildings. Ensuring any new business developments supply a business plan outlining their proposals. Encouraging new uses for redundant buildings (such as farm buildings) for workspace provision.	(West Somerset District Council; Economy and Climate Change Officer)
A lot of local consultation with local people who would be affected by changes	(No organisation given; No title given)
By protecting and encouraging the development of land and buildings for economic use with traditional industries	(Peninsula Enterprise; No title given)
It can seek to establish a spatial framework that indicates where and how development possibilities can be promoted including guidance on design, environmental impact mitigation, infrastructure and transport	(North Devon District Council; No title given)
Safeguard and provide a diverse and stable economy for all which enhances and creates employment.	(Caravan Club South West Region)
ICT infrastructure – commit National Park policy to hubs and high quality ICT infrastructure installations in all new buildings; Critical mass and support for more innovative ways of delivering services, e.g. hubs	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
By being open to new ideas and suggestions and looking at applications with an open mind.	(Exmoor Trust; Chairman)
Supporting sustainable development in rural areas, through policies that support both conventional productive agriculture and diversification from primary agriculture.	(National Farmers Union; Food and Farming Adviser)
By ensuring that no policy is unnecessarily restrictive of enterprise whilst still respecting environmental considerations	(Devon Conservation Forum; Chairman, Planning and Transport Committee)
By enabling small scale and appropriate business use/employment use. By considering very small scale employment use in many places rather than a few larger areas of employment use. By encouraging. - use/conversion of redundant/existing buildings. By being very specific about scale, massing, materials etc in different areas or area types. By considering in relation to infrastructure and housing.	(North Devon District Council; No title given)
By being sufficiently flexible open minded and forward thinking in relation to economic development in open countryside, in relation to farm and wider rural economic diversification proposals. Free or only modestly charged, pre application discussion between planning officers and project proposers should be encouraged to bring forward well conceived schemes.	(Country Land and Business Association; Regional Surveyor)

A key element of tourism is the Historic Environment and its contribution as a regional/natural attraction.	(No organisation given; No title given)
By being pro-active in marketing holidays not only in micro-accommodation with the Park but linking to surrounding gateway towns	(Chamber of Trade; Chairman)

## **Question 29**

<b>29) What, in your opinion, are the most appropriate forms of economic development within Exmoor National Park? (e.g. traditional land based industries, tourism, home working opportunities, business use etc)</b>	
Support of traditional land based industries and support of new (i.e. wood energy/boiler installation etc)	(Confederation of Forest Industries; No title given)
Precisely those named above.	(Exmoor Trust; Business Trustee)
Traditional land-based; home working / craft workshops; tourism	(Nicholas Pearson Association; No title given)
Land-Based industries; Sustainable tourism; Home working – particularly computer-based jobs	(Lynton and Lynmouth Town Council; Mayor)
land based industries to include wood fuel industry	(Forum 21; No title given)
Again nothing should be ruled out, the benefits and liabilities to the local community of any economic development should be evaluated on a case by case basis without the prevailing hypocrisy of the 'nimby'.	(Lynton and Lynmouth Association of Commerce; No title given)
Home working with appropriate broadband provision. Greater encouragement of collaborative and co-operative working in relation to tourism opportunities - i.e. infrastructure (such as routes), activities and resources. Imaginative use of redundant buildings for enterprise hubs.	(West Somerset District Council; Economy and Climate Change Officer)
All of these	(The West Somerset Community College; Assistant Principal)
All of these are important but new industries need to be encouraged as land based industries employ fewer people	(No organisation given; No title given)
Development of land and buildings for economic use with traditional industries	(Peninsula Enterprise; No title given)
Technology based, craft and intellectual property based businesses will suit the local environment but appropriate infrastructure, particularly high speed broadband will need to be provided (and funded!)	(North Devon District Council; No title given)
Key sectors – Devon Economic Strategy/Devon Rural Strategy; <a href="http://www.devoneconomy.co.uk/images/stories/reports/123175%20Devon%20Economic%20Strategy.pdf">http://www.devoneconomy.co.uk/images/stories/reports/123175%20Devon%20Economic%20Strategy.pdf</a> ; <a href="http://www.drn.org.uk/drn_rural_strategy_action_plan_web.pdf">http://www.drn.org.uk/drn_rural_strategy_action_plan_web.pdf</a>	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Home working opportunities – proving the necessary infrastructure is in place; Diversification on farms and anything related which gives our youth the opportunities to earn a living locally if they want to. Having been to college or university, many of our local young people would like to return to Exmoor and make a life for themselves on the moor, but find housing and work opportunities few and far between.	(Exmoor Trust; Chairman)

Providing opportunities for those to live and work in the area, focusing on support for food production as well as agricultural diversification. Improving ICT provision to enable work from home and SME's to locate in rural areas.	(National Farmers Union; Food and Farming Adviser)
All of the above examples. Diversification is the key	(Devon Conservation Forum; Chairman, Planning and Transport Committee)
Land based industries. Tourism. Countryside focused recreation/sport - equestrian, shooting, mountain biking (ref Snowdonia). Knowledge based industries - business services and creative industries, low impact, office based and including home-working, need to consider IT provision	(North Devon District Council; Ellen Vernon)
All of these – but we must allow diversified income streams on traditional agricultural and forestry based businesses in order to secure their survival and the continuance of the good work that they do in maintaining Exmoor's landscape and habitats.	(Country Land and Business Association; Regional Surveyor)
As in 26 above, plus tourism whilst euro/pound is in our favour	(Chamber of Trade; Chairman)

## Housing

### Question 31-39

Question	Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree	Total	Extra Comments
<b>31) Retain the current approaches in securing more affordable homes within the National Park.</b>	3	8	3	3	1	18	<p>Only for locals (Chamber of Trade; Chairman).</p> <p>I feel that the Exmoor National Park Planning Authority Policies should introduce more flexibility in the approach to provide open market housing to cross-subsidise affordable homes. There are examples where the sale of just one home on the open market would make the difference between a scheme being financially viable or not actually coming to fruition. As development within the Park is more costly due to the higher standards of design and materials required, and there is no chance of any commuted sums being raised to cross-subsidise, I think the Park should do more to encourage development, even if this means a small number of homes being sold on the open market (West Somerset Council; West Somerset Rural Housing Enabler).</p>
<b>32) Continue to provide for conversions/change of use for affordable housing or employment.</b>	5	14	2	0	1	22	Only for locals (Chamber of Trade; Chairman).
<b>33) In Dulverton, Lynton/Lynmouth and Porlock continue to provide for open market housing through conversions to residential. (The</b>	4	6	6	0	2	4	Restrict open market as much as possible (Chamber of Trade; Chairman).

<b>adopted Local Plan policy requires that where more than one unit of housing is proposed through conversions/changes of use that a unit of local needs affordable housing is provided in addition to the open market unit).</b>							
<b>34) Continue to provide for owner occupied affordable housing for local needs without the involvement of a registered social landlord. This can include self builds.</b>	4	12	3	0	1	20	N/A
<b>35) Consider allocating sites in the LDF for affordable housing in designated settlements where there is a proven need for housing.</b>	6	10	2	0	1	19	N/A
<b>36) Provide for the redevelopment of key sites and/or reuse of buildings in designated settlements for affordable housing or mixed use (such as employment) and affordable housing.</b>	5	12	3	0	0	20	N/A
<b>37) Continue to apply existing Local Plan definitions of local connection (including for employment reasons) to provide for people who have long standing residency or a need to work in the National Park (Figure 1, Appendix A).</b>	6	9	1	1	2	19	<p>I believe that the current local connection policy is flawed. It does not seem fair to local people that someone with a 9 year local connection with a Parish can be overlooked for housing in favour of someone with a 10 year local connection with a neighbouring Parish. I would suggest a slightly different cascade, which first considers those with a 10-year connection with the Parish, followed by a 5-year connection with the Parish, followed with a 10-year connection with the neighbouring Parishes etc (West Somerset Council; West Somerset Rural Housing Enabler).</p> <p>Would not agree if it precluded someone who can afford to buy or rent. It reads as if any new housing is</p>

							<p>only available to people who cannot afford it (Confederation of Forest Industries; No title given).</p> <p>The National Park needs new blood otherwise an entrepreneurial culture will not be encouraged or new people brought into the area. This policy might create a tendency for existing Park citizens to become very inward looking (The National Trust; Land Use Planning Adviser).</p>
<p><b>38) Consider the introduction of a policy that all newly built housing should be able to accommodate the elderly or people with disabilities to increase the range of accessible dwellings.</b></p>	4	5	6	4	1	20	<p>Would this make some properties only tenable for those with accessibility needs? Would it allow for a greater marketability if houses were easily adaptable but not specifically aimed at those experiencing accessibility issues. Need to clarify what “accommodate” means beyond current regulations for accessibility (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).</p> <p>This is essential, when the population is ageing (Forum 21; No title given).</p> <p>There needs to be a that some sites' characteristics may preclude such provision realistically (on viability or environmental impact ground)- it is better to have housing lacking in this respect rather than none at all. (North Devon District Council; No title given).</p> <p>It would be inappropriate to impose a blanket policy; this should rather be sought by design guidance and encouragement, market forces and application of the DDA (National Trust; Land Use Planning Adviser).</p>
<p><b>39) To encourage the release of land for affordable housing in perpetuity, consider a policy to enable members of the landowners' family in need of</b></p>	5	9	5	1	1	21	<p>Under 39 above this should reasonably be limited to the first occupancy (and successory tendencies it provided for) (North Devon District Council; No title given).</p>

affordable housing to occupy one of the affordable houses in the development.							
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## Question 40

<b>40) Are there any issues or options that you wish to raise with respect to the provision of housing. Please set out your reasons for doing so.</b>	
<b>Answers</b>	<b>Organisation</b>
The current planning restrictions have been seen <u>not</u> to have worked, they have simply restricted the supply of housing with the miss-guided assumption that the demand would fade away, with development land owners giving up land, when the reverse was true and only exacerbated the situation, with now the credit crunch making a bad situation disastrous. Most people do not understand the meaning and more importantly the differences in the terms 'Affordable Housing' or 'Local Needs Housing' or 'Social Housing', what they want is 'cheap housing with no restrictions' which is impossible. I have been advised that there is only demand for at most 100 of these homes within Exmoor National Park, and although there are some 300 in need, 200 would <u>not</u> be able to afford even if prices were below half of what they currently are. So Exmoor's population of 11000 have ill thought out draconian planning restrictions imposed upon them to placate some 100+ people. The ENPA should compile a register of neglected/empty buildings and immediately enforce EDMO's (Empty Dwelling Management Orders) <a href="http://www.emptyhomes.com">www.emptyhomes.com</a> , <a href="http://unlockingthepotential.blogspot.com/">http://unlockingthepotential.blogspot.com/</a> . Prohibit 2 <sup>nd</sup> home owners letting them as holiday lets, removing their income and their attractiveness. Draw a line in the sand differentiating in planning terms the difference in usage between a 2 <sup>nd</sup> home and a holiday let. Generally the ENPA should tackle 2 <sup>nd</sup> home and holiday home owners that contribute nothing to the local economy by imposing planning restrictions on them.	(Lynton and Lynmouth Association of Commerce; No title given)
I was very worried when it was revealed that the people wanting to change the Blackroot? Bungalow areas were mainly a committee of people living outside the area. Names vs. locals.	(No organisation given; No title given)
Natural England supports strategically planned developments which comprises of high quality green spaces within each community. The developments would respect and enhance the special qualities of Exmoor with regards to its habitat and landscape. These places would foster civic pride. These places would enable people to access, and enjoy green spaces and the natural world to improve their health and well being.	(Natural England; Planning, Communities and Biodiversity Adviser)
Continued development of the Rural Housing Enabler role at Exmoor.	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)

<p>Having a one size fits all approach to affordable housing does not take into account those organisations and landowners who are not social housing providers. It can be financially detrimental and is in direct conflict with the Charity Commissions rules. Financial support or incentives should be considered for those organisations where there is no other way of providing affordable housing within the Park. It would not be appropriate to have a policy requiring all currently empty dwellings or conversions to be for affordable housing as there might be instances where this is not in the best interests of the building or the locality. Policies should therefore allow for case by case assessments to be made and for exceptions to be made where appropriate.</p>	<p>(The National Trust; Land Use Planning Adviser)</p>
<p>We would expect the LDF to reflect the recommendations of the Taylor Review of Rural Economy and Affordable Housing commissioned by the Government. 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. In too many places this approach writes off rural communities in a 'sustainability trap' where development can only occur in places already considered to be in narrow terms 'sustainable'. The question planners must address is "how will development add to or diminish the sustainability of this community?" taking a better balance of social, economic, and environmental factors together to form a long term vision for all scales of communities. A mix of housing and employment opportunities is essential for the sustainability of rural communities."</p>	<p>(National Farmers' Union; Food and Farming Adviser)</p>
<p>Please see comments on housing in accompanying CLA policy response to the Exmoor LDF consultation paper.</p>	<p>(Country Land and Business Association; Regional Surveyor)</p>
<p>Second homes are the scourge of rural areas. Employ for most of the year, they contribute nothing to vibrancy of villages, escalate the prices beyond the local purse, and if allowed by Community Taxed 300%!</p>	<p>(Chamber of Trade; Chairman)</p>



## Settlements, Services, Transport and Infrastructure

### Question 41-51

Question	Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree	Total	Extra Comments
41) Seek to prevent the loss of employment, retail and community facilities by resisting their conversion to other uses.	7	11	3	1	1	23	Where viable and proven local need (National Trust; Land Use Planning Adviser).  Unless equivalent compensatory employment retail or community facilities can be provided elsewhere (Country Land and Business Association; Regional Surveyor).
42) Seek to enable community strategy and parish plan ideas and objectives to be positively addressed through the LDF where consistent with National Park purposes.	8	17	1	0	0	26	Tie in with community planning database (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).
43) Seek to enhance the character of Exmoor's settlements, by e.g. undergrounding overhead wires, repairing traditional fabric such as cobbles, conserving traditional shop fronts.	9	12	5	0	0	26	Whilst it may be favourable in some locations to pursue the buying of overhead cables it is not essential. More important to retain traditional street features such as surface treatments and street lights etc. Please refer to 'Streets for All' publication (No organisation given; No title given).
44) Maintain the current settlement hierarchy set out in the Adopted Exmoor National Park Local Plan Policy S1 (Figure Two, Appendix A) of Local Rural Centres, villages and open countryside.	4	11	7	1	0	23	N/A
45) In reviewing the hierarchy of named settlements within Exmoor the key test for	8	14	2	0	1	25	N/A

<b>development location should be the need to provide for balanced and sustainable communities while ensuring the conservation and enhancement of the National Park.</b>							
<b>46) Assess the National Park in the context of neighbouring areas, recognising the role of larger centres outside the National Park in providing higher level services and facilities and providing for appropriate levels and locations of development within the Park.</b>	5	15	3	0	0	23	This will raise accessibility issues, particularly with an increasingly elderly population (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).
<b>47) Work proactively with partners to seek to address and plan for issues of traffic speed, congestion and parking in settlements and ensure the highest standard of environmental design.</b>	7	17	1	0	0	25	It is important to maintain the quality of the main roads in Exmoor for through traffic and so present transit times, especially for accessibility of the National Park from outside and for access by people who live there to jobs and other facilities outside the Park, when slow journey times can be an adverse factor. The issue of traffic speed in Question 47 should take in this aspect. Indeed there is a case over and above protecting present main road speed limits to review the present extent of the low speed limits on the borders of villages like Exford and Simonsbath (RAC Foundations; No title given).
<b>48) Encourage travel by more sustainable means of transport whilst recognising the need to travel by private car in a sparsely populated rural area such as Exmoor.</b>	11	13	3	1	0	28	N/A
<b>49) Ensure that travel and traffic implications are taken into account when making decisions with regard to access to local services</b>	8	17	1	1	0	27	Accessibility! (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).
<b>50) Ensure that travel and traffic implications are taken into account in making decisions</b>	9	16	1	1	0	27	N/A

<b>which will affect local services</b>							
<b>51) Work with partners to identify shortfalls in community services and facilities. Provide for enhanced facilities locally or improve access to them where they cannot be provided in the National Park</b>	10	16	0	0	0	26	ICT infrastructure and community hub space (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).

## Question 52

<b>52) What facilities &amp; services do you consider to be important to Exmoor's communities (tick all those that apply)</b>														
Pharmacies	Banks	Schools	Pubs & hotels	Health services/dentists	Petrol Stations	Village/town & community halls	Public Call Boxes	Post Offices	Shops	Police stations	Fire stations	Childrens' play areas	Sports facilities	Total
14	12	19	17	17	13	20	11	20	19	9	12	15	15	213
<b>Extra Comments Q52</b>											<b>Organisation</b>			
All the above are important in larger settlements but it is unrealistic to expect all of them in smaller ones. A church is another facility that is really important to community life in Exmoor communities. Why are they not listed?											(Lynton and Lynmouth Town Council; Mayor)			
Schools = Age 5-11											(No organisation given; No title given)			
Schools, Village/town halls and community halls and shops seen as particularly important											(The National Trust; Land Use Planning Adviser)			
Some of the above are of less importance than others- perhaps we should have been asked to rank them? Only a few/one of some facilities are required e.g. police station etc.											(North Devon District Council; No title given)			
<i>Pubs circled as important.</i> Post offices and Shops should be combined.											(Chamber of Trade; Chairman)			
<b>Extra Comments General</b>											<b>Organisation</b>			
Another helpful reclassification might be the upgrading of the A358 to major (green) route (even trunk road status) north west of Taunton as far as the junction with the B3224, linked with the classification of Exmoor itself as a "primary destination" on the national highway network.											(RAC Foundations; No title given)			
The main roads concerned are highlighted on the map at the end of the Authority's Business Plan 2008-2009. But the Authority should negotiate with its partners the upgrading of one extra route to main road status: that from											(RAC Foundations; No title given)			

<p>Machine Cross on the A396 to the B3224 at Heath Poul. This is already part of an advisory route for lorries and affords a smoother &amp; faster route between the area of Exmoor around Dulverton and Minehead &amp; the routes towards Taunton and M5/A303. [The parallel A396 route is twisty, unpredictable for drivers who do not use the road regularly and bad news for people prone to travel sickness!]. The route might sensibly be numbered B3222 and classified accordingly.</p>	
<p>The Authority should also work with other local authorities proactively to secure and protect good wider links with the outside world especially London, the M25 and the Channel Tunnel. Included in this, for instance, is helping ensure that a good number of fast trains [1¼ hours from and to Paddington] continue to serve the railhead at Taunton and the Cross Country franchise adequately provides for needs south of Bristol, including Exmoor; and also lending support to schemes such as the A303 Stonehenge tunnel/by-pass and the A358 [M5-A303] upgrading, which will increase the value of A303 as a second [shorter] strategic route between Exmoor, London and the Home Counties via the M25.</p>	(RAC Foundations; No title given)
<p>Road and rail are together proven methods of transit into and out of the Park, despite underinvestment over decades, and given limited funds investment in them seems likely to offer higher gain than, for instance, schemes involving greater sea access through Minehead, which would be aimed at smaller external catchment areas.</p>	(Chamber of Trade; Chairman)

## Climate Change

### Question 53-58

Question	Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree	Total	Extra Comments
<b>53) Set out a hierarchy of energy efficiency actions and renewable energy development options to help achieve the most appropriate and effective means for the reduction of greenhouse gas emissions and to ensure that the special qualities of the National Park are conserved and enhanced.</b>	10	14	3	0	0	27	CLA would encourage caution in how this was to be used – we would not wish to see this used as a means of blocking renewable energy developments using the reasoning that energy efficiency measures – which can have long payback periods – should in all circumstances be invoked before any renewable energy installations can be considered for approval (Country Land and Business Association; Regional Surveyor).
<b>54) Encourage sustainable building design and construction (including drawing up an energy sustainability Supplementary Planning Document) to reduce greenhouse gas emissions and to ensure the National Park special qualities are conserved and enhanced e.g. incorporating biodiversity features, giving more priority to local and traditional materials.</b>	13	12	1	1	0	27	N/A
<b>55) Provide for small-scale recycling facilities within the National Park.</b>	11	13	1	0	0	25	N/A
<b>56) Provide for composting facilities within the National Park.</b>	9	14	2	0	0	25	But only if there is a use for this facility – encouragement of home or community composting e.g. allotments (Devon Rural Network and Devon County Council; Devon Rural Network Coordinator).

<b>57) Look at ways to turn waste into a resource – by providing for small scale operations which are in harmony with the National Park’s special qualities (e.g. anaerobic digesters on farms).</b>	14	12	1	0	0	27	N/A
<b>58) Avoid, minimise and reduce light pollution in the National Park through the design of development and working with partners.</b>	15	12	0	0	2	29	N/A

## **Question 59**

<b>59) How can light pollution be minimised and reduced?</b>	
<b>Answers</b>	<b>Organisation</b>
Design of lights/use of timing switches/reduction of street and shop lighting.	(Confederation of Forest Industries; No title given)
Don't have street lights or flood lit areas.	(National Health Service; No title given)
Restrict hours of use of very bright lights for working or sports, turn off street lighting after midnight.	(Exmoor Trust; No title given)
Reduction in street lighting to only the bare necessity.	(Exmoor Trust; Business Trustee)
Through sensitive design of lighting in new development and working with highways departments to minimise street/road lighting and ensure best design.	(Quantocks Area of Outstanding Natural Beauty; Manager)
Shrouded fittings. Low light standards in dark areas. Timers on street lights.	(Nicholas Pearson Associates Limited; No title given)
Policies to prevent unnecessary exterior lighting – when exterior lighting is essential policies should require all light to be directed downwards	(Lynton and Lynmouth Town Council; Mayor)
By giving local people the power to decide when to switch off public lighting. By reducing amount of time lights are on e.g. turn off street lights at midnight.	(Forum 21; No title given)
Light pollution should not be reduced if public safety is compromised	(Lynton and Lynmouth Association of Commerce; No title given)
If street lighting is absolutely necessary - Shield lights. A cover can minimise the amount of light that is lost upwards or sideways where it is unwanted. This will stop both light trespass and sky glow. If the inside surface of the shield is reflective this will reflect more of the light downwards, allowing a lower wattage bulb to be used to achieve the same luminance. Use the minimum amount of lighting needed to illuminate the area - as recommended by the Institute of Lighting Engineers. Also use street lights which are solar/wind powered, if possible.	(West Somerset District Council; Economy and Climate Change Officer)
Use of low powered lighting and restricting the number of lights in a road.	(No organisation given; No title given)

By the use of low pressure sodium lamps or high pressure sodium instead of mercury or metal halide lamps. Lighted should be directed to where it is needed to avoid light spillage.	(Natural England; Planning, Communities and Biodiversity Adviser)
Turn off the street lights after midnight!	(Lyn and Exmoor Vision; Chairman)
Use of only selected lighting, limited general lighting and controlled / timed non-essential lighting.	(Peninsula Enterprise; No title given)
Ensure that light release is considered as part of any application likely to produce a material amount of emissions. ILE tech. paper on Illuminated E1ternal Advertising is very useful.	(North Devon District Council; No title given)
Reduce light in public facilities during periods of non use. Consider timed or low level lighting/other types of light in villages and other frequently used areas.	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
Encourage - more energy efficient lighting in e1isting development. Seek to reduce - any unnecessary use, such as some street lighting. Work with adjoining local authorities to identify where street lighting on roads just outside the park may be significantly adding to light pollution within the Park, and seek to reduce. Require - all new development, other than very minor, to produce full information on proposed lighting and the likely light pollution distribution. Ensure light pollution minimised by light levels being kept to the minimum necessary and by light pollution being controlled. Impacts should be assessed as part of a landscape character assessment.	(The National Trust; Land Use Planning Adviser)
With great difficulty! There is regular conflict with 'health and safety' measures when trying to reduce levels of artificial light.	(Devon Conservation Forum; Chairman, Planning and Transport Committee)
Reduction in hours of street lighting. Discourage intensive use of security lights.	(The Ramblers' Association; Footpath Officer-North Devon Group)
Avoidance/minimisation of street lighting.	(North Devon District Council; No title given)
Careful design of lights (new or replacement).	(No organisation given; No title given)
Why deprive rural areas of light? This question infers waste of electricity. But there is nothing wrong with adequate lighting provision. It's the type of energy efficient light that needs addressing.	(Chamber of Trade; Chairman)

## **Question 60**

<b>60) How should the environmental benefits of renewable energy be balanced against their visual and environmental impacts?</b>	
<b>Answers</b>	<b>Organisation</b>
Scale of renewable energy impact should be in keeping with surrounding landscape	(Confederation of Forest Industries; No title given)
Don't invest unless environmental benefit e1ceeds impact. Good design for addressing visual issues	(National Health Service; No title given)
Careful analysis of effectiveness compared to visual and environmental impacts. Policies should encourage micro-renewable energy solutions and energy efficient solutions in general.	(Exmoor Trust; No title given)

The question gives the answer – by maintaining a sensible balance which will in each unique case be different by definition. There cannot be a hard and fast inflexible template.	(Exmoor Trust; Business Trustee)
The unique distinctiveness of Exmoor National Park's landscape should not be sacrificed to make an insignificant impact on a global problem.	(Quantocks Area of Outstanding Natural Beauty; Manager)
Should not be balanced; permit only if impacts are acceptable.	(Nicholas Pearson Associates Limited; No title given)
Polices should prevent wind farms and large wind turbines but small scale hydro developments should be encouraged even if there is some visual or environmental impact.	(Lynton and Lynmouth Town Council; Mayor)
It seems pretty clear that the environmental benefits outweigh other concerns.	(Forum 21; No title given)
The visual and environmental impact should be secondary environmental benefits of renewable energy otherwise the hypocrisy of the 'nimbly' will prevail.	(Lynton and Lynmouth Association of Commerce; No title given)
According to PPS22 (CLG, 2004) LPAs should have 'policies designed to promote and encourage, rather than restrict, the development of renewable energy resources', and as such the LPA should have policies and procedures in place, such as supplementary planning guidance which shows how this can be achieved. Consultation on these positive policies would be welcomed as it would help show the measures which ENP propose to take to help mitigate climate change in the community and integrate with the objectives in the West Somerset climate change strategy. PPS22 also sets out that the LPA should establish the "criteria that will be applied in assessing applications for planning permission for renewable energy projects' and this is further expanded in the supplement to PPS1 (PPS1 supplement, CLG, 2007) whereby planning authorities should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including micro-generation, to supply new development in their area. In addition, the supplementary planning guidance should establish the target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable.	(West Somerset District Council; Economy and Climate Change Officer)
A lot of consultation bearing in mind that often once lost visual and environmental changes cannot be recovered	(No organisation given; No title given)
Renewable energy developments need to be in appropriate places which take proper account of their impact upon the Natural Environment. Natural England can give advice on a case by case basis of the impacts upon SSSIs, Protected Species or the Protected landscapes.	(Natural England; Planning Communities and Biodiversity Adviser)
Community consultation based on objective independent analysis that seeks to describe the benefits and any adverse impacts to the community of the renewable energy scheme. Schemes will only be supported and succeed if the community affected sees a net benefit.	(Peninsula Enterprise; No title given)
Methodology based on weighted checklist probably easiest measure to adopt.	(North Devon District Council; No title given)
Choosing the right technology for a particular area based on feasibility study – also tie in with use of waste as a resource.	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)



<p>This needs to be done on a case by case basis. Many National Trust properties are already experiencing the impacts of climate change, such as flooding, storm damage, rainwater incursion, vegetation change and habitat changes. This makes the conservation of the natural and historic heritage increasingly complex and it underlines the need to reduce greenhouse gas emissions as much as possible to limit the extent of future detrimental impacts; on both the environment and on local communities.</p> <p>Appropriate renewable energy development, in addition to energy conservation, will help to reduce the damage to our properties from further climate change, and bring long-term benefits to society by reducing the risk of severe impacts in future; *Accordingly, the Trust strongly supports an increase in renewable energy generation nationally for heat and power in appropriate locations, and a significant expansion in microgeneration. However the location and design of all energy schemes should take account of the full range of environmental considerations at the site, including the protection of valued landscapes, biodiversity, the historic environment, and safeguard local peoples' well-being. The Trust requires that any energy-related development or activity that would affect our properties to be compatible with our statutory duty under the National Trust Acts to promote the conservation of places of historic interest and natural beauty, and public access to them.</p>	<p>(The National Trust; Land Use Planning Adviser)</p>
<p>Adverse environmental impacts must always be avoided in the National Park.</p>	<p>(Devon Conservation Forum; Chairman, Planning and Transport Committee)</p>
<p>With great care. If in doubt don't.</p>	<p>(The Ramblers' Association; Footpath Officer-North Devon Group)</p>
<p>Small scale and frequent rather than single and large scale. Enabling very small and specific household/hamlet facilities. Considering on a case by case basis in relation to visual impact.</p>	<p>(North Devon District Council; No title given)</p>
<p>By considering issues of significance as opposed to mere presence. Considering solutions such as appropriate colouring, landscaping, shaping/design, screening/camouflaging of controversial features. By using interpretive displays in village halls etc or literature, video clips/photomontages on websites etc to show and educate those initially not in favour, how developments do not have to necessarily be bad for the landscape.</p>	<p>(Country Land and Business Association; Regional Surveyor)</p>
<p>Allow as much as wind and steam turbines to be built as possible when the road visibility of such products is minimal. It's the same issue as sound and the effect of 'shoots' e.g. 2 consecutive weekends early January 2009 Chagot shoot continually audible from Cloulsham in first week and Halsway Post in the second!!</p>	<p>(Chamber of Trade; Chairman)</p>

## Other Issues and Options

<b>Are there any other issues or options that you think that the LDF should consider? Please set out below (append a separate sheet if necessary).</b>	
<b>Answers</b>	<b>Organisation</b>
When considering new woodland for carbon sequestration it should be borne in mind that conifers are 3-4 times more effective than native species. Encouragement of wood energy in place of fossil fuel	(Confederation of Forest Industries; No title given)
As far as I can see everything proposed here is sensible or necessary or both, and therefore one can only at the least agree and usually strongly agree.	(Exmoor Trust; Business Trustee)
Where the undergrounding of overhead wires is considered this should focus on the wider landscape where pylons cross it. It should not be concerned within settlements where overhead wires contribute to the character and local distinctiveness of the rural built environment.	(Quantocks Area of Outstanding Natural Beauty; Manager)
British Tourism was in the news today let's hope that the ENPA were paying attention! <a href="http://news.bbc.co.uk/1/hi/uk_politics/7816362.stm">http://news.bbc.co.uk/1/hi/uk_politics/7816362.stm</a> British tourism must grasp the "huge opportunities" ahead, Mr Brown said. The UK must be a leader in "new type of world economy", with tourism among the areas to be expanded, Mr Brown added. Ahead of the cabinet meeting Mr Brown told 200 tourism chiefs gathered at Liverpool's Arena and Convention Centre that the city's regeneration was an example of how British tourism could benefit from burgeoning world tourism, as economies such as China and India develop. He said four million British jobs depended on tourism, which generated £115bn a year: "This is a great industry, millions of jobs depend on it and it creates a huge amount of wealth for our country and I believe it can be even greater in the future."	(Lynton and Lynmouth Association of Commerce; No title given)
Actions contained with the Devon Rural Strategy; <a href="http://www.drn.org.uk/drn_rural_strategy_action_plan_web_.pdf">http://www.drn.org.uk/drn_rural_strategy_action_plan_web_.pdf</a> include a number of issues on housing demand, supply and affordability; access to services and transport; community empowerment; and climate change and environment, which are all relevant to this LDF.	(Devon Rural Network and Devon County Council; Devon Rural Network Coordinator)
There needs to be more attention to coastal issues and sea level rise, given that it is the coast that makes Exmoor distinct as a National Park (and the fact that within Exmoor is one of the classic and most frequently cited examples of coastal realignment – Bossington/ Porlock). At the stakeholder consultation event on 4 December 2008 the Trust stressed the issue of 'Coastal Change' and the need for joint working between local authorities and partners to secure the sustainable planning and management of the coast (a copy of the <i>Shifting Shores SW</i> publication was left at the meeting). There needs to be a link up with the Shoreline Management Plan review (RSS policy CO2), the LDF should seek to identify risk zones for flooding <i>and</i> coastal erosion. The LDF should identify where managed coastal realignment projects are needed and feasible (RSS Policy F1). There is also a need for 'protection' of the undeveloped coast (RSS policy CO1). There are potential conflicts with tourism development, which need to be acknowledged, but with recognition to the underlying need to value and protect the asset of the undeveloped coast <i>for</i> Tourism. The Core Strategy should define the coastal zone for the developed and undeveloped coast on	(The National Trust; Land Use Planning Adviser)

<p>its key diagram in diagrammatic form, with this shown in more detail on the Proposals Map DPD. In terms of Climate Change, generally there needs to be more emphasis on climate change 'adaptation'. There is a need for increased knowledge of the areas, communities, assets and resources most at risk from climate change and measures in place to mitigate the effects, together with improved resilience (RSS Policy SD2). For instance it needs to be recognised that settlements in steep valleys are at greater risk from storms and flash floods (such as Lynmouth in 1953). Finally, there could be a policy in the CS that specifically seeks to sustain the Park as a place that continues to offer a sense of tranquillity.</p>	
<p><b>Sustainability</b> Planning policy highlights the need for sustainable development, this is often translated into policies that imply all development should take place in towns and main villages and no development in the wider rural areas. This contradicts national policy as set out in PPS 1 and PPS 7 as follows: <b>PPS 1 Delivering Sustainable Development:</b> Paragraph 27: In preparing development plans, planning authorities should seek to: (ii) "Promote urban and rural regeneration to improve the well being of communities..." (v) Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, <b>while recognising that this may be more difficult in rural areas.</b> <b>PPS 7 Sustainable Development in Rural Areas:</b> Although policy allows that accessibility should be a key consideration in all development decisions. 1)iii) "Decisions on the location of other developments in rural areas should, <b>where possible</b>, give people the greatest opportunity to access them by public transport, walking and cycling, consistent with achieving the primary purpose of the development." Therefore Central Government advice does not prohibit development in the countryside and policies should be worded to reflect this. <b>Farm Diversification</b> Government Policy is clear in PPS 7 Sustainable Development in Rural Areas that farm diversification is an important part of the rural economy. Paragraphs 30 and 31 are key and are set out in full below 30. Recognising that diversification into non-agricultural activities is vital to the continuing viability of many farm enterprises, local planning authorities should: (i) set out in their LDDs the criteria to be applied to planning applications for farm diversification projects; (ii) be supportive of well-conceived farm diversification schemes for business purposes that contribute to sustainable development objectives and help to sustain the agricultural enterprise, and are consistent in their scale with their rural location. This applies equally to farm diversification schemes around the fringes of urban areas; and 31. A supportive approach to farm diversification should not result in excessive expansion and encroachment of building development into the countryside. Planning authorities should: (i) encourage the re-use or replacement of existing buildings where feasible, having regard to paragraphs 17-21; and (ii) have regard to the amenity of any nearby residents or other rural businesses that may be adversely affected by new types of on-farm development. Rural diversification farm shops, conversion to offices and factories, houses, holiday lets, tourism New build and change of use existing building Planning policy should also reflect the need for new buildings for both farm diversification projects and conventional farm buildings to improve the profitability and competitiveness of the food and farming industries. <b>Countryside Designations</b> PPS 7 is clear in paragraph 25 that "local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned. We would not support further local landscape designation</p>	<p>(National Farmers' Union; Food and Farming Adviser)</p>

<p>that would prevent suitable development with rural areas. <b>Renewable energy</b> There is no justification for restricting renewable energy sites to urban industrial estates, development necessary for biomass, biofuels, anaerobic digestion, wind and solar power can be sited in the countryside and offers an opportunity to meet national renewable energy targets. <b>Bad neighbour uses</b> Grain driers and livestock buildings fall into the category of “bad neighbour” uses because they can be noisy or smelly. New development should be located away from these buildings on the grounds that the new residents and existing businesses will be harmed/adversely affected. New residents of new houses built near a livestock building can complain about smell and the existing business can find themselves with an abatement notice to reduce or remove the nuisance.</p>	
<p>NDC considers the LDF a key tool to enable the regeneration of communities and therefore it is vital to ensure that the policies within the LDF encourage and enable this. An issue was raised by an individual with regards to the southern boundary of ENPA, suggesting this should expand into Molland Estate rather than skirt around the edge. It is felt there is a deviation here in terms of the landscape quality used as the criteria to determine where the boundary should be.</p>	<p>(North Devon District Council; No title given)</p>
<p>As well as our responses to the specific questions in the above questionnaire, CLA has prepared an overall statement of issues it feels are important and which should be considered in the formulation of the Exmoor National Park LDF Core Strategy and Development Management Policies. This is set out in an accompanying paper (which, it is stressed, should be read in conjunction with the above questionnaire responses).</p>	<p>(Country Land and Business Association; Regional Surveyor)</p>

## Appendix C: LDF Stakeholder Invitees

<b>Stakeholder Event 08</b>					
<b>Title</b>	<b>Initial</b>	<b>Surname</b>	<b>Job Title</b>	<b>Organisation</b>	<b>*= Attended an Event; x= Replied to Questionnaire</b>
Mr	S.	Addicott	Not Known	All Wheel Drive Club	
Mr	R.	Andrews	Exmoor & Quantocks Team	Natural England	
Mr	R.	Antliff	Principal Planning Officer	Somerset County Council	
Mr	M.	Arif	Not Known	Royal Mail Group Property	
Ms	K.	Armstrong	Community Development Manager	Community Council for Somerset	*
Mr	A.	Austen	Senior Planning Officer (Policy)	North Devon Council	
Ms	J.	Baker	Children & Young Peoples Directorate	Devon County Council	
Ms	C.	Bament	Not Known	Exmoor Society	*
Ms	L.	Bath	Accessibility Planning Officer	Somerset County Council, Transport Policy and Highways Development	*
Mr	A.	Beattie	Development Worker	Faithnet South West	
Mr	E.	Beckett	Not Known	Western Somerset Rural Action Group	*
Mr	I A	Bell	Not Known	Arc - Addington Fund	
Mr	M.	Bell	Chief Executive	South West Tourism Ltd	
Ms	S.	Berry	Economic Development Manager	Somerset County Council	
Mr	C.	Binnie	Not Known	The Exmoor Society	*
Mr	M.	Birkin	South West Campaigns Manager	Friends of the Earth	
Mr	M.	Bishop	Not Known	Active Exmoor	
Ms.	L.	Blanchard	AONB Manager	North Devon AONB	
Mr	G.	Bloomfield	Senior Conservation Officer	RSPB	
Mr	T.	Bolshaw	Chairman, Planning and Transport Committee	Devon Conservation Forum	x

Ms	M.	Bowden	Assistant Principal	The West Somerset Community College	x
Ms	D	Bowyer	Not Known	DPDS Consulting Group	
Mr	D	Brewer	Not Known	National Farmers Union - South West Region	
Mr	P.	Brice	Director of Corporate Services and Communications	Somerset Primary Care Trust	
Mr	R.	Briden	Not Known	Lynton and Lynmouth Association of Commerce and Tourism	*x
Mr	S.	Briggs	Partner	Smiths Gore	*
Ms	L.	Bristow	Customer Services	North Devon Council	
Ms	M.	Britton	Principal Policy Officer (Housing)	South West Regional Assembly	
Mr	B.	Broadbent	Conservation Officer Planning Policy	Devon Wildlife Trust	*x
Mr	A.	Bromley	Not Known	Quarry Products Association (QPA)	
Mr	T.	Brooks	Regional Director	Farming and Wildlife Advisory Group	
Mr	P.	Brown	Director of Policy and Planning	South West Regional Assembly	
Mr	A.	Brunt	Chairman	Exmoor Tourist Association	*
Mr	A J	Brunt	Chairman	Exmoor Tourist Association	
Ms	S. (Lady)	Burns	Not Known	The Exmoor Trust	*
Mr	B.	Butcher	Not Known	Forum 21	
Mr	M.	Buxton	Associate Town Planning Director	Bovis Homes Ltd	
Mr	M.	Calder	Land Use Planning Adviser	The National Trust	*x
Mr	R J	Campbell	Not Known	Ross Campbell	
Mr	K.	Cann	SW Region National Parks Officer	The Camping & Caravanning Club	
Mrs	J.	Carroll	Director of Strategic Commissioning	Devon Primary Care Trust	
Mr	A.	Chambers	Chief Executive	Peninsula Enterprise	x
Ms	R.	Chambers	Not Known	Council for National Parks	
Ms	K.	Chapman	Not Known	English Heritage	
Mr	G.	Clark	Regional Suveyor	Country Land & Business Association	*x

Mr	G.	Cleaver	Not Known	Mid Devon District Council	
Mr	P.	Collins	Regional Advocacy & Partnership Manager	Natural England	
Mrs	M.	Constable	Chief Executive	The Rural Housing Trust	
Mr	G.	Cory	Chief Executive	British Horse Society	
Mr	C.	Couzens	Executive Director	Ecos Trust	
Mr	R.	Cowling	Not Known	National Farmers' Union	*
Ms.	L	Crawford	Devon Rural Network Coordinator	Devon Rural Network and Devon County Council	x
Ms	H.	Crockford	Rural Housing Enabler	West Somerset Council	x
Ms	A.	Cross	Not Known	Women's Food and Farming Union (Devon & Somerset)	
Ms	J.	Davis	Not Known	GVA Grimley LLP	
Mr	M	Day	Not Known	Knightstone Housing Association	
Mr	K.	Denner	Transport Devt, Economy, Transport & Environment	Somerset County Council	
Mr	S.	Derby	Not Known	The Crown Estate	
Mr	D.	Dixon	Regional Co-ordinator	South West Protected Landscapes Forum	
Mr	M.	Drennan	Not Known	Sport England (South West)	
Mr	C.	Durham	Not Known	RAC Foundation	*x
Mr	C.	Edwards	Manager	Quantocks Area of Outstanding Natural Beauty	*x
Ms	M.	Edwards	Not Known	Somerset Access and Inclusion Network	
Mr	C.	Edwards	Manager	Quantock Hills Joint Advisory Committee	
Not Known	Not Known	English Heritage	Not Known	Historic buildings and Monuments Commission for England	
Mr	S.	Eyre	Not Known	Caractacus Housing	
Ms	L	Feenie	Not Known	Private Sector and Affordable Housing	

Mr	G.	Fernandez	Facilities Coordinator	CABE	
Dr	R	Ferrar	Chairman	Lyn & Exmoor Vision	*x
Dr	R.	Ferrar	Not Known	North Devon Conservation Society	
Mr	B.	Foulkes	Not Known	LDA Design Consulting LLP	
Mr	A.	Gardiner	Not Known	Youth Hostel Association	
Mr	P.	Gibbs	Not Known	Exmoor Youth Project	
Miss	C.	Giddens	Secretary	Exmoor Natural History Society	
Ms	J.	Gilbert	President	West Somerset Disability Association	
Mr	P.	Gompertz	Director	Devon Wildlife Trust	
Mr	A.	Goodall	S106 Liaison Officer	Somerset County Council- Transport Policy and Highways Development	*x
Ms	J.	Gould	Not Known	Magna Housing Group	
Ms	J.	Graham	Not Known	Somerset Rural Youth Project	
Mr	A.	Grainger	Not Known	YHA	*
Mr	E.	Halford	Not Known	Highways Agency - Network Strategy Division	
Mr	P.	Hamblin	Director	English National Park Authorities Association	
Mr	P.	Hamilton	Not Known	North Devon Voluntary Services	
Ms	A.	Hand	Not Known	Exmoor Trust	*x
Mr	S.	Hankinson	WSSP Manager	West Somerset Strategic Partnership	
Mr	M	Harold	Not Known	The National Trust	
Mr	T.	Harper	Technical and Property Services Manager	Magna West Somerset Housing Association Ltd	*
Mr	J.	Harris	Not Known	The Caravan Club South West Region	*x
Mr	I.	Harrison	Deputy Director of Environment, Economy & Culture	Devon County Council	
Mr	P	Harwood	Not Known	National Health Service	x



Mr	N	Hayward	Not Known	RPS Planning	
Mrs	C. A.	Herbert	Planning Liaison Technical Specialist	Environment Agency	x
Mr	N. S.	Hester	Not Known	The National Trust	
Ms	S.	Hibbert	Town Councillor	Lynton Town Council	*
Mr	J.	Holtom	Not Known	Holtom & Thomas Ltd	
Mr	J.	Howell	Chairman	Ramblers Association (Devon)	
Ms	D.	Ifould	Senior Regional Administrator	Institute of Directors (South Regional Office)	
Mr	N.	Jillings	Not Known	Savills	
Ms.	L.	Jones	Regional Director	Forestry Commission	
Mr	M	Jones	Not Known	Natural England	
Mr	A.	Jones	White Young Green	Sainsbury's Supermarkets Ltd	
Ms	A.	Laplough	Economy & Climate Change Officer	West Somerset Council	*x
Mr	B.	Lang	Chief Regeneration & Development Officer	West Somerset Council	
Mr	P.	Leaver	Not Known	David Wilson Partnership	
Mr	J.	Lee	Culture & Regeneration Manager	North Devon Council	
Mr	A.	Lightfoot	Not Known	Devon Economic Partnership	
Mrs	J.	Long	Footpath Officer	Ramblers Association (North Devon Group)	*x
Ms	W.	Lutley	Regional Policy Officer	CPRE South West	
Mr	G	Mansbridge	Not Known	North Devon Homes	
Mr	C	Marrow	Not Known	Forestry Commission	
Mr	K.	Marsh	Not Known	Community Council for Somerset	
Mrs	S.	May	Chair	The Exmoor Trust	*x
Mr	J.	McGowan	Not Known	Lynton and Lynmouth Association of Commerce and Tourism	
Mr	A	McIntyre	Business Trustee	Exmoor Trust	*x
Ms	K.	McKenzie	Chairman	West Somerset and Exmoor Bridleway Association	*

Not Known	Not Known	Melissa	Not Known	Leith Planning	
Mr	N	Millard	Not Known	Bruton Knowles	
Mr	J	Milward	Regional Policy Officer	Woodland Trust	x
Mr	C S	Mitchell	Not Known	Colin Buchanan & Partners	
Mr	A.	Moore	Not Known	Somerset Food Links	
Mr	J.	Mortimer	Regional Director	Country Land & Business Association	
Mr	T	Murray	Not Known	Magna West Somerset Housing Association Ltd	
Mrs	J.	Nicholson	Secretary	W.S. Archaeological & Natural History Society	*
Mr	M.	North	Not Known	Young Farmers Club (Somerset)	
Mr	M.	O'Dowd-Jones	Group Manager - Strategic Planning	Somerset County Council	
Mr	D	Ogborne	Planning Liaison Manager	Wessex Water	
Miss	A	Ordidge	Not Known	South West Regional Development Agency	
Mr	M.	Oxford	ALGE Project Officer	Association of Local Government Ecologists	
Mr	D.	Parsons	Not Known	Devon County Council	x
Mr	I.	Parsons	Not Known	Highways Agency	
Mr	N.	Pearson	Not Known	Nicholas Pearson Associates Ltd	
Mr	M.	Pewnance	Not Known	Mike Smith Architects	
Mrs	A. M.	Phipps	Not Known	Doverhay Developments Ltd	
Mr	S.	Pitcher	Executive Director	North Devon & Torridge Local Strategic Partnership	
Mr	J	Platts	Project Manager	South West Lakes Trust	*
Mr	D.	Powell	Senior Planner	Barton Willmore	
Ms.	C.	Power	Not Known	English Heritage	*
Ms	A.	Priscott	Not Known	Anne Priscott Associates Ltd	
Mr	T.	Prosser	Chairman	Lyn Valley Society	

Ms.	M.	Rayner	Not Known	West Somerset Archaeological Society	*
Not Known	Not Known	Reception	Not Known	West Somerset Council	
Mrs	J.	Richardson	Head of Service, Schools and Raising Achievement	Somerset County Council	
Mr	I.	Rigby	Vice-Chairman	Lyn & Exmoor Vision	
Ms	K.	Riley	Researcher	New Economics Foundation (NEF)	*
Mr	A.	Roberts	Not Known	Government Office for the South West	
Mr	O.C.	Roberts	Regional Secretary	The Confederation of Forest Industries	*x
Mr	M.	Robins	Chair	South West Regional Environmental Network	
Mr	T W	Rook	Not Known	Exmoor Farmer's Livestock Auctions Ltd	
Mr	Stewart	Ross	Not Known	Stewart Ross Associates	
Mr	A.	Rowe	Strategic Land and Planning Manager	Midas Homes	
Mr	S.	Rowe	Not Known	Magna West Somerset Housing Association Ltd	*
Miss	J.	Russell	Not Known	Home Builders Federation	
Mr	C.	Savage	Rural Housing Enabler	North Devon, West Somerset and Exmoor National Park Rural Housing Project	*
Ms	L	Scott	Not Known	Forum 21	
Mr	A.	Serjeant	Technical Adviser - Ecology	Somerset County Council	
Mr	A.	Simms	Policy Director	New Economics Foundation (NEF)	
Mr	G.	Sizer	Chairman	Minehead Chamber of Commerce	*x
Mr	P.	Slater	Devon Local Transport Team	Devon County Council	
Ms	E.	Smith	Not Known	Nicholas Pearson Associates Ltd	
Ms	L.	Smith	Investment Manager	Housing Corporation (South West Region)	
Ms	S.	Southam	General Manager	Falcon Rural Housing Ltd	*

Mr	R.	Standing	Not Known	Health & Safety Executive	
Mr	J.	Stow	Programme Manager	Somerset Rural Youth Project	*
Cllr	N	Stuart-Thorn	Not Known	Somerset Playing Field Association	
Mr	M J	Summerell	Not Known	National Farmers Union	
Mr	S.	Swan	Not Known	Swan Paul Partnership Ltd	
Mr	C.	Sweet	Not Known	Colson Stone Practice	
Mr	J.	Talbot	Not Known	Community Council of Devon	
Ms	L.	Tame	Conservation Manager	South West Lakes Trust	*
Mr	G	Taylor	Not Known	West Somerset Ramblers Association	
Mr	R.	Tetlow	Tetlow King Planning	SW RSL Planning Consortium	
Mr	W	Theed	Not Known	Theed Forestry Estates	
Mr	H.	Thomas	Not Known	Greater Exmoor Shoots Association	
Mrs	R.	Thomas	Not Known	The Exmoor Society	
Mr	I.	Timms	Not Known	West Somerset Council	
Mr	G.	Townsend	Planning Policy Officer	North Devon Council	*x
Mr	J.	Travis	Mayor	Lynton and Lynmouth Town Council	x
Mr	R.	Tricker	Countywide Travel Plan Coordinator	Somerset County Council	x
Ms	L.	Tucker	Planning Communities and Biodiversity Adviser	Natural England	x
Ms.	B	Venn	Housing Enabling Manager	North Devon Council	
Ms	E.	Vernon	Economic Regeneration Officer	North Devon Council	*x
Mr	J.	Vernon	Regeneration Manager	North Devon Plus	*
Mr	W	Wake	Property Manager	National Trust	*
Mr	K	Walker	Not Known	Magna Housing Group MWS	
Mr.	M.	Walker	Not Known	Peacock and Smith	
Mr	G.	Walton	Not Known	Devon Sustainable Building Initiative (DSBI)	
Mr	M.	Ward	Not Known	Field Studies Council	
Mr	M.	Weatherlake	Not Known	South West Wood Fuels	
Ms	L.	Weaver	Not Known	LEVVEL	

Mr	D.	Westbrook	Policy & Campaigns Manager	Somerset Wildlife Trust	
Mr	A.	Wiles	Field Director	Housing Corporation (South West Region)	
Mr	G.	Williams	Bath & Wells Diocesan Boa	c/o Cluttons L.L.P.	
Mr	M.	Wilsher	Planning Policy Officer	West Somerset Council	x
Mr	A.	Wilson	Not Known	Fulfords Land & Planning	
Ms	S,	Wilson	Chair	West Somerset Business Network	
Ms	C.	Wilson MRTPI	Not Known	Mobile Operators Association	
Ms.	E.	Woodhouse	Food and Farming Adviser	National Farmers' Union	*x
Ms	S	Woollacott	Not Known	Carver Knowles	
Mr.	Not Known	Woolven	Not Known	Lee Abbey Christian Movement	*
Ms	F	Wye	Not Known	Malcom Judd Partnership	
Not Known	Not Known	Not Known	Devon Local Transport Team	Devon County Council	
Not Known	Not Known	Not Known	Head of Community Development & Planning	Mid Devon District Council	
Not Known	Not Known	Not Known	Not Known	Age Concern Devon	
Not Known	Not Known	Not Known	Not Known	Age Concern Somerset	
Not Known	Not Known	Not Known	Not Known	British Geological Survey	
Not Known	Not Known	Not Known	Not Known	British Toilet Association	
Not Known	Not Known	Not Known	Not Known	Business Link in the South West	
Not Known	Not Known	Not Known	Not Known	Calvert Trust	
Not Known	Not Known	Not Known	Not Known	Centre for Ecology & Hydrology	
Not Known	Not Known	Not Known	Not Known	Devon & Exeter Racial Equality Council	

Not Known	Not Known	Not Known	Not Known	Devon Federation of YFC	
Not Known	Not Known	Not Known	Not Known	Devon Rural Network	
Not Known	Not Known	Not Known	Not Known	Freight Transport Association (Midlands, West & Wales)	
Not Known	Not Known	Not Known	Not Known	Hastoe Housing Ltd	
Not Known	Not Known	Not Known	Not Known	Health & Safety Executive	
Not Known	Not Known	Not Known	Not Known	Help The Aged	
Not Known	Not Known	Not Known	Not Known	Learning and Skills Council	
Not Known	Not Known	Not Known	Not Known	North Devon Chamber of Commerce and Industry	
Not Known	Not Known	Not Known	Not Known	Road Haulage Association Ltd	
Not Known	Not Known	Not Known	Not Known	Somerset Racial Equality Council	
Not Known	Not Known	Not Known	Not Known	Somerset YFC	
Not Known	Not Known	Not Known	Manager	Somerset Chamber of Commerce and Industry Ltd	
Not Known	Not Known	Not Known	Policy Unit	The Church Commissioners	
Not Known	Not Known	Not Known	Not Known	The Quantock Housing Partnership	
Not Known	Not Known	Not Known	Not Known	Trans-Send Ltd	
Not Known	Not Known	Not Known	Not Known	Traveller Law Reform Project	
Not Known	Not Known	Not Known	Manager	West Somerset Council	

Not Known	Not Known	Not Known	Not Known	West Somerset CVS	
Not Known	Not Known	Not Known	Not Known	Women's National Commission	